POLICY & RESOURCES CABINET BOARD

19TH JUNE 2014

FINANCE & CORPORATE SERVICES

REPORT OF THE HEAD OF FINANCIAL SERVICES – DAVID REES

INDEX OF REPORT ITEMS

PART 1 - Doc.Code: PRB-190614-REP-FS-DR

SEC	SECTION A – MATTERS FOR DECISION						
1.	Repayment of Grant Monies – Housing Renewal and Adaption Services	2-5	Neath East				
2.	Miscellaneous Grant Application	6-9	Cymmer				
SEC	TION B – MATTERS FOR INI	FORMATIO	N				
3.	Treasury Management Monitoring	10-13	All				
4.	Finance and Corporate Services Business Plans	14-49	All				

SECTION A - MATTERS FOR DECISION

ITEM 1

REPAYMENT OF GRANT MONIES – HOUSING RENEWAL AND ADAPTION SERVICES

1. Purpose of Report

1.1 To ask Members approval of Hutchinson Thomas offer of repayment of grant monies.

2. Background

- 2.1 A Group Repair grant was awarded to Mr David Steven Williams of 24 Whittington Street, Neath in March 2011, for renovation works to the property to a value of £12,231.00.
- 2.2 The conditions of the scheme state that should the property be disposed of within the protected period of 5 years commencing with the date of practical completion of the works, the balance of the cost which in this case amounts to the sum of £12,231.00 will be repayable to the Council on demand.
- 2.3 Practical Completion of the works was achieved on 29th February 2012.
- 2.4 Tragically, Mr Williams was killed in a road accident on the 29th February 2012, in consequence of which his personal representatives had no realistic alternative other than to dispose of the property on the open market for sale.
- 2.5 The late Mr Williams' estate is being administered by Hutchinson Thomas Solicitors, who have recently provided a detailed financial statement setting out the assets and liabilities of the estate.
- 2.6 A summary of the assets and liabilities are fully set out below:

Assets following sale of property and	-	£8,985.40
discharge of outstanding mortgage		
Priority debts	-	£4,738.50
(incl Probate fees, funeral costs,		
Solicitors fees)		
Amount available for ordinary debts	-	£4,246.90
The total amount of ordinary debts	-	£18,768.11
Capital One	-	£1,565.93
Halifax	-	£2,255.99
Barclaycard	-	£2,715.19
NPTCBC	-	£12,231.00

2.7 The total amount of debts exceeds the amount of available funds, the solicitors have calculated the debt repayment on a proportional basis as follows:

Capital One

£1,565.93 = 8.33% of total ordinary debts 8.33% of available funds (£4,246.90) - = £353.77

Halifax

£2,255.99 = 12.00% of total ordinary debts 12.00% of available funds (£4,246.90) = £509.63

Barclaycard

£2,715.19 = 14.44% of total ordinary debts 14.44% of available funds (£4,246.90) = £613.25

NPTCBC

£12,231.00 = 65.23% of total ordinary debts 65.23% of available funds (£4,246.90) = £2,770.25

- 2.8 Due to the limited funds available Hutchinson Thomas has advised that the total amount available to NPTCBC in relation to its debt is £2,770.25.
- 2.9 The solicitors have requested that a decision is made so they can finalise the details.

3.0 Conclusion and Recommendation

- 3.1 It is evident from the estate and administration accounts set out above, that the late Mr Williams' estate is clearly insolvent and legal services have advised that there is no prospect of recovering any greater sum from the estate than that offered by the solicitors.
- 3.2 It is accordingly recommended that having regard to the circumstances of the case and the limited funds available, the offer of £2,770.25 from the solicitors dealing with Mr Williams' estate is accepted.

4. Reasons for Proposed Decision

4.1 The proposed decisions were made to ensure the Authority exercises its discretion under The Private Sector Housing Renewal Strategy and Policy published in July 2003, pursuant to the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002.

List of Background Papers

Property Grants File

Wards Affected

Neath East

Officer Contact

Dave Rees - Head of Financial Services

Telephone: 01639 763634

Email: d.rees1@npt.gov.uk

Robert Davies - P O Housing Renewals

Telephone: 01639 763154

Email: r.i.davies@npt.gov.uk

COMPLIANCE STATEMENT

REPAYMENT OF GRANT MONIES – HOUSING RENEWAL AND ADAPTION SERVICES

(a) Implementation of Decision

The decision is proposed for implementation after the three day call in period.

(b) Sustainability Appraisal

Community Plan Impacts:

Economic Prosperity

Education and Lifelong Learning

No impact
No impact
Better Health and Well Being

Environment and Transport

Crime and Disorder

No impact
No impact
No impact

Other Impacts:

Welsh Language
Sustainable Development
Equalities
Social Inclusion
No impact
Positive
Neutral
Neutral

(c) <u>Consultation</u>

Not applicable.

ITEM 2 – MISCELLANEOUS GRANT APPLCIATION

Existing Policy Statement

- 1.1 a) Each application will be considered on its merits.
 - b) The Committee will only approve applications for financial assistance from voluntary or charitable organisations which are manifestly committed to voluntary endeavours of a local nature. This will not preclude the consideration of applications where the disposal of funds is outside the area but still provides significant benefits for the people from the Neath Port Talbot area.
 - c) No applications will be considered from religious bodies except relating to church halls and other premises where there is significant community use of the property for non-religious activities.
 - d) No applications will be considered from other public funded bodies such as community councils, hospital trusts, etc. or where the benefit may be in lieu of their contributions such as appeals for hospital equipment.
 - e) Applications from individuals may be considered where both the person and the community derive a benefit.
 - f) No grants will be made to any individual or organisation whose prime purpose is to distribute their funds to other charitable bodies.

Budget for 2014/15

1.2 The following grants are included and have been approved within this budget:-

	Budget
	2014/15
	£
Citizen Advice Bureau	82,680
Neath Port Talbot Council for	45,494
Voluntary Service	
Racial Equality Council	15,900

Maintenance of Mechanics Institute	14,037
(in lieu of grant aid to Antiquarians &	
Archives)	
West Glamorgan Association for the	2,100
Blind	
One-off grants	949
Total	161,160

Grant Application

Cymmer Afan Community Library – additional application

1.3 As Members are aware it was agreed at the meeting of the Cabinet Board of 8th May 2014 to award a grant to Cymmer Afan Community Library to cover the rent of £1,980 per annum for a five year period. A subsequent request has been received for a grant towards a £40 fee for filing the property lease arrangements with the Land Registry and towards £450 Building Insurance costs. Members should note that, as a matter of course, all community groups are informed that they will be liable for all running costs prior to entering into any lease agreement on a full repair and insurable basis.

Recommendation

- 1.4 It is recommended that Members:
 - Decide on the above mentioned application.

Reason for proposed decision

1.5 To decide on the funding application.

List of Background Papers

Letters of application.

Wards Affected

Cymmer.

Officer Contact

Mr H J Jenkins – Director of Finance & Corporate Services (Tel. 01639 763251 - email: h.jenkins@neath-porttalbot.gov.uk)

Mr D Rees – Head of Financial Services (Tel. 01639 763634 - email: d.rees1@neath-porttalbot.gov.uk)

COMPLIANCE STATEMENT

MISCELLANEOUS GRANTS APPLICATION

(a) **Implementation of Decision**

The decision is proposed for implementation after the 3 day call-in period.

(b) Sustainability Appraisal

Community Plan Impacts:

Economic Prosperity Positive
Education and Lifelong Learning Positive
Better Health and Well Being Positive
Environment and Transport Positive
Crime and Disorder No impact

Other Impacts:

Welsh Language No impact
Sustainable Development Neutral
Equalities Positive
Social Inclusion Positive

(c) <u>Consultation</u>

There has been no requirement under the Constitution for external consultation on this item.

MATTERS FOR INFORMATION

ITEM 3

TREASURY MANAGEMENT MONITORING 2014/15

1. Purpose of Report

This report sets out treasury management action and information since the previous report.

2. Rates of Interest

Bank base rates continue to be at an all-time low of 0.5% (since 5th March 2009) and detailed below are the changes in the bank base rate since April 2008.

Effective Date	Bank Rate
10 April 2008	5.00%
08 October 2008	4.50%
06 November 2008	3.50%
04 December 2008	2.00%
08 January 2009	1.50%
05 February 2009	1.00%
05 March 2009 to date	0.50%

The following table provides examples of external borrowing costs as provided by the Public Works Loans Board as at 5th June 2014.

	-	stalments ncipal	Annuity		Maturity	
	Previous 24 April 2014	Current 05 June 2014	Previous 24 April 2014	Current 05 June 2014	Previous 24th April 2014	Current 05 June 2014
	%	%	%	%	%	%
5-5.5 years	1.99	2.22	1.85	2.23	2.76	2.99
10-10.5 years	2.76	2.99	2.69	3.03	3.63	3.82
20-20.5 years	3.63	3.82	3.68	3.91	4.18	4.34
35-35.5 years	4.11	4.27	4.17	4.36	4.24	4.42
49.5-50 years	4.24	4.41	4.24	4.43	4.21	4.38

3. General Fund Treasury Management Budget

The following table sets out the treasury management revised budget and actual outturn for 2013/14 and budget for 2014/15 which consists of a gross budget for debt charges i.e. repayment of debt principal and interest, and interest returns on investment income.

2013/14 Revised Budget £'000	2013/14 Actual £'000		2014/15 Original Budget £'000
16,044	15,017	Principal and Interest charges Contribution to Transpury	16,890
1,300	2,176	Contribution to Treasury Management Equalisation Reserve to fund SSIP and other Capital Programme over the next 3 years.	
17,344	17,193	Subtotal Expenditure	16,890
		Investment Income	
(900)	(778)	- Total	(654)
160	189	- less allocated to other funds	200
(740)	(589)	Sub-total Income	(454)
16,604	16,604	Net General Fund	16,436

NB: Other funds include Trust Funds, Social Services Funds, Schools Reserves, Bonds etc.

4. Borrowing

No borrowing has been carried out since the last report.

5. Investment Income

Members should note that the majority of investments are classified as 'specified' i.e. up to 12 months and are currently with the major banks including Barclays, Lloyds Group, Bank Santander, Clydesdale, RBS and Nationwide BS.

The Council policy will allow investments up to a maximum of £25m for periods of more than 1 year and up to 5 years, and this will be considered when decisions on investing surplus funds are made.

No additional long term investments have been carried out since the last report. The Council currently has £10m invested for periods in excess of 12 months:

Counterparty	Value £'000	Period	Maturity	Rate %
Eastbourne Borough Council	4,000	4.5 Years	June 18	2.2
Peterborough City Council	6,000	5 Years	Dec 18	2.1

Icelandic Bank Update

Members should note the following position in relation to the recovery of monies from investments in Icelandic related banks.

There have been no further dividends received since the last report. The tables below show the amounts outstanding.

Table 1 – Original Investments

Bank	Original Investment	Amount of Principal Repaid	Current Outstanding Investment
	£'000	£'000	£'000
Heritable	9,000	8,597	403
KSF	3,000	2,516	484
	14,000	13,113	887

Table 2 – Investments Held in Escrow Accounts – Icelandic Kroner

Bank	Investment	Amount	Outstanding
	(Sterling	Repaid	Investment
	Equivalent)		
	£'000	£'000	£'000
New Glitnir	387	0	387

Some of the investments matured by the old Glitnir have resulted in cash being held in the form of Icelandic Kroner. In line with Icelandic law, the Kroner is not tradable and can only be spent within Iceland. The Local Government Association is pursuing ways of transferring these investments to realise repayments into Sterling. These new investments with the new bank are held in an Escrow Account in the name of the local authority and generating interest in excess of 4%.

List of Background Papers

Treasury Management Files PWLB Notice Number 214/14

Appendix

None

Wards Affected

All

Officer Contact

For further information on this report item, please contact:

Mr David Rees – Head of Financial Services

Tel. No. 01639 763646

E-mail: d.rees1@npt.gov.uk

Mr Huw Jones - Chief Accountant

Capital, Treasury, FIS and Projects

Tel. No: 01639 763575

E-mail: h.jones@npt.gov.uk

ITEM 4

FINANCE AND CORPORATE SERVICES BUSINESS PLANS

1. Purpose of the report

1.1 This report provides, for information, the business plans for 2014/15 for the sections of Legal Services and Financial Services.

2. Background

- 2.1 The Council has a general duty under the Local Government (Wales) Measure (2009) to 'make arrangements to secure continuous improvement in the exercise of its functions'. To support this, a review was undertaken of the Council's current approach to performance management by a group of officers from across the Council. External challenge to the review was provided by Rod Alcott, Chief Officer Leadership was provided by Aled Evans and Head of Service leadership by Karen Jones.
- 2.2 A key proposal from the review was to replace the existing policy which requires business plans to be produced at Accountable Manager level with a requirement for them to be produced at Head of Service level based on a common set of principles. These business plans will be underpinned by the production of service report cards at Accountable Manager level which will demonstrate the service has in place arrangements to support and inform continuous improvement.
- 2.3 The timetable for completion of the plans was mid-May in order that the relevant Cabinet Member could sign off the plans before the Annual General Meeting of Council. The plans for the Finance and Corporate Services Directorate (ICT, Legal Services and Financial Services) were produced according to the timetable and have been signed off by Councillor Arwyn Woolcock.

3. Business Plans

- 3.1 The business plans that have been provided in this report are for the sections of Legal Services and Financial Services, the ICT business plan will be reported to members at a later date along with the ICT Strategy. The business plans are all based on the common set of principles proposed by the review referred to above, were all produced according to the timetable laid down, and were signed off by Councillor Arwyn Woolcock.
- 3.2 The plans outline the key objectives of the divisions for 2014/15 along with how any risks to the achievement of these objectives will be mitigated. They finally provide a detailed plan of individual actions designed to ensure that the objectives referred to are achieved.
- 3.3 Monitoring of delivery against the business plan will take place throughout the year via meetings with Accountable Managers and with the Director of Finance and Corporate Services at his regular Departmental Management Team meetings.
- 3.4 The business plans are attached at Appendix 1 and 2 to this report.

4. Recommendation

4.1 That the report be noted.

Background Papers

None

Appendices

Appendix 1 – Financial Services Division Business Plan 2014/15

Appendix 2 – Legal Services Business Plan 2014/15

Wards Affected

A11

Officer Contact

For further information on this report item, please contact:

Mr David Michael – Head of Legal Services

Tel. No. 01639 763368

E-mail: d.michael@npt.gov.uk

Mr Dave Rees - Head of Financial Services

Tel. No: 01639 763634

E-mail: d.rees1@npt.gov.uk

Financial Services Division Business Plan 2014/15

Head of Service: David Rees

Area of Responsibility: Financial Services

Sponsor (Cabinet Member): Councillor Arwyn Woolcock

Introduction

This is the 2014/15 business plan for the Financial Services Division of the Finance and Corporate Services Directorate. It sets out a summary of achievements in 2013/14 followed by details of the priorities and actions for the division for 2014/15.

Key Achievements Summary for 2013/14

The 2014/15 budget settlement for Welsh local authorities meant a real terms budget reduction of £17m or 6.2%. Such a reduction meant that significant budget reductions were required in the Authority's budget for the year. The division worked closely with service directorates in order to develop an updated forward financial plan (FFP) and a balanced budget to take us into the new financial year.

The 2012/13 Annual Statement of Accounts was produced in line with the legislative timetable, and showed considerable improvement in terms of quality over recent years.

Funding for the capital programme enabled that programme to provide a number of significant achievements through 2013/14.

The collection rates achieved on council tax and business rates were 97.31 and 98.05 respectively. Both were increases on the rates achieved in the previous year.

A great deal of work has been carried out in supporting the requirements of the welfare benefit changes and in meeting the needs of those citizens currently in receipt of welfare benefits.

The Internal Audit plan was delivered to the satisfaction of the Wales Audit Office whilst the section was undergoing significant structural change due to the deletion of the Chief Internal Auditor post.

Principle 1 – What are the most important things for the service to achieve in 14/15?

- 1. To accurately monitor directorate budgets, highlighting any pressures at an early stage, and by working closely with directorates, to ensure suitable actions are put in place to mitigate the risks of not delivering overall spend within budget guidelines.
- 2. To work with directorates to produce a balanced budget for 2015/16 and updated Forward Financial Plan (FFP) in line with the timetable required by the Chief Executive.
- 3. To produce a Statement of Accounts for the financial year 2013/14 within the statutory timescales and to meet statutory requirements.
- 4. To maximise the collection of council tax and other income due to the Council.
- 5. To ensure that all who are entitled to benefits, receive the right amount and in a timely manner.
- 6. To deliver an agreed and detailed programme of work on financial based projects.
- 7. To ensure that assurance can be given to the Audit Committee regarding the adequacy of internal controls existing within the systems and processes operated by the Authority.
- 8. To implement the workforce agreement 2013 and all other statutory changes.
- 9. To review the debt recovery process and debtors IT system.

<u>Principle 2 – Why have we prioritised these achievements?</u>

- 1. To satisfy statutory requirements particularly around budget setting and the production of the statement of accounts.
- 2. To help ensure that the Authority maintains its expenditure and income levels within budget and doesn't require the use of reserves.
- 3. To maximise the amount of income available to the Council to help fund the services it provides.
- 4. To ensure that citizens who are in receipt of benefits receive the best possible service and are not disadvantaged financially.
- 5. To provide high quality financial advice and support to all directorates.
- 6. To minimise the risk of fraud and/or errors occurring within the systems operated by the Authority that could damage its financial and/or reputational standing.

Principle 3 – How are we going to secure these achievements?

Primarily the services to secure these achievements will be provided in-house. Some elements of service or advice however will be commissioned externally. Examples of these are in debt recovery, single person discount investigations and treasury management strategy advice.

Principle 4 – How will any risks be managed?

The following are the identified risks to achieving the priorities set above along with the measures being taken to mitigate those risks:

- 1. The risk that service and financial pressures through the year will not allow elements of the FFP to be achieved and/or will put pressure on other budget heads. This will be mitigated by a new budget monitoring process the aim of which is to highlight pressures at the earliest possible stage and compel managers to find solutions to those pressures and therefore retain net spending within the budget guidelines.
- 2. That a balanced budget is not produced in time that is sufficiently robust to meet the requirements of audit scrutiny. This is mitigated by a rigid and robust process involving at a minimum, Directors, Heads of Service and Members. The process is timetabled with clear deadlines and required outcomes.
- 3. That the Statement of Accounts will not be produced in line with the statutory deadlines, and will have an unacceptable number of audit qualifications. This is partly mitigated by detailed staff training which has taken place in the requirements of the process and in lessons learnt from previous years. Furthermore, a detailed closure programme has been designed which outlines all the requirements of the process along with appropriate timescales and deadlines. Finally, detailed monitoring of the process is in place which includes regular meetings with the Wales Audit Office (WAO).
- 4. That the Council Tax collection rate will fall below the average of the previous five years. This will be mitigated by regular monitoring of the council tax collection rate and immediate remedial action being taken by the experienced council staff. In addition, a new Council Tax Recovery Policy has recently been written and approved which includes expansion of the possible routes of recovery available to the service. This new policy including the increased methods of recovery should enable the council tax collection rates to be at least maintained at its current level and hopefully increased.

- 5. That there is a drop in performance in terms of the time taken to process benefits and in terms of the number of write offs required due to authority error. This risk is mitigated by the regular training that all benefits staff receive particularly with regard to changes in the rules and regulations surrounding benefits.
- 6. That there is a failure to deliver agreed projects on time and with the required outcomes. This will be mitigated by the establishment of a work programme for the project team. This work programme will have, for each project, detailed timescales, target dates and expected outcomes, which are allocated against individual members of staff. The work programme will be monitored on a regular basis with updates being reported to the Directorate's Departmental Management Team (DMT) for further scrutiny.
- 7. That the WAO cannot give assurance regarding the quality of audit work. This is mitigated via a number of methods. Firstly, an annual audit plan is produced by the section which is approved by Audit Committee and agreed by the WAO. Secondly, all audit work is reviewed by a senior auditor/audit manager, and further quality control checks will be carried out by the Head of Financial Services. All Internal Audit work is reported to Audit Committee on a quarterly basis, and finally the work of Internal Audit is subject to an annual review by WAO.
- 8. Further mitigation of the above risks will be achieved by the following generic actions:
 - Provide appropriate and timely training for all staff, both work based and external, to ensure that staff maintain the required skills and keep up to date with changes in regulations and legislation.
 - Provide the opportunity to achieve relevant professional qualifications to encourage staff progression and retain a high level of professional expertise within the division.
 - To maintain low levels of sickness absence in the division through strict adherence to the absence management policy and regular sickness monitoring.

- To carry out personal development reviews for all staff members within the division and to ensure that issues that arise from the reviews are acted upon.
- To retain staff morale at as high a level as possible through good communication, and through the other factors detailed in this section.
- In terms of specific service risks, all fundamental financial services provided by the division are subject to an annual review by Internal Audit which provides assurance regarding the systems and controls and recommendations for further improvement.

Principle 5 – What is our current performance in these priority areas?

- 1. In previous years, formal budget monitoring was carried out on a quarterly basis. The outturn position is currently being prepared for 2013/14, but it is expected to show that the net expenditure for the year for the Authority as a whole will be retained within budget including the agreed in year targeted underspend.
- 2. A balanced budget for 2014/15 and an updated FFP was produced to the required standard by the end of January 2014 which was earlier than the original target date.
- 3. The Statement of Accounts for 2012/13 was produced within the legislative timescale and to a standard acceptable to the WAO.
- 4. The Council Tax collection rate for 2013/14 was 97.3% which was an improvement on the previous year. Whilst the Welsh average figure is not currently available, the figure for the Authority for the previous year was better than the Welsh average.

- 5. In 2013/14 out of a total of 16,000 awards made there were a total of 39 authority errors. As a result of these errors the amount overpaid (and hence not recoverable) was only 0.04% of the total money paid out.
- 6. The project team is new in terms of its structure and aims. Finance project work has been carried out to a high standard in previous years.
- 7. In 2013/14, the Internal Audit plan was delivered with a total of 84 formal reports issued. The annual WAO assurance statement is not yet available for 13/14 but was received for 2012/13.
- 8. In 2012/13, 32,195 invoices were raised with a value of £7.8m. Income related to all outstanding debts of £34.4m was received.

Principle 6 – Action Plan:

Number	Task/Action	Comments	Resp. Officers	Target Date	Outcomes
1.	Enhance and strengthen the role of Audit Committee in the areas of risk management and Treasury Management	Work with WAO and Audit Committee Chair to agree what steps are required	D. Rees	March 2015	Wider role for Audit Committee
2.	Improve risk management arrangements in the Authority	Review current arrangements, the current policy and the risk management register	D Rees	March 2015	Improved and more joined up risk management processes
3.	Ensure completion of the monthly pay project	Lead project team to get everyone on to monthly pay	D Rees	Target set by project team	All staff to be paid monthly
4.	Implement a new budget monitoring process	Work closely with group accountants	S. Gorman	From May 2014	Improved budget monitoring process for the Authority
5.	Support the budget setting process for 2015/16 and the FFP	Provide detailed financial support primarily to the Director of Finance and Corporate Services	S. Gorman	February 2015	Balanced budget set to the Chief Executive's timescales
6.	Provide support to two new directorate group accountants	The two new accountants will require greater levels of support during their first year in the posts	S. Gorman	March 2015	Reduced on-going support necessary
7.	Co-ordinate the work required for the Statement of Accounts process	To produce a Statement of Accounts within the prescribed timescales	J. North	June 2014	Completed Statement of Accounts that meets all the legislative requirements

Number	Task/Action	Comments	Resp. Officers	Target Date	Outcomes
8.	Prepare updated closure programme for the 2014/15 accounts	To ensure that we build in any lessons learned from the current year's process	J. North	September/October 2014	To continue the improvements that have been made in the accounts closure process
9.	Identify insurance management information and its use to influence service delivery	Provide relevant data for monitoring of service requirements regarding insurance	J. North	October 2014	Improved management information and monitoring of insurance arrangements
10.	Prepare a detailed work programme for the project team for 2014/15	Agree a work programme with the Head of Financial Services to include timescales and work outlines	H. Jones	June 2014	Detailed finance projects work plan
11.	Review and where appropriate revise the treasury management strategy for the Authority	This should be based on the current financial climate and latest information from the Authority's Treasury Management advisers	H. Jones	September 2014	Updated strategy based on current information
12.	Continue to provide FIS team support to the e-procurement project	Manage the workload of the team so that support can be provided when necessary and appropriate	H. Jones	March 2015	Full implementation of the e-procurement system
13.	Implement the new council tax recovery policy	As recently approved by Members	A. Hinder	March 2015	Improved council tax recovery process
14.	Monitor and report on council tax collection rates	For monitoring by members	A. Hinder	December 2014	Improved information for Members

Number	Task/Action	Comments	Resp. Officers	Target Date	Outcomes
15.	Support the budget process in terms of council tax details and requirements	Council tax base information in particular	A. Hinder	January 2015	Balanced budget set to the Chief Executive's timescales
16.	Provide support on the welfare reform requirements	Support to the Director of Finance and Corporate Services and Members	K. Davies	March 2015	Welfare reform requirements are met in full
17.	Monitor performance on housing benefit write offs	Produce performance information for monitoring by members	K. Davies	December 2014	Improved information for Members
18.	Maintain the level of in-house benefit training for benefit staff	To ensure that staff are kept up to date with changes to regulations, allowances etc.	K. Davies	March 2015	Continue to minimise the number of authority errors on benefit claims
19.	Prepare a detailed audit plan for 2015/16	To ensure that audit coverage of the Authority's systems is adequate	A.M. O'Donnell	March 2015	Audit plan approved by Audit Committee
20.	Prepare quarterly reports for Audit Committee	To ensure Member scrutiny of audit work	A.M. O'Donnell	From June 2014	Quarterly Audit Manager reports scrutinised by Audit Committee Members
21	Ensure that the Internal Audit Service meets the new auditing standards	This is required in order to receive an adequate assurance from the WAO	A.M. O'Donnell	March 2015	Assurance received from WAO following their annual review

Number	Task/Action	Comments	Resp. Officers	Target Date	Outcomes
22.	Manage resources within budget (including savings identified within the FFP)	Mandatory corporate measure	Head of Service and all section heads	March 2015	Budget delivered within agreed guidelines
23.	Maintain sickness levels as low as possible	Mandatory corporate measure	Head of Service and all section heads	March 2015	Staff sickness levels no higher than those experienced in 2013/14
24.	Ensure all staff PDR's are completed	Mandatory corporate measure	Head of Service and all section heads	March 2015	PDR's completed for all staff in the division
25	Each financial year measure employee satisfaction levels	Mandatory corporate measure	Head of Service and all section heads	March 2015	More detailed staff satisfaction data
26.	Each financial year measure customer satisfaction levels	Mandatory corporate measure	Head of Service and all section heads	March 2015	More detailed customer satisfaction data

Legal Services

Business Plan 2014/15

Introduction

This is the Business Plan for the Legal Services in 2014/15. It sets out a summary of achievements in 2013/14, describes the context within which the department will need to operate in 2014/15 and provides details of the priorities and activities that will the focus of the department's work in 2014/15.

Key Achievements and Performance Summary 2013/14

- 1. Delivered the scheduled Forward Financial Plan ("FFP") savings in year and the additional "procurement" headed savings. We have now incorporated the business support staff in one unit whilst losing posts. Identified corporate savings outside Legal Services budget.
- 2. The Section has provided advice and assistance through the year on Data Protection. We have together with ICT dealt with the Information Commissioner's audit which has highlighted some weaknesses.
- 3. Advice has been provided on ERW which will shortly be brought to a conclusion and on waste disposal. Service provision continues with NPT Homes and Gwalia. Work has commenced on arrangements with Bridgend, Swansea and the Local Health Board on the Social Services/health collaboration. Advice and assistance has been provided in relation to the joint Youth Offending Team with Swansea and Bridgend.
- 4. In terms of the Shared Legal Services Project, the joint commercial unit has been developed during the year and the trainee solicitor scheme has been a success enabling nine young solicitors to qualify. Work has commenced with the Welsh Procurement Unit to replicate the South West Wales procurement exercise on an all Wales basis.
- 5. Support for waste disposal and recycling has been provided by a mix of the section's own staff and Messrs. Geldards with our staff being substituted for private practice where possible. Services have been provided to the South West Wales Regional Waste Joint Committee.
- 6. It is to the Council's benefit that the bulk of the equality claims have been dealt with from the FFP point of view. Our own staff have worked with other Authorities on a Wales wide basis in trying to tie up that part of the remainder of the claims which have merit and can be settled
- 7. The Margam Discovery Centre went through adjudication in year. There was a measure of success here. Papers for enforcement in the Technology and Construction Court are in preparation.

- 8. I have effectively led on Celtic Energy issues for ourselves and co-ordinated our approach with Bridgend and Powys. I have dealt with the SFO, the Chief Executive and leading members in the difficult circumstances of the initial prosecution by the SFO.
- 9. Work has commenced on legal costs associated with insurance but little progress has been made as yet.
- 10. Savings have been identified on advertising costs and we will share forms of advertisement with Bridgend and through the Shared Legal Services Project.
- 11. Some of the works identified in appendix A have been commenced already.

What are the most important things for the department to achieve in the next year (14/15)?

Directorate Aims and Objectives

The Directorate aims and objectives adopted some years ago were:-

"To maintain and continually strive to improve our courteous and efficient professional services to the public and all our clients."

Section's Aims

The aims which appear below were agreed for Legal Services some years ago with Members. These do not include Licensing and the Register Servicer.

- LO1. To enable Neath Port Talbot to achieve high standards of legality and probity in the conduct of its business.
- LO2 To develop a stronger corporate role for Legal Services in
 - Identifying and advising on forthcoming legal developments;
 - Adapting the service to meet anticipated needs;
 - Taking a more proactive role in the development of corporate policy, and
 - Supporting Corporate initiatives and policies such as Welsh Language, Equalities, Sustainability and Social Inclusion
- LO3 To ensure that priority is given to the provision of Legal Services which will assist in the achievement of Corporate Aims and Values together with those contained in the Community Plan.

- LO4 To support clients fully by the provision of prompt accessible services operating to agreed timescales and to keep them appraised of progress at all times.
- By providing the right legal framework to assist Neath Port Talbot in being a modern, outward looking local authority with good communications with the Members, the public and other partners in the provision of services.
- LO6 To provide a service which is financially transparent and gives service users an accurate account of the cost of the provision of Legal Services.
- LO7 To embrace the principles of "E-Government" and to maximise the use of Information Technology in the provision of Legal Services.
- LO8 To provide and maintain a quality legal service by staff development, training and the application of the Quality System."
- LO9 To provide the services at a moderate financial charge commensurate with the level of service provided facilitating the agreed prioritisation of matters and to fully account to internal clients for work done measured by a time recording system.
- LO10 To ensure that other parties are treated in an appropriate and courteous manner and to facilitate the prompt completion of transactions measured by a record of complaints, internal client satisfaction surveys and avoidance of service of notices to complete on the Council.
- LO11 To provide the best and timely advice to Members and to client departments.
- LO12 To have a well-trained and motivated staff, with ready access to latest developments in their area of work.
- LO13 To raise awareness of developments within the law with client departments affected.
- LO14 To focus on and to progress the aims of the Community Plan by the provision of proactive advice and in the taking of legal action to support same.

- LO15 To make greater use of IT in the provision of the service to support the Council's modernisation strategy for the provision of services.
- LO16 To retain ISO accreditation and to examine LEXEL or other recognised Quality System preferred by the Council as a total quality solution for in house service delivery.
- LO17 To make best use of the restricted accommodation in the interest of the staff and to seek to group the teams appropriately.

The aims and objectives of the Property and Corporate Team are:-

- PCT1 To assist the Council in the achievement and maintenance of propriety and appropriate standards in its dealings with its land and with other land owners measured by the prevention of adverse findings by the Local Government Ombudsman and/or District Audit where the position of the Council is based on advice given by the Legal Services Section.
- PCT2 To ensure that the Council complies with all rules of Local Government and Public Law relevant to the property function measured by the avoidance of successful legal actions against the County Borough where the position of the Council is based on advice given by the Legal Services Section.
- PCT3 The provision of well-informed advice to the Council on rights and liabilities relating to its present and prospective land holdings and those of others measured by the avoidance of successful legal actions against the Council or adverse rulings of the Land Registry.
- PCT4 To effectively pursue the policy objectives of the Council especially those relating to development, job creation and provision of housing by the provision of an effective legal property service measured by the achievement of agreed targets in service provision.
- PCT5 To ensure that Council's interests are properly protected in any transaction.
- PCT6 To maximise Council's income measured by the achievement of agreed targets for income generation.

- PCT7 To record properly all transactions and ensure that deeds and other papers are safeguarded measured by the maintenance of proper deed records.
- PCT8 To ensure propriety in contract tendering.
- PCT9 To protect the Council's interests in the drawing up of Contracts.

The Aims and Objectives of The Litigation Team are:-

- LT1 To provide an effective dispute resolution service, to include effective and competent advocacy, only using Counsel as and when necessary.
- LT2 To ensure the Council complies with the law in exercising the planning, licensing, highways and housing functions.
- LT3 To assist the Council in attaining the aims and objectives of the Community Plan in the drafting and service of appropriate notices and the taking of action through the courts
- LT4 To assist the Council in the achievement and maintenance of propriety and appropriate standards in connection with its planning, housing, highways and licensing functions as measured by the prevention of adverse findings by the Local Government Ombudsman and/or District Audit where the position of the Council is based on advice given by the Legal Services Section.
- LT5 To ensure that the Directorate of Education, Leisure and Lifelong Learning and all Schools are provided with appropriate levels of advice and legal support in the carrying out of educational functions.
- LT6 To provide the Data Protection Officer Service as required and advice on Freedom of Information.

The Aims and Objectives of the Childcare Team are:-

- LCT1 To provide accurate, well informed and relevant legal advice to the Council through all phases of its involvement with children in need and/or at risk of harm.
- LCT2 To conduct child protection and other child related litigation on behalf of the Council, including providing the vast majority of advocacy in the family Court.
- LCT3 To support the Council's Children's Services directorate in its function as an adoption agency and panel, whether alone or acting jointly, and its permanency planning function.
- LCT4 To support the development and improvement of social work competence and capability, through the provision of/contribution to training and development.
- LCT5 To support the Children's Services Directorate in its statutory complaints process

It is necessary and desirable to review and update these aims over the next year and develop aims and objectives for the Licensing and Registrar Teams. Margam Crematorium will be subject to separate arrangements.

Key Objectives in 2014/15

These have been agreed with the Chief Executive, the Leader and Deputy Leader of Council, Cabinet Member for Corporate Services and the Head of Legal Services:

General

- 1. To deliver the savings allocated within the Council's Forward Financial Plan to the department and contain overall expenditure within the cash limit set for the department;
- 2. To maintain high levels of attendance in the Section;
- 3. To ensure departmental performance management arrangements are effective and in line with the Council's revised corporate framework;

- 4. To further develop staff communications, engagement and development arrangements across the department;
- 5. To maintain high standards of health and safety at work, ensuring all risk assessments are up to date and operational; and
- 6. To maintain and effective business continuity and emergency incident response across the functions and services within the portfolio.
- 7. To ensure Directorate service changes and improvements in FFP are delivered.
- 8. To support and ensure proper governance arrangements are in place re collaboration work.
- 9. To continue work with the Head of Financial Services to review opportunities for savings in relation to legal costs in relation to the insurance service.
- 10. To lead on relevant aspects of the response to the ICO audit of data protection and co-ordinate a response overall with the Head of ICT and Procurement.
- 11. To manage litigation arising out of construction and other contracts.

All of which will be delivered through the activities listed in Appendix A.

Why have these priorities been set?

The current financial cut backs and the Forward Financial Plan which documents the Council's method of dealing with those cut backs, remain the central operational facts to be dealt with over the next few years.

This is so for two reasons:-

First, services must be delivered using fewer and fewer resources but Legal Services does not control the level of activity that it is asked to address. The Section must do what it can to make service delivery more efficient whilst managing expectations in the continuing financial environment. Some teams such as that dealing with Licensing are not so affected by these changes.

Second, the Forward Financial Plan is likely to increase rather than lessen the requirement for provision of Legal Services. Some simple examples will explain the point. As the Council examines its expenditure and reduces or reallocates funding it becomes vulnerable to actions in judicial review. Also, where services are no longer provided directly in–house legal relationships with other bodies (together with the need for documentation and advice)

increase remarkably. For example, with some local library services being provided by Community Councils or volunteer groups, documentation is needed for each of them. Likewise, many leases were granted at the end of the last financial year so that sports clubs will manage their own facilities in future. Another factor which has increased the call upon Legal Services is the extension in inter-Authority and cross boundary working. The Section has provided support for joint working in the fields of – Waste, Education, Social Services, Housing, Health and Wellbeing.

The Section co-operates with the ICT and Procurement Sections in dealing with data protection issues. The Council co-operated in a voluntary audit conducted by the Office of the Information Commissioner. This gave rise to a report taken to the Policy and Resources Cabinet Board. The report identified a number of areas for improvement.

Risks that have been identified and how risk will be managed

- 1. Service quality and availability may be compromised due to the reduction in financial resources mitigated by prioritisation of available resources and appropriate staff training and supervision. Also, communication and agreement of revised service expectations with key stakeholders.
- 2. The **cost of services and functions** may not be delivered within the cash limit and **savings** may not be achieved for workload reasons mitigated by concrete plans in place at the commencement of the financial year. Further savings will need to be identified in a review of the FFP.
- 3. **Demands on the service** will rise due to unforeseen external changes. Efforts will be made to mitigate this by developing greater efficiency and early identification of new developments.
- 4. **Demands on the service** increase as a consequence of changes elsewhere within the council mitigated by early and ongoing dialogue with colleagues to identify and agree where support needs to be prioritised.
- 5. **Service quality and availability** is compromised due to strain on staff continue to build on staff communication and engagement activities and ensure all staff are receiving suitable support.
- 6. Risk that **statutory requirements** are not met mitigated by clearly prioritising the statutory work.

36

How will we deliver the priorities we have identified?

Action Plans for each business unit within the service area

(note: action plans will be continuously reviewed and updated during the year)

Action Plan of Head of Legal Services

REF	<u>AIM</u>	<u>ACTION</u>	TEAM RESPONSIBLE & TIMINGS	FORMS OF EVIDENCE				
Mandatory	Mandatory Corporate Measures							
1	Manage resources within budget (including savings identified within the FFP)	Monthly monitoring of financial data, with prompt action to address pressures. Ensure accurate and full time recording to permit analysis of efficiency and value for money.	Whole Section management through final year.	Hitting financial targets				
2	Reduce sickness absence levels by at least 5% on 2013/14 levels	Ensure compliance with corporate policy, in particular the conduct of RTWIs and timely seeking of OH advice/services as appropriate	Whole Section management through final year.	Compliance with target reduction				
3	Ensure all staff EDRs are competed by 31.3.15 and implement identified learning and development requirements	Completion of staff EDRs with all staff	Head of Service and Accountable Managers	Completion of EDR				
4	Each financial year measure employee satisfaction levels	Completion of survey	Head of Service	Survey Results				
5	Each financial year measure customer satisfaction levels	Completion of survey and contract meetings with NPT Homes	Head of Service	Survey Results				

REF	AIM	ACTION	TEAM	FORMS OF
	11111	<u> </u>	RESPONSIBLE	EVIDENCE
			<u>& TIMINGS</u>	
6.	Improve outcomes for children in need and children looked after.	6.1. Updating and delivering training to social workers on issues of quality and format of evidence and assessment, new developments in child protection cases in the new Unified Family Court and revision of the Public Law outline, and court skills.	Child Care October 2014	Training session notes
		6.2. Senior or Principal Solicitor attending twice weekly legal surgeries with principal officers and social workers to improve decision making on individual cases; identifying cases where protective action is appropriate and reducing "drift."	Child Care June 2014	Surgery notes
		6.3. Contribution to a programme of information and training for members upon Safeguarding and the role of Corporate Parent, and also the enhancement of the skills of scrutiny committee members.	Child Care October 2014	Preparation of training materials
		6.4. Piloting an in house advocate to increase the availability of early advice upon cases, consistency of approach, and to deliver savings on the cost of using external counsel.	Child Care July 2014	Have in-house advocate in place
		6.5. Provision of accurate and timely data to the Head of Children's Services to enable him to monitor and control his legal spend, and to enhance the ability to benchmark.	Child Care July 2014	Provision of expenditure information

REF	AIM	<u>ACTION</u>	TEAM RESPONSIBLE	FORMS OF EVIDENCE
			<u>& TIMINGS</u>	
		6.6. Improve smart working through increased use of the IRIS case management system, implementation of DocsCorp PDF document handling software, and participation in the shared service Data Portal	Child Care	Implementation of data portal
	Think Family Partnership Contract Commission	6.7. Contract conditions for Framework of Providers with an estimated contract commencement date of October 2014.	Property and Corporate Ongoing by end of October 2014	Contract conditions produced

REF	<u>AIM</u>	<u>ACTION</u>	TEAM RESPONSIBLE	FORMS OF EVIDENCE
7	Raise educational standards and attainment.	7.1. Assistance in the formation of the ERW Joint Committee.	& TIMINGS Property and Corporate July 2014	Executed Agreement
		7.2. School attendance prosecutions.	Litigation Ongoing by end of March 2015	Monitoring of prosecution numbers
		7.3. Ensuring provision is made in Section 106 Agreements for educational provision as required	Property and Corporate	Agreements drafted if requested
		7.4. Strategic Schools Improvement Programme providing advice and assistance	Property and Corporate	Advice provided
		7.5. Contract for new Baglan Bay School	Property and Corporate By end of March 2015	Contract in place
		7.6. Educational Improvement Hillside Secure Unit	Property and Corporate July 2014	Contract in place
		7.7. General Legal Support for schools and Directorate of Education Leisure and Lifelong Learning	Litigation Ongoing by March 2015	Monitoring of advice given

REF	<u>AIM</u>	<u>ACTION</u>	TEAM RESPONSIBLE	FORMS OF EVIDENCE
8	Maximise the number of adults who are able to live independently	8.1. Section.33 agreement (between ABMU and NPT, Swansea and Bridgend Councils) for the Strategic Commissioning and Operational Management Board for learning disability services.	1 4	Agreements in place
		 8.2. Agreements to cover the provision and receipt of services to and from Gwalia until the decant of the care homes: 1. Receipt of meals service from Gwalia to NPT 2. Provision of transport services to Gwalia 3. Provision of certain buildings and maintenance services to Gwalia 		Agreements in place

REF	<u>AIM</u>	<u>ACTION</u>	TEAM RESPONSIBLE	FORMS OF EVIDENCE
	The provision of housing related support for the Supporting People Programme	8.3. Provision of tenancies and management agreements for Supporting People Housing Related Support.	& TIMINGS Property and Corporate By end of March 2015	Draft Agreement
	110grummie	8.4. Supporting People Contract Extensions April 2014	Property and Corporate By end of May 2014	Agreements in place
		8.5. Arranging contracts for execution of extension of services for Supporting People Grant Programme for 2014-2015. Contracts have been forwarded to providers and we are presently awaiting their return.	Property and Corporate By end of May 2014	Agreements in place
		8.6. Wallich Project Inter Authority Agreement Swansea. An inter authority agreement to cover payment and the administration of the contract between Swansea, Neath Port Talbot and Bridgend is to be entered into to cover the contract period of 2014-2015.	Property and Corporate By end of June 2014	Agreements in place

REF	<u>AIM</u>	<u>ACTION</u>	TEAM RESPONSIBLE	FORMS OF EVIDENCE
	ABMU Service Level Agreement for Adult Services Residential Training	8.7. Agreement to be entered into with ABMU to cover training services that NPT will provide to ABMU between 2014-2015. Agreement presently with ABMU for approval.	& TIMINGS Property and Corporate By end of June 2014	Agreement in place
	Social Services Direct Payment Contract	8.8. Swansea are lead authority on this project and are undertaking the procurement process as part of the Western Bay collaboration. Presently awaiting draft contract conditions for review. An inter authority agreement to cover payment and the administration of the contract between Swansea, Neath Port Talbot and Bridgend is to be entered into to cover the contract period. Presently awaiting Heads of Terms from Bridgend who are preparing this document.	Property and Corporate By end of September 2014	Provision of advice to NPT in relation to contract
	Social Services Domiciliary Care Contract	8.9. A review has been undertaken on the conditions of contracts that will be utilised. The draft contracts are presently with providers for their consideration. NPT are presently awaiting feedback to determine whether more necessary. Contracts will then be entered into in Summer 2014.	Property and Corporate By end of July 2014	Provision of advice and processing of contracts as required

REF	<u>AIM</u>		<u>ACTION</u>	TEAM RESPONSIBLE & TIMINGS	FORMS OF EVIDENCE
	Adult Social Social Social Transport Contracts	Services	 8.10. Advice on contract conditions for Transport Tender, which shall include the provision of transport services for adults within social services. Tender presently ongoing with contract execution (potentially up to 20) in Summer 2014. 8.11. Gwalia Contract Agreement to be provided in due course to cover amendments to number of residual beds utilised for rehabilitation 	Property and Corporate Ongoing – completion of Tender Stage September 2014 Property and Corporate By end of June 2014	Advice on provision as required and execution of documents of
			services. Specification currently being worked on by NPT and Gwalia, with instructions to prepared Service Level Agreement to follow imminently.		agreement reached

REF	<u>AIM</u>		<u>ACTION</u>	<u>TEAM</u> RESPONSIBLE	FORMS OF EVIDENCE
				<u>& TIMINGS</u>	
9	Support and promote economic growth regeneration etc.				
	Renewal Area Contracts	9.1.	Contracts entered into on an ad-hoc basis (approximately one a month) for Renewal Area construction work.	Property and Corporate Ongoing	Agreements in place
		9.2.	Work in execution of Neath Town Centre Development including variation of development agreements	Property and Corporate To end of March 2015	Variation of Agreements
		9.3.	Acquisition of Magistrates' Court	Property and Corporate End of May 2014	Acquisition of property
		9.4.	Renewal of Boots lease. Advice and assistance on Phase 1 of the development including the letting of the construction contract for the car park and replacement Wilkinson store	Property and Corporate End of July 2014	Renewal of Lease
		9.5.	Work on acquisition of property and payment of compensation for the PDR Advice and assistance on the Viable and Vibrant project at Port Talbot Town Centre including grant agreements and land acquisition.	Property and Corporate End of March 2015	Acquisition as instructed
		9.6.	Access agreements for new University Campus at Fabian Way	Property and Corporate End of May 2014	Agreement in place
		9.7.	Coed Darcy southern access compensation and construction agreements.	Property and Corporate To end of March 2015	Agreements in place

REF	AIM	ACTION	TEAM	FORMS OF
		<u></u>	RESPONSIBLE	EVIDENCE
			<u>& TIMINGS</u>	
10	Increase percentage of waste recycled	10.1. Provide legal advice and assistance for the tendering of waste services and the leasing of the MREC facility.10.2. Prosecutions for unauthorised waste disposal.	Property and Corporate To end of March 2015 Litigation	Advice provided Monitoring of prosecution numbers
			Ongoing to end of March 2015	
		10.3 Provide legal services to South West Wales Regional Waste Committee.	Property and Corporate To end of March 2015	Provision of Legal Services at meetings
11	Improve customer access to services and improve efficiency	11.1. Assisting in the Third Sector Review and any litigation arising out of it.	Litigation Ongoing	Conclusion of litigation
		11.2. Creation of a web page with tools for reducing postal costs	Business Support With the assistance of IT input – August/September	Web page live on Intranet
		11.3. Changes in functioning of Licensing Team giving licence applicants direct access to Licensing Officers.	Licensing	Change in working practices
		11.4. Reduction in advertising costs for the Council Corporate Project.	Litigation Ongoing to end of March 2015	Budget monitoring
		11.5. Creation of secure portal for the release of child care court material reducing copying charges	Child Care	Activation of portal

REF	AIM		ACTION	TEAM RESPONSIBLE & TIMINGS	FORMS OF EVIDENCE
		11.6	Fully integrate the Typing/Secretarial Service into Legal Service, thereby ensuring that full use (cost effectiveness) is made of them by all Legal Services colleagues.	Business Support June/July 2014	Monitoring of through put of work
		11.7	Manage the administrative integration of ROW/Commons searches within current Land Charges staff.	Litigation/Property to March 2015	Assimilation of Commons work and limitation of ROW work referred externally
		11.8	Create a more meaningful and understandable budget for all areas of the Legal Services family	Business Support Prior to the Revised Budget period circa October/November	Witnessed by Budget Journals in FIS
		11.9	Manage the change in location of the Register Office and its staff into a suitable and convenient location in Neath if this can be accommodated for the staff and clients	Registrar March 2015 provided a suitable and workable location is found	*

REF	<u>AIM</u>	<u>ACTION</u>	TEAM RESPONSIBLE & TIMINGS	FORMS OF EVIDENCE
12.	Licensing	12.1. Carry out review of all Licensing fees to ensure as far as possible that the service recovers its costs.	Licensing September 2014	Evidenced through budget monitoring
		12.2. Review all policies, conditions and procedures relating to taxi licensing and create manual.	Licensing March 2015	To be published on completion
		12.3. Review and update the Licensing Enforcement Policy	Licensing November 2015	Consultation with various interested parties followed by adoption by the Registration and Licensing Committee
		12.4. Upgrade Licensing computer software to incorporate a management tool for producing compliance inspection schedules.	Licensing March 2015	Monthly reports to be produced detailing inspection schedules
		12.5. Carry out review of the existing conditions and policies relating to Street Trading.	Licensing January 2015	Consultation with various interested parties followed by adoption by the Registration and Licensing Committee