

Agenda for a meeting of the Governance and Audit Committee to be held on Thursday, 1 December 2016 at 11.00 am in Committee Room 3 - City Hall, Bradford

Members of the Committee – Councillors

CONSERVATIVE	LABOUR	LIBERAL DEMOCRAT
M Pollard	Johnson (Chair) Thornton Swallow	J Sunderland

Alternates:

CONSERVATIVE	LABOUR	LIBERAL DEMOCRAT
Ellis	Farley Watson	Fear

Notes:

- This agenda can be made available in Braille, large print or tape format on request by contacting the Agenda contact shown below.
- The taking of photographs, filming and sound recording of the meeting is allowed except if Councillors vote to exclude the public to discuss confidential matters covered by Schedule 12A of the Local Government Act 1972. Recording activity should be respectful to the conduct of the meeting and behaviour that disrupts the meeting (such as oral commentary) will not be permitted. Anyone attending the meeting who wishes to record or film the meeting's proceedings is advised to liaise with the Agenda Contact who will provide guidance and ensure that any necessary arrangements are in place. Those present who are invited to make spoken contributions to the meeting should be aware that they may be filmed or sound recorded.
- If any further information is required about any item on this agenda, please contact the officer named at the foot of that agenda item.

From:

Parveen Akhtar

City Solicitor

Agenda Contact: Fatima Butt - 01274 432227

Phone: 01274 432227

E-Mail: fatima.butt@bradford.gov.uk

To:



A. PROCEDURAL ITEMS

1. ALTERNATE MEMBERS (Standing Order 34)

The City Solicitor will report the names of alternate Members who are attending the meeting in place of appointed Members.

2. DISCLOSURES OF INTEREST

(Members Code of Conduct - Part 4A of the Constitution)

To receive disclosures of interests from members and co-opted members on matters to be considered at the meeting. The disclosure must include the nature of the interest.

An interest must also be disclosed in the meeting when it becomes apparent to the member during the meeting.

Notes:

- (1) Members may remain in the meeting and take part fully in discussion and voting unless the interest is a disclosable pecuniary interest or an interest which the Member feels would call into question their compliance with the wider principles set out in the Code of Conduct. Disclosable pecuniary interests relate to the Member concerned or their spouse/partner.*
- (2) Members in arrears of Council Tax by more than two months must not vote in decisions on, or which might affect, budget calculations, and must disclose at the meeting that this restriction applies to them. A failure to comply with these requirements is a criminal offence under section 106 of the Local Government Finance Act 1992.*
- (3) Members are also welcome to disclose interests which are not disclosable pecuniary interests but which they consider should be made in the interest of clarity.*
- (4) Officers must disclose interests in accordance with Council Standing Order 44.*

3. MINUTES

Recommended –

That the minutes of the meeting held on 29 September 2016 be signed as a correct record (previously circulated).

(Fatima Butt – 01274 432227)



4. INSPECTION OF REPORTS AND BACKGROUND PAPERS

(Access to Information Procedure Rules – Part 3B of the Constitution)

Reports and background papers for agenda items may be inspected by contacting the person shown after each agenda item. Certain reports and background papers may be restricted.

Any request to remove the restriction on a report or background paper should be made to the relevant Strategic Director or Assistant Director whose name is shown on the front page of the report.

If that request is refused, there is a right of appeal to this meeting.

Please contact the officer shown below in advance of the meeting if you wish to appeal.

(Fatima Butt - 01274 432227)

5. REFERRAL FROM CORPORATE OVERVIEW AND SCRUTINY COMMITTEE

The Corporate Overview and Scrutiny Committee on the 19 October 2016 considered a report on the West Yorkshire Pension Fund Disinvestment from the Fossil Fuel Industry and resolved the following:

That this Committee:

- (1) Notes that West Yorkshire Pension Fund investment decisions are made by the Investment Advisory Panel which includes representatives of all West Yorkshire Districts as well as other interested parties, and not Bradford alone.
- (2) Notes that the Investment Advisory Panel considers the annual report of the Local Authority Pension Fund Forum which includes engagement activities with fossil fuel companies.
- (3) Agrees with the policy of positive engagement set by the Investment Advisory Panel.
- (4) Welcomes the progress achieved towards ensuring that the fossil fuel companies revise their business plans to take account of the COP21 agreement.
- (5) Welcomes continuing investment in green energy technology and production as the industry develops.



- (6) That the above decisions be referred to the Governance and Audit Committee and Full Council for information.

Recommended-

That the decisions from Corporate Overview and Scrutiny Committee be noted.

(Fatima Butt – 01274 432227)

B. BUSINESS ITEMS

6. LOCAL GOVERNMENT OMBUDSMAN - REVIEW OF LOCAL GOVERNMENT COMPLAINTS 2015/16 1 - 60

The Interim Assistant Director of Policy, Programmes and Change will submit **Document “P”** which summarises the number of complaints and investigations undertaken by the Ombudsman for the year ended 31 March 2016 and compares Bradford’s performance against that of other local authorities.

Recommended-

That the Committee takes assurance from the result of the Local Government Ombudsman’s Annual Review of Local Government Complaints 2015/16, that the Authorities complaints process is overall satisfactory.

(Irina Arcas – 01274 435269)

7. ANNUAL TREASURY MANAGEMENT REPORT 2015/16 61 - 70

This Council is required by regulations issued under the Local Government Act 2003 to produce an Annual Treasury Management review of activities and the actual prudential and treasury indicators for 2015/16.

The Director of Finance will submit **Document “Q”** which reports on the Council’s Treasury Management Activities for the year ending 31 March 2016. The report meets the requirements of both the CIPFA Code of Practice on Treasury Management (the Code) and the CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code).



Recommended –

That the report (Document “Q”) be noted and referred to Council for adoption.

(David Willis – 01274 432361)

8. TREASURY MANAGEMENT MID YEAR REVIEW UP TO 30 SEPTEMBER 2016 71 - 82

The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties, providing adequate liquidity initially before considering investment return.

The Director of Finance will submit **Document “R”** which reports on the Council’s Treasury Management Mid Year Review up to 30 September 2016.

Recommended-

That the changes to the Treasury policy set out in section 2.6.3 of Document “R” be noted and referred to Council for adoption.

(David Willis – 01274 432361)

9. THE ANNUAL AUDIT LETTER FOR THE 2015/16 AUDITS OF CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL AND WEST YORKSHIRE PENSION FUND 83 - 98

The External Auditor will submit **Document “S”** which reports on the Annual Audit Letter that summarises the key issues arising from the audits of City of Bradford Metropolitan District Council and West Yorkshire Pension Fund for 2015/16 which have been reported previously to the Committee during the year.

The letter confirms that External Audit gave unqualified audit opinions on the financial statements and the value for money conclusion.

It also summarises the key issues detailed in the Audit Completion Reports which were presented to the Committee on 29 September 2016.



Recommended-

That the Annual Audit Letter be considered.

(Steve Appleton – 01274 432392)

10. INTERNAL AUDIT PLAN 2016/17 - MONITORING REPORT AS AT 30 SEPTEMBER 2016 99 - 120

The Director of Finance will submit **Document “T”** which brings to the attention of members any significant issues arising from the audit work undertaken to date and to inform them about the progress made up to 30 September 2016, against the Internal Audit Plan, which was approved by the Committee on 15 April 2016.

Recommended-

That the Committee:

- (1) Takes assurance from the results to date that show that the control environment of the authority is overall satisfactory.**
- (2) Endorse the anticipated coverage and changes of Internal Audit work during the year.**
- (3) Requires Internal Audit to monitor the control environment and continues to assess areas of control weakness and the ability of management to deliver improvements to the control environment when required.**
- (4) Requires Internal Audit to monitor its resourcing levels to ensure that they are sufficient and appropriate to support an effective Internal Audit function.**

(Mark St Romaine – 01274 432888)

11. ADOPTION REGIONALISATION 121 - 144

The Government is committed to adoption services being reorganised under regional arrangements whereby a group of local authorities collaborate to provide services in a newly created Regional Adoption Agency (RAA).

The Deputy Director, Children’s Social Care will submit **Document “U”** which informs the Committee about plans for the Adoption function of Bradford council to be transferred to a new West Yorkshire Regional Adoption Agency hosted by Leeds City Council.



Recommended-

That it be recommend that the proposal to the Executive to give full agreement to the development and implementation of the Regional Adoption Agency be endorsed.

(Mary Brudenell – 01274 434439)

12. MINUTES OF WEST YORKSHIRE PENSION FUND (WYPF) JOINT ADVISORY GROUP HELD ON 28 JULY 2016 145 - 156

The Council's Financial Regulations require the minutes of meetings of the WYPF be submitted to this Committee.

In accordance with the above the Director of West Yorkshire Pension Fund will submit **Document "V"** which reports on the minutes of the meeting of the WYPF Pension Board held on 28 July 2016.

Recommended-

That the minutes of the WYPF Pension Board held on 28 July 2016 be considered.

(Rodney Barton – 01274 432317)

13. EXCLUSION OF THE PUBLIC

The Committee is asked to consider if the item relating to the minutes of the meeting of the West Yorkshire Pension Fund Investment Advisory Panel meeting held on 28 July 2016 should be considered in the absence of the public and, if so, to approve the following recommendation:

Recommended –

That the public be excluded from the meeting during the consideration of the items relating to minutes of the West Yorkshire Pension Fund Investment Advisory Panel meeting held on 28 July 2016 because the information to be considered is exempt information within paragraph 3 (Financial or Business Affairs) of Schedule 12A of the Local Government Act 1972. It is also considered that it is in the public interest to exclude public access to this item.



14. **MINUTES OF WEST YORKSHIRE PENSION FUND (WYPF)
INVESTMENT ADVISORY PANEL MEETING HELD ON 28 JULY
2016**

157 -
164

The Council's Financial Regulations require the minutes of meetings of the WYPF be submitted to this Committee.

In accordance with this requirement, the Director of West Yorkshire Pension Fund will submit **Not for Publication Document "W"** which reports on the minutes of the meeting of the WYPF Investment Advisory Panel held on 28 July 2016.

Recommended –

That the minutes of the West Yorkshire Pension Fund Investment Advisory Panel held on 28 July 2016 be considered.

(Rodney Barton – 01274 432317)

THIS AGENDA AND ACCOMPANYING DOCUMENTS HAVE BEEN PRODUCED, WHEREVER POSSIBLE, ON RECYCLED PAPER



Report of the Interim Assistant Director of Policy, Programmes and Change to the meeting of Governance and Audit Committee to be held on 1 December 2016.

P

Subject:

Local Government Ombudsman - Review of Local Government Complaints 2015/16

Summary statement:

Following receipt of the Annual Review Letter from the Local Government Ombudsman, this report summarises the number of complaints and investigations undertaken by the Ombudsman for the year ended 31 March 2016 and compares Bradford's performance against that of other local authorities.

Samantha Plum
Interim Assistant Director
Policy, Programmes and Change

Portfolio:
Corporate

Report Contact: Irina Arcas
Phone: (01274) 435269
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Overview & Scrutiny Area:
Corporate



1. SUMMARY

Following receipt of the Annual Review Letter from the Local Government Ombudsman (LGO), this report summarises the number of complaints and investigations undertaken by the Ombudsman for the year ended 31 March 2016 and compares Bradford's performance against that of other local authorities.

2. BACKGROUND

The LGO was established under the Local Government Act 1974 which defines the main statutory functions for the Ombudsman as

- to investigate complaints against councils and some other authorities
- to investigate complaints about adult social care providers from people who arrange or fund their adult social care (Health Act 2009)
- to provide advice and guidance on good administrative practice

Its main activity under the Act is the investigation of complaints, which it states is limited to complaints from members of the public alleging they have suffered injustice as a result of maladministration and/or service failure. Under Part IIIA the Ombudsman investigates complaints from people who allege they have suffered injustice as a result of action by adult social care providers.

The Ombudsman's jurisdiction covers all local authorities (excluding town and parish councils); police and crime bodies; school admission appeal panels and a range of other bodies providing local services. The vast majority of the complaints the Ombudsmen receive concern the actions of local authorities and adult social care providers are within the LGO's jurisdiction.

The Regulatory Reform (Collaboration etc between Ombudsmen) Order 2007 amended the 1974 Act and clarified the powers of the LGO and the Parliamentary and Health Service Ombudsman (PHSO) to work together. With the consent of the complainant the Ombudsman can share information, carry out joint investigations and produce joint reports where complaints fall within the remit of both Ombudsman schemes. In practice, the Ombudsmen consider and agree proposals to conduct joint investigations where the matters complained about are so closely linked that a joint investigation leading to the production of a joint conclusion and proposed remedy in one report is judged to be the most effective means of reaching a decision on maladministration and injustice.

3. OTHER CONSIDERATIONS

- 3.1 Each year the Local Government Ombudsman provides its Annual Review Letter to each Authority (Appendix 1) detailing the annual summary of statistics on the complaints made to its office. The data provided shows the complaints and enquiries it has recorded, along with the decisions it has made and whilst the number of complaints will not, by itself, give a clear picture of how well those



complaints are being responded to they do allow for comparisons to be made with authorities of a similar size.

- 3.2 The Review of Local Government Complaints 2015/16 (attached as Appendix 2) identifies that the LGO received a total of 114 new complaints and enquiries about Bradford between 1 April 2015 and 31 March 2016 compared to 122 in the previous year. A breakdown across Services is detailed below:

Service Area	2014/15	2015/16
Adult Social Care	19	18
Benefits and Council Tax	19	21
Corporate and other Services	12	12
Education and Children's Services	21	19
Environmental Services and Public Protection	12	12
Highways and Transport	18	14
Housing	2	4
Planning and Development	19	12
Other	0	1
Total	122	114

Upon receipt of a complaint the LGO will initially approach the Local Authority to ascertain the status of the complaint. The LGO will normally only accept complaints if the complainant has exhausted the Councils own internal complaint process. In 2015/16 the LGO made 116 decisions in relation to complaints about Bradford compared to 121 the previous year. Of the 116 decisions made in 2015/16, 44 (37.9%) were referred back to the Council for local resolution and 36 (31%) were closed by the LGO after its initial enquiries. 8 (6.9%) complaints were considered incomplete, invalid or other advice was provided.

- 3.3 During the period in question 28 complaints (42 in 2014/15) were subject to a detailed investigation carried out by the LGO. 16 of those complaints were not upheld with 12 being upheld i.e. 10.5% of the total complaints received by the LGO were upheld. A breakdown across service area of those subject to a formal investigation is below;

Service Area	Upheld	Not Upheld
Adult Social Care	3	4
Benefits and Council Tax	3	1
Corporate and other Services	-	2
Education and Children's Services	2	2
Environmental Services and Public Protection	3	1
Highways and Transport	-	1
Housing	-	-



Planning and Development	1	5
Total	12	16

Across the Country the LGO registered in excess of 19,700 complaints and enquiries and upheld 51% of complaints where it carried out a detailed investigation. In 2015/16 the 43% of the 28 Bradford complaints which were upheld following a detailed investigation by the LGO compares favourably with the 51% national comparator, the regional comparator of 46.3% and the Yorkshire and Humber comparator of 47%.

- 3.4 Of the twelve complaints detailed above which were upheld by the LGO, five resulted in a small amount of compensation being paid to the complainants. Across those five complaints £1,450 was paid in compensation and £250 was paid to one complainant for the time and trouble they took in pursuing the complaint. In two other cases a summons charge and a planning fee were repaid to complainants who had cases upheld.
- 3.5 Learning from complaints - Complaints provide senior managers with useful information in respect of the way that services are delivered. Under the Complaints Procedure and where necessary the delivery of recommendations or corrective actions are monitored through Action Plans agreed with the service manager affected, particularly in relation to complaint findings from LGO investigations.
- 3.6 Guidance from the LGO in relation to Council complaints processes suggests that as part the final response provided by the authority in question to a complainant, the complainant should be directed to the LGO as the body which can carry out an independent review of their complaint if they remain dissatisfied by the Councils response. The LGO review found that nationally a significant percentage of people were not even told that they could approach the LGO for an independent opinion whereas in Bradford a standard paragraph is included in all final responses to complainants which contains all the necessary contact details for the LGO.

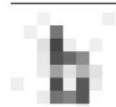
4. FINANCIAL & RESOURCE APPRAISAL

The cost of investigating and supporting complaints and enquiries from the LGO is included in the Councils base budget and does not incur any additional costs to the Council.

In five of the ten cases where the LGO undertook a formal investigation and upheld the complaint, the LGO recommended compensation and other payments to complainants totalling £1,700, the cost of which is borne by Service Departments from with the base budget.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

The LGO's review suggests that overall the numbers of complaints is increasing and Councils have less resource available to manage them. However, the overall



number of complaints considered by the LGO for Bradford has reduced compared to last year and of those where the LGO carried out a detailed investigation, the number which result in a complaint being upheld has also reduced.

6. LEGAL APPRAISAL

There are no specific legal issues arising within this report.

7. OTHER IMPLICATIONS

7.1 EQUALITY & DIVERSITY

There are no direct equal rights implications. All decisions on complaint investigations are made on the individual facts of the case taking into account the Council's Code of Practice for dealing with Complaints, the Children's Social Care and the Health and Adult Social Care complaints procedures.

7.2 SUSTAINABILITY IMPLICATIONS

There are no sustainability implications.

7.3 GREENHOUSE GAS EMISSIONS IMPACTS

There are no impacts on Gas Emissions.

7.4 COMMUNITY SAFETY IMPLICATIONS

There are no impacts on Community Safety.

7.5 HUMAN RIGHTS ACT

There are no impacts in relation to the Human Rights Act.

7.6 TRADE UNION

There are no Trade Union implications.

7.7 WARD IMPLICATIONS

There are no impacts on Gas Emissions.

7.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS (for reports to Area Committees only)

There are no impacts on Gas Emissions.

8. NOT FOR PUBLICATION DOCUMENTS

None

9. OPTIONS

There are no options to consider

10. RECOMMENDATIONS

That the Governance and Audit Committee takes assurance from the result of the Local Government Ombudsman's Annual Review of Local Government Complaints 2015/16, that the Authorities complaints process is overall satisfactory.

11. APPENDICES

Appendix 1 - Annual Review Letter

Appendix 2 - Local Government Ombudsman Review of Local Government Complaints 2015/16

12. BACKGROUND DOCUMENTS

None

21 July 2016

By email

Kersten England
Chief Executive
City of Bradford Metropolitan District Council

Dear Kersten England,

Annual Review Letter 2016

I write to you with our annual summary of statistics on the complaints made to the Local Government Ombudsman (LGO) about your authority for the year ended 31 March 2016.

The enclosed tables present the number of complaints and enquiries received and the decisions we made about your authority during the period. I hope that this information will prove helpful in assessing your authority's performance in handling complaints.

Last year we provided information on the number of complaints upheld and not upheld for the first time. In response to council feedback, this year we are providing additional information to focus the statistics more on the outcome from complaints rather than just the amounts received.

We provide a breakdown of the upheld investigations to show how they were remedied. This includes the number of cases where our recommendations remedied the fault and the number of cases where we decided your authority had offered a satisfactory remedy during the local complaints process. In these latter cases we provide reassurance that your authority had satisfactorily attempted to resolve the complaint before the person came to us. In addition, we provide a compliance rate for implementing our recommendations to remedy a fault.

I want to emphasise that these statistics comprise the data we hold, and may not necessarily align with the data your authority holds. For example, our numbers include enquiries from people we signpost back to the authority, but who may never contact you.

In line with usual practice, we are publishing our annual data for all authorities on our website, alongside an annual review of local government complaints. The aim of this is to be transparent and provide information that aids the scrutiny of local services.

Effective accountability for devolved authorities

Local government is going through perhaps some of the biggest changes since the LGO was set up more than 40 years ago. The creation of combined authorities and an increase in the number of elected mayors will hugely affect the way local services are held to account. We have already started working with the early combined authorities to help develop principles for effective and accessible complaints systems.

We have also reviewed how we structure our casework teams to provide insight across the emerging combined authority structures. Responding to council feedback, this included reconfirming the Assistant Ombudsman responsible for relationship management with each authority, which we recently communicated to Link Officers through distribution of our manual for working with the LGO.

Supporting local scrutiny

Our corporate strategy is based upon the twin pillars of remedying injustice and improving local public services. The numbers in our annual report demonstrate that we continue to improve the quality of our service in achieving swift redress.

To measure our progress against the objective to improve local services, in March we issued a survey to all councils. I was encouraged to find that 98% of respondents believed that our investigations have had an impact on improving local public services. I am confident that the continued publication of our decisions (alongside an improved facility to browse for them on our website), focus reports on key themes and the data in these annual review letters is helping the sector to learn from its mistakes and support better services for citizens.

The survey also demonstrated a significant proportion of councils are sharing the information we provide with elected members and scrutiny committees. I welcome this approach, and want to take this opportunity to encourage others to do so.

Complaint handling training

We recently refreshed our Effective Complaint Handling courses for local authorities and introduced a new course for independent care providers. We trained over 700 people last year and feedback shows a 96% increase in the number of participants who felt confident in dealing with complaints following the course. To find out more, visit www.lgo.org.uk/training.

Ombudsman reform

You will no doubt be aware that the government has announced the intention to produce draft legislation for the creation of a single ombudsman for public services in England. This is something we support, as it will provide the public with a clearer route to redress in an increasingly complex environment of public service delivery.

We will continue to support government in the realisation of the public service ombudsman, and are advising on the importance of maintaining our 40 years plus experience of working with local government and our understanding its unique accountability structures.

This will also be the last time I write with your annual review. My seven-year term of office as Local Government Ombudsman comes to an end in January 2017. The LGO has gone through extensive change since I took up post in 2010, becoming a much leaner and more focused organisation, and I am confident that it is well prepared for the challenges ahead.

Yours sincerely



Dr Jane Martin
Local Government Ombudsman
Chair, Commission for Local Administration in England

Local Authority Report: City of Bradford Metropolitan District Council
For the Period Ending: 31/03/2016

For further information on how to interpret our statistics, please visit our website:
<http://www.lgo.org.uk/information-centre/reports/annual-review-reports/interpreting-local-authority-statistics>

Complaints and enquiries received

Adult Care Services	Benefits and Tax	Corporate and Other Services	Education and Children's Services	Environment Services	Highways and Transport	Housing	Planning and Development	Other	Total
19	21	12	19	12	14	4	12	1	114

Decisions made

				Detailed Investigations			
Incomplete or Invalid	Advice Given	Referred back for Local Resolution	Closed After Initial Enquiries	Not Upheld	Upheld	Uphold Rate	Total
6	2	44	36	16	12	43%	116

Notes

Our uphold rate is calculated in relation to the total number of detailed investigations.

The number of remedied complaints may not equal the number of upheld complaints. This is because, while we may uphold a complaint because we find fault, we may not always find grounds to say that fault caused injustice that ought to be remedied.

The compliance rate is the proportion of remedied complaints where our recommendations are believed to have been implemented.

Complaints Remedied

by LGO	Satisfactorily by Authority before LGO Involvement	Compliance Rate
7	0	100%

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Review of Local Government Complaints 2015-16

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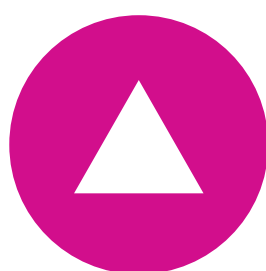
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Local Government Ombudsman

PO Box 4771
Coventry
CV4 0EH

Phone: 0300 061 0614
Web: www.lgo.org.uk
Twitter: [@LGOmbudsman](https://twitter.com/LGOmbudsman)

At a glance



51%
investigations
upheld

3,529 recommendations to put things right

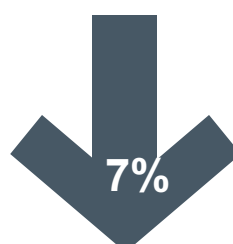


Significant changes on previous year (complaints and enquiries received):

**Education &
children's services**



Housing



Introduction

This report publishes the complaint statistics of the Local Government Ombudsman, for its local government jurisdiction, for the year ending 31 March 2016.

In publishing the statistics by local authority, available in data tables at the end of this report, we aim to help local authorities to analyse their complaint handling performance and provide an open resource for anyone who wishes to scrutinise local services. The report also reflects on the statistics to give our view on what they mean for the local government sector.

The headline messages from this year's statistics are:

- > we received 19,702 complaints and enquiries, which is a similar level to the previous year
- > we upheld 51% of detailed investigations, which has increased from 46% the previous year
- > the area most complained about is education and children's services
- > we also saw the biggest increase in percentage terms (13%) in complaints and enquiries about education and children's services

We know, however, that numbers alone do not tell everything about the attitude towards complaints and how they are responded to locally. Arguably of more importance is to understand the impact those complaints have on people and to learn the lessons from those complaints to improve the experience for others.

This year we are able to publish more information about the recommendations we make to

put things right when people have suffered. We made 3,529 separate recommendations to remedy injustice. These recommendations include actions for the local authority to take to remedy injustice for individuals and to prevent injustice for others by improving practice.

Our investigations can also provide local authorities with the reassurance that they have carried out a fair investigation of a complaint and satisfactorily offered to put things right, before the person decided to come to us. Our annual review letters to local authorities, published in tandem with this report, show the number of upheld cases where we were satisfied with the remedy the local authority had proposed. They also show how often each authority complied with our recommendations – we welcome that 99.9% of recommendations were complied with across all local authorities last year.

The LGO is the final stage for complaints – the person affected must have gone through their local authority's complaints process before coming to us for an independent review of the case. So in relation to the many thousands of exchanges happening daily between local authorities and people in their areas, our complaints are a relatively small proportion; however each one represents a problem that was not put right locally, or an experience that drove the person to pursue their complaint with us. This report includes examples of some of the issues we see through case studies from people who have complained.

The report concludes with advice on using the statistics to support

local scrutiny, including a set of questions to help local councillors scrutinise how their authority responds to, and learns from, complaints.

About the statistics

To reflect the changing definition of what constitutes local government services, for the purposes of this year's annual review of local government complaints we have widened the scope of the bodies classed as local government. Editions of this report from previous years counted complaint numbers for councils and national park authorities only; whereas the data in this report incorporates complaints and enquiries registered against other local bodies that fall under our jurisdiction. These include school admission appeal panels, fire authorities, transport authorities, police and crime commissioners, and some other government organisations. In this report, we use 'local authority' as an umbrella term for this larger group of organisations. The widening of the scope of bodies we have classed as local government has undoubtedly been a factor in the 6% rise in complaints and enquiries received when compared with last year's report.

The LGO also looks at complaints about independent social care providers. This includes complaints from people 'self-funding' their care without any involvement by the council. Data for independent care providers are not included in this report, but are incorporated in our annual review of social care complaints, published in the autumn.

The Ombudsman's view

The future for local government complaints

I am pleased to present the LGO's third annual review of local government complaints, which continues our commitment to openness and transparency through the publication of our complaint statistics. It adds to the suite of information we publish to help share the learning from complaints to improve local public services. I hope it will be of interest to all those working in the sector. The new statistics we include this year about our recommendations to put things right demonstrate the impact our investigations have, not just in remedying injustice for individuals but also in preventing injustice for the wider public. The review is published on the same day as LGO Annual Letters to each local authority in England. These are available on our [website](#). A combined data table is also attached to this report. During our investigations we agree that some complaints have been remedied satisfactorily by the local authority, and for the first time this year we acknowledge the number of complaints where this has happened.

This will be the last annual review of local government complaints that I present, due to my seven year term of office completing at the end of 2016. When I joined the LGO in 2010, I could not have envisaged the level of change I would witness during the period.

The role of local authority as commissioner of services has become increasingly prevalent. Nowadays service delivery typically involves a complex mix of public, private and charitable organisations working together. While local government has proven its abilities to adapt and innovate in light of budgetary challenges, these systems have inevitably changed the relationship between the citizen and public service provider. This has brought with it challenges for local authorities in retaining accountability structures and ensuring redress is accessible when things go wrong.

The devolution agenda is perhaps the biggest change to local government in a generation, and will transform the way public services are held to account. We have worked with the frontrunner combined authorities to support their thinking on developing effective and accessible complaints processes that fit the emerging new structures of local service delivery. It is important that the LGO retains its authority in the future to affect remedy in this brave new world.

The maze that people are sometimes required to navigate in order to raise a complaint about a public service has been one of my biggest concerns. It is clear that a single Public Services Ombudsman would present a more accessible and effective route to redress. Local

government can be reassured that we continue to work closely with the Cabinet Office to ensure that our 40 years plus experience of remedying local government complaints, and understanding its unique accountability structures, informs the development of any draft legislation.

Finally, I express my appreciation to those that have brought complaints to us – you can be reassured that in doing so you have helped to make services better for others. And I wish to credit those in local authorities that have worked constructively with us, sometimes in challenging situations, to ensure complaints are resolved.

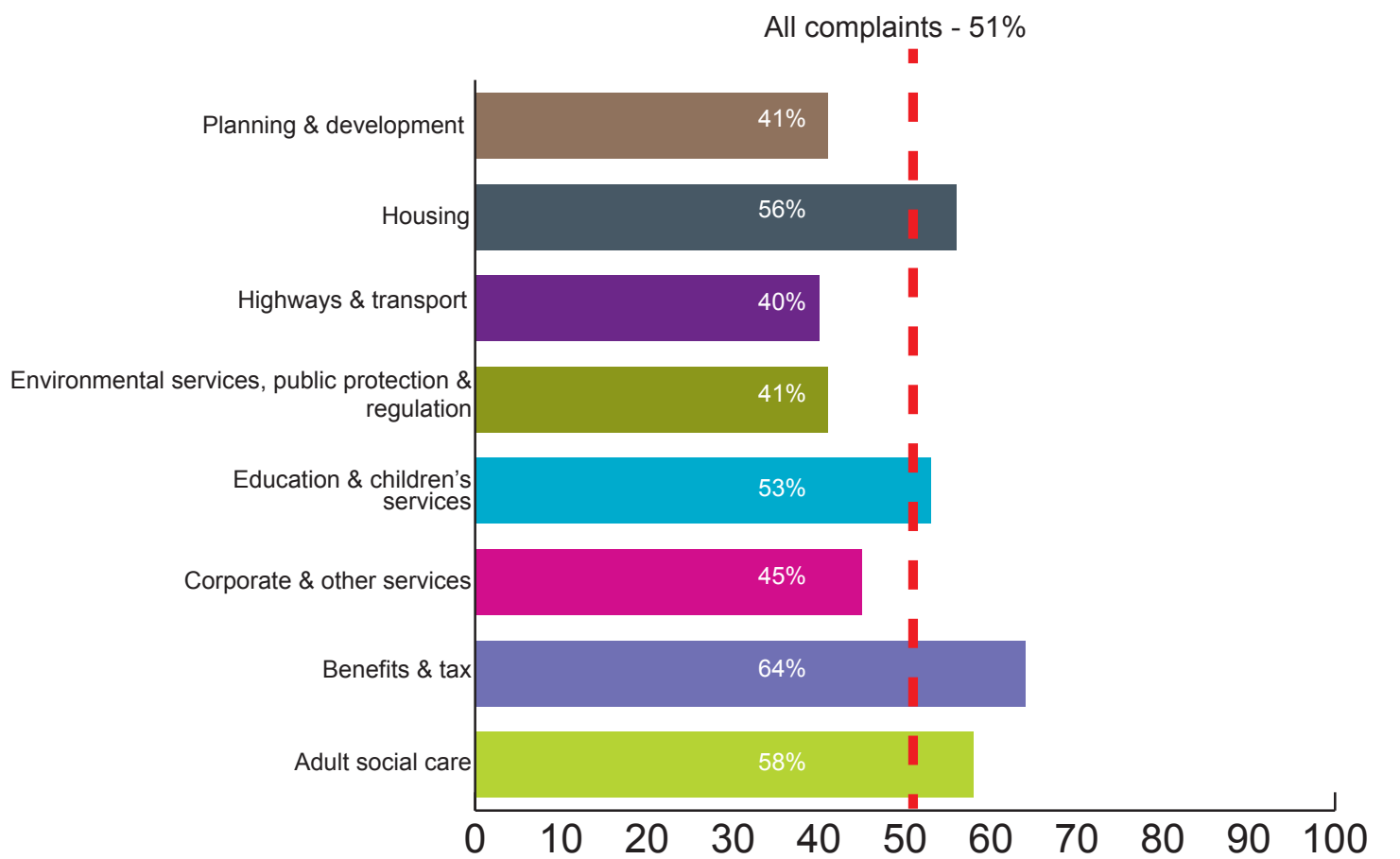
Jane Martin
Local Government Ombudsman

Making a difference

Remedying injustice

Experience tells us that the most effective and timely way to resolve a complaint is for it to be put right at the local level before the issue escalates to the Ombudsman. However, our casework tells us that a significant amount of complaints are not resolved satisfactorily locally, leaving people to ask us for an independent review. We carried out 4,464 detailed investigations, and upheld 51% of these (2,260 in number) last year.

Detailed investigations upheld

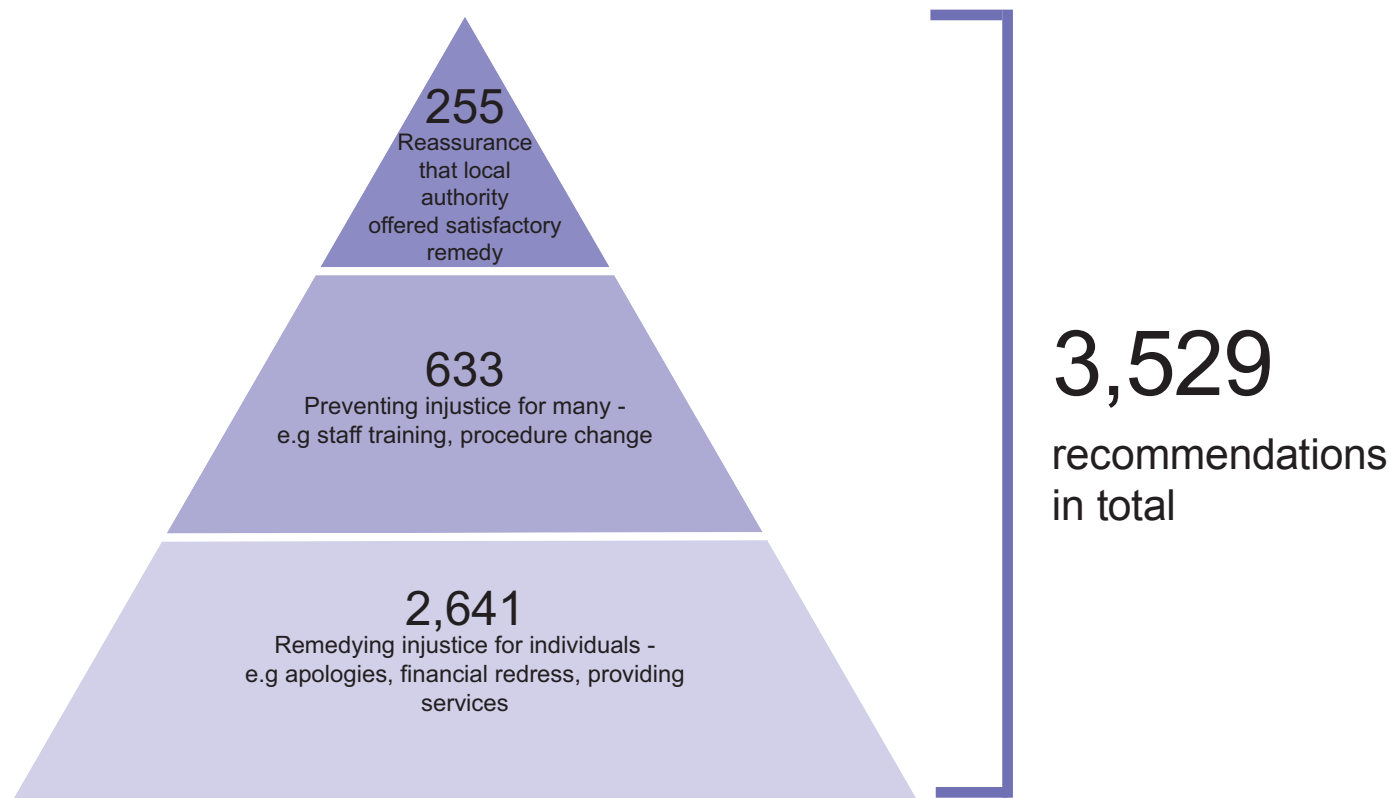


We are most likely to find fault in complaints about benefits and tax (64%), and least likely to find fault in complaints about highways and transport (40%).

We class a complaint as upheld when we find some fault in the way the local authority acted. This includes complaints where a local authority acknowledged fault in their local investigation and offered to take action to put it right, but the person still wanted an independent review of the complaint by us.

Making a difference

Recommendations to put things right



Types of remedies

If we decide the local authority has acted with fault, and the fault caused an injustice, we will make recommendations for the local authority to put things right to remedy the fault. Our recommendations are designed to place people back in the position they were in before the fault happened.

We will recommend an apology where the local authority has not already done so. A common phrase we hear is: “I simply want somebody to take responsibility for what happened”.

We look to see whether remedial action needs to be taken to restore a person’s situation. This may include reinstating or providing a service, making a decision on something under the right grounds, or providing information.

If the injustice cannot be remedied through remedial action we may recommend a financial payment. This may be a specific and quantifiable value, for example a tax that somebody should not have paid. But often it represents a loss that is more difficult to value, such as the impact of the loss of care services. We also make recommendations for a payment to recognise the distress that somebody has suffered as a result of the authority’s errors, as well as the time and trouble someone is put to in having to pursue their complaint with us.

Impact of recommendations

Our powers allow us to investigate matters that come to our attention during an investigation if we think other people, who have not complained to us, may have suffered. We can then make recommendations to remedy the injustice to those others. In addition when we find faults with a policy decision that may have affected multiple people, we can recommend the local authority reviews its files and puts things right for other individuals similarly affected.

Making a difference

Stories we heard

Remedying injustice – putting things right for others

Katrina and her younger brother George became involved with the council's children's services department when the council became concerned about a potential risk to their safety. Following a meeting with the different agencies involved, the council placed the children on child protection plans.

Katrina complained to us that she had suffered significant distress during the period because of the way the council treated her through the process.

We did not criticise the council for initiating the child protection meeting, but found that it did not properly involve Katrina in the meeting as it should have done according to local guidance, and she was unnecessarily denied contact with one of her parents for a number of months. It also did not properly inform all the agencies involved once it had found no risk and closed the case.

Only Katrina had complained to us, but we recognised that the council's faults had also caused injustice to her brother George. The council agreed to our recommendations to put things right for both children. This included written apologies and offers of counselling for the siblings, as well as financial payments to recognise the distress caused and their uncertainty about how events may have panned out differently but for the council's faults.



Improving services

We always consider whether the issues uncovered in an investigation may affect other local people in a similar manner, and whether we can make practical recommendations to avoid that happening. Examples of this include recommendations to review council policies, change procedures, or provide staff training. We are particularly likely to recommend this type of action if we find faults with a local authority policy, standard procedure or especially poor administrative practice.

An integral part of our work is sharing our intelligence and experience from complaints to encourage better services for all. We regularly publish 'Focus Reports' that look at systemic issues found in our complaints. These feedback good practice to local authorities and raise public awareness where there is clear evidence of a public interest. We publish all of our decisions (except where there is a risk to the anonymity of those involved) and complaints data as a resource for people to interrogate. The identity of the complainant is not revealed in our decisions, but we do name the body in jurisdiction.

Local Government complaint numbers & trends



Adult social care

We received 2,584 complaints and enquiries about the responsibilities of councils for adult social care, which is a 4% increase on the previous year. We upheld 58% of complaints investigated in detail.

In our role as Local Government and Social Care Ombudsman, we can provide redress for people with unresolved complaints about any aspect of adult social care, regardless of whether or not the council funds or commissions the services. We can investigate any independent social care providers registered with the regulator, the Care Quality Commission (CQC).

This report only includes the statistics for complaints about the responsibilities of councils, and touches on the most significant themes. We publish an annual review of social care complaints every autumn, which analyses the trends across the whole sector in more depth.

Assessment and care planning

We received the most complaints within adult social care about the assessment and care planning process, at 601. We also upheld 70% of detailed investigations that were specifically about care planning.

Assessment and care planning are at the heart of any council's social care responsibilities. Councils have a statutory duty to carry out an assessment for anyone in their area who appears to need care and support. If eligible, they must draw up a care plan to meet agreed outcomes which is regularly reviewed. Some of the common faults we find in this area are:

- > poor communication
- > not involving families adequately
- > delays in assessing and reviewing, and
- > inadequate information to enable people to make the right choices.

If we identify faults in the assessment and care planning process, we will look to see if direct action could restore the situation, such as carrying out an assessment or review, putting in place a service or involving the family in the process. Typically it can be difficult to quantify the impact of not providing support, but we may recommend a payment to recognise avoidable distress.

Local Government complaint numbers & trends



Adult social care

Charging

We registered 278 complaints and enquiries about charging for care, and upheld 62% of detailed investigations.

The social care system can be complex for people to understand, and it is often at a time of crisis when people first encounter the need for support. Many of the cases we see about charging relate to information being given which is inconsistent or out of line with current guidance.

Our recent Focus Report on charging explains some of the ways we typically remedy injustice in this area.

Focus Report – providing the right information on fees



Our cases show that many people are not being given the right information about charging for social care, meaning they often pay too much. People can choose to pay for more expensive care, but it must be a genuine choice.

We published a Focus Report, [*Counting the cost of care*](#), showing some of the common issues around care 'top-up' fees.

We told some of the stories of people who come to us for help. These included people who had been given confusing or incorrect advice by their council, or those who were not offered a genuine choice of affordable care home that did not require a top-up fee. Other stories included peoples' finances being assessed before their care needs, and councils abdicating responsibility for the top-up to the care home.

To put things right we can recommend action such as an apology, a refund of top-up fees that should not have been charged or a reassessment of needs. We often make recommendations to review procedures to ensure others are not affected.

The report provides insight from our complaints to help councils (and care providers) implement best practice. We also provide questions for councillors to help them scrutinise services locally. By achieving significant publicity for the report we raised public awareness of the right to sound information to enable informed decisions about care.

Local Government complaint numbers & trends



Adult social care

Home care

People may prefer to have their care needs met in their own home to have a level of independence and maintain familiarity with their surroundings.

We experienced a 29% increase in the number of complaints and enquiries received about councils' provision of home care (also known as domiciliary care) from 218 the previous year to 281 this year. This contrasts with a steady decline in the number of people receiving home care funded by local authorities – it fell by 20% between 2009 and 2015¹.

This means that, as a proportion of all people receiving home care with local authority involvement, more are bringing a complaint to us.

There could be a number of reasons for this. However, the outcome may be seen positively: that more people are coming forward to make their concerns

heard. On the other hand, we upheld a high level of complaints (67%), which would indicate councils are often getting it wrong in this area.

Common faults include failure to provide services, such as cancelled or short visits, inaccurate invoicing for and recording of visits, poor communication between the commissioning council and the home care provider and not seeking timely medical assistance.

Some of our complaints reflect issues that have been highlighted by the sector. The Care Quality Commission's (CQC) report *Not just a number* found common issues were undermining the majority of good home care².

These included a lack of consistency of care workers and missed or late visits, amongst others. More recently, a study by UNISON found that 74% of local authorities in England were

limiting some home care visits to 15 minutes³. Guidance by the National Institute for Health and Care Excellence (NICE), introduced in September 2015 advises that home care visits should be no shorter than half an hour unless they are for basic tasks and part of a wider support package or to check someone is safe and well⁴.

¹ [United Kingdom Homecare Association \(UKHCA\) Summary: An Overview of the domiciliary care market in the UK Homecare – May 2016](#)

² [Care Quality Commission - February 2013](#)

³ [Suffering alone at home, Unison, 2014](#)

⁴ Home care: delivering personal care and practical support to older people living in their own homes (NICE guidelines NG21), September 2015

Local Government complaint numbers & trends



Benefits and tax

We received 2,562 complaints and enquiries about benefits and tax. We upheld 64% of those cases we investigated.

Council tax

We registered 1,511 complaints and enquiries in this area. Where we completed an investigation, 61% of cases resulted in complaints being upheld.

Some of the common issues we find include problems with the administration of individuals' council tax accounts, delays in responding to complainants and providing inaccurate information. We receive a number of complaints and enquiries about changes to discount schemes on council tax for empty properties, after councils were given additional powers to manage these schemes locally.

Enforcement agents (bailiffs)

There has been an increase in the amount of complaints and enquiries received about the actions of bailiffs recovering council tax. The increase was at 46% on the previous year (86 received this year and 59 the previous year).

As councils take more action to recover debts the use of bailiffs will undoubtedly increase. While bailiff action can be an unpleasant experience we upheld very few complaints this year about the

actions of a bailiff using their 'Taking Control of Goods' powers.

Business rates

We registered 143 complaints and enquiries about business rates. While we carried out proportionately fewer detailed investigations than in previous years, we upheld a higher percentage of them. On issues of rating the liability for business rates, there is a specific route to redress through the courts. However we find some common issues around delays in dealing with information, as well as councils' discretionary decisions on business rate reliefs.

Complaints about council tax and business rates are often about how councils take action to recover debts. Despite a tax being properly due, we sometimes find a council unreasonably delayed in billing someone, resulting in them receiving a sudden and unexpected demand for a large debt. In these cases we may recommend some of the debt is waived.

In some cases we help people that come to us by advising on the best way to get their problem resolved. This may be to a Valuation Tribunal if the dispute is about liability to pay tax. We

have found councils at fault for not making the appeal route clear to complainants and for incorrectly dealing with liability issues through the corporate complaints process rather than the correct appeal process.

Housing benefit

The majority of our benefits-related complaints are about housing benefit. We registered 752 complaints and enquiries and upheld 68% of investigations. We look at the way councils deal with the claims and how they advise of appeal rights. We also consider landlord complaints that councils have not made a direct payment of housing benefit to them.

If we find that an unnecessary delay by a council caused an injustice, we may recommend it make a payment to reflect this. We can also recommend councils pay landlords for sums lost if we find fault in this area. We may also recommend a council reviews its administrative processes.

Local Government complaint numbers & trends



Benefits & tax

Council tax support and council tax benefit

Council tax benefit was abolished in April 2013, but we still receive some complaints about council tax benefit overpayments. We registered 119 complaints and enquiries last year. Common faults we find in this area include when a council delays in dealing with a claim or passing a case to appeal. If a council is taking steps to recover tax, but we find fault in the way the original claim was handled, we can consider how the person has been affected and make a suitable recommendation to put this right. For example, we can recommend the council determines a claim without delay or reimburses costs incurred by the complainant caused by the delay in determining a claim.

Stories we heard

Council tax - unreasonably late billing

Between 2003 and 2006 Angela shared a rented flat with three other tenants. They believed the landlord was responsible for paying the council tax. Neither the tenants nor the landlord told the council they were renting the flat.

The previous owner of the flat had died, and between 2002 and 2010 the council sent bills to his representative. The bills were not paid, but the council did nothing about chasing this up until July 2010 when it was told the flat had been sold. It billed the new owner, who told the council about Angela and her co-tenants. The council sent the four tenants bills for more than £4,600 to the only address it had – the property. No payments were received. In 2011 the council instructed bailiffs who were unable to find Angela or the other tenants and passed the debt back to the council in mid 2012. In early 2014 the council found Angela's current address; it could not find the address of the other tenants. It wrote to Angela asking her to either pay the debt in full or make an arrangement to do so.

Angela complained about being asked to pay such a large sum so long after she had left the property. She said she had no addresses for her former flat mates.

We found the council was right to say Angela and her co-tenants were all liable for the debt. But we also found the council was at fault in having delayed for so long in checking if the late owner had sold the property. It was also at fault in its delays in trying to contact Angela after it billed her; there were long periods when no action was taken to find Angela's new address. The council agreed to our recommendations to reduce Angela's debt to 25% of the total, which is what she should have paid if she had been billed in time, and then to halve this total because of the further delays in contacting her.



Local Government complaint numbers & trends



Education and children's services

During this period, we received 3,438 complaints and enquiries about education and children's services. This is the highest volume of complaints we deal with in comparison with other subject areas. We upheld 53% of those cases we investigated.

Child protection

We registered 903 complaints and enquiries in this area. Where we completed an investigation, 68% of cases resulted in complaints being upheld. This is considerably higher than the average for all complaints (51%).

Child protection complaints relate to safeguarding procedures which are intended to protect children from the risk of neglect or abuse. Often complaints are made by parents or family members, about or on behalf of a child or young person. They may consider that something has gone wrong in the process and the child or young person has been left at risk of harm as a result. We also receive complaints from people who have been investigated due to child protection concerns being raised. By their nature these complaints require sensitive handling and sometimes the outcome the complainant desires is something that only the courts could decide – for example revoking a decision to remove a child from the family.

Where we find fault in child protection complaints, recommendations to review safeguarding procedures is particularly important to avoid the likelihood of other children being similarly affected.

Children's statutory complaints procedure

Many complaints we receive are about or involve councils' application of the statutory children's social care complaints process. This is designed to ensure the rights and needs of the child are at the heart of the process and that young people's voices are heard. Once a complaint has been accepted via this procedure, complainants have a right to progress through each stage: local resolution; investigation; and independent review. We regularly see instances where councils fail to follow the process, or its guiding principles. In these cases we may recommend a financial payment if failures have caused or compounded the person's distress.

Child sexual exploitation

Recent inquiries into the failures to prevent child sexual exploitation in some areas are well publicised. We have only received a small number of complaints on the subject. But, we have seen some instances where a council has taken a lack of consent from a young person to justify not investigating a complaint or for failing to take safeguarding action. This is of concern given the young person may not perceive themselves to be a victim or vulnerable to potential exploitation and do not therefore recognise they may be in need of protection. A failure to properly consider and assess a young person when such concerns have been raised may leave them at continued risk.

Local Government complaint numbers & trends



Education and children's services

School admission appeals

We registered 654 complaints and enquiries in this area. We investigated fewer complaints than in previous years but upheld significantly more cases, 43% in 2015-16 compared to 26% 2014-15. We do not have jurisdiction to consider complaints about Academies and Free Schools and so the number of complaints we are able to consider has reduced significantly as more schools have converted to Academy status.

Common themes in the complaints we uphold are poor administrative practices such as insufficient information provided or new information presented on the day of the appeal; inadequate recording of the decision making process; panels taking into account irrelevant information and poorly communicated decisions leaving appellants with no understanding of how the decision was reached.

When we find fault and are satisfied it has caused an injustice we usually recommend the admission authority holds a fresh appeal with a different panel, to restore faith that the parents' appeal is heard impartially and fairly. We may also recommend it reviews its admission criteria or appeals procedure.

Special Educational Needs

We registered 355 complaints and enquiries about special educational needs (SEN). We upheld 70% of those cases we investigated. Again this is considerably higher than the average across all subject areas (51%). Where we do find fault, the impact on the individual and their family can be particularly acute. Cases can be complex, and we often see complaints where the relationship between the family and the council has broken down.

Delays in the process are one of the overriding features of SEN complaints we uphold. In addition we tend to find problems where there has been no holistic and timely approach to planning for future needs – particularly around the key transition points between stages of schooling and post-16 education.

Where we find fault, we can recommend a financial payment to recognise the lack of provision or ask that relevant assessments or reviews take place promptly. Unfortunately we regularly see cases where a child is left without suitable education for prolonged periods, which requires careful consideration to recommend a remedy that addresses all the issues of missing out for such time.

New arrangements for education, health and care plans (EHCPs) to replace statements of SEN came into force in September 2014. Due to the timescales of this process it is too early for us to have seen enough complaints about EHCPs to identify systemic trends. But some initial concerns are councils failing to arrange transition meetings for transfer from statements to EHCPs, or using the 20 weeks timescale as a deadline rather than aiming to complete the process as quickly as possible.

School transport

We received a significant increase in the number of complaints and enquiries about councils' provision of school transport. We have seen some emerging issues where school transport has been withdrawn without there having been any changes to the transport policy or the person's circumstances. We have also seen a number of complaints where changes to longstanding transport policies have been made without parents being informed or provided with clear and timely information about them. These type of changes often affect many families in the council areas. In some of the cases we received, the catalyst for the local changes affecting people have been the council reviewing its transport policy, or how they apply their existing policy, in light of a need to reduce costs.

Local Government complaint numbers & trends



Education and children's services

Stories we heard

Child protection – not following the children's complaints process

Petra became the adopted mother of two young girls, aged four and five. The children told her that their former foster carer had smacked them.

Petra approached the council with the allegations. It, and the council failed to convene the correct planning meetings and social workers recorded the concern as 'unsubstantiated'.

Petra later raised further concerns made by the children. She also claimed that some of the children's belongings and memory boxes were not passed on from the foster carer.

The council held a meeting chaired by an independent officer to look at whether the council had investigated the allegations properly. The meeting decided that any investigation could be traumatic for the children and doubted whether sufficient evidence would be gained.

Petra tried to pursue her complaint with the council, but it refused progress it to the second stage, so she approached us.

We found the council at fault for not following the statutory children's social care complaints process. And while the council claimed it did weigh up the evidence it may get from interviewing the children over the potential harm it may cause, it also failed to follow its own policy which said that any child or adult that reports a concern must be consulted.

The council agreed to our recommendations to apologise and agree a clear plan for interviewing the children. It also agreed to train staff, and review its procedures for how it investigates allegations, how it progresses complaints through the statutory process quickly, and how it works with foster carers to impress the importance of keeping photographs and possessions safe.

We also recommended a small financial payment to Petra and her two daughters to recognise the avoidable frustration and distress they were caused.



Local Government complaint numbers & trends



Environmental services, public protection and regulation

We received 1,714 complaints and enquiries in this area. We upheld 41% of detailed investigations.

Refuse and recycling

The highest number of complaints and enquiries were about refuse and recycling, at 487. For many people the collection of their waste is one of the most visible functions of a local authority. Failure to properly collect waste can be a serious health hazard. A common complaint is that collections have been missed, although we often find during these investigations that councils have taken satisfactory steps to remedy this locally. When we find fault in refuse complaints, there are sometimes issues with how the council handles the initial complaint. We upheld 59% of detailed investigations in this area.

Noise

We received 188 complaints and enquiries about noise nuisance. Complaints are usually about noise from a neighbouring house or business. Councils have a responsibility to investigate cases of alleged noise nuisance and to come to a decision on whether action needs to be taken to manage it. They will usually monitor the noise to determine whether it is classed as statutory nuisance. A common issue we find is delay in the process; either in taking action to assess whether the noise amounted to a nuisance, in taking action to reduce the noise or in informing the people involved on progress of the issue.

To put things right we may recommend that action is taken to address a statutory noise nuisance, such as acoustic works. If it is clear that proper action would have led to a reduction in the nuisance sooner, we will recommend a payment to recognise a loss of amenity.

Anti-social behaviour

We received 203 complaints and enquiries about anti-social behaviour. Sometimes people complaining about these issues also experience problems with noise nuisance. Similar to noise complaints, the common faults we see include delays in taking action when action was promised, and failing to keep people informed effectively. If we find fault, we can recommend the council re-evaluates the issues and may include interviewing witnesses or reviewing with the police practical measures to control anti-social behaviour. We can recommend a payment to recognise avoidable distress. If a person's complaint is about a neighbour who is a social housing tenant, then we will signpost to the Housing Ombudsman who is the correct ombudsman to handle their unresolved complaint.

Local Government complaint numbers & trends



Highways and transport

We received 2,110 complaints and enquiries about highways and transport. We upheld 40% of detailed investigations, which is the lowest of all areas of our work.

Fines

The area in which we received the most complaints and enquiries, at 751, was parking and traffic fines. For most issues related to this subject, there is a statutory process for challenging fines through a tribunal. Despite this, we still find a number of common issues, and because of the millions of penalties issued each year any improvement by councils in this area could benefit many people. We find cases where councils have not correctly informed people of their rights, particularly when making an informal challenge to a penalty charge notice. We also investigate complaints about how councils have taken recovery action on unpaid penalty charges.

Repairs and traffic management

Most other highways and transport complaints and enquiries are about traffic management, and highway repairs and maintenance. Typically these include complaints about potholes, injury to people and damage to vehicles, parking permits and issues like road closures, speed restrictions or pavement obstructions.

Where we do find fault, many recommendations will include a financial element – either cancelling fines or fees, or a payment for the time and trouble in having to pursue the issue with us.

Stories we heard

Traffic fines - failure to reverse fine

Dan and Kirsty received a penalty charge notice by post from the council for a moving traffic contravention. It contained a photograph of the car involved, but its vehicle registration was not the same as that on the notice itself. The council had clearly sent the notice to the couple in error and they wrote to point this out.

Although it was correctly addressed, Dan and Kirsty's letter to the council was returned marked 'addressee gone away'. Despite several letters and phone calls, the couple could not resolve the matter with the council and complained to us.

At our intervention, the council accepted it had been at fault and cancelled the penalty charge. It agreed to pay Dan and Kirsty £25 to recognise their time and trouble. However, this complaint should have been resolved earlier. The council's error was readily apparent and it should not have required the couple to come to us to get things sorted.



Local Government complaint numbers & trends



Housing

During the year we received 2,325 complaints and enquiries about housing, which is 7% fewer than in the previous year. Most were either about how councils allocate social housing, or their homelessness services. A smaller number were about the different ways authorities are involved with private sector housing, including licensing, enforcement activity in relation to disrepair and improvement, and other issues to do with the landlord/tenant relationship. We upheld 56% of housing investigations.

Although the responsibility for complaints about the provision and management of social housing passed to the Housing Ombudsman in April 2013, we still receive many enquiries from people who want to complain about these matters. We continue to work with the Housing Ombudsman in providing information about our respective roles, but we also urge councils to improve the advice about which Ombudsman people should complain to when they have made a final decision their complaints.

Housing allocations

We received 916 complaints and enquiries about housing allocations and we upheld 51% of detailed investigations. Using our experience of those complaints we published a Focus Report, which highlighted some of the common failures in this area and acted as a timely reminder to councils of the need to ensure their allocation policies do not exclude certain vulnerable groups. Some of the recurring problems include poor handling of requests for medical priority, not updating housing applications following a change in circumstances, and failures in how exceptional circumstances are considered by applying blanket policies.

Homelessness

We received 467 complaints and enquiries about homelessness, which is an 8% increase on the previous year. We also upheld 71% of detailed investigations.

Latest government statistics for England show that around a third of all households accepted as homeless, and around three quarters of all households placed in temporary accommodation, are in London⁵. 68% (317 out of 467) of our complaints and enquiries about homelessness were against London authorities. Recently we have seen complaints about council decisions – often but not only London boroughs – to offer accommodation outside the council's area.

We have also dealt with complaints about the way councils deal with private tenants who seek assistance when served with a notice to quit from their landlord. We have also seen evidence of 'gatekeeping', where councils

delay or avoid altogether taking a homelessness application. We continue to receive complaints that offers of temporary accommodation are unsuitable and that councils take too long to carry out reviews of the suitability of such accommodation.

In complaints about housing allocations and homelessness, injustice may be suffered by vulnerable individuals or by families. Sometimes it is clear what is needed to remedy the injustice, for example by the council making an offer of suitable accommodation or by giving additional priority to a housing application. Often the remedy will include some financial redress. Procedural change recommendations may include such things as reviewing standard processes to meet government guidance and improving the information given to local people.

⁵ Statutory Homelessness: October to December Quarter 2015

Local Government complaint numbers & trends



Housing

Stories we heard

Homelessness - housed out of area in unsuitable home

Anita is a single parent to three teenagers. She is on a low income and gets tax credit and Child Benefit support. The family were evicted from their London home when the landlord wanted the property back, and she applied to the council as homeless.

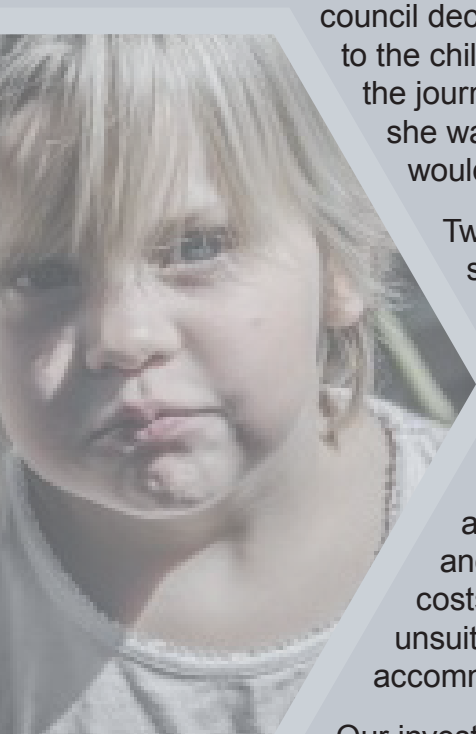
They were offered a three-bedroom home in a town in Essex as temporary accommodation while the council decided her homeless application. Anita was concerned about the distance to the children's schools and colleges and her job. These were in East London and the journey would take up to two hours. However she reluctantly accepted because she was advised it was the only property available and if she refused the council would consider its duty to her discharged.

Two months later Anita tried to request a review of the accommodation, stating she could not afford the significant additional transport costs; had the family been placed in London, the children would have been entitled to free bus travel. A homeless applicant, however, does not have a right to request a review of the suitability of the accommodation until a council has made a decision to accept a housing duty.

It took another month for the council to make a decision and accept a full housing duty as a homeless family in priority need. Anita lodged another review request, reiterating her concerns about the distance and costs. Ten weeks later the council concluded the temporary Essex home was unsuitable and placed the family on the transfer list for a move to more suitable accommodation.

Our investigation found the council took too long to decide the homeless application – no work happened on the case for around five months. Although the family would likely still have been placed in Essex because it was the only three-bedroom home available at the time, if the council had properly assessed the suitability of the home at the outset, taking into account the educational needs of the children, it would have recognised the need to transfer them nearer much sooner.

The council agreed to our recommendations to apologise and refund Anita the £3,000 spent on train fares over the period and pay her £500 to recognise the inconvenience and distress caused. It also offered suitable temporary accommodation in London around the time our investigation was completed.



Local Government complaint numbers & trends



Planning and development

We received 2,528 complaints and enquiries in this area and upheld 41% of investigations.

Planning applications

A large proportion of complaints and enquiries we get in planning are about planning applications – there were 1,617 received in the year. The majority are from people who object to a planning application or a council's decision to grant planning permission.

Objectors do not have a right of an appeal about a planning decision; they can take independent action in court, but with the costs usually prohibitive, we are the only realistic way for people affected by a council's planning decision to get redress. We provide individuals with redress if council administrative faults have caused them a personal injustice. However, we do receive complaints from objectors not directly affected by a development.

In the complaints where we find fault, some of the common issues are failures around publicising applications or properly considering objections to applications, explaining the reasons for decisions and considering the impact on neighbouring properties.

If we find fault causing injustice, we can recommend action to lessen the impact of development, like changes to gardens or properties to reduce overlooking, access or noise issues. In some

cases, if the application was unlikely to have been approved but for the faults identified, we may recommend a financial payment to recognise the loss of value to a property. We may recommend procedural changes or training for staff, and members of the planning committee.

Planning enforcement

We received 498 complaints and enquiries about planning enforcement. Once it is satisfied a planning contravention has taken place, a council must decide whether it is appropriate and practical to take enforcement action. There are time limits after which unauthorised development becomes immune from enforcement action, so we expect councils to investigate alleged contraventions within a reasonable timeframe. Enforcement action is discretionary, and any action taken should be proportionate to the breach identified. This means that formal action should not normally be taken unless informal negotiation fails.

A common issue raised in planning enforcement is a lack of communication. Even if we find no fault in the way a council handles the contravention itself, the failure to regularly update someone on progress invariably adds to their sense of frustration. Delays during which local people may

be suffering the consequences of unauthorised development are another problem, and on occasion result in the council losing planning control and the ability to take enforcement action.

As in planning application complaints, we would look to see if action can be taken to put right planning breaches. This may involve recommending the council takes appropriate formal enforcement action. If a council, through fault, loses planning control, we may recommend a payment to recognise a loss of amenity or value of property.

Local Government complaint numbers & trends



Planning and development

Planning enforcement - failure to retain planning control



Johan complained that a neighbour's large terrace balcony affected his privacy by overlooking his garden.

The council approved the neighbour's planning application, subject to a condition requiring him to submit detailed plans of screening measures, and build according to those plans. The council had intended the condition to also reserve the right for it to decide whether the screening was satisfactory, but failed to do this. It had assured Johan that a 1.8 metre high screen would protect his privacy.

The neighbour submitted plans that the council found unsatisfactory. After it chased the neighbour for revised plans and got no response, it decided to start enforcement action. It was at this point, that it realised the planning condition was not worded as intended and the council had lost planning control. The neighbour had met its obligations by submitting plans and building to them.

Johan decided to plant a large number of trees in an effort to protect his privacy. It is estimated it would take 3 to 5 years for them to grow to the 6 metres needed to begin to screen the impact of the balcony.

The council agreed to our recommendations. These were to make a payment to Johan for the cost of planting the trees, for the impact of the balcony on his amenities until the trees provide screening, and for his time and trouble in pursuing the complaint.

Corporate and other services



We received 988 complaints and enquiries registered about corporate and other services. We upheld 45% of detailed investigations.

Complaints in this area include: council contracts and business matters, leisure and culture, council land (when not related to planning), access to information and standards committees.

Complaints and enquiries about elections more than doubled on the previous year (from 30 to 62). This is likely due to the 2015 general election, although a number of complaints in this area were signposted to the Electoral Commission as the more appropriate body to investigate.

Supporting local scrutiny

We encourage the use of our statistics to help inform scrutiny of local public services. This report publishes our statistics for all local authorities in one place so they can easily be compared with other areas. We also publish the data in spreadsheet format on our website together with annual review letters to local authorities.

It is important to remember, however, that these statistics should be a starting point for discussion on how complaints are dealt with in an area. Different levels of complaint numbers to the Ombudsman can be caused by many factors; it is too simplistic to imply they are connected directly to good or bad services in an area. For example, low numbers may reflect poor signposting to the Ombudsman and an inaccessible complaints procedure, or it may reflect good complaint handling locally.

Local councillors have an important part to play in scrutinising local services. Many local authorities tell us they share their information about complaints with councillors, and we encourage those authorities not already doing so to start. Below are some questions councillors may consider asking to get a picture of how complaints are handled locally.

Questions for councillors

How does your council:

- > actively welcome feedback from service users about how it manages complaints?
- > report the outcomes and lessons learned from complaints to all members?
- > provide similar information that is easily accessible for the public?
- > consider how commissioned partners implement an effective complaints handling service?
- > clearly signpost its complaints procedure, including the right to come to the LGO, within all access points?

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Adur District Council	0	5	0	0	1	0	1	4	0	11
Allerdale Borough Council	1	2	1	0	2	0	0	23	0	29
Amber Valley Borough Council	0	4	0	0	2	0	1	13	0	20
Arun District Council	0	5	2	0	4	0	0	8	0	19
Ashfield District Council	0	5	3	0	0	1	2	4	0	15
Ashford Borough Council	0	7	3	0	3	0	2	8	0	23
Aylesbury Vale District Council	0	11	3	0	3	0	3	9	0	29
Babergh District Council	0	3	1	0	2	0	6	6	1	19
Barking and Dagenham London Borough Council	7	33	5	23	22	23	27	5	0	145
Barnet London Borough Council	20	48	4	17	15	42	38	32	3	219
Barnsley Metropolitan Borough Council	9	9	5	10	7	4	3	11	1	59
Barrow Borough Council	0	5	0	0	1	0	0	3	0	9
Basildon Borough Council	0	10	0	0	7	2	4	9	1	33
Basingstoke and Deane Borough Council	0	4	2	0	3	0	1	12	0	22
Bassetlaw District Council	0	3	1	0	2	2	5	7	0	20
Bath and North East Somerset Council	5	3	4	6	4	4	2	12	0	40
Bedford Borough Council	4	2	1	14	5	1	5	4	2	38
Bexley London Borough Council	6	25	3	13	7	5	12	6	1	78
Birmingham City Council	55	132	11	71	88	48	80	32	6	523
Blaby District Council	0	3	0	0	1	1	2	5	0	12
Blackburn with Darwen Council	9	9	1	13	5	3	0	2	0	42
Blackpool Borough Council	9	6	6	10	6	2	3	5	0	47
Bolsover District Council	0	2	4	0	1	0	1	2	0	10
Bolton Metropolitan Borough Council	6	9	2	8	8	2	2	5	1	43
Boston Borough Council	0	2	2	1	0	0	0	5	0	10
Bournemouth Borough Council	12	9	2	12	9	4	11	7	0	66
Bracknell Forest Council	4	1	1	8	1	1	2	7	1	26
Braintree District Council	0	4	2	1	1	0	1	4	0	13
Breckland District Council	0	2	2	0	1	0	1	9	0	15
Brent London Borough Council	17	24	3	15	13	42	52	14	3	183

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Brentwood Borough Council	0	6	0	0	0	0	0	3	0	9
Brighton and Hove City Council	27	13	4	28	4	12	13	21	1	123
Bristol City Council	14	33	15	23	24	18	28	28	0	183
Broadland District Council	1	0	0	0	2	0	1	6	0	10
Broads Authority	0	0	2	0	0	0	0	1	0	3
Bromley London Borough Council	35	39	7	20	8	8	38	17	1	173
Bromsgrove District Council	0	3	3	0	2	0	1	5	0	14
Broxbourne Borough Council	0	0	1	0	3	1	4	7	0	16
Broxtowe Borough Council	0	7	1	0	2	0	3	3	1	17
Buckinghamshire County Council	13	0	3	16	4	17	0	0	1	54
Burnley Borough Council	0	3	0	0	3	2	2	2	0	12
Bury Metropolitan Borough Council	13	5	1	11	13	5	2	3	0	53
Calderdale Metropolitan Borough Council	13	7	4	19	11	11	2	13	0	80
Cambridge City Council	0	2	0	0	4	0	7	4	0	17
Cambridgeshire County Council	15	0	5	26	1	10	0	0	0	57
Camden London Borough Council	14	10	6	9	8	25	38	11	4	125
Cannock Chase District Council	0	7	2	0	1	0	1	0	0	11
Canterbury City Council	1	4	3	1	3	0	5	11	0	28
Carlisle City Council	1	3	2	0	1	0	2	3	0	12
Castle Point Borough Council	0	4	1	0	3	0	3	2	0	13
Central Bedfordshire Council	7	7	4	12	4	7	6	18	0	65
Charnwood Borough Council	0	4	0	0	2	0	4	5	0	15
Chelmsford City Council	0	2	3	0	1	0	3	7	0	16
Cheltenham Borough Council	0	1	0	0	0	0	1	4	0	6
Cherwell District Council	0	4	2	0	4	3	4	16	0	33
Cheshire East Council	15	12	16	23	12	13	0	27	1	119
Cheshire West and Chester Council	6	8	11	14	9	10	3	13	1	75
Chesterfield Borough Council	0	1	1	0	0	2	3	0	0	7
Chichester District Council	0	3	1	0	1	2	2	11	0	20
Chiltern District Council	0	3	0	0	5	0	2	1	0	11

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Chorley Borough Council	0	5	0	0	1	0	2	3	0	11
Christchurch Borough Council	0	1	0	0	0	0	2	6	0	9
City of Bradford Metropolitan District Council	19	21	12	19	12	14	4	12	1	114
City of London	2	0	0	1	3	2	1	1	0	10
Colchester Borough Council	1	3	2	0	3	2	6	8	0	25
Copeland Borough Council	0	2	0	0	4	0	0	2	0	8
Corby Borough Council	0	3	2	0	6	1	4	1	0	17
Cornwall Council	46	21	9	50	13	15	9	73	1	237
Cotswold District Council	0	1	0	0	2	0	0	6	0	9
Coventry City Council	12	16	11	20	21	20	6	3	0	109
Craven District Council	0	0	2	0	2	0	1	3	0	8
Crawley Borough Council	0	3	0	0	2	1	9	4	2	21
Croydon London Borough Council	31	33	5	30	25	23	67	14	0	228
Cumbria County Council	10	2	2	30	2	7	0	0	0	53
Dacorum Borough Council	0	5	0	0	4	1	5	7	1	23
Darlington Borough Council	12	1	1	1	6	4	0	4	0	29
Dartford Borough Council	0	5	1	1	3	1	6	3	0	20
Dartmoor NPA	0	0	0	0	0	0	0	1	0	1
Daventry District Council	0	4	2	0	2	0	3	5	0	16
Derby City Council	12	11	2	24	7	3	3	3	1	66
Derbyshire County Council	36	1	2	38	3	15	0	1	0	96
Derbyshire Dales District Council	0	0	1	0	0	0	0	7	1	9
Devon County Council	42	0	6	60	5	33	0	2	0	148
Doncaster Metropolitan Borough Council	13	6	3	12	11	5	9	11	1	71
Dorset County Council	24	0	2	14	4	7	0	1	0	52
Dover District Council	0	4	0	0	2	2	3	3	0	14
Dudley Metropolitan Borough Council	6	6	4	13	14	9	11	9	1	73
Durham County Council	32	23	9	28	26	17	9	38	1	183
Ealing London Borough Council	19	28	8	19	17	35	34	20	3	183
East Cambs District Council	0	1	2	0	2	1	0	1	0	7

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
East Devon District Council	1	3	3	0	2	0	4	10	0	23
East Dorset District Council	1	4	0	0	1	2	1	5	0	14
East Hampshire District Council	0	1	2	0	3	0	1	8	0	15
East Herts District Council	0	3	4	0	1	2	0	9	0	19
East Lindsey District Council	0	3	3	0	7	0	0	18	1	32
East Northamptonshire Council	0	1	1	0	2	0	1	5	0	10
East Riding of Yorkshire Council	15	5	6	15	8	9	3	14	0	75
East Staffordshire Borough Council	0	2	0	0	2	1	0	3	0	8
East Sussex County Council	51	0	4	32	1	7	0	2	0	97
Eastbourne Borough Council	0	12	1	1	3	0	5	1	0	23
Eastleigh Borough Council	0	1	0	0	0	0	4	9	0	14
Eden District Council	0	2	1	0	3	0	1	11	0	18
Elmbridge Borough Council	1	0	0	1	1	3	3	9	0	18
Enfield London Borough Council	16	41	3	13	6	16	47	14	1	157
Environment Agency	0	0	0	0	6	0	0	0	0	6
Epping Forest District Council	0	4	0	0	5	1	20	8	0	38
Epsom and Ewell Borough Council	0	5	0	0	3	2	1	8	0	19
Erewash Borough Council	1	2	1	0	2	1	0	5	1	13
Essex County Council	52	0	8	146	11	58	1	2	1	279
Exeter City Council	0	1	0	1	2	1	6	8	0	19
Exmoor NPA	0	0	0	0	0	0	0	0	0	0
Fareham Borough Council	0	2	0	0	1	1	0	4	1	9
Fenland District Council	0	5	0	0	7	1	3	13	1	30
Forest Heath District Council	1	0	0	0	0	0	1	3	0	5
Forest of Dean District Council	0	2	1	0	3	0	0	6	0	12
Fylde Borough Council	0	3	0	0	1	0	0	4	0	8
Gateshead Metropolitan Borough Council	7	2	6	8	12	6	9	6	2	58
Gedling Borough Council	0	3	1	0	0	0	3	6	0	13
Gloucester City Council	0	4	0	0	3	0	1	6	0	14
Gloucestershire County Council	23	0	4	24	1	10	0	0	0	62

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Gosport Borough Council	0	7	1	0	1	1	3	1	0	14
Gravesham Borough Council	0	5	1	0	1	1	13	2	0	23
Great Yarmouth Borough Council	1	4	0	1	2	0	3	5	0	16
Royal Borough of Greenwich	16	24	4	25	11	9	37	9	2	137
Guildford Borough Council	0	1	2	1	0	1	2	8	1	16
Hackney London Borough Council	14	21	11	18	2	17	29	4	0	116
Halton Borough Council	3	1	1	13	5	4	0	4	0	31
Hambleton District Council	0	1	0	1	2	0	0	7	0	11
Hammersmith and Fulham London Borough Council	5	20	2	14	4	26	29	11	2	113
Hampshire County Council	37	0	4	58	4	15	0	1	0	119
Harborough District Council	0	3	2	0	4	0	1	10	0	20
Haringey London Borough Council	14	60	7	27	19	23	56	12	2	220
Harlow District Council	0	5	2	1	8	0	4	0	0	20
Harrogate Borough Council	0	1	1	1	4	1	2	11	1	22
Harrow London Borough Council	13	26	4	11	10	34	17	20	0	135
Hart District Council	0	1	0	0	0	1	0	4	1	7
Hartlepool Borough Council	3	4	2	2	2	0	1	5	0	19
Hastings Borough Council	0	6	2	0	2	1	5	8	0	24
Havant Borough Council	0	2	0	0	2	2	2	4	0	12
Havering London Borough Council	8	13	2	13	3	12	27	9	0	87
Herefordshire Council	10	3	5	13	5	7	3	13	3	62
Hertfordshire County Council	35	0	4	62	3	26	0	5	0	135
Hertsmere Borough Council	0	3	2	1	0	0	3	9	0	18
High Peak Borough Council	0	2	1	0	1	0	0	7	0	11
Hillingdon London Borough Council	16	20	4	19	3	8	36	11	4	121
Hinckley and Bosworth Borough Council	0	1	1	0	3	0	2	10	0	17
Horsham District Council	0	3	0	0	0	1	2	13	0	19
Hounslow London Borough Council	15	41	7	15	9	24	35	22	1	169
Huntingdonshire District Council	0	7	2	0	2	0	1	11	0	23
Hyndburn Borough Council	0	2	0	0	3	0	1	3	0	9

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Ipswich Borough Council	0	1	0	1	1	0	3	1	0	7
Isle of Wight Council	19	7	2	9	3	9	7	4	0	60
Council of the Isles of Scilly	0	0	0	1	0	1	0	0	0	2
Islington London Borough Council	13	9	4	12	6	14	31	9	2	100
Royal Borough of Kensington and Chelsea	8	7	3	9	3	17	18	9	2	76
Kent County Council	62	0	5	98	7	10	2	1	0	185
Kettering Borough Council	0	3	0	0	0	1	4	3	0	11
King's Lynn and West Norfolk Borough Council	0	1	4	0	3	1	1	7	1	18
Kingston upon Hull City Council	11	13	5	27	13	5	8	2	2	86
Royal Borough of Kingston upon Thames	9	10	1	7	3	16	20	5	1	72
Kirklees Metropolitan Borough Council	19	13	13	18	8	6	3	13	0	93
Knowsley Metropolitan Borough Council	8	1	1	8	1	2	5	1	0	27
Lake District NPA	0	0	1	0	0	1	0	1	0	3
Lambeth London Borough Council	16	53	15	20	14	29	86	7	3	243
Lancashire County Council	68	0	5	68	3	14	0	1	0	159
Lancaster City Council	0	4	2	0	2	0	3	1	0	12
Leeds City Council	24	27	16	56	30	15	22	26	1	217
Leicester City Council	17	16	9	25	11	9	12	4	1	104
Leicestershire County Council	22	1	5	30	4	16	0	2	0	80
Lewes District Council	0	6	2	0	2	0	2	5	1	18
Lewisham London Borough Council	22	39	5	31	12	7	37	9	0	162
Lichfield District Council	0	2	0	0	1	0	2	3	0	8
Lincoln City Council	0	6	2	0	7	1	9	2	1	28
Lincolnshire County Council	36	0	2	28	3	9	0	2	1	81
Liverpool City Council	33	42	18	31	31	11	6	6	2	180
Luton Borough Council	12	14	8	17	6	4	11	3	0	75
Maidstone Borough Council	0	7	2	0	4	4	7	19	0	43
Maldon District Council	0	3	2	0	1	1	2	7	0	16
Malvern Hills District Council	0	2	1	0	0	0	1	4	0	8
Manchester City Council	17	23	7	30	16	24	10	11	2	140

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Mansfield District Council	1	7	5	0	6	0	0	3	1	23
Medway Council	16	14	4	20	3	11	17	12	0	97
Melton Borough Council	0	1	0	0	0	0	0	1	0	2
Mendip District Council	0	3	3	0	5	1	1	10	0	23
Merton London Borough Council	7	11	3	11	3	20	10	5	0	70
Mid Devon District Council	0	0	0	0	3	0	3	4	1	11
Mid Suffolk District Council	0	1	4	0	2	1	2	5	0	15
Mid Sussex District Council	0	1	0	0	3	3	0	10	0	17
Middlesbrough Borough Council	6	9	4	8	4	4	0	3	0	38
Milton Keynes Council	7	8	5	5	6	8	13	4	2	58
Mole Valley District Council	0	1	0	0	1	0	1	10	1	14
New Forest District Council	0	1	4	0	3	2	2	10	0	22
New Forest NPA	0	0	2	0	0	0	0	6	0	8
Newark and Sherwood District Council	1	3	1	1	3	0	0	9	0	18
Newcastle City Council	11	15	2	13	6	7	8	3	3	68
Newcastle-under-Lyme Borough Council	1	13	3	0	2	1	2	11	0	33
Newham London Borough Council	10	24	14	19	11	66	86	9	4	243
Norfolk County Council	45	0	3	40	6	14	0	1	1	110
North Devon District Council	1	3	1	0	2	3	4	9	0	23
North Dorset District Council	0	5	0	0	1	0	1	3	0	10
North East Derbyshire District Council	0	3	2	0	3	0	2	9	0	19
North East Lincolnshire District Council	9	13	7	8	4	1	2	3	0	47
North Hertfordshire District Council	1	3	4	0	4	1	1	3	0	17
North Kesteven District Council	0	1	0	0	3	0	4	4	0	12
North Lincolnshire Council	7	2	1	7	3	5	0	9	1	35
North Norfolk District Council	0	3	1	1	4	0	0	5	0	14
North Somerset Council	5	27	5	14	9	5	3	10	0	78
North Tyneside Metropolitan Borough Council	6	10	5	13	3	5	6	7	1	56
North Warwickshire Borough Council	0	2	2	0	1	0	3	2	0	10
North West Leicestershire District Council	1	1	0	0	4	1	1	4	0	12

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
North York Moors NPA	0	0	0	0	0	0	0	3	0	3
North Yorkshire County Council	37	0	3	31	2	16	0	4	0	93
Northampton Borough Council	1	13	3	0	6	4	9	8	1	45
Northamptonshire County Council	23	0	4	73	2	13	1	1	0	117
Northumberland Council	9	5	11	18	6	11	5	22	1	88
Northumberland NPA	0	0	0	0	0	0	0	0	0	0
Norwich City Council	0	14	2	0	7	2	8	3	1	37
Nottingham City Council	18	17	8	28	12	13	3	4	2	105
Nottinghamshire County Council	37	0	4	37	2	15	0	0	0	95
Nuneaton and Bedworth Borough Council	0	2	1	0	4	0	1	1	2	11
Oadby and Wigston Borough Council	2	2	1	0	3	0	6	0	0	14
Oldham Metropolitan Borough Council	7	13	4	21	8	2	3	5	2	65
Oxford City Council	0	8	2	2	4	2	13	4	1	36
Oxfordshire County Council	22	0	3	21	2	9	0	2	0	59
Peak District NPA	0	0	1	0	0	0	0	2	0	3
Pendle Borough Council	0	6	0	0	2	1	1	5	0	15
Peterborough City Council	6	5	0	17	4	5	6	6	0	49
Plymouth City Council	13	17	6	15	15	14	4	17	1	102
Poole Borough Council	7	2	1	8	5	6	2	8	0	39
Portsmouth City Council	13	8	2	15	5	5	2	1	1	52
Preston City Council	0	6	1	0	2	1	3	8	2	23
Purbeck District Council	0	0	0	0	1	0	0	1	0	2
Reading Borough Council	8	7	3	12	3	13	9	4	1	60
Redbridge London Borough Council	23	23	7	23	6	28	18	32	3	163
Redcar and Cleveland Council	7	10	1	8	5	1	2	4	1	39
Redditch Borough Council	0	4	0	0	5	0	3	2	0	14
Reigate and Banstead Borough Council	0	5	0	0	2	1	1	12	0	21
Ribble Valley Borough Council	0	2	2	0	1	0	0	4	0	9
Richmond upon Thames London Borough Council	6	9	1	6	4	3	12	7	0	48
Richmondshire District Council	0	0	2	0	1	0	2	0	0	5

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Rochdale Metropolitan Borough Council	8	15	2	10	12	6	2	9	0	64
Rochford District Council	0	1	1	0	0	2	2	1	0	7
Rossendale Borough Council	0	4	0	0	3	0	0	2	0	9
Rother District Council	0	2	2	0	3	0	0	11	0	18
Rotherham Metropolitan Borough Council	6	4	3	17	3	3	4	1	2	43
Rugby Borough Council	0	1	0	0	1	0	0	5	0	7
Runnymede Borough Council	1	4	0	0	0	0	3	5	0	13
Rushcliffe Borough Council	0	4	0	0	0	0	0	3	0	7
Rushmoor Borough Council	1	2	0	0	3	0	2	1	0	9
Rutland County Council	1	2	3	3	0	0	0	1	0	10
Ryedale District Council	0	1	0	0	2	0	0	3	0	6
Salford City Council	13	26	5	17	12	7	3	6	1	90
Sandwich Metropolitan Borough Council	23	17	6	17	7	5	21	7	1	104
Scarborough Borough Council	1	3	5	0	10	4	3	7	0	33
Sedgemoor District Council	0	1	3	0	1	0	2	6	0	13
Sefton Metropolitan Borough Council	24	14	4	30	4	6	4	12	1	99
Selby District Council	0	4	0	0	3	1	7	8	0	23
Sevenoaks District Council	0	3	0	0	3	1	3	10	1	21
Sheffield City Council	32	24	12	34	23	40	25	8	1	199
Shepway District Council	0	5	3	0	1	3	5	4	0	21
Shropshire Council	22	7	4	8	8	4	3	26	1	83
Slough Borough Council	4	6	2	8	1	6	17	3	0	47
Solihull Metropolitan Borough Council	9	2	0	6	7	5	4	4	0	37
Somerset County Council	21	0	3	27	1	9	0	0	0	61
South Buckinghamshire District Council	0	2	0	0	1	0	0	7	0	10
South Cambridgeshire District Council	0	5	2	0	4	0	2	5	0	18
South Derbyshire District Council	0	1	0	0	2	0	1	6	0	10
South Downs NPA	0	0	0	0	0	1	0	1	0	2
South Gloucestershire Council	15	8	1	16	6	1	3	4	0	54
South Hams District Council	0	5	2	0	1	0	0	7	0	15

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
South Holland District Council	0	1	1	0	0	3	1	5	0	11
South Kesteven District Council	1	2	0	0	2	1	0	3	0	9
South Lakeland District Council	0	1	1	0	2	0	0	6	0	10
South Norfolk District Council	0	0	3	0	2	0	2	12	0	19
South Northamptonshire District Council	0	0	1	0	1	0	0	6	0	8
South Oxfordshire District Council	0	3	2	0	2	1	2	9	0	19
South Ribble Borough Council	0	2	3	1	2	0	0	2	1	11
South Somerset District Council	0	1	1	0	1	1	3	9	0	16
South Staffordshire District Council	0	2	0	0	2	0	0	6	1	11
South Tyneside Metropolitan Borough Council	10	1	4	14	4	5	8	4	1	51
Southampton City Council	10	7	7	18	12	5	5	3	0	67
Southend-on-Sea Borough Council	11	11	1	10	5	6	6	3	1	54
Southwark London Borough Council	9	30	5	16	15	14	72	12	3	176
Spelthorne Borough Council	0	1	0	0	1	1	4	5	0	12
St Albans City Council	0	6	2	0	4	3	1	11	0	27
St Edmundsbury Borough Council	0	1	0	0	0	0	2	7	0	10
St Helens Metropolitan Borough Council	9	2	2	4	9	4	0	6	0	36
Stafford Borough Council	0	0	2	0	4	0	0	17	1	24
Staffordshire County Council	38	0	3	39	4	14	1	3	1	103
Staffordshire Moorlands District Council	0	1	0	0	1	1	0	10	0	13
Stevenage Borough Council	0	4	1	0	0	1	8	2	2	18
Stockport Metropolitan Borough Council	17	11	6	18	5	5	5	11	0	78
Stockton-on-Tees Borough Council	2	3	2	15	7	3	2	5	0	39
Stoke-on-Trent City Council	12	20	3	20	13	8	5	5	1	87
Stratford-on-Avon District Council	0	1	0	0	1	0	1	6	0	9
Stroud District Council	0	2	0	0	0	0	5	9	0	16
Suffolk County Council	24	0	1	48	3	15	0	1	0	92
Suffolk Coastal District Council	0	1	0	0	0	1	3	5	0	10
Sunderland City Council	7	10	7	19	2	1	2	5	3	56
Surrey County Council	69	0	5	57	4	29	0	3	0	167

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Surrey Heath Borough Council	0	3	2	0	0	2	1	4	0	12
Sutton London Borough Council	8	8	2	14	3	4	11	13	0	63
Swale Borough Council	0	0	1	0	5	2	3	10	1	22
Swindon Borough Council	5	9	0	7	7	6	6	5	1	46
Tameside Metropolitan Borough Council	8	10	5	20	5	3	2	4	0	57
Tamworth Borough Council	0	2	2	0	2	0	6	1	0	13
Tandridge District Council	1	3	0	0	3	1	6	8	0	22
Taunton Deane Borough Council	0	0	2	0	0	0	1	14	0	17
Teignbridge District Council	0	2	0	0	6	0	6	9	0	23
Telford and Wrekin Borough Council	8	8	3	10	3	1	1	5	0	39
Tendring District Council	1	3	1	0	1	0	1	14	0	21
Test Valley Borough Council	0	0	0	0	0	1	0	4	0	5
Tewkesbury Borough Council	0	1	0	0	3	2	1	3	0	10
Thanet District Council	0	7	3	0	9	0	12	10	0	41
Three Rivers District Council	0	5	1	0	0	0	0	8	0	14
Thurrock Council	8	19	3	13	9	4	19	7	0	82
Tonbridge and Malling Borough Council	0	3	3	0	0	1	1	4	0	12
Torbay Council	7	6	9	14	9	11	2	9	1	68
Torridge District Council	0	0	1	0	2	3	2	11	2	21
Tower Hamlets London Borough Council	10	19	11	22	13	19	48	6	1	149
Trafford Metropolitan Borough Council	16	21	1	10	7	12	2	6	0	75
Transport for London	0	0	1	0	11	189	0	0	0	201
Tunbridge Wells Borough Council	0	4	0	0	0	3	3	11	0	21
Uttlesford District Council	0	2	0	0	1	0	1	7	0	11
Vale of White Horse District Council	0	8	1	0	1	1	1	9	0	21
Wakefield City Council	19	7	2	8	15	8	3	18	1	81
Walsall Metropolitan Borough Council	10	9	4	23	6	2	2	11	0	67
Waltham Forest London Borough Council	10	24	8	17	17	26	40	6	2	150
Wandsworth London Borough Council	9	22	4	13	5	5	26	13	2	99
Warrington Council	11	6	2	9	6	2	1	2	1	40

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Warwick District Council	0	6	2	0	5	2	1	4	0	20
Warwickshire County Council	33	0	1	23	2	8	0	0	0	67
Watford Borough Council	1	7	4	0	2	2	8	1	0	25
Waveney District Council	0	8	2	0	0	1	0	0	0	11
Waverley Borough Council	0	5	2	0	2	2	4	11	0	26
Wealden District Council	2	4	2	0	4	0	3	8	0	23
Wellingborough Borough Council	0	4	1	0	1	2	2	3	0	13
Welwyn Hatfield Borough Council	0	3	1	0	4	0	7	4	3	22
West Berkshire Council	4	3	2	14	1	2	2	5	0	33
West Devon Borough Council	0	1	0	0	1	0	1	3	0	6
West Dorset District Council	0	1	1	0	1	0	0	8	0	11
West Lancashire Borough Council	0	2	1	0	4	0	2	5	1	15
West Lindsey District Council	0	1	1	0	1	0	0	11	0	14
West Oxfordshire District Council	0	2	0	0	4	2	1	5	0	14
West Somerset District Council	0	1	1	0	1	0	1	2	0	6
West Sussex County Council	43	0	6	36	6	18	0	6	0	115
Westminster City Council	6	52	3	8	14	14	30	5	0	132
Weymouth and Portland Borough Council	0	0	0	0	6	0	0	2	0	8
Wigan Metropolitan Borough Council	9	16	10	14	10	5	4	9	0	77
Wiltshire Council	19	5	5	34	10	11	6	18	1	109
Winchester City Council	0	6	1	0	2	1	5	17	2	34
Royal Borough of Windsor and Maidenhead	14	3	2	14	4	7	0	9	1	54
Wirral Metropolitan Borough Council	17	13	3	21	10	7	2	14	1	88
Woking Borough Council	1	1	3	0	2	2	2	1	0	12
Wokingham Borough Council	3	2	4	15	2	2	1	10	0	39
Wolverhampton City Council	7	6	8	20	5	7	8	3	0	64
Worcester City Council	0	4	0	0	3	2	3	2	0	14
Worcestershire County Council	20	0	3	28	2	7	0	1	0	61
Worthing Borough Council	0	2	1	0	2	0	3	1	0	9
Wychavon District Council	0	5	1	0	1	0	0	13	0	20

Data sheets - complaints & enquiries received (by category) 2015-16

	Adult Social Care	Benefits & tax	Corporate & other services	Education & children's services	Environmental services, public protection & regulation	Highways & transport	Housing	Planning & development	Other	Total
Wycombe District Council	0	9	1	0	3	1	1	4	0	19
Wyre Borough Council	0	3	4	0	1	0	0	4	0	12
Wyre Forest District Council	0	1	0	0	2	2	1	1	1	8
York City Council	11	11	5	13	7	7	6	9	0	69
Yorkshire Dales NPA	0	0	0	0	0	0	0	2	0	2
Totals	2526	2550	960	3234	1699	2085	2232	2522	167	17975

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Adur District Council	0	0	5	3	1	0	0	9	0	0	100
Allerdale Borough Council	0	0	4	6	0	20	100	30	20	0	100
Amber Valley Borough Council	0	0	5	7	4	5	56	21	4	0	100
Arun District Council	0	1	5	8	1	2	67	17	0	1	100
Ashfield District Council	2	2	6	5	2	0	0	17	0	0	100
Ashford Borough Council	2	1	11	5	1	2	67	22	1	0	100
Aylesbury Vale District Council	0	2	7	8	4	4	50	25	1	2	100
Babergh District Council	1	2	7	6	3	3	50	22	2	0	100
Barking and Dagenham London Borough Council	6	7	66	45	16	7	30	147	6	1	100
Barnet London Borough Council	11	8	123	46	7	18	72	213	14	0	100
Barnsley Metropolitan Borough Council	4	2	28	10	8	6	43	58	5	0	100
Barrow Borough Council	0	0	5	0	4	1	20	10	1	0	100
Basildon Borough Council	1	0	19	9	2	2	50	33	2	0	100
Basingstoke and Deane Borough Council	1	0	6	12	1	3	75	23	2	0	100
Bassetlaw District Council	0	0	8	6	3	0	0	17	0	0	100
Bath and North East Somerset Council	4	0	11	9	9	9	50	42	6	0	100
Bedford Borough Council	3	0	12	10	9	2	18	36	0	1	100
Bexley London Borough Council	2	3	33	21	6	13	68	78	9	2	100
Birmingham City Council	22	30	264	104	36	71	66	527	60	5	100
Blaby District Council	0	0	4	7	0	2	100	13	1	0	100
Blackburn with Darwen Council	0	0	15	14	2	7	78	38	7	0	100
Blackpool Borough Council	4	0	18	12	9	7	44	50	6	1	100
Bolsover District Council	2	0	3	3	2	0	0	10	0	0	100
Bolton Metropolitan Borough Council	4	3	21	9	5	5	50	47	4	1	100
Boston Borough Council	0	0	2	5	2	0	0	9	0	0	100
Bournemouth Borough Council	2	2	32	17	10	10	50	73	8	1	100
Bracknell Forest Council	2	0	12	6	4	2	33	26	1	0	100
Braintree District Council	1	0	7	1	0	0	0	9	0	0	100
Breckland District Council	1	0	4	5	2	2	50	14	1	0	100
Brent London Borough Council	7	11	92	49	10	26	72	195	18	4	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Brentwood Borough Council	0	0	5	3	2	0	0	10	0	0	100
Brighton and Hove City Council	8	0	38	37	33	21	39	137	12	5	100
Bristol City Council	5	15	66	45	16	29	64	176	12	3	100
Broadland District Council	1	1	0	5	5	2	29	14	2	0	100
Broads Authority	0	0	0	2	0	0	0	2	0	0	100
Bromley London Borough Council	12	1	73	36	19	28	60	169	23	1	100
Bromsgrove District Council	0	0	4	4	2	6	75	16	5	1	100
Broxbourne Borough Council	1	0	3	5	6	3	33	18	2	0	100
Broxtowe Borough Council	2	1	5	4	3	0	0	15	0	0	100
Buckinghamshire County Council	6	1	18	25	5	5	50	60	5	0	100
Burnley Borough Council	0	2	4	5	2	0	0	13	0	0	100
Bury Metropolitan Borough Council	1	1	25	12	10	5	33	54	4	1	100
Calderdale Metropolitan Borough Council	3	0	28	23	11	12	52	77	11	0	100
Cambridge City Council	1	1	8	3	1	2	67	16	1	0	100
Cambridgeshire County Council	3	1	26	15	9	12	57	66	11	0	100
Camden London Borough Council	9	14	57	30	17	12	41	139	9	0	100
Cannock Chase District Council	1	1	5	3	1	1	50	12	1	0	100
Canterbury City Council	3	1	10	8	5	2	29	29	1	0	100
Carlisle City Council	0	0	3	3	3	0	0	9	0	0	100
Castle Point Borough Council	1	0	8	3	1	0	0	13	0	0	100
Central Bedfordshire Council	3	2	21	19	4	10	71	59	9	0	100
Charnwood Borough Council	1	1	7	2	2	1	33	14	0	0	100
Chelmsford City Council	1	2	11	2	1	0	0	17	0	0	100
Cheltenham Borough Council	0	1	1	2	1	1	50	6	0	0	100
Cherwell District Council	2	0	8	14	3	4	57	31	4	0	100
Cheshire East Council	7	2	41	34	25	20	44	129	16	3	100
Cheshire West and Chester Council	5	1	24	29	11	12	52	82	9	1	100
Chesterfield Borough Council	0	2	1	3	1	0	0	7	0	0	100
Chichester District Council	0	0	3	14	0	2	100	19	2	0	100
Chiltern District Council	1	0	5	4	0	0	0	10	0	0	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Chorley Borough Council	0	1	4	7	1	1	50	14	0	0	100
Christchurch Borough Council	1	0	4	2	2	0	0	9	0	0	100
City of Bradford Metropolitan District Council	6	2	44	36	16	12	43	116	7	0	100
City of London	0	0	3	5	0	0	0	8	0	0	100
Colchester Borough Council	2	3	12	4	1	1	50	23	0	0	100
Copeland Borough Council	0	0	3	3	2	0	0	8	0	0	100
Corby Borough Council	0	2	6	6	2	1	33	17	1	0	100
Cornwall Council	8	3	97	64	26	34	57	232	21	4	100
Cotswold District Council	0	0	4	1	2	1	33	8	1	0	100
Coventry City Council	5	3	51	28	11	11	50	109	8	1	100
Craven District Council	1	0	4	2	0	0	0	7	0	0	100
Crawley Borough Council	2	3	7	7	2	2	50	23	0	1	100
Croydon London Borough Council	10	10	110	41	20	21	51	212	21	0	100
Cumbria County Council	5	1	25	14	4	7	64	56	6	0	100
Dacorum Borough Council	2	1	15	3	5	2	29	28	0	0	100
Darlington Borough Council	1	1	5	8	5	12	71	32	9	2	100
Dartford Borough Council	2	0	9	5	3	1	25	20	1	0	100
Dartmoor NPA	1	0	0	0	0	0	0	1	0	0	100
Daventry District Council	0	0	8	5	2	0	0	15	0	0	100
Derby City Council	2	2	24	30	6	5	45	69	4	0	100
Derbyshire County Council	4	0	42	24	13	12	48	95	9	2	100
Derbyshire Dales District Council	1	0	5	2	0	1	100	9	0	0	100
Devon County Council	11	1	44	45	28	18	39	147	12	2	100
Doncaster Metropolitan Borough Council	2	4	37	17	13	10	43	83	7	0	100
Dorset County Council	1	0	20	16	6	5	45	48	4	0	100
Dover District Council	1	0	5	4	2	1	33	13	0	1	100
Dudley Metropolitan Borough Council	2	6	29	19	5	7	58	68	7	0	100
Durham County Council	10	3	48	74	33	25	43	193	16	2	100
Ealing London Borough Council	9	4	97	48	13	12	48	183	8	2	100
East Cambs District Council	0	0	2	5	1	2	67	10	1	0	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
East Devon District Council	1	0	6	7	8	8	50	30	6	1	100
East Dorset District Council	0	0	6	5	2	1	33	14	0	0	100
East Hampshire District Council	2	0	6	4	3	0	0	15	0	0	100
East Herts District Council	0	0	8	9	1	0	0	18	0	0	100
East Lindsey District Council	3	2	9	13	5	1	17	33	0	1	100
East Northamptonshire Council	1	1	5	3	3	1	25	14	0	0	100
East Riding of Yorkshire Council	2	1	30	18	15	10	40	76	5	1	100
East Staffordshire Borough Council	0	0	4	6	1	0	0	11	0	0	100
East Sussex County Council	9	0	32	30	22	28	56	121	26	1	100
Eastbourne Borough Council	3	0	13	3	1	5	83	25	3	2	100
Eastleigh Borough Council	0	0	4	4	5	1	17	14	1	0	100
Eden District Council	0	0	7	1	8	1	11	17	0	0	100
Elmbridge Borough Council	1	0	5	7	1	4	80	18	4	0	100
Enfield London Borough Council	7	5	76	38	8	25	76	159	19	2	100
Environment Agency	1	0	3	2	3	0	0	9	0	0	100
Epping Forest District Council	1	1	10	8	13	9	41	42	5	2	100
Epsom and Ewell Borough Council	0	0	2	8	2	4	67	16	2	1	100
Erewash Borough Council	1	1	4	3	1	3	75	13	2	0	100
Essex County Council	7	1	89	70	73	24	25	264	21	0	100
Exeter City Council	0	0	9	2	4	3	43	18	1	1	100
Exmoor NPA	0	0	0	0	0	0	0	0	0	0	100
Fareham Borough Council	1	0	5	1	1	0	0	8	0	0	100
Fenland District Council	2	1	14	8	2	2	50	29	2	0	100
Forest Heath District Council	1	0	1	2	0	3	100	7	2	0	100
Forest of Dean District Council	1	0	5	5	0	0	0	11	0	0	100
Fylde Borough Council	0	0	3	4	1	1	50	9	0	0	100
Gateshead Metropolitan Borough Council	2	6	22	17	5	2	29	54	2	0	100
Gedling Borough Council	0	1	4	4	1	0	0	10	0	0	100
Gloucester City Council	0	0	4	6	2	4	67	16	3	1	100
Gloucestershire County Council	4	0	25	16	16	5	24	66	5	0	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Gosport Borough Council	0	1	5	6	1	0	0	13	0	0	100
Gravesham Borough Council	2	3	8	7	3	0	0	23	0	0	100
Great Yarmouth Borough Council	1	0	8	7	0	0	0	16	0	0	100
Royal Borough of Greenwich	5	8	66	28	16	12	43	135	7	0	100
Guildford Borough Council	0	1	6	4	2	4	67	17	1	0	100
Hackney London Borough Council	6	6	52	31	11	12	52	118	10	0	100
Halton Borough Council	3	0	10	10	2	4	67	29	3	0	100
Hambleton District Council	0	0	5	3	1	0	0	9	0	0	100
Hammersmith and Fulham London Borough Council	5	10	41	42	8	12	60	118	7	0	100
Hampshire County Council	4	1	60	25	7	17	71	114	15	1	100
Harborough District Council	0	0	5	8	4	1	20	18	1	0	100
Haringey London Borough Council	10	14	89	55	14	32	70	214	28	2	100
Harlow District Council	0	3	9	6	2	1	33	21	1	0	100
Harrogate Borough Council	2	0	8	6	4	3	43	23	1	0	100
Harrow London Borough Council	5	1	63	34	17	16	48	136	13	0	100
Hart District Council	2	0	2	2	0	1	100	7	1	0	100
Hartlepool Borough Council	0	0	7	4	4	1	20	16	0	0	100
Hastings Borough Council	2	0	10	6	2	3	60	23	1	1	100
Havant Borough Council	1	0	7	4	1	0	0	13	0	0	100
Havering London Borough Council	4	5	44	21	9	14	61	97	9	1	100
Herefordshire Council	4	0	24	10	15	14	48	67	7	2	100
Hertfordshire County Council	5	1	66	29	24	17	41	142	14	2	100
Hertsmere Borough Council	0	0	8	3	5	3	38	19	0	0	100
High Peak Borough Council	0	0	4	4	2	2	50	12	1	1	100
Hillingdon London Borough Council	7	5	55	24	18	11	38	120	9	0	100
Hinckley and Bosworth Borough Council	0	0	5	3	3	0	0	11	0	0	100
Horsham District Council	0	0	6	7	2	3	60	18	3	0	100
Hounslow London Borough Council	7	4	86	40	12	29	71	178	21	2	100
Huntingdonshire District Council	0	0	8	11	1	1	50	21	0	0	100
Hyndburn Borough Council	1	0	4	2	0	1	100	8	1	0	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Ipswich Borough Council	0	1	3	3	1	0	0	8	0	0	100
Isle of Wight Council	0	0	25	11	5	14	74	55	11	1	100
Council of the Isles of Scilly	0	0	1	1	0	0	0	2	0	0	100
Islington London Borough Council	6	10	42	20	11	10	48	99	7	1	100
Royal Borough of Kensington and Chelsea	5	2	30	22	13	8	38	80	6	0	100
Kent County Council	3	1	74	44	28	34	55	184	30	1	100
Kettering Borough Council	0	0	3	4	2	2	50	11	1	1	100
King's Lynn and West Norfolk Borough Council	2	1	8	4	1	2	67	18	2	0	100
Kingston upon Hull City Council	3	4	41	24	3	8	73	83	6	0	100
Royal Borough of Kingston upon Thames	2	3	31	16	4	5	56	61	4	0	100
Kirklees Metropolitan Borough Council	4	2	34	27	7	13	65	87	9	0	100
Knowsley Metropolitan Borough Council	0	0	15	8	1	4	80	28	3	0	100
Lake District NPA	0	0	0	3	0	0	0	3	0	0	100
Lambeth London Borough Council	13	26	103	57	26	26	50	251	19	3	100
Lancashire County Council	5	0	65	36	15	33	69	154	29	1	100
Lancaster City Council	1	1	2	5	1	2	67	12	1	0	100
Leeds City Council	8	12	66	68	33	22	40	209	13	3	100
Leicester City Council	7	3	48	29	11	16	59	114	13	0	100
Leicestershire County Council	7	0	30	32	10	7	41	86	5	2	100
Lewes District Council	1	0	9	7	1	1	50	19	1	0	100
Lewisham London Borough Council	6	1	93	29	15	18	55	162	15	1	100
Lichfield District Council	2	0	4	2	2	0	0	10	0	0	100
Lincoln City Council	0	5	10	6	4	2	33	27	2	0	100
Lincolnshire County Council	6	1	38	14	13	9	41	81	8	0	100
Liverpool City Council	12	2	72	44	17	21	55	168	18	1	100
Luton Borough Council	2	1	27	28	10	5	33	73	5	0	100
Maidstone Borough Council	1	0	11	16	7	8	53	43	3	1	100
Maldon District Council	1	0	5	8	2	1	33	17	0	1	100
Malvern Hills District Council	0	0	2	5	0	1	100	8	1	0	100
Manchester City Council	7	5	64	42	13	28	68	159	21	1	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Manchester City Council	1	0	10	11	1	3	75	26	2	1	100
Medway Council	3	3	41	30	8	19	70	104	14	2	100
Melton Borough Council	0	0	1	0	0	0	0	1	0	0	100
Mendip District Council	1	0	11	4	4	13	76	33	2	0	100
Merton London Borough Council	2	2	28	25	11	11	50	79	7	3	100
Mid Devon District Council	0	2	2	4	3	0	0	11	0	0	100
Mid Suffolk District Council	1	1	6	1	2	4	67	15	1	2	100
Mid Sussex District Council	0	0	3	8	6	2	25	19	1	0	100
Middlesbrough Borough Council	3	0	16	11	4	6	60	40	5	0	100
Milton Keynes Council	2	5	21	20	6	9	60	63	9	0	100
Mole Valley District Council	1	1	4	6	1	0	0	13	0	0	100
New Forest District Council	0	0	5	14	2	2	50	23	1	0	100
New Forest NPA	0	1	1	3	2	1	33	8	1	0	100
Newark and Sherwood District Council	0	0	7	5	1	6	86	19	3	1	100
Newcastle City Council	4	5	33	13	10	2	17	67	2	0	100
Newcastle-under-Lyme Borough Council	0	0	18	10	5	2	29	35	2	0	100
Newham London Borough Council	15	13	108	69	16	27	63	248	20	1	100
Norfolk County Council	8	0	43	29	9	8	47	97	6	0	100
North Devon District Council	3	1	10	6	4	2	33	26	1	0	100
North Dorset District Council	0	0	4	3	2	2	50	11	0	1	100
North East Derbyshire District Council	1	0	7	6	2	0	0	16	0	0	100
North East Lincolnshire District Council	1	0	18	20	3	4	57	46	2	1	100
North Hertfordshire District Council	0	0	7	7	3	0	0	17	0	0	100
North Kesteven District Council	2	0	2	6	2	0	0	12	0	0	100
North Lincolnshire Council	3	0	18	5	3	3	50	32	3	0	100
North Norfolk District Council	1	0	5	4	2	1	33	13	0	1	100
North Somerset Council	3	1	32	14	7	15	68	72	12	0	100
North Tyneside Metropolitan Borough Council	2	2	22	20	8	5	38	59	3	1	100
North Warwickshire Borough Council	0	0	3	5	1	0	0	9	0	0	100
North West Leicestershire District Council	0	0	8	1	4	1	20	14	0	0	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
North York Moors NPA	0	0	2	1	0	0	0	3	0	0	100
North Yorkshire County Council	5	0	30	29	19	19	50	102	18	0	100
Northampton Borough Council	2	2	20	18	2	6	75	50	5	1	100
Northamptonshire County Council	4	1	52	23	10	17	63	107	17	0	100
Northumberland Council	2	1	36	23	14	11	44	87	9	1	100
Northumberland NPA	0	0	0	0	0	0	0	0	0	0	100
Norwich City Council	4	3	14	15	1	7	88	44	5	1	100
Nottingham City Council	9	3	40	33	14	13	48	112	9	1	100
Nottinghamshire County Council	8	0	33	31	9	10	53	91	9	1	100
Nuneaton and Bedworth Borough Council	2	1	1	4	0	2	100	10	2	0	100
Oadby and Wigston Borough Council	0	0	10	5	0	2	100	17	1	0	100
Oldham Metropolitan Borough Council	5	0	32	20	7	5	42	69	2	0	100
Oxford City Council	7	8	11	10	2	2	50	40	1	0	100
Oxfordshire County Council	2	1	18	19	8	7	47	55	4	0	100
Peak District NPA	0	0	1	2	0	1	100	4	1	0	100
Pendle Borough Council	0	0	5	7	2	2	50	16	1	0	100
Peterborough City Council	3	0	28	11	3	4	57	49	2	0	100
Plymouth City Council	4	1	46	26	12	19	61	108	16	0	100
Poole Borough Council	3	0	15	10	9	3	25	40	2	1	100
Portsmouth City Council	4	1	25	12	3	2	40	47	2	0	100
Preston City Council	2	0	7	5	4	2	33	20	1	0	100
Purbeck District Council	0	0	2	0	1	1	50	4	0	0	100
Reading Borough Council	7	1	22	12	10	5	33	57	3	1	100
Redbridge London Borough Council	5	2	70	54	18	13	42	162	10	0	100
Redcar and Cleveland Council	1	1	23	6	4	1	20	36	1	0	100
Redditch Borough Council	0	0	7	3	2	0	0	12	0	0	100
Reigate and Banstead Borough Council	0	0	11	4	3	4	57	22	1	0	100
Ribble Valley Borough Council	0	0	4	2	1	1	50	8	1	0	100
Richmond upon Thames London Borough Council	4	1	19	15	9	11	55	59	9	1	100
Richmondshire District Council	0	2	0	2	0	1	100	5	0	0	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Rochdale Metropolitan Borough Council	2	2	30	22	6	7	54	69	4	1	100
Rochford District Council	1	0	5	2	1	0	0	9	0	0	100
Rossendale Borough Council	0	0	7	1	3	2	40	13	1	0	100
Rother District Council	1	0	5	7	4	2	33	19	1	0	100
Rotherham Metropolitan Borough Council	4	2	19	10	8	9	53	52	9	0	100
Rugby Borough Council	0	0	0	4	2	2	50	8	1	0	100
Runnymede Borough Council	1	0	4	4	2	1	33	12	1	0	100
Rushcliffe Borough Council	0	0	5	0	0	1	100	6	1	0	100
Rushmoor Borough Council	0	0	7	0	0	0	0	7	0	0	100
Rutland County Council	1	0	1	6	1	0	0	9	0	0	100
Ryedale District Council	0	0	2	2	2	0	0	6	0	0	100
Salford City Council	4	3	45	22	7	6	46	87	5	0	100
Sandwell Metropolitan Borough Council	9	7	52	21	5	11	69	105	10	0	100
Scarborough Borough Council	5	2	10	8	4	0	0	29	0	0	100
Sedgemoor District Council	0	0	6	5	3	1	25	15	0	0	100
Sefton Metropolitan Borough Council	7	1	52	22	8	12	60	102	9	0	100
Selby District Council	0	0	8	8	3	2	40	21	2	0	100
Sevenoaks District Council	1	0	5	9	6	1	14	22	1	0	100
Sheffield City Council	8	10	72	63	24	21	47	198	19	2	100
Shepway District Council	1	2	6	6	6	0	0	21	0	0	100
Shropshire Council	5	3	29	18	15	15	50	85	10	0	100
Slough Borough Council	2	2	23	8	6	8	57	49	6	0	100
Solihull Metropolitan Borough Council	1	0	15	11	5	10	67	42	7	0	100
Somerset County Council	2	0	36	12	4	14	78	68	12	1	100
South Buckinghamshire District Council	0	1	4	3	2	1	33	11	0	0	100
South Cambridgeshire District Council	1	0	8	5	7	3	30	24	1	0	100
South Derbyshire District Council	1	1	2	4	1	0	0	9	0	0	100
South Downs NPA	0	0	0	1	0	1	100	2	1	0	100
South Gloucestershire Council	4	0	24	13	11	8	42	60	5	1	100
South Hams District Council	0	0	5	6	8	2	20	21	1	0	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
South Holland District Council	1	1	1	6	3	0	0	12	0	0	100
South Kesteven District Council	0	0	3	5	1	0	0	9	0	0	100
South Lakeland District Council	0	1	2	6	1	0	0	10	0	0	100
South Norfolk District Council	0	0	4	11	4	2	33	21	1	1	100
South Northamptonshire District Council	0	1	1	4	0	1	100	7	0	0	100
South Oxfordshire District Council	0	0	5	8	5	4	44	22	3	1	100
South Ribble Borough Council	2	0	4	3	0	0	0	9	0	0	100
South Somerset District Council	0	0	4	6	6	1	14	17	1	0	100
South Staffordshire District Council	1	0	4	0	2	7	78	14	4	0	100
South Tyneside Metropolitan Borough Council	2	1	18	11	12	6	33	50	4	0	100
Southampton City Council	3	2	34	14	5	7	58	65	6	1	100
Southern-on-Sea Borough Council	4	1	25	12	7	7	50	56	4	0	100
Southwark London Borough Council	9	21	69	42	13	22	63	176	19	1	100
Spelthorne Borough Council	0	0	7	4	0	1	100	12	0	0	100
St Albans City Council	0	0	15	4	3	4	57	26	2	1	100
St Edmundsbury Borough Council	0	0	4	3	2	1	33	10	0	0	100
St Helens Metropolitan Borough Council	0	0	11	13	6	4	40	34	2	1	100
Stafford Borough Council	1	0	3	8	3	3	50	18	1	1	100
Staffordshire County Council	5	1	48	25	12	15	56	106	13	0	100
Staffordshire Moorlands District Council	0	0	6	5	2	0	0	13	0	0	100
Stevenage Borough Council	1	4	6	2	1	3	75	17	0	0	100
Stockport Metropolitan Borough Council	4	0	38	20	6	4	40	72	3	0	100
Stockton-on-Tees Borough Council	5	0	12	8	8	12	60	45	6	3	100
Stoke-on-Trent City Council	7	2	36	26	6	12	67	89	7	2	100
Stratford-on-Avon District Council	0	0	4	3	4	0	0	11	0	0	100
Stroud District Council	1	2	3	5	8	0	0	19	0	0	100
Suffolk County Council	7	0	36	27	13	8	38	91	7	0	100
Suffolk Coastal District Council	0	0	2	6	3	0	0	11	0	0	100
Sunderland City Council	8	2	22	14	5	8	62	59	6	2	100
Surrey County Council	10	0	71	46	16	20	56	163	18	0	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Surrey Heath Borough Council	0	0	5	4	0	1	100	10	1	0	100
Sutton London Borough Council	5	4	24	19	6	7	54	65	5	0	100
Swale Borough Council	2	0	11	8	1	1	50	23	1	0	100
Swindon Borough Council	3	3	26	11	3	4	57	50	2	0	100
Tameside Metropolitan Borough Council	4	1	24	12	2	7	78	50	4	1	75
Tamworth Borough Council	0	2	5	3	2	2	50	14	0	1	100
Tandridge District Council	2	3	6	5	6	2	25	24	2	0	100
Taunton Deane Borough Council	0	1	9	1	2	1	33	14	0	0	100
Teignbridge District Council	0	0	13	2	3	2	40	20	2	0	100
Telford and Wrekin Borough Council	0	0	16	11	8	7	47	42	5	1	100
Tendring District Council	0	1	3	7	4	3	43	18	1	0	100
Test Valley Borough Council	0	0	2	4	1	0	0	7	0	0	100
Tewkesbury Borough Council	0	0	3	4	1	3	75	11	1	1	100
Thanet District Council	2	2	20	13	3	1	25	41	1	0	100
Three Rivers District Council	0	0	4	7	3	1	25	15	0	0	100
Thurrock Council	3	4	41	22	5	9	64	84	7	1	100
Tonbridge and Malling Borough Council	0	0	5	6	2	0	0	13	0	0	100
Torbay Council	6	1	21	20	12	10	45	70	9	0	100
Torridge District Council	2	0	6	7	5	3	38	23	3	0	100
Tower Hamlets London Borough Council	7	11	78	35	13	9	41	153	7	1	100
Trafford Metropolitan Borough Council	2	0	26	21	5	17	77	71	12	0	100
Transport for London	8	3	95	79	6	7	54	198	3	3	100
Tunbridge Wells Borough Council	0	1	8	6	2	2	50	19	2	0	100
Uttlesford District Council	0	0	6	3	3	1	25	13	1	0	100
Vale of White Horse District Council	0	0	13	5	1	2	67	21	1	0	100
Wakefield City Council	3	3	20	24	18	7	28	75	6	0	100
Walsall Metropolitan Borough Council	5	0	31	18	7	6	46	67	5	0	100
Waltham Forest London Borough Council	4	5	54	58	11	18	62	150	13	0	100
Wandsworth London Borough Council	7	6	39	26	8	26	76	112	10	1	100
Warrington Council	1	2	15	11	5	9	64	43	8	1	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Warwick District Council	2	2	7	6	3	1	25	21	1	0	100
Warwickshire County Council	3	1	23	22	6	4	40	59	4	0	100
Watford Borough Council	0	0	16	9	1	0	0	26	0	0	100
Waveney District Council	1	0	5	3	0	2	100	11	2	0	100
Waverley Borough Council	2	1	5	10	4	4	50	26	3	0	100
Wealden District Council	0	0	7	6	5	1	17	19	0	0	100
Wellingborough Borough Council	1	0	5	2	4	2	33	14	1	0	100
Welwyn Hatfield Borough Council	3	4	10	3	4	3	43	27	2	1	100
West Berkshire Council	2	0	13	9	5	5	50	34	4	0	100
West Devon Borough Council	0	0	3	0	0	4	100	7	4	0	100
West Dorset District Council	0	0	7	3	1	3	75	14	3	0	100
West Lancashire Borough Council	2	1	6	2	4	0	0	15	0	0	100
West Lindsey District Council	1	0	5	1	0	3	100	10	3	0	100
West Oxfordshire District Council	0	1	4	6	3	0	0	14	0	0	100
West Somerset District Council	0	0	2	0	0	2	100	4	2	0	100
West Sussex County Council	5	0	42	44	14	9	39	114	6	0	100
Westminster City Council	8	6	58	36	8	20	71	136	17	1	100
Weymouth and Portland Borough Council	0	0	3	3	2	0	0	8	0	0	100
Wigan Metropolitan Borough Council	3	2	33	28	7	12	63	85	8	2	100
Wiltshire Council	6	1	33	34	19	21	53	114	16	1	100
Winchester City Council	2	5	13	6	2	3	60	31	1	0	100
Royal Borough of Windsor and Maidenhead	4	0	28	14	7	4	36	57	3	0	100
Wirral Metropolitan Borough Council	8	1	27	25	14	21	60	96	18	0	100
Woking Borough Council	0	1	3	5	3	2	40	14	2	0	100
Wokingham Borough Council	2	1	13	8	6	10	63	40	7	0	100
Wolverhampton City Council	1	2	30	24	10	6	38	73	4	1	100
Worcester City Council	0	0	6	5	3	4	57	18	2	0	100
Worcestershire County Council	2	2	21	12	8	8	50	53	6	1	100
Worthing Borough Council	0	0	2	5	3	1	25	11	1	0	100
Wychavon District Council	0	0	7	6	3	2	40	18	2	0	100

Data sheets - complaints & enquiries decided (by outcome) 2015-16

	Invalid or incomplete	Advice given	Referred back for local resolution	Closed after initial enquiries	Not upheld	Upheld	Uphold rate (%)	Total	Complaints remedied by LGO	Complaints remedied by Authority	Compliance rate (%)
Wycombe District Council	0	0	8	5	3	5	63	21	2	2	100
Wyre Borough Council	0	0	5	5	2	0	0	12	0	0	100
Wyre Forest District Council	0	1	5	2	1	0	0	9	0	0	100
York City Council	2	4	14	26	9	13	59	68	12	0	100
Yorkshire Dales NPA	0	0	0	1	2	0	0	3	0	0	100
Totals	876	569	7406	4968	2162	2237	51	18218	1648	155	99.94

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Report of the Director of Finance to the meeting of Governance and Audit Committee to be held on 1 December 2016.

Subject:

Q

Annual Treasury Management Report 2015/2016.

Summary statement:

This report shows the Council's Treasury Management activities for the year ending 31 March 2016.

Stuart McKinnon- Evans
Director of Finance

Portfolio:
Leader

Report Contact: David Willis
Phone: (01274) 432361
E-mail: david.willis@bradford.gov.uk

Overview & Scrutiny Area:
Corporate



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Annual Treasury Management Report 2015/16

1. Introduction

This Council is required by regulations issued under the Local Government Act 2003 to produce an annual treasury management review of activities and the actual prudential and treasury indicators for 2015/16. This report meets the requirements of both the CIPFA Code of Practice on Treasury Management (the Code) and the CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code).

During 2015/16 the minimum reporting requirements were that the full Council should receive the following reports:

- an annual treasury strategy in advance of the year (Council 24/03/2015)
- a mid-year (minimum) treasury update report (Council 08/12/2015)
- an annual review following the end of the year describing the activity compared to the strategy (this report)

The regulatory environment places responsibility on members for the review and scrutiny of treasury management policy and activities. This report is, therefore, important in that respect, as it provides details of the outturn position for treasury activities and highlights compliance with the Council's policies previously approved by members.

This Council confirms that it has complied with the requirement under the Code to give prior scrutiny to all of the above treasury management reports by the Governance and Audit Committee before they were reported to the full Council.

2.1 The Economy and Interest Rates

Market expectations for the first increase in Bank Rate moved considerably during 2015/16, starting at quarter 3 2015 but soon moving back to quarter 1 2016. However, by the end of the year, market expectations had moved back radically to quarter 2 2018 due to many fears including concerns that China's economic growth could be heading towards a hard landing; the potential destabilisation of some emerging market countries particularly exposed to the Chinese economic slowdown, and the continuation of the collapse in oil prices during 2015 together with continuing Eurozone growth uncertainties.

These concerns have caused sharp market volatility in equity prices during the year with corresponding impacts on bond prices and bond yields due to safe haven flows. Bank Rate, therefore, remained unchanged at 0.5% for the seventh successive year. Economic growth (Gross Domestic Product) in 2015/16 has been disappointing with growth falling steadily from an annual rate of 2.9% in quarter 1 2015 to 2.1% in quarter 4.

The sharp volatility in equity markets during the year was reflected in sharp volatility in bond yields. However, the overall dominant trend in bond yields since

July 2015 has been for yields to fall to historically low levels as forecasts for inflation have repeatedly been revised downwards and expectations of increases in central rates have been pushed back. In addition, a notable trend in the year was that several central banks introduced negative interest rates as a measure to stimulate the creation of credit and hence economic growth.

The European Central Bank commenced a full blown quantitative easing programme of purchases of Eurozone government and other bonds starting in March at €60bn per month. This put downward pressure on Eurozone bond yields. There was a further increase in this programme of QE in December 2015.

As for America, the economy has continued to grow healthily on the back of resilient consumer demand. The first increase in the central rate occurred in December 2015 since when there has been a return to caution as to the speed of further increases due to concerns around the risks to world growth.

The UK elected a majority Conservative Government in May 2015, removing one potential concern but introducing another due to the promise of a referendum on the UK remaining part of the EU. The government maintained its tight fiscal policy stance but the more recent downturn in expectations for economic growth has made it more difficult to return the public sector net borrowing to a balanced annual position within the period of this parliament.

2.2 Overall Treasury Position as at 31 March 2016

At the beginning and the end of 2015/16 the Council's treasury (including borrowing by Public Finance Initiative and finance leases) position was as follows:

TABLE 1	31 March 2015 Principal	31 st March 2016
Total debt	£391m	£336m
PFI & other Finance Leases	204m	£196m
Total Debt	595m	£532m
CFR	£679m	£666m
Over / (under) borrowing	(£84m)	(£134m)
Total investments	£112.3m	£43m
Net debt	£482.7m	£489m

2.3 The Strategy for 2015/16

The expectation for interest rates within the treasury management strategy for 2015/16 anticipated a low but rising Bank Rate, (starting in quarter 1 of 2016), and gradual rises in medium and longer term fixed borrowing rates during 2016/17. Variable, or short-term rates, were expected to be the cheaper form of borrowing over the period. Continued uncertainty in the aftermath of the 2008 financial crisis promoted a cautious approach, whereby investments would continue to be dominated by low counterparty risk considerations, resulting in relatively low returns compared to borrowing rates.

In this scenario, the treasury strategy was to postpone borrowing to avoid the cost of holding higher levels of investments and to reduce counterparty risk.

The sharp volatility in equity markets during the year was reflected in sharp volatility in bond yields. However, the overall dominant trend in bond yields since July 2015 has been for yields to fall to historically low levels as forecasts for inflation have repeatedly been revised downwards and expectations of increases in central rates have been pushed back.

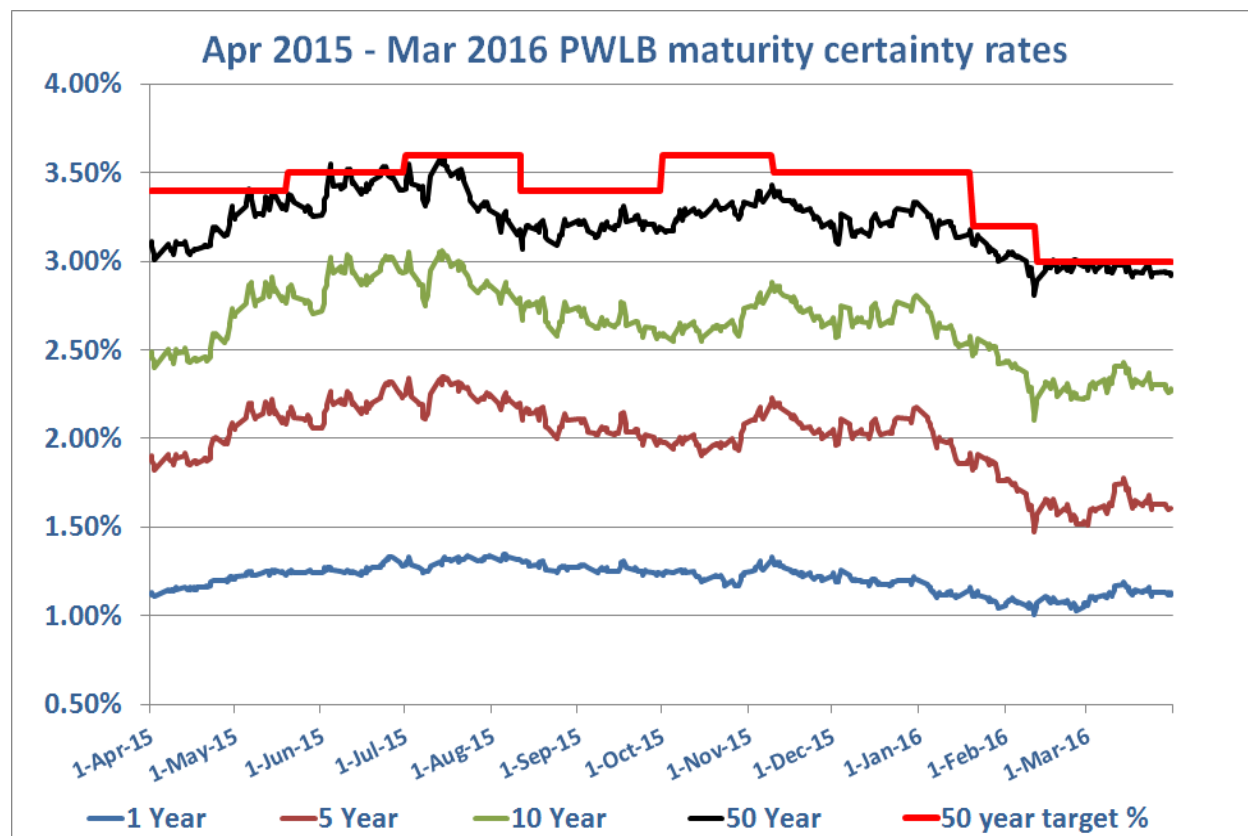
2.4 The Borrowing Requirement and Debt

The Council's underlying need to borrow to finance capital expenditure is termed the Capital Financing Requirement (CFR). The CFR represents the sum of historic borrowing required to fund the Council's capital investment less any provision made for the repayment of that debt through the Minimum Revenue Provision (MRP). This does not necessarily equate to external borrowing as the Council can use its own cash balances to fund its borrowing requirements. Where this occurs it is sometimes referred to as being "under borrowed" as if those cash balances are exhausted the Council would need to go out and borrow externally.

	31 March 2015 Actual	31 March 2016 Budget	31 March 2016 Actual
Capital Financing Requirement	£679m	£696m	£666m

2.5 Borrowing Rates in 2015/16

Public Works Loan Board certainty maturity borrowing rates - the graph below shows how PWLB certainty rates have fallen to historically very low levels during the year. The PWLB is the main source of borrowing for the council.



2.6 Borrowing Outturn for 2015/16

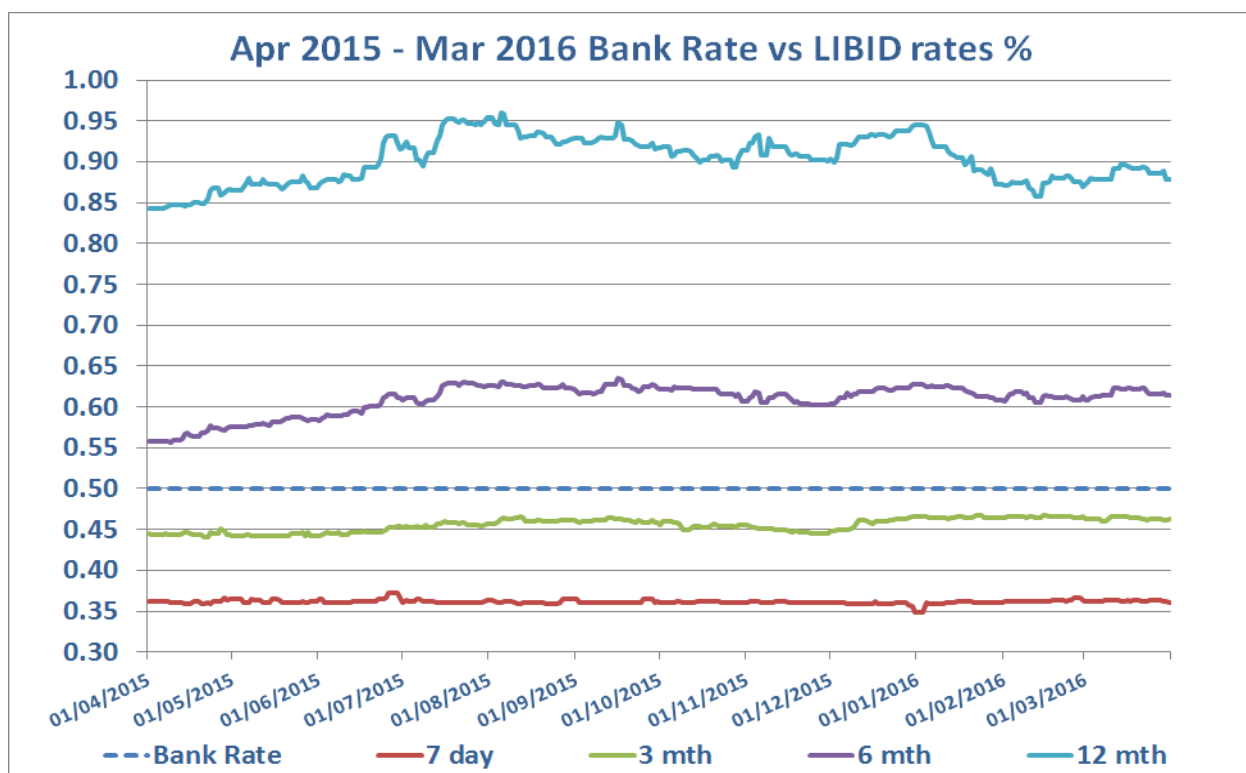
Due to investment concerns, both counterparty risk and low investment returns, no borrowing was undertaken during the year.

No rescheduling was done during the year as the average 1% differential between PWLB new borrowing rates and premature repayment rates made rescheduling unviable.

Repayments

On the 27/04/15 the Council repaid £53.6m of debt which matured on that date. This reduced the debt balance from £384m to £330.4m.

2.7 Investment Rates in 2015/16



Bank Rate remained at its historic low of 0.5% throughout the year; it has now remained unchanged for seven years. Market expectations as to the timing of the start of monetary tightening started the year at quarter 1 2016 but then moved back to around quarter 2 2018 by the end of the year. Deposit rates remained depressed during the whole of the year, primarily due to the effects of the Funding for Lending Scheme and due to the continuing weak expectations as to when Bank Rate would start rising.

2.8 Investment Outturn for 2015/16

Investment Policy – the Council's investment policy is governed by CLG guidance, which has been implemented in the annual investment strategy approved by the Council on 12th October 2010. This policy sets out the approach for choosing investment counterparties, and is based on credit ratings provided by the three main credit rating agencies, supplemented by additional market data (such as rating outlooks, credit default swaps, bank share prices etc)

The centrally held investments complied with the approved strategy, but the schools balances with Barclays and Lloyds were above the Treasury counterparty limits.

Investments held by the Council - the Council maintained an average balance of £94.2m of internally managed funds. The internally managed funds earned an average rate of return of 0.62%. The comparable performance indicator is the average 7-day LIBID rate which was 0.36%.

2.9 Other Issues

None

3. Other considerations

None

4. Financial and Resources Appraisal

The financial implications are set out in section 2 of this report

5. Risk Management and Governance Issues

None

6. Legal Appraisal

Any relevant legal considerations are set out in the report

7. Other Implications

- 7.1 Equal Rights implications – no direct implications
- 7.2 Sustainability implications – no direct implications
- 7.3 Green house Gas Emissions Impact – no direct implications
- 7.4 Community safety implications – no direct implications
- 7.5 Human Rights Act – no direct implications
- 7.6 Trade Unions – no direct implications
- 7.7 Ward Implications – no direct implications

8. Not for publications documents – none

9 Recommendations

9.1. That the report be noted and referred to Council for adoption.

10. Appendices

- 1. Prudential Indicators
- 2. Treasury Management Indicators

11. Background Documents

Treasury Management Practices
Treasury Management Schedules

Appendix 1: Prudential and treasury indicators

1. PRUDENTIAL INDICATORS	2014/15	2015/16	2015/16
Extract from budget and rent setting report	actual	original	actual
	£m	£m	£m
Capital Expenditure	£114m	£86m	£70m
Ratio of financing costs to net revenue stream	15.5%	15.4%	14.4%
Gross borrowing requirement General Fund	£391m	£349m	£336m
CFR	£679m	£696m	£666m
Incremental impact of capital investment decisions	£ p	£ p	£ p
Increase in council tax (band D) per annum	£0.00	0.00	0.00

2. TREASURY MANAGEMENT INDICATORS	2014/15	2015/16	2015/16
	actual	original	actual
	£m	£m	£m
Authorised Limit for external debt -			
borrowing	£391m	£420m	£336m
other long term liabilities	£204m	£240m	£196m
TOTAL	£595m	£660m	£532m
Operational Boundary for external debt -			
borrowing	£391m	£380m	£336m
other long term liabilities	£204m	£220m	£196m
TOTAL	£595m	£600m	£532m
Upper limit for fixed interest rate exposure	+175 %	+175 %	+175%
Upper limit for variable rate exposure			
Upper limit for variable rate exposure	+20 %	+20%	+20%
Upper limit for total principal sums invested for over 364 days			
(per maturity date)	£40m	£40m	£40m

Maturity structure of fixed rate borrowing during 2015/16	upper limit	lower limit
under 12 months	20%	0%
12 months and within 24 months	20%	0%
24 months and within 5 years	50%	0%
5 years and within 10 years	50%	0%
10 years and above	90%	20%

Report of the Director of Finance to the meeting of Governance and Audit Committee to be held on 1 December 2016.

Subject:

R

Treasury Management Mid Year Review up to 30 September 2016.

Summary statement:

This report shows the Council's Treasury Mid Year Review up to 30 September 2016.

Stuart McKinnon- Evans
Director of Finance

Portfolio:
Leader

Report Contact: David Willis
Phone: (01274) 432361
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Overview & Scrutiny Area:
Corporate



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Treasury Management Review up to 30 September 2016

1.1 Background

The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties, providing adequate liquidity initially before considering investment return.

The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer term cash flow planning to ensure the Council can meet its capital spending operations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses. On occasion any debt previously drawn may be restructured to meet Council risk or cost objectives.

Accordingly, treasury management is defined as:

“The management of the local authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”

1.2 Introduction

The Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management (revised 2011) was adopted by this Council

The primary requirements of the Code are as follows:

1. Creation and maintenance of a Treasury Management Policy Statement which sets out the policies and objectives of the Council's treasury management activities.
2. Creation and maintenance of Treasury Management Practices which set out the manner in which the Council will seek to achieve those policies and objectives.
3. Receipt by the full council of an annual Treasury Management Strategy Statement - including the Annual Investment Strategy and Minimum Revenue Provision Policy - for the year ahead, a Mid-year Review Report and an Annual Report covering activities during the previous year.
4. Delegation by the Council of responsibilities for implementing and monitoring treasury management policies and practices and for the execution and administration of treasury management decisions.

5. Delegation by the Council of the role of scrutiny of treasury management strategy and policies to a specific named body. For this Council the delegated body is Governance and Audit Committee:

This mid-year report has been prepared in compliance with CIPFA's Code of Practice on Treasury Management, and covers the following:

- An economic update for the first part of the 2016/17 financial year;
- A review of the Treasury Management Strategy Statement and Annual Investment Strategy;
- The Council's capital expenditure (prudential indicators);
- A review of the Council's borrowing strategy for 2016/17;
- A review of any debt rescheduling undertaken during 2016/17;
- A review of the Council's investment portfolio, Treasury and Prudential Limits for 2016/17;
- Treasury Policies /Issues

2 Economics and interest rates

2.1 Economics update

UK Gross Domestic Product (GDP) growth rates in 2013 of 2.2% and 2.9% in 2014 were strong but 2015 was disappointing at 1.8%, though it still remained one of the leading rates among the G7 countries. Growth improved in quarter 4 of 2015 from +0.4% to 0.7% but fell back to +0.4% (2.0% y/y) in quarter 1 of 2016 before bouncing back again to +0.7% (2.1% y/y) in quarter 2. During most of 2015, the economy had faced headwinds for exporters from the appreciation during the year of sterling against the Euro, and weak growth in the European Union, China and emerging markets, plus the dampening effect of the Government's continuing austerity programme. The referendum vote for Brexit in June this year delivered an immediate fall in confidence indicators and business surveys, pointing to an impending sharp slowdown in the economy. However, subsequent surveys have shown a sharp recovery in confidence and business surveys, though it is generally expected that although the economy will now avoid flat lining, growth will be weak through the second half of 2016 and in 2017.

The Bank of England meeting on August 4th addressed this expected slowdown in growth by a package of measures including a cut in Bank Rate from 0.50% to 0.25%. The Inflation Report included an unchanged forecast for growth for 2016 of 2.0% but cut the forecast for 2017 from 2.3% to just 0.8%. The Governor of the Bank of England, Mark Carney, had warned that a vote for Brexit would be likely to cause a slowing in growth, particularly from a reduction in business investment, due to the uncertainty of whether the UK would have continuing full access, (i.e. without tariffs), to the EU single market. He also warned that the Bank could not do all the heavy lifting and suggested that the Government will need to help growth by increasing investment expenditure and possibly by using fiscal policy tools (taxation). The new Chancellor Phillip Hammond announced after the referendum result, that the target of achieving a budget surplus in 2020 will be eased in the Autumn Statement on November 23.

The Inflation Report also included a sharp rise in the forecast for inflation to around 2.4% in 2018 and 2019. The Consumer Price Index has started rising during 2016 as the falls in the price of oil and food twelve months ago fell out of the calculation during the year and, in addition, the post referendum 10% fall in the value of sterling on a trade weighted basis is likely to result in a 3% increase in CPI over a time period of 3-4 years. However, the Monetary Policy Committee (MPC) is expected to look thorough a one off upward blip from this devaluation of sterling in order to support economic growth, especially if pay increases continue to remain subdued and therefore pose little danger of stoking core inflationary price pressures within the UK economy.

The American economy had a patchy 2015 with sharp swings in the growth rate leaving the overall growth for the year at 2.4%. Quarter 1 of 2016 disappointed at +0.8% on an annualised basis while quarter 2 improved, but only to a lacklustre +1.4%. However, forward indicators are pointing towards a pickup in growth in the rest of 2016. The Federal Reserve embarked on its long anticipated first increase in rates at its December 2015 meeting. At that point, confidence was high that there would then be four more increases to come in 2016. Since then, more downbeat news on the international scene and then the Brexit vote, have

caused a delay in the timing of the second increase which is now strongly expected in December this year.

In the Eurozone, the European Central Bank (ECB) commenced in March 2015 its massive €1.1 trillion programme of quantitative easing to buy high credit quality government and other debt of selected Euro Zone countries at a rate of €60bn per month; this was intended to run initially to September 2016 but was extended to March 2017 at its December 2015 meeting. At its December and March meetings it progressively cut its deposit facility rate to reach -0.4% and its main refinancing rate from 0.05% to zero. At its March meeting, it also increased its monthly asset purchases to €80bn. These measures have struggled to make a significant impact in boosting economic growth and in helping inflation to rise from around zero towards the target of 2%. GDP growth rose by 0.6% in quarter 1 2016 (1.7% y/y) but slowed to +0.3% (+1.6% y/y) in quarter 2. This has added to comments from many forecasters that central banks around the world are running out of ammunition to stimulate economic growth and to boost inflation. They stress that national governments will need to do more by way of structural reforms, fiscal measures and direct investment expenditure to support demand in their economies and economic growth.

Japan is still bogged down in anaemic growth and making little progress on fundamental reform of the economy while Chinese economic growth has been weakening and medium term risks have been increasing.

2.2 Interest rate forecasts

The Council's treasury advisor, Capita Asset Services, has provided the following forecast:

	Dec-16	Mar-17	Jun-17	Sep-17	Dec-17	Mar-18	Jun-18	Sep-18	Dec-18	Mar-19	Jun-19
Bank rate	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.25%	0.25%	0.25%	0.25%	0.50%
5yr PWLB rate	1.00%	1.00%	1.10%	1.10%	1.10%	1.10%	1.20%	1.20%	1.20%	1.20%	1.30%
10yr PWLB rate	1.50%	1.50%	1.60%	1.60%	1.60%	1.60%	1.70%	1.70%	1.70%	1.70%	1.80%
25yr PWLB rate	2.30%	2.30%	2.40%	2.40%	2.40%	2.40%	2.50%	2.50%	2.50%	2.50%	2.60%
50yr PWLB rate	2.10%	2.10%	2.20%	2.20%	2.20%	2.20%	2.30%	2.30%	2.30%	2.30%	2.40%

Capita Asset Services undertook a quarterly review of its interest rate forecasts after the MPC meeting of 4th August cut Bank Rate to 0.25% and gave forward guidance that it expected to cut Bank Rate again to near zero before the year end. The above forecast therefore includes a further cut to 0.10% in November this year and a first increase in May 2018, to 0.25%, but no further increase to 0.50% until a year later. Mark Carney, has repeatedly stated that increases in Bank Rate will be slow and gradual after they do start. The MPC is concerned about the impact of increases on many heavily indebted consumers, especially when the growth in average disposable income is still weak and could well turn

negative when inflation rises during the next two years to exceed average pay increases.

The overall longer run trend is for gilt yields and Public Work Loan Board (PWLB) rates to rise, albeit gently (please see paragraph 2.7). An eventual world economic recovery may also see investors switching from the safe haven of bonds to equities. However, we have been experiencing exceptional levels of volatility in financial markets which have caused significant swings in PWLB rates. Our PWLB rate forecasts are based on the Certainty Rate (minus 20 bps) which has been accessible to most authorities since 1st November 2012.

The overall balance of risks to economic recovery in the UK remains to the downside. Downside risks to current forecasts for UK gilt yields and PWLB rates currently include:

- Monetary policy action reaching its limit of effectiveness and failing to stimulate significant sustainable growth, combat the threat of deflation and reduce high levels of debt in some major developed economies, combined with a lack of adequate action from national governments to promote growth through structural reforms, fiscal policy and investment expenditure.
- Weak capitalisation of some European banks.
- A resurgence of the Eurozone sovereign debt crisis.
- Geopolitical risks in Europe, the Middle East and Asia, increasing safe haven flows.
- Emerging country economies, currencies and corporates destabilised by falling commodity prices and/ or Fed rate increases, causing a further flight to safe havens (bonds).
- UK economic growth and increases in inflation are weaker than we currently anticipate.
- Weak growth or recession in the UK's main trading partners - the EU and US.

The potential for upside risks to current forecasts for UK gilt yields and PWLB rates, especially for longer term PWLB rates include: -

- The pace and timing of increases in the Fed. funds rate causing a fundamental reassessment by investors of the relative risks of holding bonds as opposed to equities and leading to a major flight from bonds to equities.
- UK inflation returning to significantly higher levels than in the wider EU and US, causing an increase in the inflation premium inherent to gilt yields.
- US election.

2.3 Treasury Management Strategy Statement and Annual Investment Strategy update

The Treasury Management Strategy Statement (TMSS) for 2016/17 was approved by this Council on 22nd March. There are no policy changes to the

TMSS; the details in this report update the position in the light of the updated economic position and budgetary changes already approved.

2.4 The Council's Capital Position (Prudential Indicators)

This part of the report is structured to update:

- The Council's capital expenditure plans;
- Limits to Borrowing Activity,
- Borrowing
- Compliance with the limits in place for borrowing activity.

2.4.1 Prudential Indicator for Capital Expenditure

This table shows the revised estimates for capital expenditure and the changes since the capital programme was agreed at the Budget.

Capital Expenditure by Service	2016/17 Original Estimate £m	Current Position £m	2016/17 Revised Estimate £m
Total Capital Expenditure	133	23.4	100.8

2.4.2 Limits to Borrowing Activity

The first key control over the treasury activity is a prudential indicator to ensure that over the medium term, net borrowing (borrowings less investments) will only be for a capital purpose. Gross external borrowing should not, except in the short term, exceed the total of Capital Finance Requirement (CFR) in the preceding year plus the estimates of any additional CFR for 2016/17 and next two financial years. This allows some flexibility for limited early borrowing for future years.

The Director of Finance reports that no difficulties are envisaged for the current or future years in complying with this prudential indicator.

Below is the Authorised Limit which represents the limit beyond which borrowing is prohibited, and needs to be set and revised by members. It reflects the level of borrowing which, while not desired, could be afforded in the short term, but is not sustainable in the longer term. It is the expected maximum borrowing need with some headroom for unexpected movements. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003.

Authorised limit for external debt	2016/17 Original Indicator	Current Position
Borrowing	£400m	£336m
Other long term liabilities	£240m	£202m
Total	£640m	£538m

Given the current historically low interest rates, the reduction in the Council's cash balance and the need to finance the commitments in the capital investment plan it is expected that the Council will need to consider additional borrowing before the end of this financial year.

2.4.3 Borrowing

The Council's capital financing requirement (CFR) for 2016/17 is expected to be below the original forecast of £719m, due to slippage in a number of capital schemes. . The CFR denotes the Council's underlying need to borrow for capital purposes. If the CFR is positive the Council may borrow from the PWLB or the market (external borrowing) or from internal balances on a temporary basis (internal borrowing). The balance of external and internal borrowing is generally driven by market conditions. The Council has borrowings of £336m and last year utilised £53m of cash flow funds in lieu of borrowing. This is a prudent and cost effective approach in the current economic climate but will require ongoing monitoring in the event that upside risk to gilt yields prevails.

It is anticipated that further borrowing be undertaken during this financial year to refinance the loans totally £26m maturing in March 2017.

The graph and table below show the movement in PWLB certainty rates for the first six months of the year to date:

PWLB certainty rates 1 April 2016 to 30 September 2016

	1 Year	5 Year	10 Year	25 Year	50 Year
01/04/16	1.13%	1.62%	2.31%	3.14%	2.95%
30/09/16	0.93%	1.06%	1.58%	2.36%	2.19%
Low	0.78%	0.95%	1.42%	2.08%	1.89%
Date	26.09.2016	10.08.2016	10.08.2016	12.08.2016	12.08.2016
High	1.20%	1.80%	2.51%	3.28%	3.08%
Date	27.04.2016	27.04.2016	27.04.2016	27.04.2016	27.04.2016

2.4.4 Debt Rescheduling

Debt rescheduling opportunities have been very limited in the current economic climate given the consequent structure of interest rates, and following the increase in the margin added to gilt yields which has impacted PWLB new borrowing rates since October 2010. No debt rescheduling has therefore been undertaken to date in the current financial year.

2.5 Investment Portfolio, Treasury and Prudential Limits 2016/17

In accordance with the Code, it is the Council's priority to ensure security of capital and liquidity, and to obtain an appropriate level of return which is consistent with the Council's risk appetite. It is a very difficult investment market in terms of earning the level of interest rates commonly seen in previous decades as rates are very low and in line with the current 0.25% Bank Rate. The continuing potential for a re-emergence of a Eurozone sovereign debt crisis, and its impact on banks, prompts a low risk and short term strategy. Given this risk environment, investment returns are likely to remain low.

The Council held £41m of investments as at 30th September 2016 (£43m at 31 March 2016) and the investment portfolio yield for the first 6 months of the year is 0.53% against a benchmark of 0.28 %.

The Director of Finance confirms that the approved limits within the Annual Investment Strategy and prudential limits were not breached in 2016/17. Apart from on the cash investments, where school individual balances for both Lloyds and Barclays were over the set limits.

2.6 Treasury Policies /Issues

2.6.1 Following the closure of the cash offices in 2013, the Council put in place arrangements for residents to pay their Council Tax and other bills through a network of high street retailers and post offices. The only bank approved at the time to offer the necessary cash handling service to support the new arrangement was the Co-op Bank.

Arrangement have now been made to change over the running of this service to Barclays Bank with an expected start date of the middle of January. While this will cause the Treasury limits for Barclays to be breached due to the schools balances held with this bank (please see below). Balances will be kept to a minimum and cleared into the Council main account on a daily basis. It should also be noted that Barclays is a significantly better credit rated bank than the Co-op Bank.

2.6.2 In a previous Treasury report the investment limits for the 4 main UK banks were reduced to the same credit criteria as the other banks/building societies within the policy. This resulted in the Lloyds investment limit reducing to £20m and Barclays to £7m.

This raised the following issue

Bradford schools- The schools have their own individual bank balances with the four main UK banks .At 31/03/16 their overall bank balances with Lloyds was £24.7m and Barclays £8.8m, both exceeding the Treasury Policy investment limits.

Schools changing to Academies

In around the next 18 months most of the Primary and Secondary schools are expected to convert to academies (18 have already converted since April).Once converted to academies their bank balances no longer count towards the Council's Treasury limits.

2.6.3 With the above change in status for the schools and the use of Barclays for cash handling the following alteration to the Council Treasury policy are proposed.

i) That school balances have a temporary exception from the Treasury Policy until the main academy conversion process has been finished.

ii) If Barclays credit rating fall in the future resulting in the bank being outside the Treasury policy. The council can continue to use Barclays for the cash handling service, as long as balances are cleared to the council main bank account on a daily basis.

2.7 Addition to report 14/11/16.

On Wednesday the 9/11/16 the headlines were dominated by news that Donald Trump was the new presidential elect, defying expectations and spurring an initial volatility in financial markets. At first the reaction was for capital to move into safer investments, as many market participants unwound positions based on a Clinton victory. Bonds were then sold off as analyst predicted that Trump's spending on infrastructure would place upward pressure on inflation, but equities rallied, led by sharp rises in pharmaceuticals, miners and defence stocks. While Donald Trump tame post-election speech seemed to calm global markets, participants will be watching closely to see whether he delivers on his campaign promises or whether they are simply pre-election rhetoric. Part of the process will include a close study of the team that he selects between now and his inauguration in January. Markets will continue to monitor any announcement by Donald Trump, as investors look for clarity of his future policy proposals.

The Donald Trump election has also brought into focus other election/referendum taking place in the next year including in Italy, France and Germany. The results from these could have the potential to change the landscape in Europe. This adds another layer of uncertainty going forward.

The PWLB rates (rates the council borrow at) have been increasing and this raises the issue of when the Council needs to borrow. It also means that forecast going forward for borrowing need to be reassessed as rates may go higher quicker than originally expected.

3. Other considerations

None

4. Financial and Resources Appraisal

The financial implications are set out in section 2 of this report

5. Risk Management and Governance Issues

None

6. Legal Appraisal

Any relevant legal considerations are set out in the report

7. Other Implications

- 7.1 Equal Rights implications – no direct implications
- 7.2 Sustainability implications – no direct implications
- 7.3 Green house Gas Emissions Impact – no direct implications
- 7.4 Community safety implications – no direct implications
- 7.5 Human Rights Act – no direct implications
- 7.6 Trade Unions – no direct implications
- 7.7 Ward Implications – no direct implications

8. Not for publications documents – none

9 Recommendations

9.1. That the changes to the Treasury policy set out in section 2.6.3 be noted by the Governance and Audit Committee and referred to Council for adoption.

10. Background Documents

Treasury Management Schedules

Treasury Management Schedules

Treasury Policy

Report of the External Auditor to the meeting of Governance and Audit Committee to be held on 1 December 2016.

Subject: **S**

The annual audit letter for the 2015/16 audits of City of Bradford Metropolitan District Council and West Yorkshire Pension Fund

Summary statement:

The annual audit letter summarises the key findings from our audits for 2015/16.

Mark Kirkham
Partner
Mazars LLP

Report Contact: Steve Appleton
Phone: (01274) 432392
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1. SUMMARY

The annual audit letter summarises the key issues arising from the audits of City of Bradford MDC and West Yorkshire Pension Fund for 2015/16 which have been reported previously to the Committee during the year.

The letter confirms that we gave unqualified audit opinions on the financial statements and the value for money conclusion.

The letter also summarises the key issues detailed in our Audit Completion Reports which we presented to the Committee on 29 September 2016.

2. BACKGROUND

Not applicable.

3. OTHER CONSIDERATIONS

None.

4. OPTIONS

Not applicable.

5. FINANCIAL & RESOURCE APPRAISAL

Not applicable.

6. RISK MANAGEMENT AND GOVERNANCE ISSUES

None.

7. LEGAL APPRAISAL

Not applicable.

8. OTHER IMPLICATIONS

8.1 EQUALITY & DIVERSITY

Not applicable.

8.2 SUSTAINABILITY IMPLICATIONS

Not applicable.

8.3 GREENHOUSE GAS EMISSIONS IMPACTS

Not applicable.

8.4 COMMUNITY SAFETY IMPLICATIONS

Not applicable.

8.5 HUMAN RIGHTS ACT

Not applicable.

8.6 TRADE UNION

Not applicable.

8.7 WARD IMPLICATIONS

Not applicable.

9. NOT FOR PUBLICATION DOCUMENTS

None.

10. RECOMMENDATION

That the Governance and Audit Committee considers the annual audit letter.

11. APPENDICES

Annual audit letter

12. BACKGROUND DOCUMENTS

None.

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Annual Audit Letter 2015/16

**City of Bradford Metropolitan District Council including
West Yorkshire Pension Fund**

October 2016

Mazars LLP
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Gildersome
Leeds
LS27 7JN

Members
City of Bradford Metropolitan District Council
City Hall
Centenary Square
Bradford
BD1 1 HY

26 October 2016

Dear Members

Annual Audit Letter 2016

I am delighted to present to you City of Bradford Metropolitan District Council's (the Council's) Annual Audit Letter. The purpose of this document is to summarise the outcome of the audit of the Council's 2015/16 annual accounts and our work on our value for money conclusion.

We carried out the audit in accordance with the Code of Audit Practice for Local Government bodies issued by the National Audit Office and delivered all expected outputs in line with the timetable established by the Accounts and Audit Regulations 2015.

2015/2016 has been another challenging year for the Council and like most other authorities across the country City of Bradford Metropolitan District Council made some tough decisions on its spending priorities and plans. We reflect on these matters in the value for money and future challenges sections of this letter.

Given the difficult circumstances we were pleased to issue an unqualified opinion on the statement of accounts and the value for money conclusion.

I would like to express my thanks for the assistance of the Council's finance team, as well as senior officers and the Governance and Audit Committee. The continued constructive approach to our audit is appreciated.

If you would like to discuss any matters in more detail then please do not hesitate to contact me or my senior manager Steve Appleton on 0113 387 8850.

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Yours faithfully

Mark Kirkham
Partner
Mazars LLP

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Our reports are prepared in the context of the 'Statement of responsibilities of auditors and audited bodies 2015-16' issued by Public Sector Audit Appointments Ltd. Reports and letters prepared by appointed auditors and addressed to Members or officers are prepared for the sole use of the Council and we take no responsibility to any Member or officer in their individual capacity or to any third party.

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01 Key messages

Our Annual Audit Letter provides a summary of our work and findings for the 2015/16 audit period for Members and other interested parties.

We reported the detailed findings from our audit work to the Governance and Audit Committee in our Audit Completion Reports for City of Bradford Metropolitan District Council and West Yorkshire Pension Fund on 29 September 2016. We also confirmed that your Whole of Government Accounts (WGA) return was consistent with the audited financial statements.

The key conclusions for each element are summarised below:

Our audit of the statement of accounts

We issued an audit report including an unqualified opinion on the Council's financial statements including West Yorkshire Pension Fund on 29 September 2016.

Our work on your financial statements aims to provide reasonable assurance that your accounts are free from material misstatement. The assessment of materiality is, therefore, a key part of our work and we specify an overall materiality threshold, based on revenue expenditure in the Council's accounts and benefits payable in the Pension Fund's accounts, together with lower materiality values for accounting entries we consider to be more sensitive, such as officer and Member remuneration.

We consider materiality when planning and performing our work and in assessing the results.

At the planning stage, we make a judgement about the size of misstatements which we consider to be material and which provides a basis for determining the nature, timing and extent of risk assessment procedures, identifying and assessing the risk of material misstatement and determining the nature, timing and extent of further audit procedures. We updated our materiality calculations when we received the accounts and set the overall level at £19.5m for the Council's accounts and £47.9m for the Pension Fund's accounts.

In applying our view of materiality we identified the following significant risks:

CBMDC accounts	WYPF accounts
<ul style="list-style-type: none">management override	<ul style="list-style-type: none">management override
<ul style="list-style-type: none">revenue recognition	<ul style="list-style-type: none">valuation of unquoted investments
<ul style="list-style-type: none">pension estimates	<ul style="list-style-type: none">actuary's report disclosure
<ul style="list-style-type: none">valuation of land and buildings	

We carried out a programme of work to address these risks which included including the testing of journals and transactions. Our work did not identify any issues to report.

Our VFM conclusion

We carried out sufficient, relevant work, in line with the National Audit Office's guidance, so that we could conclude on whether you had in place, for 2015/16, proper arrangements to secure economy, efficiency and effectiveness in your use of resources.

We issued an unqualified VFM conclusion on 29 September 2016.

Whole of Government Accounts (WGA)

We provide assurance to the National Audit Office (NAO), as the auditor of central government departments, in relation to the consistency of your WGA consolidation pack with the audited statement of accounts. We reported that your consolidation pack was consistent with the audited statement of accounts.

Our other responsibilities

As the Council's appointed external auditor, we have other powers and responsibilities as set out in the Local Audit and Accountability Act 2014. These include responding to questions on the accounts raised by local electors as well as a number of reporting powers such as reporting in the public interest. We did not receive any questions about the accounts or valid objections in relation to your 2015/16 accounts from local electors, nor did we exercise our wider reporting powers.

02 Financial statements

Audit of the financial statements

We audited your financial statements in line with auditing standards and we reported our detailed findings to the meeting of the Governance and Audit Committee on 29 September 2016. We issued an audit report, including an unqualified opinion, on the statement of accounts on 29 September 2016.

Preparation of the accounts

The Council presented us with draft accounts in accordance with the national deadline. Working papers and other supporting evidence were produced on a timely basis throughout the audit. Your arrangements and the responsiveness of officers enabled us to complete our comprehensive procedures efficiently.

Issues arising from the audit of the accounts

We would like to highlight the following key points:

- officers prepared good quality draft financial statements and working papers;
- there were very few errors identified and no errors impacting on the Council's General Fund balance;
- all errors were corrected other than those which were clearly trivial; and
- the audit progressed well and there were no significant difficulties encountered. We received the full co-operation of officers.

Annual Governance Statement (AGS)

The AGS is drafted by the Council to provide assurance to the reader over how it is managed and how it has dealt with risks in the year. We reviewed the AGS to see whether it complied with relevant guidance and whether it was misleading or was inconsistent with what we know about the Council. We found no areas of concern to report.

West Yorkshire Pension Fund

We presented the detailed findings from our audit of the West Yorkshire Pension Fund in a separate Audit Completion Report to the Council at the Governance and Audit Committee on 29 September 2016. We noted the following key points:

- officers prepared good quality draft financial statements and working papers;
- there were very few misstatements and disclosure errors identified;
- all errors were corrected except three on the grounds that the misstatements did not have a material impact on the financial statements;
- the audit progressed well and there were no significant difficulties encountered. We received the full co-operation of officers; and
- we did not identify any significant deficiencies in internal controls during the course of the audit (noting our work is not intended to express an opinion on the effectiveness of the system of internal control).

03 VFM conclusion

For 2015/16, we are required to satisfy ourselves the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. We performed our work in this area in accordance with guidance set out by the NAO in Auditor Guidance Note 3. This required us to consider one overall criterion as set out below.

Overall criterion: *in all significant respects, the audited body had proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people.*

Our work in this area focused on the three sub-criteria specified by the National Audit Office namely:

Sub-criteria	Focus of the sub-criteria
Informed decision-making	<ul style="list-style-type: none">• Acting in the public interest, through demonstrating and applying the principles and values of sound governance.• Understanding and using appropriate and reliable financial and performance information (including, where relevant, information from regulatory/monitoring bodies) to support informed decision making and performance management.• Reliable and timely financial reporting that supports the delivery of strategic priorities.• Managing risks effectively and maintaining a sound system of internal control.
Sustainable resource deployment	<ul style="list-style-type: none">• Planning finances effectively to support the sustainable delivery of strategic priorities and maintain statutory functions.• Managing and utilising assets effectively to support the delivery of strategic priorities.• Planning, organising and developing the workforce effectively to deliver strategic priorities.
Working with partners and other third parties	<ul style="list-style-type: none">• Working with third parties effectively to deliver strategic priorities.• Commissioning services effectively to support the delivery of strategic priorities.• Procuring supplies and services effectively to support the delivery of strategic priorities.

As part of our work, we also:

- reviewed your Annual Governance Statement;
- considered the work of other relevant regulatory bodies or inspectorates to the extent the results of the work have an impact on our responsibilities; and
- carried out risk-based work we determined to be appropriate.

Risk based work

We identified significant audit risks relating to sustainable resource deployment reflecting the significant financial pressure from reduced funding and increasing demand for some services. We reported the detailed findings of our review of the Council's arrangements in a separate report to the Governance and Audit Committee on 29 September 2016.

We were able to gain sufficient assurance from our work to mitigate the audit risk although we note that the scale of the financial challenge is so significant that fundamental changes to the level and scope of service provision are envisaged to ensure the Council manages within its available resources.

Overall conclusion

We satisfied ourselves that, in all significant respects, the Council put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources for the year ending 31 March 2016 and we issued an unqualified VFM conclusion.

04 Future challenges

Financial challenges

The main challenge we see for the Council, along with others and the wider public sector, is the continued pressure on finances and the need to plan for further reductions in spending power which will make it increasingly difficult to maintain the existing level service provision. We have noted how the Council has dealt with this challenge so far and expect there to be a need for difficult decisions to spending is kept within available resources.

The Council has made good progress in addressing this challenge to date and has a proven track record of strong budget management and delivering planned budget reductions. The Council under-spent on its 2015/16 budget by £0.8 million ending the year with usable corporate reserves of £19.9 million to support future budget decisions although £6.1 million has been committed to support the 2016/17 budget as planned.

As well as reduced funding the Council also faces increasing demand for some services. The Council is working to achieve challenging savings plans for 2016/17 and to identify further plans to bridge funding gaps for 2017/18 (£11.5m) and 2018/19 (£32m) as set out in the Council's Medium Term Financial Strategy.

Other challenges

The difficulty in maintaining good service performance levels at the same time as finding savings is recognised by the Council. Performance assessment arrangements are in place and outcomes are regularly reported to and monitored by Members.

These challenges include:

- improving educational attainment;
- safeguarding vulnerable children; and
- ensuring an effective integrated system of health and social care.

With a financial outlook that is increasingly challenging the Council will need to agree an operating and financial plan that balances the needs and expectations of citizens and service users and the statutory framework with available resources.

Next year's audit

We will focus our work on the risks that your challenges present to your financial statements and your ability to maintain proper arrangements for securing value for money.

We will also share with you relevant insights that we have as a national and international accounting and advisory firm with experience of working with other public sector and commercial service providers.

In terms of the technical challenges that officers face around the production of the statement of accounts, we will continue to work with them to share our knowledge of new accounting developments and we will be on hand to discuss any issues as and when they arise. A key area in this respect includes working with officers as they make preparations for transport infrastructure on a fair value accounting basis as required by the accounting Code. This will require significant changes in the 2016/17 statements and we are already working with officers to ensure the required systems are in place.

05 Fees

As outlined in our Audit Strategy Memoranda for City of Bradford MDC and West Yorkshire Pension Fund presented to the Governance and Audit Committee on 15 April 2016, Public Sector Audit Appointments Ltd (PSAA) sets a scale fee for our audit and certification work. The fees applicable to our work in 2015/16 are summarised below.

Element of work	2014/15 Final Fee	2015/16 As previously reported	2015/16 Final Fee
City of Bradford Metropolitan District Council			
Code audit work	£247,089	£185,317	£185,317
Certification work	£26,310	£16,520	£16,520
Non-audit work for certification of grants outside the PSAA regime	£5,250	£2,900	£2,900
Total	£278,649	£204,737	£204,737
West Yorkshire Pension Fund			
Code audit work	£48,545	£48,545	£48,545

The fee outlined above in relation to certification work is an estimate as we are yet to complete our work on certifying the Council's Housing Benefit claim.

Non-audit work during the year relates to our work certifying the Teachers' Pensions return 2014/15 (£2,100) and European Regional Development Fund grant (£800) for which fees were agreed separately with officers.

Should you require any further information on this letter or on any other aspects of our work, please contact:

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Report of the Director of Finance to the meeting of the Governance and Audit Committee to be held on 1 December 2016.

Subject:

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INTERNAL AUDIT PLAN 2016/17 – MONITORING REPORT AS AT 30 SEPTEMBER 2016

Summary statement:

This report monitors the progress made by Internal Audit against the Internal Audit Plan for 2016/17 as at 30 September 2016.

Stuart McKinnon-Evans
Director of Finance

Portfolio

Leader of Council and Corporate Portfolio

Report Contact: Mark St Romaine
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Improvement Area:

Corporate

SUMMARY

- 1.1 The purpose of this report is to bring to the attention of members of the Governance and Audit Committee (G&AC) any significant issues arising from the audit work undertaken to date and to inform them about the progress made up to 30 September 2016, against the Internal Audit Plan, which was approved by the Committee on 15 April 2016.

2. BACKGROUND

- 2.1 Internal Audit is part of Financial Services within the Department of Finance. This is the half year monitoring report on the Internal Audit Plan for 2016/17. This is detailed in Appendix 1. The overall Audit Opinion is that from the audit work performed to date, Internal Audit concludes that the Council's overall control framework is satisfactory.
- 2.2 The report enables the Council to demonstrate compliance with the Public Sector Internal Audit Standards (PSIAS). These require the Head of Internal Audit to report periodically to the Governance and Audit Committee on Internal Audit's activity, purpose, authority, responsibility and performance relative to its plan. Reporting must also include significant risk exposures and control issues, including fraud risks, governance issues and other matters needed or requested either by senior management or the Governance and Audit Committee.

The PSIAS also require the Head of Internal Audit to communicate the Internal Audit activity's plans and resource requirements, including significant interim changes, to the Governance and Audit Committee, including any impact of resource limitations.

- 2.3 Due to pressures on resources and the need to maintain a sustainable service, the Internal Audit sections of Bradford and Wakefield have been looking to deliver efficiencies through joint working. From 1st September 2014 Wakefield and Bradford Councils have shared a Head of Internal Audit. This has been undertaken through a Service Level Agreement and a business case is to be written by the 31st December 2016 to determine future service arrangements.

Bradford has also brought in 60 days per annum of computer audit service from Wakefield. Opportunities to increase joint working in the future are actively being explored by both audit teams including both teams operating the same Audit Software, MKinsight, from October 2016.

3. OVERVIEW AND SCRUTINY COMMITTEE CONSIDERATION

- 3.1 Not Applicable.

4. OTHER CONSIDERATIONS

- 4.1 There are no other considerations.

5. OPTIONS

- 5.1 Not applicable

6. FINANCIAL AND RESOURCE APPRAISAL

- 6.1 The work of Internal Audit adds value to the Council by providing management with an assessment on the effectiveness of internal control systems, making, where appropriate, recommendations that if implemented will reduce risk and deal with financial uncertainty.

7. RISK MANAGEMENT

- 7.1 The work undertaken by Internal Audit is primarily concerned with examining risks within various systems of the Council and making recommendations to mitigate those risks. Consideration was given to the corporate risk register when the Audit Plan for 2016/17 was drawn up and any issues on the risk register that relate to an individual audit are included within the scope.
- 7.2 The key risks examined in our audits are discussed with management at the start of the audit and the implementation of recommendations is followed up with Strategic Directors.

8. LEGAL APPRAISAL

- 8.1 The Accounts and Audit Regulations for 2015 require the Council to undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance. These standards are detailed in the Public Sector Internal Audit Standards supported by CIPFA's Local Government Application Note.

9. OTHER IMPLICATIONS

9.1 Equal Rights

Internal Audit seeks assurance that the Council fulfils its responsibilities in accordance with its statutory responsibilities and its own internal guidelines. When carrying out its work Internal Audit reviews the delivery of services to ensure that they are provided in accordance with the formal decision making process of the Council.

9.2 Sustainability Implications

When reviewing Council Business Internal Audit examines the sustainability of the activity and ensures that mechanisms are in place so that services are provided within the resources available

9.3 Greenhouse Gas Emissions Impacts

There are no impacts on Gas Emissions.

9.4 Community Safety Implications

There are no direct community safety implications.

9.5 Human Rights Act

There are no direct Human Rights Act implications.

9.6 **Trade Union**

There are no implications for the Trade Unions arising from the report.

9.7 **Ward Implications**

Internal Audit will undertake specific audits through the year which will ensure that the decisions of council are properly carried out.

10. **NOT FOR PUBLICATION DOCUMENTS**

10.1 None.

11. **RECOMMENDATIONS**

That the Governance and Audit Committee:

11.1 Takes assurance from the results to date that show that the control environment of the authority is overall satisfactory.

11.2 Endorse the anticipated coverage and changes of Internal Audit work during the year.

11.3 Requires Internal Audit to monitor the control environment and continues to assess areas of control weakness and the ability of management to deliver improvements to the control environment when required.

11.4 Requires Internal Audit to monitor its resourcing levels to ensure that they are sufficient and appropriate to support an effective Internal Audit function.

12. **APPENDICES**

Appendix 1 – Internal Audit Plan for 2016/17 – Monitoring Report as at 30th September 2016.

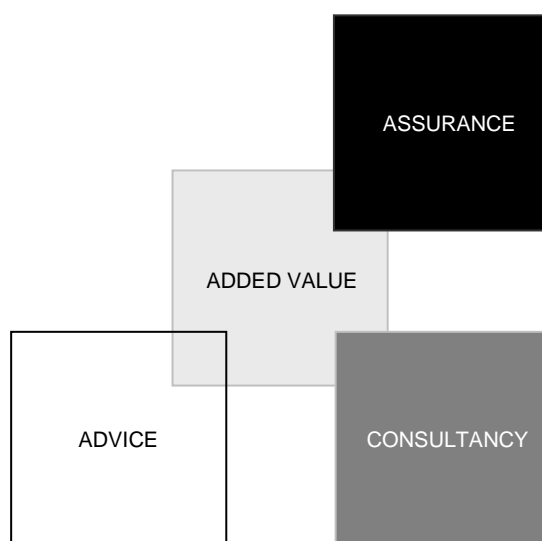
13. **BACKGROUND DOCUMENTS**

13.1 G&AC report dated 15 April 2016 – Internal Audit Plan 2016/17.

INTERNAL AUDIT PLAN 2016/17

MONITORING REPORT

AS AT 30.09.16.



1 INTRODUCTION

- 1.1 The Internal Audit Annual Plan for 2016/17 was approved by the Governance and Audit Committee (G&AC) at its meeting on 15 April 2016. This report is the half year monitoring report for this financial year. It identifies the progress made against the Internal Audit Plan up until 30 September 2016 and identifies any significant audit issues arising.
- 1.2 The report enables the Council to demonstrate compliance with the Public Sector Internal Audit Standards (PSIAS). These require the Head of Internal Audit to report periodically to the Governance and Audit Committee on Internal Audit's activity, purpose, authority, responsibility and performance relative to its plan. Reporting must also include significant risk exposures and control issues, including fraud risks, governance issues and other matters needed or requested either by senior management or the Governance and Audit Committee.
- 1.3 The PSIAS also require the Head of Internal Audit to communicate the Internal Audit activity's plans and resource requirements, including significant interim changes, to the Governance and Audit Committee, including any impact of resource limitations

2 RESOURCES

2.1 Reduction in Audit Resources

The Internal Audit Plan for 2016/17 has 5% more capacity than in 2015/16 (1873 days v 1795 days) and 27% less capacity than in 2014/15 (2567 days). This net reduction has required the Service in conjunction with the s151 officer to consider and prioritise the use of these resources. The main core delivery of Internal Audit in 2016/17 was planned to be the provision of assurance on the Council's fundamental financial systems.

Further, in September 2014 the Council entered into a Service Level Agreement (SLA) with Wakefield Council, for Bradford to provide its Head of Internal Audit and Insurance to manage Wakefield's Internal Audit & Risk Service. The SLA also requires a Business Plan to be prepared, which will be written by December 2016, to determine an option appraisal for future service delivery.

This SLA commitment, together with insurance management and accountancy support to Bradford, absorb 184 days (10%) of the available planned 1873 days. In addition, a further 170 days are provided to West Yorkshire Pension Fund. The net audit days currently provided to Bradford Council in 2016/17 is 1519 days.

2.2 MK Insight

The 2016/17 plan contains a provision for time to introduce MK Insight which is an integrated Internal Audit ICT package produced by Morgan Kai that delivers the full range of Internal Audit functionality from planning, to reporting, including time recording and working paper preparation. This will replace the collection of manual and Microsoft based documents and out of date in house packages currently in use.

A business case for its introduction was presented in 2015/16, which was approved and licences for the system were purchased. During the early part of the year Audit Management worked with representatives from Morgan Kai to set the configuration which will tailor the package to Bradford's requirements. Towards the end of the half

year all staff were trained in the use of the package and user testing has been carried out. Morgan Kai is currently using feedback from this to make final amendments to the configuration. Once this is complete staff will begin to use the system to perform new audits in the second half year, with a view to making full use of the system from 1 April 2017.

3 SERVICE DELIVERY

3.1 Audit Coverage

As at 30 September 2016, 44% of the 2016/17 audit plan has been completed compared to last year when 48% of the 2015/16 audit plan had been completed by this time.

Internal Audit faces a challenge in the second half of 2016/17 to deliver the audit plan. This challenge is due to the available resources of the function, which now has very limited capacity to absorb unforeseen audit issues and unplanned work, without it affecting the delivery of planned core audit work.

During the year to date there have been some revisions to the 2016/17 audit plan to reflect the priorities of the service and that several audits are taking more time to complete than was anticipated. These plan changes are detailed in section 3.7. The net effect of the proposed changes is that the section will focus marginally less on significant and fundamental systems than planned.

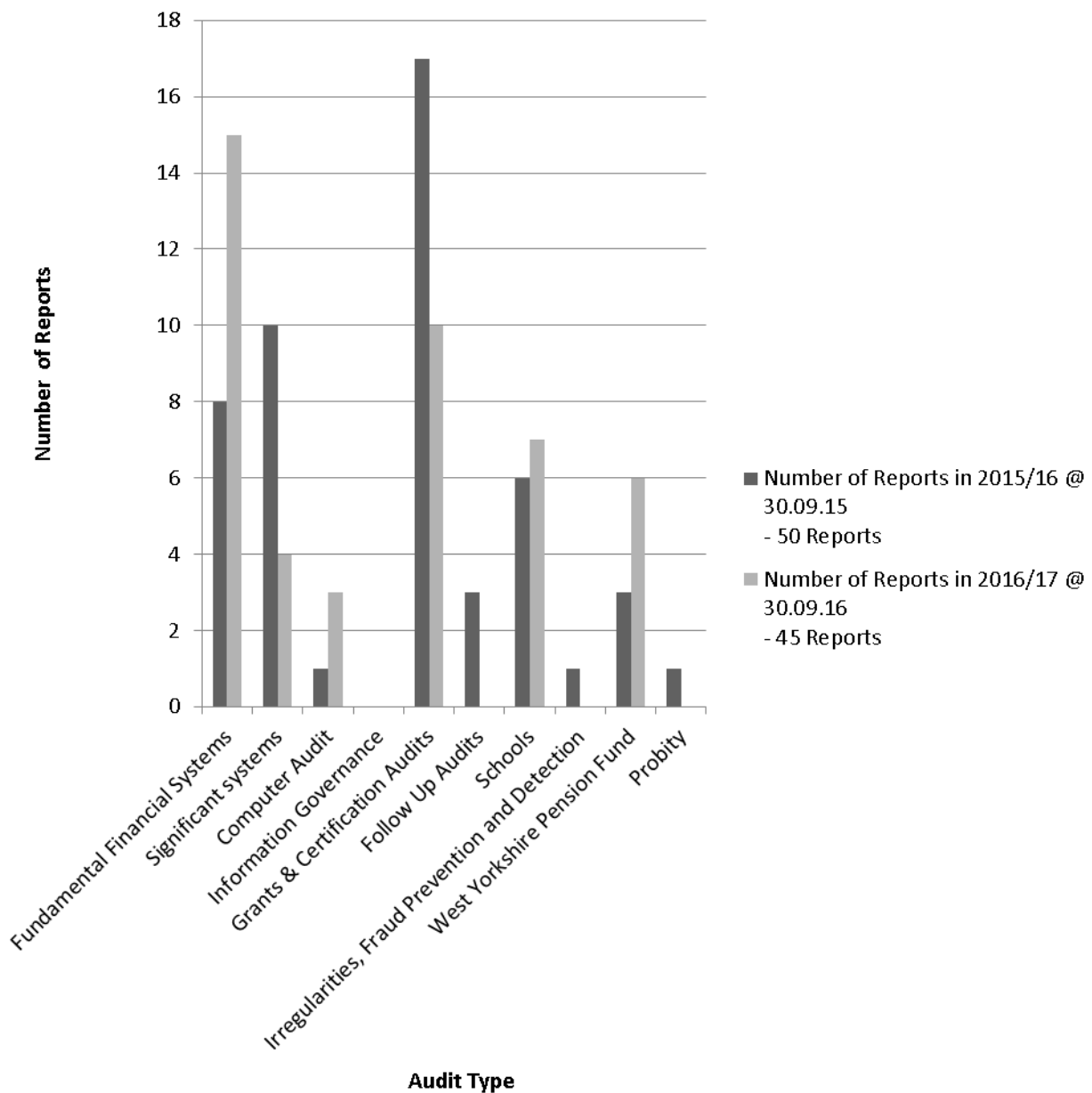
Currently it is forecast that 90% of the audit plan will be delivered by the end of the financial year which is the target level of completion. However, due to its relatively low resourcing levels, this forecast is more sensitive to changes in available resources than in prior years.

3.2 Reports Issued

All Internal Audit assignments result in an Audit Report which identifies the audit coverage, findings from the audit, risks arising from identified control weaknesses and prioritised audit recommendations. Chart One below shows that as at 30 September 2016 a total of 45 reports have been issued, which compares with 50 at this time last year. The chart shows a breakdown of the reports by audit type, with grant and certification audits generating the highest number of reports to date in each year.

The reduction in the number of reports issued is due to the reduction in available resources.

**Chart One: Showing the Breakdown by Audit
Type of Audit Reports Produced As At 30
September 2016 and 2015**



3.3 Control Environment

The following table details the opinions from those audits over the last two years where an appraisal of the overall system could be obtained. As can be seen the proportion of reports assessed as either adequate, good or excellent opinions are increasing over time and account for approximately 80% of the opinions reached. Whilst reassuring this may be expected as Internal Audit's core focus is on fundamental and significant systems.

Table One: Six Monthly Analysis of Audit Opinions raised in Internal Audit Reports issued in the Period 1 October 2014 to 30 September 2016

	1 Oct 2014 and 31 March 2015		1 April 2015 and 30 Sept 2015		1 Oct 2015 and 31 March 2016		1 April 2016 and 30 Sept 2016	
Opinions	Total	Proportion	Total	Proportion	Total	Proportion	Total	Proportion
Excellent	13	28%	10	31%	4	15%	9	29%
Good	14	30%	9	28%	6	23%	8	26%
Adequate	9	19%	7	22%	13	50%	9	29%
Limited Assurance	6	13%	5	16%	3	12%	5	16%
No Assurance	5	11%	1	3%	0	0%	0	0%
Total Relevant Reports	47		32		26		31	
Not applicable**	29		18		5		14	
Total Reports	76		50		31		45	

** Internal Audit gives an opinion on the control environment whenever it is appropriate to do so. However, traditionally audit reports that provide advice, review specific control concerns or investigate irregularities generally do not have an opinion as they are too limited in scope.

Conversely the proportion of reports classified as limited assurance and no assurance have decreased over time.

The analysis above relates to those reports with opinions. Opinions are derived from a standard analysis of the level of control satisfaction and number of high priority recommendations within a report. Where reports are produced that do not relate to the planned evaluation of risks and controls, for example in response to requests for advice on specific matters, or in response to known control failures there is often no opinion applied to the report.

The proportion of reports issued without an opinion being expressed is decreasing over time, but is still high representing 31% (14) of all reports issued over the period 1.4.16 to 30.09.16. In future, Internal Audit will continue to try and increase the proportion of reports issued that include an audit opinion.

The audit work has identified that 79% of controls examined were operating satisfactorily. All concerns arising from the audit assignments result in an audit recommendation. To date, 100% of our audit recommendations have been accepted by management. This is consistent with the 2015/16 outcome (100%).

3.4 Follow Up Audits

3.4.1 Internal Audit currently follows up its audit work in two ways – Annual follow up returns from Strategic Directors and performing individual follow up audits. The purpose of this section is to report the progress that Strategic Directors have confirmed as being made in implementing previously agreed Internal Audit recommendations and also to inform G&AC of the outcome of the Internal Audit follow up audits undertaken in the period 01.04.16 to 31.10.16.

3.4.2 Annual Returns From Strategic Directors

Analysis of the Annual Returns from Strategic Directors is shown in Table Two below.

Table Two: Analysis of Strategic Director's Reported Rate of Implementation of Agreed Recommendations for Reports issued up to 31.03.16

Department	Total in Follow Up		Overall Progress of Implementation		Outstanding Reports & Rec's Carried Forward		No Progress in Level of Implementation During Year	
	Reports	Rec's	2016/17	2015/16	Reports	Rec's	Reports	Rec's
Adult Services	9	21	98%	42%	1	1	-	-
Chief Executive	4	6	100%	100%	0	0	-	-
Children's Services	24	107	90%	96%	5	13	1	1
City Solicitor	-	-	-	-	-	-	-	-
Environment & Sport	10	25	97%	97%	6	14	-	-
Finance	15	31	87%	88%	7	13	2	2
Human Resources	6	11	81%	92%	1	2	-	-
Public Health	1	2	100%	67%	0	0	-	-
Regeneration	7	15	93%	97%	3	6	-	-
Total for all Departments	76	218	94%	85%	23	49	3	3

The total of 76 reports containing 218 High Priority recommendations which were followed up with Strategic Directors included 30 reports and 66 agreed recommendations that were carried forward as not fully implemented at the time of last year's follow up, and 46 reports and 152 agreed recommendations issued during the 2015/16 financial year. All recommendations included in the follow up had passed their agreed implementation date. The Strategic Directors' returns showed that 70% of reports and 78% of recommendations were fully implemented during the year, which is a slight decrease from last year's figures (75% and 81% respectively). However, if progress is adjusted to reflect overall progress for each report, including partial completion, as shown on the Covalent system (used to monitor the recommendations) then total overall progress of implementation of recommendations rises to 95% which is significantly higher than last year's position of 85%.

The Strategic Director's returns showed that 23 reports and 49 recommendations were not fully implemented, at the time of the sign off. Around half of these, 12 reports and 23 recommendations, were brought forward from the previous year (i.e. reports issued in or before 2014/15), and 3 of these (containing 3 recommendations) showed no further progress in implementing the recommendations had been made in the year since the last return.

One of these reports related to Children's Services and two to Finance. These reports are detailed below.

This reported absence of progress has been brought to the attention of the relevant Directors to allow them to reconfirm that the progress shown in Covalent is accurate and/or prompt corrective action to be taken as appropriate.

List of Reports Where No Further Progress Has Been Made in Implementing Agreed Recommendations

Finance

Audit of Risk Management: Issued 21.01.15

Information Retention & Disposal: Issued 28.03.14

Children's Services

Follow up of Concerns Relating to Compliance with Council's Procure to Pay Process: Issued 05.11.14

3.4.3 Individual Follow Up Audits Undertaken by Internal Audit

During the year Internal Audit has carried out 7 follow up Audits to determine the level of implementation of agreed recommendations. One of the follow ups formed part of the original audit plan and was selected due to the significance of the concerns in that area. This audit commenced before the Strategic Directors returns were received. Following receipt of the Strategic Directors' returns Internal Audit subsequently followed up a further sample of 6 reports where the returns showed that the recommendations were fully implemented. The purpose of all the follow up audits was to independently validate the reported implementation rates of agreed recommendations and these, together with the audit results are shown in Appendix A.

In total 18 high priority recommendations were followed up, with 16 of these being reported by Directors as fully implemented within their returns. The follow up testing concluded that, in fact, 13 of the high priority recommendations had been fully implemented which is lower than the reported rate, however none of the residual recommendations were considered to be high priority in terms of the risk remaining, and all required only minor improvement to comply fully.

This is a significant improvement on the position found in follow up audits carried out in 2015 where a third of recommendations which directors had deemed fully implemented were found to have high priority concerns still outstanding.

All follow up audits resulted in a report, and where necessary further recommendations have been made, to ensure that the original control weaknesses are addressed in their entirety.

3.5 Special Investigatory Reviews

Internal Audit was commissioned in the first half of the 2016/17 to perform a number of special investigatory reviews. In brief these reviews were as follows:

- 3.5.1 Internal Audit examined the arrangements involving a school owned company. The purpose of the audit was to consider the appropriateness of the tender process in the awarding of school catering contracts to this company and the levels of competition that were evident in this process. This audit concluded that schools should not continue to procure their catering services from the company and recommended that they seek an alternative provider with immediate effect. A report detailing this concern and recommendation was issued to the respective Governing Body's of the schools involved

- 3.5.2 At the request of the Chief Executive, Internal Audit were requested to perform a comprehensive review of the Council's action against a former employee following a complaint from a member of the public regarding inappropriate content being held on his Facebook page. Internal Audit's review was to include preparation of a chronology of events relating to this action, clarity regarding the investigation of information governance issues around the case.
- 3.5.3 The 2015/16 Internal Audit Annual Report, which was reported to Governance and Audit Committee on 29 September 2016, highlighted concerns regarding the debt management controls surrounding the Payroll Services provided to full budget share schools and external bodies. Internal Audit gave a commitment to monitor the position and performed a follow up audit in the first half of 2016/17.

The audit concluded that some progress had been made in implementing the four previously agreed high priority recommendations, specifically the introduction in April 2016 of a monthly reconciliation of payroll costs invoiced to those posted in the financial ledger. This has improved financial control, but further action is still required for full implementation.

The main issue was the recovery of £2.124m payroll costs that the Council has incurred over a number of previous years, dating back to 2006/7, but not recovered as at 31.3.16. As at August 2016, invoices with a total value of £833,145, 39% of the 31.3.16 balance, had been issued. Of these, £346,017 had been paid. The bad debt provision, currently £1.2m, needs to be reviewed for adequacy as the outcome from recovery action progresses.

3.6 Summary of Audit Reports and Findings

A summary of the routine audits undertaken and the recommendations identified is reported in Appendix B.

3.7 Overall Opinion

From the audit work performed to date Internal Audit concludes that the Council's overall control framework is satisfactory, though this is based upon a reduced level of coverage in comparison to prior years.

3.8 Existing and Planned Changes to Internal Audit Coverage in 2016/17

During the year the audit plan is subject to revision in light of requests for, or the need to do additional unplanned audit work and also to reflect any in year changes in available resources. Action is taken as appropriate to ensure that audit resources are efficiently and effectively deployed. The 2016/17 audit plan has been revised. Appendix C indicates those audits added to the plan and those that have been replaced. Those audits replaced will be considered when establishing the 2017/18 audit plan, but in a number of cases it is anticipated that there will no longer be a need for the audit work in 2017/18.

In determining these plan changes, Internal Audit has considered a number of relevant factors including risk and impact of control failure, external funding

requirements, prior audit assurance, maturity of the control environment, appropriate timing for the review, Corporate and Directors' priorities.

It is proposed that the section continues to focus on Fundamental and Significant Systems work in the second half of the financial year as these areas of work materially contribute to audit's opinion on the Council's control environment. In addition, as significant system work takes longer to prepare and complete, this reduces the ability of the service to reach its 90% audit plan completion target.

The fundamental and significant systems planned to be covered in the second half of the year include the following.

Fundamental systems

Capital Asset Additions, Disposals and Valuations
Capital accounting - Highways Infrastructure Revaluation
Capital Schemes Review
Cash Systems
Bank Reconciliation
Enforcement (all revenue streams)
Budgetary Control
Quotes, Tenders, Contract Award
Supplier Setup, Maintenance & Payments (P2P)
Miscellaneous payments (P2P)
Starters and Leavers Schools
Temporary and Permanent Payroll Variations
Expenses and allowances (Payroll)

Significant systems

Continuing Healthcare
Transitional Planning
Housing Options Transformation
Strategic Risk - Governance Resilience
Resource Allocation System implementation (Adults)
Purchased care (Adults)
Strategic risk - Quality accessible & affordable housing
Strategic risk - Regeneration & investment into District: focusing on Keighley bid
Public Health – Dental
Grants to Voluntary Organisations
Licensing (Taxi etc)
Planning Applications and Building Regulations Fees
Direct Payments
Strategic Risks - Adults safeguarding incident
Youth Service Expenditure Review
ContrOCC Liquidlogic Integration (Children's)
Wyke Community & Childrens Ltd
No Recourse to Public Funds

3.8 Internal Audit's Performance Indicators

Client Feedback

After each audit a client feedback questionnaire is issued to the appropriate officer to obtain feedback from them about the audit. 100% of the officers that responded said

that the audit recommendations made were useful, realistic and overall the audit was of benefit to management.

Timeliness of Audits

During the first 6 months, 69% of draft reports were issued within 3 weeks of finishing the site work, this is below the target of 80% and is due to one audit generating seven reports that missed the target. 100% of final reports were issued within a week of the post audit meeting, exceeding that target of 90%. The timeliness of issuing draft and final reports is crucial to providing a good service to officers, enabling them to deal with the issues raised and consider the recommendation made.

Appendix A Follow Up Audits Performed 1.4.16. to 31.10.16

Appendix B Summary of Audit Reports and Findings

Appendix C Unplanned Audit Work Included in or Deleted from the Revised 2016/17 Internal Audit Plan as at 31.10.16

Follow Up Audits Performed 1.4.16 to 31.10.

Department	Audit	Agreed High Priority Recs in Original Report	Confirmed as Fully Implemented in Directors Return	Audit Results		
				Fully Implemented	Partially Implemented	
					Residual Action High Priority	Residual Action Requires Attention
Finance	Schools External Payroll	4	2	2	2	
	13-14 Discretionary Fees & Charges	2	2	1		1
Environment & Sport	Charging System – Customer Contact Centre	1	1	1		
	Charging System - Bulky Residential Waste & New Bins	1	1	1		
Chief Executive - WYPF	WYPF Reimbursement of Agency Payments	2	2	2		
Children's Services	Concerns Relating to The Innovation Centre	6	6	5		1
Human Resources	Requisitioning, Ordering and Receipting:	2	2	1		1
Totals		18	16	13	2	3
% of Total Agreed Recommendations		100%	89%	72%	11%	17%

Appendix B

Summary of Audit Reports and Findings

1. Fundamental Systems

- 1.1 Audit work carried out in the first half of 2016/17 supported the strategy of moving away from high level annual assurance audits to more detailed cyclical audits of the systems. During the period to 30.09.16 15 reports were issued relating to fundamental systems.
- 1.2 Reviews of Accounts Receivable, Capital, Benefits, Council Tax and NNDR resulted in opinions ranging from Excellent to Satisfactory, however audits of elements of the procurement and payroll systems resulted in three reports with Limited Assurance opinions as detailed below:
- Each year the Director of Finance is required to sign a statement confirming that amounts paid over to the West Yorkshire Pension Fund are correct. Although not material in context of total contributions, an audit carried out to support this certification found that incorrect employer contribution rates had been applied to a number of external bodies which the council provides payroll services to, potentially damaging the council's reputation as a service provider and resulting in the Director of Finance having to provide a qualified year end certificate.
 - In October 2014 the council introduced purchase cards to improve the efficiency of low value procurement and Internal Audit provided systems advice at that time. This audit found that take up of the cards had been greater than anticipated, but that there were significant weaknesses in the application of expected controls (as documented within card guidance) at both service and corporate level, increasing the risk of inappropriate usage.
 - Whilst undertaking a review of tendering procedures Internal Audit was asked for advice regarding an ongoing process. Audit's enquiries identified that a service department had failed to follow advice from Procurement leaving them in breach of both Contract Standing Orders and legislation. As a result of the audit the closing date for the submission of tender bids was extended. Failure to do this could have resulted in a process which could not demonstrate value for money, and may have been subject to legal challenge.

2. Significant Systems

- 2.1 During the first half of the year, four reports relating to significant systems were issued, each of which are summarised below.
- 2.2 Following a successful prosecution by the Council for fraud involving around £134,000 in direct payments, an audit was performed to provide an overview of the direct payments system, its key metrics and review the current level of implementation of the outstanding audit recommendations previously raised and consider whether this is leading to an unreasonable level of exposure to direct payment fraud. The report raised a number of key messages and concerns. The key audit concerns, stated below, resulted in a Critical recommendation that required immediate remedial action, which management accepted. Management have

subsequently confirmed that they have initiated action to address these concerns.

- 2.3 The recent prosecution identified clients who were not receiving the assessed level of care due to fraud by their “suitable person”. The audit highlighted that there were 32 clients in receipt of direct payments into their bank accounts, totalling £431k per annum, who were overdue a financial review by more than a year due to non-provision of their accounts, a characteristic shared with the prosecuted case. A further, 25% of these have not had their care needs reassessed in over 3 years. The Council therefore has no assurance that the direct payments to these clients are being used appropriately. Consequently similar safeguarding and fraud issues may exist within this cohort and possibly others.
- 2.4 The audit of the Early Years Funding of Private, Voluntary & Independent Settings identified that there was no reconciliation performed of total payments made per SAP to the payments calculated through the funding formula. Consequently incorrect or inappropriate payments may be made and not detected. Audit visits to ensure compliance with the funding agreement were not being performed and there was no independent validation of the eligibility and accuracy of the census data input by providers, for example by reference to health data. Thus there is the risk that providers do not comply and receive payments for which they are not entitled. Corrective action is being taken by management to address these issues.
- 2.5 Internal Audit performed a high level review of the Council’s Travel Assistance Programme, which was based upon a desk top review of programme documentation and discussions with key staff. The review highlighted to Programme Management and the Director of Finance, Internal Audit’s concerns regarding the delivery of the programme’s objectives to enable appropriate actions to be taken. The Director of Finance agreed to take the concerns highlighted in the report forward.

The concerns surrounded a number of key areas such as the realism of the achievable cost savings, the successful implementation of the new process for reassessment, the reliability of the pilot exercise and the level of change required to meet the proposed budget savings. Internal Audit will be seeking an update from Programme Management on the actions taken and the current status of the programme in 2017.

- 2.3 Adult & Community Services are undertaking a major transformation programme, part of which includes the intention to introduce Individual Service Funds (ISF’s). As part of the development of ISF’s a “100 day Challenge” (Direct Payments Delivery Model) was initiated to develop a working model for an ISF and run a pilot to test out the effectiveness of the model. CMT received a report detailing the outcome of the challenge in September 2016.

Internal Audit met with officers involved in developing the framework for ISF’s to establish the nature of expected controls being designed into the new system. Additionally, a small number of expected programme controls were included to gain assurance that programme objectives would be delivered on time. At the time of the audit the framework was still under development therefore much of the work relied upon the assertions of officers interviewed as part of the process.

The audit culminated in a report showing the key control expectations and a summary of the key observations and suggested actions for inclusion in the

developed ISF working model. The report issued was intended for information, discussion and challenge to help the project identify and incorporate the key control requirements for delivering ISF's and managing the risks and opportunities.

3. Schools

3.1 School Audits

During the first half of the year, seven reports relating to schools were issued (six reports in 2015/16). Of these, five related to individual school audits and included recommendations to improve the control environment at all schools visited. The remaining report provided a summary of the Schools Financial Value Standard process.

Two of the schools audited were the subject of limited assurance audit opinions, and further details are shown below.

St James Church Primary School

A limited assurance opinion was given following the audit of St James Church Primary School. This was due to concerns in the following areas:

Budgeting – the audit concluded that there was inadequate internal budget monitoring and a lack of budgetary information in the Raising Achievement Plan.

Purchasing and procurement – evidence was found of purchases being made without an order being raised in advance, and a lack of segregation of duties in the procurement process.

Personnel issues – the audit found a lack of adequate supporting documentation contained in personnel files to support the appointment of staff.

Payroll – there was insufficient segregation of duties in the checking of payroll reports and the self employed status of individuals was not being checked by the school.

Wycliffe Primary School

A limited assurance was also given at Wycliffe Primary School and the key concerns arising from this audit are detailed below:

Governance - the minutes of Governing Body and Resources Committee meetings indicated a lack of action and continuity, which could result in ineffective financial stewardship.

Benchmarking - there was no evidence of Governors and staff comparing the school's financial performance with that of similar schools, meaning that potential efficiency savings may not be identified.

Budgeting - There was no costed School Development Plan in place with links to the budget, which could result in the school's development priorities not being achieved.

Purchasing - Orders were not always placed in advance of purchases, which could result in a lack of proper authorisation and unknown commitments

3.2 Schools Financial Value Standard

At the 2016/17 year end all maintained schools were required to complete a self assessment against the Department for Education's Schools Financial Value Standard (SFVS). As at 31 March 2016 SFVS self assessments had been completed by 158 of the Council's 170 schools. The returns received for 2016 show an overall improvement in the standard of completion of the returns and the quality of action plans. The number of late returns also decreased, giving assurance that more schools are engaging with the SFVS process and complying with its requirements.

Further SFVS training will be offered in early December 2016 following the success of previous training sessions. Despite the increasing number of schools converting to academy status, Internal Audit are pleased that schools are continuing to attend training and engage with SFVS, thus recognising the benefits that it provides in ensuring effective financial management in schools. Internal Audit's continued approach of focussing on training rather than auditing individual schools' SFVS returns is a more efficient use of resources achieving greater coverage across the district.

4. Grants

Grant certification work is carried out in response to conditions placed on central government targeting of funding to local authorities, for example funding for road repairs following the damage caused by flooding.

The grants requiring certification can vary and change each year. The audit plan for 2016/17 has seen the number of grants requiring review remain the same, however, one grant has ceased while one new grant was required to be reviewed. To date 10 reports have been issued relating to 9 capital and revenue grants which required Internal Audit certification.

The values of the grants varied considerably and conditions also varied and included confirming that targets had been met, that funds had been appropriately spent and that other requirements, such as publication of how the grant had been used, had been complied with.

Overall Internal Audit has been able to give a positive opinion for all grants and consequently no funding has been lost.

5 Computer Audit

Computer audits are delivered by a specialist computer auditor from Wakefield as part of the joint working arrangements. Two reports were issued in relation to Computer Audits in the first half year which concluded that arrangements for WiFi provision were excellent, but that improvements relating to access and performance were required to the Service Desk provision. A further report was issued in relation to concerns that arose in relation to e-mail security identified during an audit of significant systems.

6. West Yorkshire Pension Fund (WYPF)

During 2016/17 Internal Audit has carried out a variety of audits in the West Yorkshire Pension Fund (WYPF). Reports issued to the 30 September 2016 include:-

- **Review of WYPF 2015/16 Accounts.** This audit is carried out at the request of the Financial Controller to assist in producing accurate, easy to read information within the financial accounts.
- **Local Government Pension Scheme Contributions.** Employers pay combined contributions to the WYPF, being employers and employees contributions, on a monthly basis. This audit ensured that there are adequate processes in place to provide reasonable assurance that the contributions system is effectively managed. The control environment was found to be of a good standard.
- **Transfers in.** This audit reviews the process for transferring in pension benefits for new employees, which have been built up in their former employment, in order to amalgamate them with their new West Yorkshire Pension Fund contributions. One issue identified led to a high priority recommendation for improvement being made which was accepted by management.
- **New Pensions and Lump Sums – Flexible Retirements.** Provided that their employer gives consent a member has the option to reduce their hours or move to a less senior position and can draw some or all of their pension benefits built up. This audit determines whether the West Yorkshire Pension Fund has appropriate procedures in place to provide reasonable assurance that the new pension and lump sum payments in respect of Flexible Retirements is effectively managed. The standard of control of new pensions and lumps sums in respect of flexible retirements was found to be good.
- **Fund of Hedge Funds.** This audit reviews the control and monitoring of investments made in Fund of Hedge Funds. Whilst this has been a reducing area of investment, a recommendation was made in the event that transactional activity in this area increased. Otherwise the control environment was of a good standard.
- **UK and Foreign Private Equity.** This audit reviews the purchase, sale and receipt of dividends, in respect of both UK and foreign private equities, which form 4.6% of the market value of the investment portfolio. The control environment was found to be satisfactory, however, an issue was identified leading to a high priority recommendation for improvement which was accepted by management

Unplanned Audit Work Included in and Planned Audit Work Deleted from the Revised 2016/17 Internal Audit Plan as at 30.09.16

Additional unplanned audit work done / propose doing in 2016/17	Reason
No Recourse to Public Funds	Funding that requires audit assurance that it is being used appropriately
Concerns relating to Contract for Replacement windows	Concerns raised regarding possible non-compliance with procurement procedures for this contract
Highway Flood Recovery Grant 15-16	One-off grant which required an audit certificate for the funding body.
Implementation of ContrOCC financial management system by ContrOCC	New system due to be implemented in late 16/17 to replace existing systems to manage payment and allowances made by Childrens' Specialist Services
6th Form Funding	Audit work required to provide assurance to the s151 officer over funds received by the LA from the Education Funding Agency, for subsequent transfer to LA controlled learning providers and maintained school sixth form, have been paid in full to them and expended in accordance with the terms and conditions of funding.
Wyke Community and Childrens Ltd	Audit work required over an issue with eligibility of expenditure and governance arrangements of this Centre which is in receipt of Council funding.

Planned audit work proposed not doing in 2016/17	Reason
Bank Reconciliation and Unallocated Cash - 15/16	Removed audit as duplication of coverage is provided by 66111 cash collection and banking audit and 16-17 bank reconciliation audit
Payment of Fostering Fees and Allowances	Implementation of ContrOCC system by the service will probably defer the planned audit until 17/18. Internal Audit's priority is to support the implementation of ContrOCC by Children's Specialist Services Fostering Service
Leaving Care	Same reason as Payment of Fostering Fees and Allowances.
Benefit Payments	Remove as not priority with some audit coverage provided by External Audit's annual review of benefit grant
HR Reserve	Remove this contingency item, which has not been allocated.
Statutory Sick Pay / Statutory Maternity Pay	Defer audit until 17/18 as not priority

Youth Services Expenditure Review	Councillor concerns that included allegations of inappropriate spending
Staffing Issue	Audit work was required to ascertain the appropriateness of the arrangements surrounding the contract of a School Business Manager.
Concerns Relating to Mail Distribution	Advisory work following a request from staff at Birksland.
Review of information gathered by the Council when investigating and taking action against a former employee	Audit work undertaken at the request of the Chief Executive.

Insurance	Defer audit until 17/18 as not priority. It should be noted the Head of Internal Audit is also responsible for Insurance
School Catering - electronic payment system	Defer audit until 17/18 as not priority.
Academisation Audit Advice/Work	Specific contingency removed from plan, with any required work in this area to come from general school advice allocation
School audit reserve	Contingency to perform school audits removed as not priority that reduces the planned audit coverage from 10 to 8 schools.
Pinch Point Funding Grant	This grant has now finished and therefore did not require an audit certificate relating to 2015/16

Report of the Deputy Director (Children's Social Care) to the meeting of the Governance and Audit Committee to be held on 1st December 2016

Subject: Adoption Regionalisation

U

Summary statement:

This report is to inform the Governance and Audit Committee about plans for the Adoption function of Bradford council to be transferred to a new West Yorkshire Regional Adoption Agency hosted by Leeds City Council.

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Deputy Director
(Children's Social Care)

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Portfolio:

Education, Employment and Skills

Overview & Scrutiny Area:

Children's Services

1. SUMMARY

- 1.1 The Government is committed to adoption services being reorganised under regional arrangements whereby a group of local authorities collaborate to provide services in a newly created Regional Adoption Agency (RAA). The driver for this proposed change is to enhance the outcomes for children in achieving more timely placements of children for adoption; facilitate greater recruitment of the right adopters for children and speedier identification of the matches of children and families. This will take place with an increased emphasis upon the paramount need for timely and expert adoption support at every step of the adoption journey for families from recruitment right through to adoption support.
- 1.2 In July 2016, the Executive gave permission to support and endorse the proposals towards progressing the arrangements to establish a Regional Adoption Agency and the creation of a West Yorkshire Adoption Agency hosted by Leeds City Council.
- 1.3 Further work has been completed regarding progressing this and this report is now seeking a decision to formally delegate the functions of the adoption service to a Joint Committee (JC), made up of elected members from the 5 West Yorkshire councils to oversee the arrangements. The JC will sub-delegate the function to the Director of Children's Services in the host agency.
- 1.4 The regional agency will be operated under the terms of a Partnership Agreement, which will confirm the legal and governance arrangements; the budget; staffing and funding contributions for the 5 Local Authorities.
- 1.5 The operational accountability of the regional agency will be to the Management Board, which will comprise of Senior Officers delegated by each Director of Children Services with representation drawn also from key stakeholders, including the Adopter Voice Forum and the Voluntary Adoption Alliance (VAA).
- 1.6 The regional agency will be led by a Head of Service with a staffing structure, which has been designed with reference to the application of best practice drawn from West Yorkshire, the voluntary sector and extensive research.
- 1.7 Staff from Bradford and the other 3 Local Authorities will be transferred into the employment of Leeds City Council, to the RAA as a TUPE transfer in accordance with TUPE legislation. There has been ongoing engagement with staff affected and the trade unions about the transfer of the function and about the vision and aims of the new agency
- 1.8 The recommendation to the December 2016 Executive is that agreement is given to the delegation of the adoption service function to the Joint Committee.

2. BACKGROUND INFORMATION

Nationally

- 2.1 The Education and Adoption Act 2016 is clear about the regionalisation agenda and government is clear that all local authorities will be part of a Regional Adoption Agency (RAA) or will have delegated their adoption functions to a RAA by 2020. The background of the national landscape and drivers are covered in detail in the paper that came before the Executive in July 2016.

Yorkshire and Humber Region

- 2.2 The Yorkshire and Humberside Local Authorities and Voluntary Adoption Agencies have been part of an adoption consortium for many years and have worked pro-actively to develop the best arrangements as we move towards a regionalised approach for the delivery of adoption services in the region. This has been assisted with transitional funding from the Department for Education (DfE).
- 2.3 There will be three groupings who will become separate Regional Adoption Agencies within the wider Yorkshire and Humberside (Y &H) region; South Yorkshire, North and the Humber and West Yorkshire. The West Yorkshire councils are Bradford, Calderdale, Kirklees, Leeds and Wakefield.
- 2.4 The Y & H project has been selected as one of the 5 demonstration projects by the DfE (out of 19 projects in England). It is anticipated that the West Yorkshire RAA will commence operation on 1 April 2017. West Yorkshire councils have all agreed *in principle* at the Executive/Cabinet Boards to the transfer of the adoption service function to establish a regional adoption agency.
- 2.5 These three RAA's – South, North and West are connected by a Hub who will fulfil some functions on behalf of all the three Regional Adoption Agencies (RAA's) across the Yorkshire and Humber region. The work that the hub will do on behalf of the three RAA's is still work in progress but aims to add value and improve outcomes for children as well as providing value for money.

3. REPORT ISSUES

The Education and Adoption Act 2016 is clear about the regionalisation agenda and government is clear that all local authorities will be part of a Regional Adoption Agency (RAA) or will have delegated their adoption functions to a RAA by 2020.

- 3.1 The plan is that the West Yorkshire RAA will become operational by April 2017 providing a high quality service for children and adoptive families.

Corporate Parenting role

- 3.2 The RAA will work in partnership with social work services in each Local Authority (LA). Each LA will retain the corporate parenting responsibility for looked after children and each Local Authority will still retain the responsibility for decisions about the planning for children and the match with a family. In Bradford, this will remain the responsibility of the Deputy Director, Children's Social Care.

- 3.3 The RAA will be a regional agency with an emphasis on the local delivery of services. The RAA will retain a base in each local authority office and will work with each LA to ensure that children's needs are prioritised and that there is a sense of urgency in the planning for children regarding permanence. This will also ensure that families are recruited to meet children's needs and that adoption support can be delivered effectively at a local level.

Governance and legal arrangements

- 3.4 The new arrangements will be overseen by a Joint Committee (JC) of councillors representing the 5 local authorities, who have knowledge of and responsibility for Children's Services. It is proposed that this will meet as a minimum of one meeting per year with others to be arranged at the chair's discretion. This will enable flexibility in terms of number of meetings if Members feel more control is necessary in the early days but are happy to exercise a lighter touch as the RAA becomes established.

The Joint Committee will exercise the corporate parenting role of the Participating Authorities in relation to the functions of One Adoption Agency for West Yorkshire. The remit of the JC will be to agree the annual report and receive reports in relation to the performance and progress of the agency, oversee the discharge of the Delegated Functions, including monitoring of the budget and strategic direction of the service.

- 3.5 The operational accountability of the regional agency will be to the Management Board, which will comprise senior officers delegated by each Director of Children's Services with representation drawn also from other stakeholders, including the Adopter Voice forum and the Voluntary Adoption Alliance. The management board will meet 2 monthly to review both RAA functioning and also the impact for West Yorkshire's children, adopters and birth families. Specifically it will promote good performance in relation to the Delegated Functions, reflecting added value brought by One Adoption Agency for West Yorkshire in outcomes for children and their adoptive families; monitor the budget allocated to One Adoption Agency for West Yorkshire and review value for money achieved by One Adoption Agency for West Yorkshire. The Director of Children's Services in Leeds will appoint a Head of Service for the RAA.
- 3.6 The adoption functions to be delegated to the West Yorkshire RAA include Adoption services including: Recruitment and approval of potential adopters; Identification of potential matches between children and adopters; Provision of adoption panels; and provision of adoption support services to adopters, adopted people and birth families.
- 3.7 In the five LA's, non- agency adoption work is carried out within the adoption services in 3 out of the five LA's and will become part of the new RAA. However, further work is still required about the resources required to undertake this specific function and this reports seeks agreement from the Executive that the DCS can make further arrangements for extending the breadth of the City of Bradford district Council's delegation to this aspect of the function. In addition, there is also further scoping work to be done to look at the support for Special Guardians in 2017 to be considered as part of the RAA as the project develops and again is seeking approval from the Executive that the DCS can agree this with the management board and Joint Committee as the project develops.

- 3.8 The regional agency will be operated under the terms of a Partnership Agreement, which will confirm the legal and governance arrangements; the budget; funding contributions for the 5 local authorities. *The principles regarding the partnership agreement are set out and explained in Section {4.5} of this report with some aspects discussed below for clarity.*

Staffing Issues

- 3.9 The regional agency will be led by a Head of Service with a staffing structure, which has been designed with reference to the application of best practice drawn from West Yorkshire, the voluntary sector and extensive research.
- 3.10 Staff from Bradford, Wakefield, Kirklees and Calderdale adoption services will be transferred into the employment of Leeds City Council, within the RAA. The transfer of staff requires detailed HR processes to address TUPE, assimilation, due diligence etc. as well as formal consultation with the staff and trade unions in the coming months. For the Bradford employees who TUPE transfer to Leeds City Council their pension benefits within the West Yorkshire Fund will transfer to Leeds City Council. The value of the pensions benefit for transferring employees will not be affected by the transfer.
- 3.11 There has been engagement with the affected staff and trade unions by each local authority and in addition the regional adoption project has had actively engaged with affected staff from all the 5 agencies. This is covered further in Section {4.4}.
- 3.12 Leeds City Council will be employing around 105 Full time equivalent staff to discharge the function. This will include both existing Leeds employees and approximately 60 staff from the other 4 West Yorkshire local authorities. This will include employing a Head of Service for the agency. . There will be 28 staff within the adoption service in Bradford who will transfer to the new agency
- 3.13 The Regional Adoption Agency will be based in Leeds and staff will be based in offices in all 5 local authority areas. Appropriate arrangements will be put in place to ensure that they have adequate resources.

3.14 **Budget**

The budget proposals put forward have been agreed by a working group from across the five local authorities for approval as part of the budget setting process. The proposed budget is 6.85 million and is described in Appendix 2. The contributions of each LA have been calculated as the % of each council's budget in proportion to the aggregated budget of all 5 LAs for the provision of adoption services in 2016-17.

- 3.15 The budget proposal does not include "adoption allowances" that are provided directly to adoptive families to support the arrangement. In Bradford this budget is just under 2 million. The majority of these will be long standing commitments by each Local Authority to families that will continue until the children in the families reach adulthood. The payment of adoption allowances and the corresponding budgets show a significant degree of variance between the 5 local authorities and the new management of the RAA service will have very limited scope to influence this large expenditure for several years. These historical arrangements will continue to be administered and reviewed by each local authority whilst further work is undertaken

regarding new system for recipients from April 2017. This work will need to consider the eligibility criteria for support, financial assessment model, rates, duration and review.

- 3.16 In drafting the proposed budget, consideration has been given to the efficiencies that will be made from bringing together five adoption services. However, as a new venture and a national demonstration project it is important that the agency is able to function effectively as a new entity. In addition the numbers of children requiring adoption at a national level are in a period of flux and therefore the budget needs to be able to be flexible enough to respond to this.
- 3.17 One of the key drivers in bringing agencies together is to improve practice in adoption and improve outcomes for children and families. It is essential that the staffing structure provides a good skill mix of staff to deliver the service; setting up policies, systems and processes to support the work; providing good management oversight and practice leadership; and develop quality assurance systems to ensure a high quality service in the region.
- 3.18 In Year 1 the proposed budget achieves efficiencies are reductions with regard to rationalising adoption panels, commissioned services for adoption support and inter agency fees. Over time there are likely to be further efficiencies in adoption support and management costs as practice is embedded and the systems are put in place to support the service.
- 3.19 The RAA budget will be ring fenced during the year to the agency, with any underspend in the budget at the end of the year apportioned out to each local authority in line with the funding formula. Conversely, should there be an overspend (due to increased demand) this would be met by each Local Authority.
- 3.20 In future years the proportion of the annual budget that each authority pays will be in accordance with a pre-agreed formula but the budget itself is subject to the agreement of each individual authority through the management board. The budget will only change in line with local authority pay settlements and changes to the scope of the function that is being discharged.

4. OTHER CONSIDERATIONS - THE BRADFORD CONTEXT

Consultation and Engagement

- 4.1 There has been regional consultation with lead members for children across the region to keep them updated about progress and this has also taken place locally. Steps have also been taken to ensure that new elected members have been briefed and there will be more detailed and ongoing consultation as the project develops.
- 4.2 There have been regular information provided and discussions with affected staff across West Yorkshire to ensure they are up to date regarding the progress of regionalisation. The trade unions have also been kept up to date on the progress of the plans to date.
- 4.3 The transfer of the adoption function to the regional agency and staff from other Local Authorities to Leeds will require detailed HR processes to address TUPE, assimilation, due diligence etc. as well as formal consultation with the staff and trade

unions in the coming months. There has already been engagement with staff across West Yorkshire regarding the vision and the aims of the new RAA as well as discussions about practice improvement and service delivery.

- 4.4 In October, three engagement sessions were held with staff about the vision and aims of the agency, the legal and governance arrangements and to involve staff in thinking about the structure to ensure a high quality service delivery. In addition, an intended measures letter is in the process of being completed and will be provided to the trade unions and affected staff prior to the Executive.
- 4.5 Engagement of adopted young people, adoptive parents and birth families has been undertaken and is on-going regarding this agenda, with adoptive parents on the project board to ensure that the service is developed to meet the needs of adoptive families as the RAA is being developed.

5. OPTIONS

- (a) Bradford has been working in collaboration with other Local Authorities and Voluntary adoption agencies (VAA's) throughout the Yorkshire and Humber region to create a new model of service delivery for adoption services in line with the government's agenda. There is an agreed approach to the future delivery of services in West Yorkshire. This will improve services for children and adoptive families and deliver a more effective and cost efficient service, utilising government funding to manage the transition and improve the practice in this important area of work.
- (b) If Bradford does not implement this proposal this does not meet the governments expectation to reduce the number of adoption agencies and Bradford would be out of step with the Yorkshire and Humber Local Authorities and would also miss the opportunity of government funding to implement the agency.

6. FINANCIAL & RESOURCE APPRAISAL

- 6.1 A regional adoption budget has been proposed and covers the costs of running the RAA, including the staff that will be transferring into the service. (Appendix 2). It is not envisaged that there will be additional financial costs to the authority and this has been discussed in Section 3.
- 6.2 It is envisaged that significant practice improvement for children and adopters will be achieved, as well as the scope for economies of scale and cost efficiencies, through the establishment of a regional agency over time.
- 6.3 The adoption staff will be working in a number of locations across the West Yorkshire area including in Bradford. The main office base will be within Leeds.

7. RISK MANAGEMENT AND GOVERNANCE ISSUES

- 7.1 The new arrangements will be underpinned by a detailed Partnership Agreement, determining a regional adoption budget with an agreed funding formula from each of the LA's. The agreement is currently being drafted with involvement from Bradford Legal services and will be the subject of ongoing scrutiny by them and the Director of

Children's services to ensure it covers all areas that Bradford wish to be covered legally.

The following information relates to the key elements within the partnership agreement for the Executive to be aware of: These issues have been discussed in section 3 but specific issues are highlighted here.

- 7.2 The agreement will detail the adoption service that is being provided and the responsibilities of the head of the regional agency.
- 7.3 Management board: this will be made up of one representative from each authority along with representatives from the third sector. The board will work on the basis of one member one vote with the third sector only having a vote on matters that they can usefully contribute to (e.g. the third sector will not be involved in approving the annual budget). The management board will take decisions on a majority basis with the exception of approval of the annual budget which will require the unanimous agreement of the local authority members. In the event of an agreement not being reached then a dispute resolution process is proposed within the partnership agreement with an escalation of this to Directors of Children's Services and Chief Executives in each local authority if the matter cannot be resolved by the management board.
- 7.4 Budget: In future years the proportion of the annual budget that each authority pays will be in accordance with a pre-agreed formula but the budget itself is subject to the agreement of each individual authority through the management board. The budget will only change in line with local authority pay settlements and changes to the scope of the function that is being discharged.
- 7.5 Term of Agreement: The term of the agreement will be 10 years with an initial review after 5 years. The partnership members will be able to renew the term at expiry of the 10 year period. One or all partnership members will be able to withdraw from the partnership agreement (and therefore the regional agency) upon giving [18] months' notice. This ability to withdraw from the RAA is subject to following a dispute resolution procedure first and can be triggered if one or more partners have concerns about the operation of the RAA and at will. The partnership agreement will deal with allocation of costs, losses and liabilities between the partnership members in the event of termination.
- 7.6 The details of the partnership agreement, including those set out above, are subject to change as the project develops but the principles will remain the same. The Director of Children's Services will continue to consult with Members and officers including the lead member for Children and Families as the agreement and the project as a whole is developed and finalised.

8. LEGAL APPRAISAL

- 8.1 The adoption functions included in the proposed transfer are executive functions of the local authority. The proposal to discharge functions jointly with other authorities is lawful and governed by the Local Government Act 1972 and the Local Authorities (Arrangements for the Discharge of Functions (England) Regulations 2012.

- 8.2 The Education and Adoption Act 2016 provides the Secretary of State with the power to direct one or more local authorities to make arrangements for any or all of their specified adoption functions to be carried out on their behalf by one of the local authorities named or by another adoption agency. The Secretary of State can either name which adoption agency should carry out these functions, or instruct the local authorities to determine who should carry out the functions. The effect of the provisions is that the Government has the power to remove the adoption function from a local authority and direct that another authority or adoption agency carries out that function.
- 8.3 The proposals would involve a transfer of staff from City of Bradford MDC to Leeds City Council. It is considered that the Transfer of Undertakings (Protection of Employment Regulations 2006 ("TUPE") would apply to such a transfer. If collective redundancies are envisaged, information and consultation duties under Trade Union and Labour Relations (Consolidation) Act 1992 may also apply. The Council should also bear in mind any relevant collective agreement, policy and/or procedure. It is important to inform the recognised trade unions long enough before the proposed transfer of staff to enable effective consultation with representatives of any affected employees to take place.

9. RECOMMENDATIONS

- 9.1 That the Governance & Audit Committee recommend that the proposal to the Executive to give full agreement to the development and implementation of the Regional Adoption Agency is endorsed.

10. APPENDICES

Appendix 1a - Constitution of the Joint Committee

Appendix 1b - Procedure Rules

Appendix 1c - Terms of Reference

Appendix 2 – Budget Information

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APPENDIX 1a

THE WEST YORKSHIRE ADOPTION JOINT COMMITTEE

Constitution

1) Introduction

- a) The West Yorkshire Adoption Joint Committee ('WYAJC') is a joint committee under S9EB of the Local Government Act 2000 and pursuant to Regulation 11 of the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012.
- b) The Participating Authorities have entered into a Partnership Agreement dated XXX ('the Partnership Agreement'¹) for the discharge of functions by the Host Authority (acting as a Regional Adoption Agency to be known as One Adoption Agency for West Yorkshire.)
- c) WYAJC will exercise functions delegated to it by the Participating Authorities in relation to adopter recruitment and assessment, family finding, adoption panel and adoption support ('the Delegated Functions') as set out in the WYAJC Terms of Reference.
- d) Political proportionality rules do not apply to the WYAJC.

2) Participating Authorities

- a) WYAJC will comprise the following authorities ('the Participating Authorities'):-
 - i) City Of Bradford Metropolitan District Council;
 - ii) Calderdale Council;
 - iii) The Council of the Borough of Kirklees Council;
 - iv) Leeds City Council ('the Host Authority'); and
 - v) Wakefield City Council.

3) Membership

- a) WYAJC shall comprise one Member from each Participating Authority² ('the Principal Member').
- b) Co-option of Members onto WYAJC is not permitted.
- c) Each Participating Authority shall have a pool of up to two named substitute Members³. The clerk to WYAJC must be advised before the commencement of the meeting if a substitute is to attend in place of the Principal Member.
- d) In the event of a Principal Member ceasing to be a member of the Participating Authority, he/she shall also cease to be a member of WYAJC and the relevant authority shall appoint another Principal Member in his/her place as soon as reasonably practicable.

¹ Which term shall be understood to include any later amendments to the Partnership Agreement

² The Leader of each authority shall make arrangements for the appointment of the Principal Member who may be the Lead Member for Children or another, and may be a Member of the Executive or of the authority.

³ The Leader of each authority shall make arrangements for the appointment of substitute Members who may be Members of the Executive or of the authority

- e) Each Participating Authority may remove its Principal Member and or any of those Members named in its pool of Substitute Members and appoint a different Principal Member or additional Substitute Member to the pool by providing 24 hours' notice to the clerk to WYAJC.
- 4) Chair
- a) The chair of WYAJC ('the Chair') shall be the Member appointed by the Host Authority.
 - b) A vice chair ('the Vice Chair') shall be elected from amongst the Principal Members at the first meeting of the committee each municipal year.
 - c) Where, at any meeting or part of a meeting of WYAJC the Chair is either absent or unable to act, to the Vice Chair shall preside for that meeting or part of that meeting as appropriate.⁴
- 5) Delegation of Functions
- a) Sub Committees
WYAJC may set up Sub-Committees as required to enable it to execute its responsibilities effectively and may delegate tasks as it sees fit to these bodies, which may be formed of such members of WYAJC as it considers appropriate.
 - b) Advisory Groups
WYAJC may set up advisory groups as required to enable it to execute its responsibilities effectively and may delegate tasks as it sees fit to these bodies, which may be formed of officers and / or members of the Participating Authorities or such third parties as WYAJC considers appropriate.
 - c) Officers
WYAJC may delegate such of its functions as it sees fit to the Director of Children's Services for the Host Authority⁵.
- 6) Hosting and Administration
- a) WYAJC shall be hosted by Leeds City Council ('the Host Authority')
 - b) The Host Authority shall provide clerking services and legal advice in addition to fulfilling monitoring officer and S151 officer roles for the WYAJC.
 - c) The administrative costs of supporting WYAJC will be met by the Participating Authorities in accordance with the funding formula agreed between them and set out in the Partnership Agreement.

⁴ For the avoidance of doubt, the role of chair vests in the Principal Member concerned and in his/her absence the role of chair will not automatically fall to the relevant Principal Member's substitute.

⁵ Unless expressly indicated the fact that a function has been delegated to the Director for Children's Services of the Host Authority does not require that officer to give the matter his/her personal attention. The officer may arrange for such delegation to be exercised by an officer of suitable experience and seniority. However the Director of Children's Services will remain responsible for any decision taken pursuant to such arrangements.

- 7) Access to Information
- a) Those documents and notices relating to WYAJC which are made available for public inspection will be published on the One Adoption Agency for West Yorkshire's website. Participating Authorities may provide links to the site from their own websites.
- 8) Conduct of Members
- a) Members of WYAJC shall comply with the Members' Code of Conduct as adopted by their own authority
 - b) Members of WYAJC shall maintain their register of interests as required by the Members' Code of Conduct,
 - c) Members of WYAJC shall declare any disclosable pecuniary interest⁶ in a matter to be considered by the committee in accordance with the agenda for the meeting
 - d) Any complaint in relation to the conduct of a member of WYAJC shall be referred to the Monitoring Officer of their own authority and dealt with in accordance with the rules and procedures in place at and at the cost of that authority.
- 9) Scrutiny of Decisions
- a) Participating Authorities shall continue to operate overview and scrutiny functions in relation to the joint arrangements.
- 10) Winding up of WYAJC
- a) Participating Authorities may cease to participate in the joint committee in accordance with the provisions set out in the Partnership Agreement.
 - b) WYAJC may be wound up on the unanimous consent of all Participating Authorities in accordance with the provisions set out in the Partnership Agreement.
- 11) Amendment of this Constitution
- a) This constitution can only be amended by resolution of each of the Participating Authorities.

⁶ As defined in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012/1464

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APPENDIX 1b

THE WEST YORKSHIRE ADOPTION JOINT COMMITTEE

Rules of Procedure for Meetings

1) Frequency of Meetings

- a) WYAJC shall meet a minimum of once per year.
- b) Additional meetings shall be fixed at the discretion of the Chair.

2) Agenda for Meetings

- a) The clerk shall settle the agenda for any meeting in consultation with the Chair.
- b) In settling the agenda the Clerk shall ensure that at each meeting of WYAJC the following business will be conducted:
 - i) consideration of the minutes of the last meeting;
 - ii) exempt information – potential exclusion of the press and public, if any;
 - iii) late items, if any;
 - iv) declarations of interest, if any;
 - v) consideration of reports submitted by the Chair of the Management Board or the Director of Children's Services for the Host Authority, if any; and
 - vi) any other matter set out in the agenda for the meeting(which shall indicate which are Key Decisions¹ and which are not).

3) Notice of Public Meetings

- a) The Clerk will arrange to give notice of the time and place of a public meeting by publishing the agenda, together with every report, for that meeting on the One Adoption Agency for West Yorkshire website at least five clear working days before the meeting.
- b) Where the meeting is convened less than five clear working days before the meeting, notice will be given by publishing the agenda, together with every report, for that meeting on the One Adoption Agency for West Yorkshire website at the time the meeting is convened.
- c) Where an item is added to the agenda for a meeting after publication of that agenda, copies of the revised agenda and any report relating to that item, will be published on the One Adoption Agency for West Yorkshire website when the item is added to the agenda.
- d) Nothing in this rule requires a copy of an agenda, item or report to be available for inspection by the public until a copy is available to members of the decision making body concerned.

¹ As determined in accordance with the definition used by the Host Authority.

4) Notice of Private Meetings

- a) The Clerk will exclude access by the public to reports which in his/her opinion² contain:
 - i) confidential information; or.
- b) exempt information, and the report includes the reasons why, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.
- c) Where the whole or part of any report is not available for inspection by the public because it contains confidential or exempt information every copy of that report or part of that report must be marked “not for publication” and must state that it contains confidential information or, by reference to Schedule 12A Local Government Act 1972 the description of exempt information which it contains.

28 Days’ Notice

- d) At least 28 clear calendar days before a meeting at which exempt or confidential information is to be considered, the Clerk will arrange for a notice to publish on the One Adoption Agency for West Yorkshire website a notice of the intention to hold a meeting, or part of a meeting of WYAJC in private.
- e) The notice will include a statement of the reasons why it is intended that the meeting, or part of the meeting, should be held in private.

5 Days’ Notice

- f) At least five clear working days before a meeting at which exempt or confidential information is to be considered, the Clerk will publish further notice of the intention to hold the meeting of WYAJC in private. This will be done by including in an open report to the meeting:-
 - i) A statement of the reasons for the meeting to be held in private;
 - ii) Details of any representations received about why the meeting should be open to the public; and
 - iii) A statement of response to any such representations

Urgent Meetings At Which Exempt Or Confidential Information Is To Be Considered

- g) Where the date a meeting must be held makes compliance with rules 4d to 4f impracticable then the meeting may only consider exempt or confidential items in private with the agreement of the chair of the relevant Scrutiny Board of the Host Authority. In considering the matter the Scrutiny Board Chair must be satisfied that the meeting is urgent and cannot reasonably be deferred.

² The Clerk shall be advised by the Monitoring Officer where there is any doubt as to the confidentiality of any matter

- h) As soon as reasonably practicable after obtaining the Scrutiny Chair's agreement the Clerk will publish on the One Adoption Agency for West Yorkshire website notice of the intention to hold the meeting at which exempt or confidential information is to be considered. This will be done by including in an open report to the meeting:-
 - i) The reason why the meeting is urgent and cannot reasonably be deferred
 - ii) Confirmation of the agreement of the chair of the relevant Scrutiny Board.

5) Meetings to be held in public

- a) All meetings of WYAJC will be held in public³. However the public must be excluded from the the part or parts of a meeting whenever:-
 - i) Confidential information is likely to be disclosed during an item of business;
 - ii) The meeting passes a resolution, identifying the relevant part of the meeting to which it applies, that the public should be excluded because exempt information, described with reference to Schedule 12A Local Government Act 1972, is likely to be disclosed during an item of business; or
 - iii) A lawful power is used to exclude a member or members of the public in order to maintain orderly conduct or prevent misbehaviour at the meeting. The public may only be excluded from that part or parts of the meeting to which the circumstances set out above relate, and where, if required, notice has been given in accordance with paragraphs 4d to 4h above.
- b) The Recording Protocol: Third Party Recording of Committees, Boards and Panels⁴ shall apply to public meetings of WYAJC.

6) Quorum

- a) The quorum shall be three members.
- b) No business shall be transacted at a meeting unless a quorum exists at the beginning of a meeting. If at the beginning of the meeting the clerk to WYAJC after counting the members present declares that a quorum is not present, the meeting shall stand adjourned.

7) Attendance at meetings

- i) The Chair may invite any person, whether a member or officer of one of the Participating Authorities or a third party, to attend the meeting and speak on any matter before WYAJC.

³ Regulation 3, Executive Arrangements Regulations 2012

⁴ Appendix 1 to this document

- ii) Any person, whether a member or officer of one of the Participating Authorities or a third party, may be invited to attend on a standing basis following a unanimous vote of those present and voting at any meeting of WYAJC⁵.

8) Voting

- a) Each Participating Authority shall have one vote which shall be exercised by the Principal Member or their substitute provided that the clerk has been advised of the substitution prior to commencement of the meeting.
- b) Voting shall be conducted by a show of hands.
- c) All questions shall be decided by a simple majority of the votes of the members present, the Chair having the casting vote in addition to his/her vote as a member of WYAJC in event of a tie.
- d) The minutes of the meeting shall include a record of the names of members who cast a vote for a decision, against a decision or abstained from voting on a decision where, before a vote is taken on any matter by WYAJC, any two members present may demand that the votes are recorded, or where a record of the votes is required by law.

9) Recording of Decisions Taken at Meetings of WYAJC

- a) As soon as reasonably practicable after any meeting of WYAJC, the Clerk will produce a minute of every decision taken at that meeting and publish it on the WYAJC website together with the report in relation to the decision made. The minute will include;
 - i) A record of the decision including the date it was made,
 - ii) a statement of the reasons for each decision,
 - iii) details of any alternative options considered and rejected at that meeting and
 - iv) a record of any interest declared by any Member together with a note of any dispensation granted in respect of that interest .

10) Public Access to Documents

Agendas, Reports and Minutes

- a) For six years after a meeting, the Council will make available for inspection:-
 - i) The agenda for the meeting;
 - ii) Reports relating to items when the meeting was open to the public;
 - iii) The minutes of the meeting excluding any part of the minutes of proceedings when the meeting was not open to the public or which disclose exempt or confidential information;

⁵ Such person shall not be a Member of the Committee and shall not be entitled to vote in relation to any item, however they shall be entitled to send a substitute to attend the meeting in their place.

- iv) A summary of any proceedings not open to the public where the minutes open to inspection would not provide a reasonably fair and coherent record;

Background Papers

- b) The author of a report will set out a list of those documents ('Background Papers') relating to the subject matter of the report which in his/her opinion:
 - i) Disclose any facts or matters on which the report or an important part of the report is based; and
 - ii) Have been relied on to a material extent in preparing the reportBut this does not include:-
 - i) published works;
 - ii) works which disclose confidential or exempt information;
 - iii) the advice of a political advisor; or
 - iv) any draft report or document.
- b) A copy of each of the documents listed will be made available for public inspection for four years after the date of the meeting.

Documents Available for Public Inspection

- c) In addition to publication on the One Adoption Agency for West Yorkshire website the Clerk will make available for inspection by the public on request during office hours at the Host Authority's offices at Civic Hall, Leeds and shall supply copies of :
 - i) Any agenda and reports which are open to public inspection;
 - ii) Any further statements or particulars necessary to indicate the nature of items in the agenda which are not open to public inspection; and
 - iii) If the Monitoring Officer thinks fit, copies of any other documents supplied to Members in connection with an itemto any person on payment of a charge for postage, copying and any other costs.

11) Interpretation

- a) The ruling of the Chair⁶ as to the interpretation of any question in relation to these rules of procedure shall be final.

⁶ Who shall seek the advice of the clerk

Recording⁷ Protocol: Third Party Recording of Committees, Boards and Panels

WYAJC wants to be open and transparent in the way in which it conducts its decision-making. Therefore recording is allowed at all meetings of the WYAJC to enable those not present to see or hear the proceedings either as they take place (or later) and to enable the reporting of those proceedings.

1. Filming or other recording of all meetings of the authority, whilst those meetings are open to the public, is permitted^{8 9}.
2. Those wishing to record proceedings should, as a courtesy, inform the chair (or clerk) of the committee of their intentions to record prior to the commencement of the meeting.
3. Recordings may only be taken overtly from the area designated for the public and;
 - a. Recording devices must be in silent mode
 - b. No flash or additional lighting is permitted
 - c. Recordings must be taken from one fixed position and must not obstruct others from observing proceedings
4. The chair of a meeting has the authority to instruct that recordings be stopped where¹⁰:
 - a. The press and public have been excluded from the meeting due to the nature of (exempt or confidential) business being discussed.
 - b. There is public disturbance or a suspension/adjournment of a meeting
 - c. The recording has become disruptive or distracting to the good order and conduct of the meeting.
 - d. Continued recording is against the wishes of an individual¹¹

Use of Recordings by Third Parties– code of practice

The following code of practice applies to the use of recordings.

- A. Any published recording should be accompanied by a statement of when and where the recording was made, the context of the discussion that took place, and a clear identification of the main speakers and their role or title.
- B. Those making recordings must not edit the recording in a way that could lead to misinterpretation or misrepresentation of the proceedings or comments made by attendees. In particular there should be no internal editing of published extracts; recordings may start at any point and end at any point but the material between those points must be complete.

⁷ This includes both video and audio recording

⁸ In accordance with any regulations relating to such matters.

⁹ All agendas will indicate that recordings may be made at the meeting by third parties; signage will also be displayed indicating this

¹⁰ In all cases recording equipment must be switched off.

¹¹ Where members of the public raise an objection to being recorded, then those individuals will not be filmed. However continued audio recording will be permitted where the contributions are material to the resolutions to be made.

APPENDIX 1c

WEST YORKSHIRE ADOPTION JOINT COMMITTEE

Terms of Reference

Purpose

- 1) WYAAJC brings together the five participating authorities to:-
 - a) Engage with voluntary adoption agencies in the region;
 - b) Deliver adopter recruitment, matching, adoption panel and support functions through a regional adoption agency known as One Adoption Agency for West Yorkshire;
 - c) Promote excellent and innovative practice; and
 - d) Ensure value for money.

The Delegated Functions

- 2) WYAJC will discharge the following functions on behalf of the Participating Authorities¹:-
 - a) Adoption services including:-
 - i) Recruitment and approval of potential adopters;
 - ii) Identification of potential matches between children and adopters;
 - iii) Provision of adoption panels; and
 - iv) Provision of adoption support services² to adopters, adoptees, birth families and relevant professionals.

Remit

- 3) WYAJC will:-
 - a) Receive reports in relation to the performance and progress of One Adoption Agency for West Yorkshire from both the Head of Service and the Management Board;
 - b) discuss and agree the strategic direction of One Adoption Agency for West Yorkshire, including the setting of stretch targets;
 - c) oversee the discharge of the Delegated Functions;
 - d) promote good performance in relation to the Delegated Functions, reflecting added value brought by One Adoption Agency for West Yorkshire in outcomes for children and their adoptive families ;
 - e) monitor the budget allocated to One Adoption Agency for West Yorkshire;
 - f) review value for money achieved by One Adoption Agency for West Yorkshire; and

¹ Functions in relation to individual children (including decisions to place for adoption and to approve a match) remain the responsibility of each Participating Authority.

² Including maintenance of and access to adoption records

- g) exercise the corporate parenting role of the Participating Authorities in relation to the functions of One Adoption Agency for West Yorkshire.

DRAFT

Appendix 2

Regional Adoption Agency Budget 2017/18

<u>WYRAA Budget Breakdown</u>		£	
Staffing		4,219,500	
Commissioned Services		267,500	
Inter Agency Expenditure		1,508,000	
Other		848,815	
		6,843,815	
<u>WYRAA Partner contribution to 17/18 Budget and Percentage split</u>			
	Based on	Based on	%age
	16/17 Return	%age Contribution	Split
Partner Contributions	£	£	
Bradford	1,294,329	1,294,329	18.9%
Calderdale	831,148	831,148	12.1%
Kirklees	982,314	982,314	14.4%
Leeds	2,898,269	2,898,269	42.3%
Wakefield	837,755	837,755	12.2%
	6,843,815	6,843,815	100%

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Report of the Director, West Yorkshire Pension Fund to the meeting of Governance and Audit Committee to be held on 1 December 2016.

Subject:

V

Minutes of West Yorkshire Pension Fund (WYPF) Joint Advisory Group held on 28 July 2016.

Summary statement:

The Council's Financial Regulations require the minutes of meeting of the WYPF Joint Advisory Group to be submitted to this committee.

Rodney Barton
Director

Portfolio:

Leader of Council & Corporate

Report Contact: Rodney Barton
Phone: (01274) 432317
E-mail: Rodney.barton@bradford.gov.uk

Overview & Scrutiny Area: Corporate



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Minutes of a meeting of the WYPF Joint Advisory Group held on Thursday, 28 July 2016 at WYPF, Aldermanbury House, Bradford

Commenced 1.00 pm
Concluded 2.15 pm

Present –

<u>Bradford Members</u> Miller Lal Amran	<u>Calderdale Members</u> Baines Lynn Metcalf
<u>Kirklees Members</u> Fadia Richards Asif	<u>Leeds Members</u> Davey Harrand
<u>Wakefield Members</u> Jones Foster	<u>Trade Union Representatives</u> L Bailey - Unison I Greenwood – Unison
<u>Scheme Members</u> W Robinson	

Apologies: Councillor Thornton (Bradford); Councillor Dawson (Leeds); Councillor Speight (Wakefield) T Chard (GMB) and Scheme Member K Sutcliffe.

1. APPOINTMENT OF CHAIR

Resolved –

That Councillor Thornton be elected Chair for the Municipal Year 2016-2017

2. APPOINTMENT OF DEPUTY CHAIR

Resolved -

That Councillor Miller be elected Deputy Chair for the Municipal Year 2016/17.

Councillor Miller in the Chair



3. DISCLOSURES OF INTEREST

All those present who were members or beneficiaries of the West Yorkshire Pension Fund disclosed, in the interests of transparency, an interest in all relevant business under consideration.

Action: *City Solicitor*

4. MINUTES

Resolved -

That the minutes of the meeting held on 28 January 2016 be signed as a correct record.

5. INSPECTION OF REPORTS AND BACKGROUND PAPERS

There were no appeals submitted by the public to review decisions to restrict documents.

6. WEST YORKSHIRE PENSION FUND (WYPF) ADMINISTRATION OUTTURN 31 MARCH 2016

The report of the Director, West Yorkshire Pension Fund (**Document “A”**) summarised the total costs of administering pensions and investments in 2015/16 for WYPF.

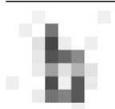
Appended to the report was an analysis of the total cost of operations for 2015/16 showing variance against revised budget and 2014/15 costs. A detailed explanation of a variance between the revised estimate and outturn figure of £95,000 was provided.

A variance on WYPF Oversight and Governance was raised. It was explained that the variance was due to CIPFA guidance now requiring some expenditure costs being reclassified from Investment Costs into the Oversight and Governance costs. A view that the previous classification was a more accurate account was expressed.

Resolved –

That the WYPF total cost of administering pensions and investments for 2015/16, contained in Document “A”, be noted.

Action: *Director, West Yorkshire Pension Fund.*



7. **UNAUDITED REPORT AND ACCOUNTS 2015/16**

The WYPF unaudited Report and Accounts for the financial year 31 March 2016 were appended to the report of the Director, West Yorkshire Pension Fund (**Document “B”**).

Members were advised that once the final audit was completed the audited Report and Accounts would be presented to the Joint Advisory Group at the meeting in January 2017.

The report revealed that the only Key Performance Indicator which had not been exceeded was the provision of pension estimates. It was explained that Government guidance had required changes to internal software systems. A delay in receipt of that guidance had prevented software suppliers adapting their systems and more detailed manual calculations had been required as a result. Enquires to the fund had been prioritised with the most urgent issues being given priority. In response to suggestions that the target be lowered it was stressed that work was in progress to achieve the target and whilst the performance figures were high the fund wished to maintain that level of service.

Members questioned the risk to the fund's portfolio which could arise from fossil fuel disinvestment. In response it was reported that the Investment Advisory Panel, at its meeting in November 2015, had discussed the issue in detail. It had concluded its satisfaction with the existing portfolio but had agreed that investigations into alternative sources should be continued. The Investment Advisory Panel had discussed, at its meeting earlier today, a report produced by a specialist carbon disposal operator on plans to reduce oil costs and extraction of energy. Assurances were provided that the portfolio was reviewed on a regular basis and all investments, in terms of risk and reward were monitored. In ensuing discussions about fossil fuels the Fund's ability to influence that industry through their investments was acknowledged.

Following discussions about the impact of a potential significant increase in redundancy payments it was explained that the fund valuation did include cash flow forecasts and Members would be kept advised of any liquidity issues arising.

Resolved –

That the unaudited WYPF Report and Accounts for the financial year ended 31 March 2016, appended to Document “B”, be approved.

Action: Director, West Yorkshire Pension Fund.

8. **AUDIT STRATEGY MEMORANDUM 2015/16**

The report of the Director, West Yorkshire Pension Fund, (**Document “C”**), contained the Audit Strategy Memorandum which set out the plan for the external audit of West Yorkshire Pension Fund 2015/16.



The document provided an assessment of significant risks of material error and work to mitigate that risk. Members were assured that the risks outlined were inherent to most organisations and were common and standard to a Pension Fund of the size of WYPF. The audit was underway and not yet completed but had not identified any material matters to which Members should be altered.

It was questioned if the process had changed in recent times to reflect the increasing use of information technology. In response it was confirmed that IT specialists were utilised to undertake programme reviews and testing and that no specific risks had been identified.

Resolved –

That the Audit Strategy Memorandum 2015/16, contained in Document “C”, be noted.

Action: Director, West Yorkshire Pension Fund.

9. INVESTMENT REFORM CRITERIA AND GUIDANCE - INVESTMENT POOLING

The Director, West Yorkshire Pension Fund, presented a report, (**Document “D”**), which advised Members of the Government’s intention to work with Local Government Pension Schemes (LGPS) administering authorities to ensure that they pooled investments to significantly reduce costs while maintaining overall investment performance. The report also included proposals for asset pooling in the LGPS which had been submitted to the Government on 15 July 2016.

Members were reminded that on 25 November the Investment Reform Criteria and Guidance was issued, which set out the criteria to be applied to the pooling of LGPS assets. Authorities had been invited to submit their initial proposals for pooling by 19 February 2016. West Yorkshire Pension Fund (WYPF) together with Greater Manchester and Merseyside duly submitted its proposals by the deadline. The submission and the Minister’s response were available on the WYPF website. A more comprehensive proposal had been submitted to the Government on 15 July 2016 and that submission would be assessed against the criteria in Document “D”.

It was questioned if a response to the submission on 15 July had been received together with any agreement on assets to be held outside of the pool. The Director, West Yorkshire Pension Fund confirmed that a common response had been received to the proposals submitted in February.

The response submitted by the WYPF in July 2016 revealed that as the cost base for management of listed assets was so low it was likely that WYPF costs would rise as a result of pooling. WYPF had requested consideration should be given to allowing it to retain its listed investments outside the pool for a period in order to establish a baseline low cost for managing listed assets. Members



voiced their agreement with that request and suggested their support, and their strong belief that WYPF must not be made to raise costs, should be conveyed.

Resolved –

That the submission to Government appended to Document “D” and the continued development of pooling arrangements also contained in Document “D” and subject to Government response, be noted.

Action: Director, West Yorkshire Pension Fund

10. LOCAL GOVERNMENT PENSION SCHEME 2014

The Director, West Yorkshire Pension Fund, presented a report (**Document “E”**) which updated Members on changes and proposed changes to the Local Government Pension Scheme (LGPS) 2014.

Resolved –

That the report be noted.

Action: Director, West Yorkshire Pension Fund

11. REVIEW OF ADDITIONAL VOLUNTARY CONTRIBUTIONS (AVC) PROVIDERS

Annually the WYPF ask Aon Hewitt’s Investment Consulting Division to review the performance of Additional Voluntary Contribution Providers in terms of investment performance, financial strength, investment capabilities, charging structure and administration. The report of the West Yorkshire Pension Fund Director, (**Document “F”**) outlined the findings of the review.

An amendment to 3.10 of Document “E” was tabled and provided the annual management charges for SSgA Emerging Markets Equity Index Fund which had been omitted from Document “F”.

Members were advised that issues about the costs of Prudential had been raised. Prudential had maintained that as they provided additional services for WYPF members they incurred additional administrative costs. Efforts were being progressed to reduce those costs.

Resolved –

That the outcome of the annual review of WYPF’s AVC providers be noted and the recommendations of Aon Hewitt to make changes to the lifestyle options set out in paragraphs 3.6; 3.8 and 4.5 of Document “F” be approved.

Action: Director, West Yorkshire Pension Fund



12. 2016 ACTUARIAL VALUATION

The report of the Director, West Yorkshire Pension Fund (**Document “G”**) advised Members that the actuarial valuation of the West Yorkshire Pension Fund (WYPF) was being prepared based on the situation at 31 March 2016 and would determine the level of employers' contributions from April 2017 onwards.

The report provided Members with a summary of the proposed approach to the actuarial valuation at 31 March 2016 by the Fund's actuary. Economic conditions, referred to in the report, were discussed and the likelihood of volatile conditions influencing the choice of discount rate was questioned. In response, dynamic discussions, which Members were assured were always undertaken with the actuary, were explained. The main objective of those discussions was to maintain as steady a contribution rate as possible for the main employers.

Resolved -

That the report be noted.

Action: Director, West Yorkshire Pension Fund

13. REGISTER OF BREACHES OF THE PENSIONS REGULATOR'S CODE OF CONDUCT

The report of the Director, West Yorkshire Pension Fund, (**Document “H”**), informed Members that in accordance with the Pensions Act 2004 (the Act), from April 2015 all Public Service Pension Schemes came under the remit of the Pensions Regulator.

Section 70 of the Act imposed a requirement to report a matter to The Pensions Regulator as soon as was reasonably practicable where that person had reasonable cause to believe that:

- (a) a legal duty relating to the administration of the scheme had not been or would not being complied with, and
- (b) the failure to comply was likely to be of material significance to The Pensions Regulator in the exercise of any of its functions.

In accordance with the WYPF Breaches Procedure a register of any breaches of the Pensions Regulator Code of Practice was maintained. The Register of Breaches 2016 and Late Payment of Contributions, April 2016, due by May 2016 were appended to the report.

Members were assured that a report on the Register of Breaches would be provided to each meeting to ensure Members were aware of any contraventions.

Resolved –

That the entries, all of which relate to late payment contributions by employers, on the Register of Breaches be noted.

Action: Director, West Yorkshire Pension Fund



14. RISK MANAGEMENT

The report of the Director, West Yorkshire Pension Fund, (**Document “I”**) presented the latest WYPF Departmental Risk Management Report.

The report revealed that 42 risks had been identified. Members were advised that the risks had been rated. Of those risks 20 had been rated above their acceptable tolerance level and 22 below the tolerance line. To mitigate those risks an Action Management Plan had been developed and each risk was owned and reviewed by a senior manager of the fund. The Action Management Plan was contained at Appendix 1 to Document “I”.

The impact of Government Budget cuts was raised by Members and it was questioned how risks outside the control of the fund were managed. In response it was explained that if there should be a level of redundancy way above what was predicted at the actuarial valuation the Fund had the ability to divest short term liquid investments to meet liabilities. Any such measures would always be discussed with the Investment Advisory Panel and a communication exercise would be undertaken with Members.

The Director was thanked for the production of an understandable and informative risk management matrix.

Resolved –

That the West Yorkshire Pension Fund Risk Management Report be noted.

Action: Director, West Yorkshire Pension Fund

15. SHARED SERVICE PARTNERSHIP WITH LINCOLNSHIRE PENSION FUND

Members were reminded that West Yorkshire Pension Fund’s (WYPF) shared service partnership to provide a pension’s administration service for Lincolnshire Pension Fund (LPF) had commenced on 1 April 2015.

The report of the Director, West Yorkshire Pension Fund, (**Document “J”**), provided an update on the partnership to date. The report included performance and benchmarking and contained an analysis of performance against key areas of work for the period 1 April 2015 to 31 March 2016 as measured against both local indicators and the national CIPFA benchmarks.

Scheme information including an age profile of the scheme and the number of employers were provided. An administration update reported the issuing of life certificates to all 18,000 pensioner members to monitor their continuing entitlement to a pension from LPF. It was explained that a life certificate exercise had not previously been conducted by LPF. The likelihood of fraud being detected arising from that exercise was questioned and it was anticipated that this would be minimal.



Issues which had been encountered with the quality and timing of data received from Lincolnshire were reported and work undertaken to receive monthly returns was discussed. The benefits of shared services to the whole of the WYPF were reiterated.

Resolved –

That the report be noted.

Action: Director, West Yorkshire Pension Fund

16. EXTERNAL BUSINESS - PENSION ADMINISTRATION FOR THE FIREFIGHTERS' PENSION SCHEMES

Members were advised that West Yorkshire Pension Fund provided a shared service partnership to provide a pensions administration service for seven Fire Authorities. The report of the Director, West Yorkshire Pension Fund, (**Document “K”**) was presented to provide an update on the business to date.

The background to the report revealed that West Yorkshire Pension Fund (WYPF) provided a shared service partnership to provide a pensions administration service for seven Fire Authorities. The majority of the fire service business had been won through tender process which meant that there were different prices and service level agreements in place for each of those authorities. It was explained that work was being undertaken to move all of the authorities to a shared service arrangement.

In recognition of its achievements Members were advised that, at the recent Pension Scheme of the Year Awards held in London, the Fund had won the Best Use of IT and Technology Award.

Resolved –

That the report be noted.

Action: Director, West Yorkshire Pension Fund

17. TRAINING, CONFERENCES AND SEMINARS

The Director, West Yorkshire Pension Fund, submitted a report, (**Document “L”**), which informed Members of training courses, conferences and seminars which may assist them. Full details of each event were available at the meeting.

Members were advised that training to understand their responsibilities and the issues they would be dealing with was a very high priority and that they were encouraged, and would be fully supported, to undertake such training by the Fund.

No resolution was passed on this item.



18. ANNUAL MEETINGS

The report of the Director, West Yorkshire Pension Fund (**Document “M”**) advised members of two Annual Meetings, one for Employers and one for Scheme Members which would be held in 2016.

Resolved –

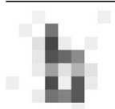
That the details of the Annual Meetings, contained in Document “M” be noted.

Action: Director, West Yorkshire Pension Fund

Chair

Note: These minutes are subject to approval as a correct record at the next meeting of the WYPF Joint Advisory Group.

THESE MINUTES HAVE BEEN PRODUCED, WHEREVER POSSIBLE, ON RECYCLED PAPER



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