WALES AUDIT OFFICE

SWYDDFA ARCHWILIO CYMRU

2007-2008

November 2008

Authors: Rod Alcott and PricewaterhouseCoopers LLP **Ref: 986A2008**

Annual Letter

Blaenau Gwent County Borough Council

Contents

Summary	6
The Appointed Auditor's report	
The Financial Statements present fairly and we did not identify any material weaknesses in internal control	8
The Council's 2007-2008 Financial Statements present fairly the Council's financial position and were properly prepared	8
An examination of the Council's significant financial systems did not identify any material weaknesses in internal control	9
The 2007-2008 Whole of Government Return was completed appropriately	9
We have certified that the audit has been completed in accordance with the requirements of the Public Audit (Wales) Act 2004 and the Code of Audit and Inspection Practice	10
There were no formal questions or objections to the 2007-2008 financial statements	10
Our work in respect of electors' questions has been concluded	10
The Council's improvement planning arrangements complied with statutory requirements	11
The Council's Improvement Plan has been delivered appropriately and represents a balanced picture of performance in the last year	11
Our audit of the National Strategic Indicators highlights that the Council has robust arrangements in place for the collection and validation of performance information although it needs to review target setting in some service areas to ensure they are realistic	11
The publication of the Corporate Improvement Plan 2008-2012 represents a significant development for the Council	12
The Council had satisfactory arrangements in place to help it achieve economy, efficiency and effectiveness in its use of resources	12
The Council is making progress in addressing a number of corporate areas, but it has significant financial pressures to manage and needs to develop a medium-term financial plan	13
The Council has made significant progress in implementing the Single Status Agreement	14
The Council has appropriate arrangements in place to plan and manage the tenant ballot process in relation to the potential housing stock transfer	15
The Council is continuing to make progress towards achieving a long-term waste management solution	15
The Council has a good record of achieving its revenue budget and has appropriate arrangements in place to manage and use its financial reserves, but it needs to develop a medium-term financial plan	16

The Council has appropriate financial management arrangements in place, but it faces increasing financial pressures in several service areas	17
The Council made effective use of the National Fraud Initiative	19
Our certification of the Council's grant claims and returns is nearing completion	20
The Relationship Manager's report on behalf of the Auditor General	20
The annual joint risk assessment validated the Council's priorities for improvement and the Council has responded constructively to previous recommendations	20
The Council's risk assessment and risk management arrangements have developed over the last few years and, with further refinement, can make a significant contribution to wider performance management arrangements	20
The Council has responded positively to the recommendations of inspection work	21
Individual reviews of social services, fostering services, member training, highways maintenance, homelessness and measuring service improvement have indicated some good practice and some areas for improvement	21
The Council has worked hard to improve its performance in delivering Social Services and has continued to make steady progress on the improvements gained last year	21
The inspection of the Council's fostering service revealed some good practice and some areas for improvement	22
Despite a delayed start, the arrangements for private fostering are developing well and the Council must ensure that arrangements to meet the remaining statutory obligations are put in place	22
The Council is approaching member training and development in an appropriate way to equip members with the skills and knowledge to help them make a more effective contribution to continuous service improvement	23
The Council is managing the highway infrastructure effectively, but continuing with this approach based upon existing levels of resources is unsustainable	23
The Council has developed some appropriate approaches to meet emerging challenges in homelessness, but needs to adopt a more strategic approach to ensure that its plans are realised	24
The Council is improving its approach to measuring service improvement	24
The Council has engaged positively with the Wales Audit Office's initiatives to promote improvement	24
The Council is committed to using the Good Practice Exchange through shared learning	24
The Council is committed to delivering the Making the Connections agenda and its approach to fleet management is making best use of resources to support improvements in service delivery	25

Appendices	
Auditor's report on the arrangements for securing economy, efficiency and effectiveness in its use of resources in 2007-2008	27
Criteria for assessing the Council's arrangements during 2007-2008 for securing economy, efficiency and effectiveness in its use of resources	28
Audit Report of the 2008/2009 Improvement Plan	29
Audit and inspection fees	31

Status of this report

This document has been prepared for the internal use of Blaenau Gwent County Borough Council as part of work performed in accordance with statutory functions, the Code of Audit and Inspection Practice and the 'Statement of Responsibilities' issued by the Auditor General for Wales.

No responsibility is taken by the Wales Audit Office (the Auditor General and his staff) and, where applicable, the appointed auditor in relation to any member, director, officer or other employee in their individual capacity, or to any third party.

In the event of receiving a request for information to which this document may be relevant, attention is drawn to the Code of Practice issued under section 45 of the Freedom of Information Act 2000. The section 45 Code sets out the practice in the handling of requests that is expected of public authorities, including consultation with relevant third parties. In relation to this document, the Auditor General for Wales (and, where applicable, his appointed auditor) is a relevant third party. Any enquiries regarding disclosure or re-use of this document should be sent to the Wales Audit Office at infoofficer@wao.gov.uk.

Summary

1. This Annual Letter sets out the key messages arising from work undertaken over the last 12 months up to the point when it was written by:
   - the Appointed Auditor under the Code of Audit and Inspection Practice (the Code); and
   - the Relationship Manager (RM) on behalf of the Auditor General for Wales (Auditor General) under the studies and inspection powers of the Auditor General.
2. The Annual Letter includes a summary of audit and inspection work and reports progress against improvement actions. It draws on published reports of other inspectorates to provide an annual summary to Blaenau Gwent County Borough Council (the Council). The work planned for the year was set out in the Regulatory Plan 2007-2008 and more detail on the specific aspects of the work undertaken can be found in the separate reports that have been issued during the year.
3. The Annual Letter will be presented to all members at the Council meeting in December 2008.
4. The Auditor General's Appointed Auditor has completed the audit of accounts in accordance with the requirements of the Public Audit (Wales) Act 2004 and the Code. We have concluded that:
   - The Council's financial statements presented fairly and were properly prepared. We did not identify any material weaknesses in internal control.
   - The Council's improvement planning arrangements complied with statutory requirements.
   - The Council had satisfactory arrangements in place to achieve economy, efficiency and effectiveness in its use of resources.
   - The Council is making progress in addressing a number of corporate areas, but it has significant financial pressures to manage and needs to develop a medium-term financial plan.
5. The RM has concluded that:
   - The annual risk assessment validated the Council's priorities for improvement and it has taken effective action in response to the recommendations of audit and inspection work.
   - Individual service reviews of member training, highways maintenance, homelessness and measuring improvement have indicated some good practice and some areas for improvement
     - the Council is approaching member training and development in an appropriate way to equip members with the skills and knowledge to help them make a more effective contribution to continuous service improvement;

- the Council is managing the highway infrastructure effectively, but continuing with this approach based upon existing levels of resources is unsustainable;
- the Council has developed some appropriate approaches to meet emerging challenges in homelessness, but needs to adopt a more strategic approach to ensure that its plans are realised;
- the Council is improving its approach to measuring service improvement; and
- the Proteus Project is an exciting and challenging development of provision to meet the needs of all pupils who require education otherwise than at school that is in need of significant improvement.

- The Council has engaged positively with the Wales Audit Office's initiatives to promote improvement.

We recommend no statutory inspections this year

6. The Appointed Auditor is required each year to recommend whether, on the basis of audit work undertaken, the Auditor General should carry out a Best Value Inspection of the Council or whether Welsh Ministers should recommend a course of action, referred to as 'a direction' under section 15 of the Local Government Act 1999 (the 1999 Act). On the basis of audit work undertaken.

7. The Appointed Auditor:
   - does not recommend that the Auditor General should carry out a Best Value Inspection of the Council under section 10A of the 1999 Act; and
   - does not recommend that Welsh Ministers should give a direction under section 15 of the 1999 Act.

The Appointed Auditor's report

8. The Financial Statements are an essential means by which the Council accounts for its stewardship of the resources at its disposal and its financial performance in the use of those resources. The Code identifies that it is the Council's responsibility to:
   - put systems of internal control in place to ensure the regularity and lawfulness of transactions;
   - maintain proper accounting records; and
   - prepare Financial Statements in accordance with relevant requirements.
9. As auditors we are required to audit the Financial Statements and to issue an auditor's report which includes an opinion on whether the Financial Statements present fairly the financial position and transactions of the Council. The auditor's report also refers to compliance with relevant legislation, directions, regulations and applicable accounting standards.

The Financial Statements present fairly and we did not identify any material weaknesses in internal control

The Council's 2007-2008 Financial Statements present fairly the Council's financial position and were properly prepared

10. International Standard on Auditing (ISA) 260 requires auditors to report to 'those charged with governance' the findings of our accounts audit. The Appointed Auditor's report '*Audit of the Financial Statements – reporting to those charged with governance'* was presented to the Audit Committee on 26 September 2008. A summary of the findings is set out in Exhibit 1.

Exhibit 1: ISA 260 reporting to the Council

Reporting requirement	Auditor's response
Modifications to the auditor's report.	No modifications to the auditor's report.
Unadjusted misstatements.	There were no unadjusted misstatements. Some adjustments were made in conjunction with officers during the course of our audit.
Material weaknesses in the accounting and internal control systems identified during the audit.	No matters arose.
Views about the qualitative aspects of the entity's accounting practices and financial reporting.	The qualitative aspects of the Council's accounting practices and financial reporting continue to improve but there are some areas where further action needs to be taken.

Reporting requirement	Auditor's response
Matters specifically required by other auditing standards to be communicated to those charged with governance.	No matters arose.
Any other relevant matters relating to the audit.	No matters arose.

11. On 30 September 2008 we issued an unqualified auditor opinion on the Financial Statements.

An examination of the Council's significant financial systems did not identify any material weaknesses in internal control

12. Our review of the Council's financial systems has involved documenting them and where necessary testing the operation of the internal controls. We have concluded that the Council's significant financial systems can be relied upon to produce materially correct outputs. We identified scope to improve controls in some areas and reported these to management. In summary, the improvements required were to ensure that:
    - The monthly bank reconciliation is undertaken and fully reconciled on a timely basis.
    - The debtors and creditors systems are reconciled to the general ledger on a regular basis.
    - The report that details changes to standing data on the creditors system is evidenced as reviewed.
    - The Council monitors closely its aged debt for housing benefits overpayments.
    - Attention is given to the levels of fees the Council receives for building regulations. Charges should be based on the fact that the Council should be breaking even over three years. Currently the Council is making consistent surpluses each year, which contravenes the regulations.

The 2007/2008 Whole of Government return was completed appropriately

13. In accordance with the Government and Resources and Accounts Act 2000 and relevant guidance issued by the Welsh Assembly Government (Assembly Government), a Consolidated Pack (C Pack) is prepared annually by the Council to assist HM Treasury with its production of the Whole of Government Accounts (WGA). The Pack contains 2007-2008 financial information and is finalised once the accounts have been audited.
14. On behalf of the National Audit Office (NAO) as auditor of the WGA, the Wales Audit Office is required to audit the C-Pack in accordance with statutory requirements and NAO audit instructions. From our audit of the Council's return this year we found:
    - arrangements are in place to ensure satisfactory production of the WGA C-Pack;
    - the C-Pack was consistent with the audited statutory accounts;

- material transaction streams and balances with other WGA bodies were identified completely and correctly; and
- transaction streams and balances with the Assembly Government in excess of £5 million were formally agreed as required.

We have certified that the audit has been completed in accordance with the requirements of the Public Audit (Wales) Act 2004 and the Code of Audit and Inspection Practice

There were no formal questions or objections to the 2007-2008 financial statements

15. In accordance with the Accounts and Audit (Wales) Regulations 2005 the Council has advertised the rights of local electors to:
    - inspect and make copies of the Annual Return;
    - question the auditor about the accounts; and
    - attend before the auditor and make objections to the accounts or any item in them.
16. These rights have not been exercised. Although we continue to receive a range of questions from members of the public and other interested parties, none of these have been regarded as formal objections to the financial statements.

Our work in respect of electors' questions has been concluded

17. Since our 2007 Annual Letter, our work in respect of electors' questions dating back to the 1998-1999 financial year has been concluded. In particular, we completed our review of a transaction relating to the sale of a parcel of land at Pantyfforest by the Council.
18. We issued a report to the Council in September, which summarised the results of a considerable amount of audit work undertaken. It stated that we had no evidence before us to suggest that the Council did not sell the Pantyfforest land described in the report at best consideration. However, we advised that the disposal procedures could be strengthened further to ensure that the Council is able to evidence that the process of disposal is fair and equitable.
19. As a result of concluding our work arising from electors' questions, we formally closed the audits of 1998-1999 – 2006-2007 by issuing appropriate audit certificates.

The Council's improvement planning arrangements complied with statutory requirements

The Council's Improvement Plan has been delivered appropriately and represents a balanced picture of performance in the last year

20. Under the Local Government Act 1999 and subsequent guidance issued by the Assembly Government in Circular 28/2005, an Improvement Plan must be published by 31 October each year. We are required to audit the Improvement Plan in accordance with statutory requirements and guidance, and to report our findings, including on the completion of the joint risk assessment, our audit of the Council's Performance Indicators (PIs) and on its performance measurement arrangements.

21. The Plan and the Public Summary were produced and published on time and complied fully with the guidance in Circular 28/2005:
    - the detailed Plan and the Summary are concise, well written documents which report a balance of good performance and areas for improvement;
    - the Council's corporate objectives and key actions for achieving them are clearly set out; and
    - the 'Stage 1' Improvement Plan complies with the guidance in Circular 28/2005.

22. Detailed responsibilities, the scope of our work and the audit certificate are set out in Appendix 3.

Our audit of the National Strategic Indicators highlights that the Council has robust arrangements in place for the collection and validation of performance information although it needs to review target setting in some service areas to ensure they are realistic

23. The 2008 Improvement Plan reports performance during 2007-2008 against 56 PIs. In terms of comparative performance against the PIs for 2006/2007:
    - 30 per cent demonstrate some measure of improvement;
    - 23 per cent show that performance has remained static;
    - 39 per cent indicate that performance has deteriorated; and
    - 8 per cent were unavailable for comparison.

24. The trend is a mixed one. In particular, the Council's six PIs in respect of waste management have shown deterioration in comparison to 2006-2007. However, the prior year waste figures were higher due to incorrect data being included. The Council has recognised this and has taken appropriate corrective action.

25. The Council continues to set itself challenging performance targets in a number of service areas. The Council needs to ensure that its arrangements for setting targets are more consistent and co-ordinated across all services. Those arrangements should deliver targets that continue to be challenging but that are also realistic.

The publication of the Corporate Improvement Plan 2008-2012 represents a significant development for the Council

26. The Council's Improvement Plan contains four priority outcomes for improvement, which the Council is aiming to achieve over the next four years. The development of a new format for the Corporate Improvement Plan is a major step forward for the Council in setting corporate objectives for the medium-term and illustrating its progress against those objectives.

27. In addition, measures have been taken to integrate equalities and sustainability frameworks into the operational functions of the Council. However, the Council recognises that work is required to embed equalities and sustainability into corporate and service planning processes further. The Council is planning to use guidance from the WGLA to inform how this is done.

The Council had satisfactory arrangements in place to help it achieve economy, efficiency and effectiveness in its use of resources

28. The Public Audit (Wales) Act 2004 requires auditors to satisfy themselves that the audited body has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources. This requirement is reflected in the Code.

29. Our conclusion has been reached as part of our annual audit of the accounts. We examined evidence of the existence of the Council's corporate performance management and financial management arrangements. In this work we do not comment on or provide assurance on the effectiveness of those arrangements during the year.

30. Separate value-for-money work does consider where arrangements or their operation could be improved. The results of such work carried out during 2007-2008 are set out later in this Annual Letter. This work informs our conclusion on the existence of arrangements but is not essential to it.

31. The auditor's report on the Council's arrangements for securing economy, efficiency and effectiveness in its use of resources during 2007-2008 is set out in Appendix 1. The criteria used to assess this are set out in Appendix 2.

32. We have concluded that in 2007-2008 the Council had satisfactory arrangements in place to support the achievement of its responsibility to secure economy, efficiency and effectiveness in its use of resources. The detailed results of our assessment are summarised in Exhibit 2.

Exhibit 2: Assessment of proper arrangements

Aspect	Arrangement	Yes or No
Strategic and operational objectives	Has the Council put in place arrangements for establishing, reviewing and implementing its strategic and operational objectives?	Yes
Meeting the needs of users and taxpayers	Has the Council put in place arrangements to ensure that services meet the needs of users and taxpayers, and for engaging with the wider community?	Yes
Internal controls	Has the Council put in place arrangements to ensure compliance with established policies, procedures, laws and regulations?	Yes
Risk management	Has the Council put in place arrangements for identifying, evaluating and managing operational and financial risks and opportunities, including those arising from involvement in partnerships and other forms of joint working or contracting?	Yes
Resource Management	Has the Council put in place arrangements for managing its financial and other resources, including arrangements to safeguard its financial standing?	Partly, as the Council has yet to develop a medium-term financial plan but it does have a financial framework in place
Reviewing Performance	Does the Council have arrangements in place to monitor and review performance, including arrangements to ensure data quality?	Yes
Standards of Conduct	Has the Council ensured that its affairs are managed in accordance with proper standards of conduct and to prevent and detect fraud and corruption?	Yes
Overall Conclusion	Has the Council put in place proper arrangements to secure 'economy, efficiency and effectiveness' in its use of resources?	Yes

The Council is making progress in addressing a number of corporate areas, but it has significant financial pressures to manage and needs to develop a medium-term financial plan

33. As part of our audit programme we focused on the Council's actions in the following areas:
    - the Single Status agreement and job evaluation;
    - potential housing stock transfer;
    - waste management; and
    - financial arrangements.

34. Work is still ongoing to develop and plan the review of Adult Mental Health Services, with the rollout scheduled to commence in the final quarter of 2008.

The Council has made significant progress in implementing the Single Status Agreement

35. In 1997, local government employers and the relevant trade unions signed the "Single Status Agreement". Enshrined in equal pay legislation, the Single Status Agreement committed authorities to undertake equal pay reviews and to introduce non-discriminatory pay structures ('job evaluation'), addressing the fact that local government employees were employed on different terms and conditions for pay structures without a clear rationale. This introduction of the Single Status Agreement in local government in turn highlighted that in some cases individuals had been treated unequally, which led to claims for compensation under the Equal Pay Act.

36. The job evaluation process at the Council for the assessment of the rank order of jobs is still ongoing, with the next stage of the process being job modelling and an assessment of actual revenue budget implications. The Council has already built these costs into its revenue budget forecasts.

37. Job evaluation is a complicated process due to the variety of jobs performed by the Council's employees. This year, the Council has engaged with key stakeholders throughout the process, holding a number of workshops and meetings with managers to embed changes and communicate the impact of job evaluation to departments.

38. As part of our financial audit and performance programme, we have reviewed the Council's arrangements in place for meeting the commitments under the Single Status agreement and Equal Pay legislation. We met with key officers to discuss the process undertaken, the external advice received and the subsequent offer decisions made.

39. The Council obtained external legal advice to develop a logical and consistent methodology for making offers to claimants. In addition, the Council held a number of road shows and gave each claimant the opportunity to discuss their claims on an individual basis with the Council and ACAS before accepting or rejecting their offer.

40. In 2007-2008, the Council paid out and settled approximately 75 per cent of the estimated number of claims, amounting to £2.1 million, with a provision in the accounts for the remaining potential liabilities of £1 million. With respect to these costs, the Council took a decision to obtain a capitalisation directive from the Welsh Assembly for amounts paid out in 2007-2008 to minimise the impact on the Council tax payer in the short-term.

41. For the claims outstanding, the Council has left the offers open for acceptance and some payments have been made since the year end. For those claimants that do not accept the offer, there remains the possibility that the claim will go to the employment tribunal. It is then the decision of the tribunal as to whether an individual has a valid claim against the Council. There is therefore a risk that the claimant is awarded amounts that may be more or less than the original offer. The Council has put a provision in the accounts for the remaining liability.

The Council has appropriate arrangements in place to plan and manage the tenant ballot process in relation to the potential housing stock transfer

42. In June 2007, the Council agreed to ballot its tenants on whether or not the tenants would agree to a housing stock transfer.

43. Due to the Council election in May 2008, the Council has only recently appointed specialist advisors to support it through the process and has begun to establish a shadow board, which will have representation from:
    - tenants;
    - councillors; and
    - independent experts.

44. The Council is undertaking an exercise with tenants to explain the implications of a stock transfer. For example, face to face consultations have taken place, with further such events planned, and two 'show rooms' have been created to illustrate the planned effect of the stock transfer in terms of housing improvements.

45. An offer document has been prepared and will go to Council in December 2008. The vote is anticipated to take place in 2009. Should the result be a 'no' vote, the Council would remain responsible for the improvements required to meet the Welsh Housing Quality Standards. In addition, the current economic climate and financial institutions' approach to lending risk could put significant financial pressure on any future transfer of stock. The Council has discussed these risks with its financial advisors.

The Council is continuing to make progress towards achieving a long-term waste management solution

46. The Council has made progress in addressing waste management issues and is pursuing a number of avenues to reduce landfill waste in accordance with EU and Assembly Government targets. This is an area that contains a number of risks for all councils due to the policy environment and the extent of technical developments.

47. The Council is undertaking a Joint Waste Programme, which is a solution to procure waste management that deals with various complex issues including a sustainable option for the disposal of residual waste that is left after high levels of recycling have taken place. It has procured a short-term contract for the disposal of food and green waste, which is an intermediary measure to give the Council time to determine its strategy for the longer-term.

48. The Council has also undertaken a successful communication exercise to encourage more door step recycling and intends to procure a long-term organics contract to reduce household waste at landfills.

49. To ensure that the Council is successful in reducing its landfill waste, significant cost pressures exist that require the Council's full attention going forward. Failure to meet external targets will result in a financial penalty to the Council.

The Council has a good record of achieving its revenue budget and has appropriate arrangements in place to manage and use its financial reserves, but it needs to develop a medium-term financial plan

50. We are responsible for assessing whether the Council has put in place adequate arrangements to monitor, control and report on its financial standing. Our audit was based on a review of:
    - setting the revenue budget and capital programme;
    - financial monitoring and reporting;
    - meeting financial targets; and
    - financial reserves.

51. We have examined budget reports and procedures and are satisfied that:
    - suitable arrangements are in place;
    - the Council's revenue and capital budgets cover all relevant areas of income and expenditure and are based on realistic assumptions; and
    - the Council has in place sound arrangements for financial monitoring and reporting which should ensure that any potential material misstatements and variances will be identified.

52. Members and officers continue to review reserves annually to ensure that the reasons they were established remain valid and that the amount reserved is based on realistic assumptions of need. Exhibit 3 identifies that, as at 31 March 2008, the Council had some £27.7 million in capital and revenue reserves, which is a £5.5 million increase compared to last year.

Exhibit 3: The Council's reserves in 2006-2007 and 2007-2008

	2006/2007 £ million	2007/2008 £ million
Capital earmarked	1.2	1.4
Revenue earmarked	9.0	10.3
General	6.3	9.1
Housing Revenue Account (HRA)	4.0	5.0
Schools	1.7	1.9
Total	22.2	27.7

Source: Blaenau Gwent County Borough Council Audited Accounts 2007-2008

53. Earmarked reserves have been set aside for known commitments such as insurance and potential future budget and financial management pressures. We are pleased to note that the Council has continued to improve its financial position and has increased general reserves. However, we consider that the level of earmarked and general reserves remains at a minimum, particularly in light of the financial pressures faced by the Council. As part of the budget setting approval process the Council must continue to ensure that these reserves are appropriate and taken into account. The Council must also continue to work with primary and secondary schools to ensure that their reserves are appropriate.

54. The impact of the credit crunch and the banking crisis on the public sector continues to be an area of concern. Consequently it is good to note that the Council does not have any funds deposited in Icelandic banks. However, the wider implications of the current economic climate will inevitably have an effect on the Council.

55. As described in Exhibit 4, the Actuary identified a deficit of £158.3 million on the Council's Pension Fund (using the methodology within Financial Reporting Standard (FRS) 17) compared with £111.9 million in 2006-2007. The main reason for the decrease in the deficit is changes in the demographic and financial assumptions used to estimate liabilities of the Fund.

Exhibit 4: The Council's Pension Fund valuation

	2006-2007 £ million	2007-2008 £ million
Estimated value of assets in the scheme	196.8	194.4
Estimated liabilities	308.7	352.7
Net liability	111.9	158.3

Source: Blaenau Gwent County Borough Council Audited Accounts 2007-2008

56. Following our recommendation in last year's Annual Letter, we monitored the Council's progress for putting in place a medium-term financial plan. Whilst a detailed paper has been discussed at senior officer level, and has been presented to all departmental management teams, only incremental progress has been made in developing a medium-term financial plan and therefore this has not yet been presented to or approved by Council.

57. Officers have explained to us that, due to the financial and other challenges faced by all departments of the Council, less officer time from across all departments has been allocated to this task than had been anticipated.

58. Continuing significant cost pressures coupled with a below inflation revenue support grant settlement for 2009-2010 has meant that the Council is prioritising its efforts on constructing a budget for 2009-2010. It is inevitable that the Council needs to focus on these immediate pressures. However, some of the cost pressures and saving schemes required to contain them will have an impact over a number of years. Therefore, we recommend that the Council prepares a medium-term financial plan following the approval of its 2009-2010 annual budget.

The Council has appropriate financial management arrangements in place, but it faces increasing financial pressures in several service areas

59. The Council's significant financial systems are generally effective and improvements continue to be made to the internal financial control environment.

60. To demonstrate financial stewardship, the Council needs to ensure effective financial management including:

- effective internal financial controls, such as robust standing orders and financial regulations, strong budgetary control and an effective internal audit function;
- recognised standards of financial conduct;
- appropriate arrangements to ensure that the Council only enters into transactions where there is specific legal provision for it to do so; and
- effective arrangements to prevent and detect fraud and corruption.

61. Our review of these areas found:

- that the arrangements to maintain the systems of internal control were effective;
- that, as in previous years, Internal Audit has met the required professional standards and we have been able to place reliance on its work;
- that effective arrangements were in place to ensure that the Council enters into transactions only where there is specific provision for it to do so; and
- the ethical framework of the Council was operating effectively as were the arrangements for preventing and detecting fraud and corruption.

62. There are a number of further financial pressures that will need to be considered and managed. Examples of these are set out in Exhibit 5.

Exhibit 5: Financial pressures

Financial pressures	Implications
Local Government Settlement	The local government settlement for 2009-2010 has resulted in a 1.5 per cent increase in Assembly Government funding. The settlement represents a significant challenge to the Council in respect of setting a balanced budget.
Job evaluation and Single Status	To date, the Council has settled approximately 80 per cent of its Single Status liability, with a financial provision in the accounts for the remaining potential claimants. The job evaluation process is underway and the Council has built a preliminary assessment of the impact into its budgets. As the process is completed the Council is planning to re-assess the future revenue costs and will revise the requirement on future budgets.
Energy costs	Substantial increases in electricity and gas prices are expected which will greatly affect the flexibility of the Council's budget and resulting financial position.
Education	School funding is calculated primarily on pupil numbers and therefore falling school rolls has a direct impact upon the level of income the Council receives for its education provision. The Council will need to assess the magnitude and impact of falling numbers and take action where appropriate to maximise its education funds across the borough.

Financial pressures	Implications
Social Care	There is increasing demand and financial pressure on social care services, particularly regarding looked after children, adoption support, people with a learning disability and older people. The Council is continuing to modernise through further development of alternative and preventative services that are intended to minimise high cost demand in the longer-term and ensure resources are used to best effect.
Waste Management	The Council is faced with tough Assembly and EU targets for landfill waste reduction, with financial penalties for non-compliance when measured against those targets.
Silent Valley Waste Services Limited	Silent Valley Waste Services Limited is a separate corporate body which is a subsidiary of the Council. The Council should continue to review on a regular basis the level of future capping costs at the site. The Council should ensure that it has made adequate provisions in the financial statements and have considered all of its potential future liabilities in respect of the landfill site.

63. Once these pressures have been analysed and accommodated within the 2009-2010 budget the Council intends to ensure that they are incorporated into the medium-term financial plan.

The Council made effective use of the National Fraud Initiative

64. The National Fraud Initiative (NFI) is a biennial computerised data matching exercise conducted across England and Wales. The Audit Commission is responsible for the exercise in England and the Auditor General is responsible for the exercise in Wales through his appointed auditors at local government bodies.

65. The exercise is designed to identify overpayments to suppliers and benefit claimants and to detect fraud perpetrated on public bodies. The referrals from the 2006-2007 exercise were released in January 2007 to participating bodies including local councils. The matches have been investigated and resulted in the identification of £4.7 million of fraud and overpayment across Wales. In May 2008, the Auditor General published a national report on the overall findings of the 2006-2007 exercise.

66. The Council reported savings of £34,926 in respect of NFI in 2006-2007. It took appropriate action to investigate the matches and to address instances of suspected fraud and error.

67. Data extractions for the 2008-2009 exercise commenced in October 2008 and authorities should receive data matches in early 2009. The Auditor General is undertaking the 2008-2009 exercise in accordance with the powers set out in the Serious Crime Act 2007 to conduct data matching exercises to assist in the prevention and detection of fraud in Wales. The Auditor General has recently published a Code of Data Matching Practice to help ensure that people's information is protected and processed appropriately during data matching exercises such as NFI.

Our certification of the Council's grant claims and returns is nearing completion

68. The Council is in receipt of a number of grants from various awarding bodies which often require audit certification depending upon the amount of grant received.

69. In addition, the Council is reimbursed by the Department for Work and Pensions (DWP) for payments awarded to Housing and Council Tax Benefit claimants. This reimbursement, through submission of a subsidy claim to the DWP, exceeds £25 million. We are required to certify the subsidy claim by testing a significant sample of individual benefit claims.

Our certification of the 2007-2008 claim is ongoing. Issues arising from our work on this and other outstanding claims will be reported to management at the conclusion of our work.

The Relationship Manager's report on behalf of the Auditor General

The annual joint risk assessment validated the Council's priorities for improvement and the Council has responded constructively to previous recommendations

The Council's risk assessment and risk management arrangements have developed over the last few years and with further refinement can make a significant contribution to wider performance management arrangements

70. The Council has completed, and agreed with its regulators, a risk assessment of its services and corporate functions. The outcomes of the risk assessment were reported in the Council's Improvement Plan, supporting the identification of its priorities for the next year.

71. The Council has continued to develop its mechanisms for capturing, monitoring and collating risk. We reported last year on the need for the Council to begin to address the need for evidence on outcomes rather than actions to mitigate risks. Progress in this area has been slow and the Council now needs to move forward with this if the risk assessment is to make the necessary contribution to wider performance management arrangements.

72. The annual risk assessment identified a number of high risk. In common with other councils, highways maintenance, waste management, asset management, meeting the Welsh Housing Quality Standard, and meeting future housing needs remain high risk.

73. On a more localised level regeneration, community safety, human resources, development control, building control, procurement, the range and quality of adult services and some aspects of governance and strategic management are examples of areas where the risk remains high.

The Council has responded positively to the recommendations of previous inspection work

74. We have followed up the implementation of recommendations arising from our work on private sector housing, citizen-based information and alternative methods of service delivery to ensure that the Council has appropriate mechanisms in place to respond to external challenge.

75. This work has not yet been completed and we will report the outcomes from the study in next year's annual letter.

Individual reviews of social services, member training, highways maintenance, homelessness and measuring service improvement have indicated some good practice and some areas for improvement

76. The main findings from reviews of social services, member training, highways maintenance, homelessness and measuring service improvement are included below.

The Council has worked hard to improve its performance in delivering Social Services and has continued to make steady progress on the improvements gained last year

77. The Council and the Care and Social Services Inspectorate Wales (CSSIW) agreed the Annual Performance Evaluation (APE) for the year ending 31 March 2008 and this summary of the findings, including the overall conclusion above, is produced with approval from CSSIW.

78. Performance Indicators and the Council's own self-assessment indicated achievements across both children's and adult services. The Council recognises the areas, such as consistency in the quality of services for looked after children and care leavers and re-shaping services, where further work is required.

79. The Council has identified strategic targets for areas of service which should support its aim to increase independence. This could be taken further when the outcome based approach is more developed to identify outcomes for individuals and families.

80. Strengths and achievements recognised in the APE included:
    - working positively with regulators to support the drive for improvement;
    - reviewing the Continuous Improvement Plan, linking it more cohesively with corporate and departmental plans;
    - providing greater consistency in children's services, where timeliness and quality through continued examination of performance, has continued to be a high priority;
    - modernising and re-shaping of adult services that has resulted in key shifts in the way services are provided, including the continued emphasis on providing improved independence through services in the community;
    - focusing on performance management and performance information, which has been embedded and used to prioritise, plan and drive improvements; and
    - continuing to maintain and develop partnership working.

81. Priorities for Improvement that were identified included:

- improving the quality of services to its most vulnerable children. The Council acknowledges that it still has work to do to improve the quality of these services and thus outcomes for individuals.
- improving assessment for adult and carers. While there had been increased performance in some aspects, there were some anomalies. This suggests that the work already undertaken to engage with carers must continue to be given high priority.

The inspection of the Council's fostering service revealed some good practice and some areas for improvement

82. In March 2008 the Council received a report that had been compiled following a January inspection of the fostering service undertaken by Care and Social Services Inspectorate Wales (CSSIW) under the provisions of the Care Standards Act 2000 and associated regulations.

83. The primary focus of the report is to comment on the quality of life and quality of care experienced by service users (foster carers and children in placement). This summary of the report is produced with the approval of CSSIW.

84. The Council has been through a significant change with the creation of the Social Services, Education and Leisure Directorate. This transition took place in summer 2007. It is anticipated that this will assist in developing the agenda for improved education outcomes for looked after children.

85. Foster carers indicated their appreciation of the support provided by staff in the fostering service and were consistent in their comments about their reliability and consideration to them as carers. They also described receiving regular information about training events.

86. The fostering service has developed the foster carer handbook. It contains details about all key procedures and provides a wide range of information and guidance for foster carers. It is a positive resource document.

87. Information for 2007 indicates that there were no looked after children excluded from school either permanently or for a fixed period. However, the percentage of looked after children without a Personal Education Plan within the required timescale in the same period was in the region of 57 per cent. This is an area clearly in need of attention.

Despite a delayed start, the arrangements for private fostering are developing well and the Council must ensure that arrangements to meet the remaining statutory obligations are put in place

88. In 2007/2008 and 2008/2009 a review was undertaken of the arrangements for Private Fostering across Wales. The purpose of the review was to understand how local authorities were carrying out their responsibilities in relation to private fostering.

89. The first element of the review, issued in January 2008, was a survey that was completed by all local authorities across Wales. The second element was to undertake follow-up fieldwork in six local authorities. Blaenau Gwent was selected for follow-up fieldwork which took place on 13 June 2008.

90. Feedback based on the survey and the fieldwork was provided to the Council in August 2008. This summary of the feedback is produced with the approval of CSSIW.

The Council is approaching member training and development in an appropriate way to equip members with the skills and knowledge to help them make a more effective contribution to continuous service improvement

91. The Wales Audit Office undertook to examine the arrangements that had been put in place for training and development of elected members to assess whether the training programme would deliver the required outcome of progressing the modernising agenda.

92. The overall conclusion from the work, which was agreed with the Council, is reproduced above.

93. We came to this conclusion because:

- clear objectives underpin the training and development programme, the content of which is aligned to corporate priorities;
- the Council has provided necessary resources to support the programme's delivery;
- members are committed to engaging with the programme;
- the programme is delivered flexibly and members' needs have been taken into account;
- regular monitoring and evaluation take place to help shape and inform the programme; and
- the programme is contributing to an open culture of continuous improvement.

The Council is managing the highway infrastructure effectively, but continuing with this approach based upon existing levels of resources is unsustainable

94. The Wales Audit Office undertook a study to examine whether the Council's approach to highways maintenance is enabling it to best manage the highway infrastructure from finite resources.

95. The overall conclusion from the work that was agreed with the Council, is reproduced above. We came to this conclusion because:

- the Council has comprehensive information on the road condition and has a well-developed assessment system in place which allows targeting of resources;
- the Council is making effective use of available funding but there are increasing demands for repairs as a result of a deteriorating highway infrastructure; and
- the Council has made limited progress in developing long-term plans to manage the highway network through a comprehensive Highway Asset Management Plan.

The Council has developed some appropriate approaches to meet emerging challenges in homelessness, but needs to adopt a more strategic approach to ensure that its plans are realised

96. The Wales Audit Office undertook a study to examine whether the Council is developing an appropriate approach to meeting emerging challenges in homelessness.

97. The overall conclusion from the work, which was agreed with the Council, is reproduced above. We came to this conclusion because:

- there are key gaps to providing a customer focussed homelessness prevention, advice and options service, but the Council has taken positive steps to address these issues;
- the Council does not have all the information it needs to identify emerging trends in homelessness, but has put resources in place to improve data collection and analysis;
- the Council has developed strategies, policies and plans to deal with potential changes to the demand for homelessness services and housing, but they have yet to demonstrate impact; and
- there is commitment within the Council and its partners to deliver the plan, but a more strategic approach is needed to ensure implementation and improve services to homeless people.

The Council is improving its approach to measuring service improvement

98. The Council is making good progress on a project to establish a performance management framework and a range of performance measures for services that support Sport and Active Living. The project is initially focusing on Sport and Active Living, but the framework that is being developed will be portable to other areas within the Council.

99. The Wales Audit Office is providing support for the project which should result in a revised performance management framework and associated materials. The project is progressing well and a framework setting out performance measures that flow from strategic outcomes is partially complete. The next stage of the work will be to examine the implementation issues involved in using the approach across other services within the Council.

The Council has engaged positively with the Wales Audit Office's initiatives to promote improvement

The Council is committed to using the Good Practice Exchange through shared learning

100. In 2007, the Wales Audit Office embarked on a long-term programme of promoting improvement across public services through the capture, evaluation and dissemination of good practice. Web-based facilities to support improvements in sickness absence management, fleet management, occupational health and grants management have been launched and the ability to access Wales Audit Office case studies and facilities to share learning across public services have been developed.

101. Since work on sickness absence in late 2007 by the Wales Audit Office, the Council has re drafted the sickness absence policy, prepared managing absence guides for managers and strengthened support for long-term sick employees with the appointment of National Brittanica Occupational Health providers and an Employee Assistance Programme, which provides counselling services for staff.

102. During November 2008 final communications on the new approaches to sickness absence management were delivered to staff, unions and managers and the Council hopes to see a tangible reduction in absence statistics in the first six months of 2009.

103. Next year we will focus on Smarter Ways of Working (SWOW), aiming to provide a convenient stimulus for innovation and creative thinking in gearing the organisation of work – and the people who deliver it – to more flexible patterns. This work aims to support an overall organisational strategy of improvement, generating benefits in relation to cost control, sustainability, and employee engagement. At the heart of SWOW is citizen-centred service design.

104. The Council now wishes to utilise the support offered under the SWOW phase, to progress the work on sickness absence, as it recognises that flexible working options can reduce absenteeism rates.

The Council is committed to delivering the Making the Connections agenda and its approach to fleet management is making best use of resources to support improvements in service delivery

105. The Wales Audit Office is committed to an ongoing programme of work focusing on the Making the Connections (MtC) agenda across the public sector in Wales. In 2007 we completed a baseline assessment of progress made in implementing that agenda, following which we concluded that a phased review of asset management would provide a framework for future work.

106. The first phase of that work – on fleet management – was designed to identify whether public sector organisations' arrangements made the best use of resources to support improvement in service delivery. The Welsh public sector collectively uses approximately 16,000 vehicles which cost some £200 million per annum to run. We estimate that these vehicles drive some 250 million miles per annum which generates some 110,000 tonnes of carbon dioxide (CO_2). Effective fleet management can improve service delivery, reduce operating costs and minimise the environmental impact of the fleet.

107. The Council's vehicle fleet costs £2.6 million to run each year. We estimate that these vehicles travel 2.5 million miles each year and produce 1,512 tonnes of CO_2.

108. The Council does not have a clear strategy for fleet management set out in a single corporate strategy document. However, fleet management is covered within a comprehensive business plan for Purchasing, Stores and Transport.

109. The Council has entered into joint purchasing agreements with other bodies to achieve economies of scale and the Council makes effective use of Value Wales for procuring vehicles, fuel and replacement parts. However, it does not record key financial and other PIs to determine whether it is achieving value for money.

110. The Council has considered ICT solutions to support fleet management. For example, all gritters have state of the art trackers so the Council can monitor exactly when the roads have been gritted.

111. Vehicle maintenance services are provided in-house following a tender process undertaken about 10 years ago. Whilst the service has not been re-tendered since, a significant amount of work has been undertaken to market test the service and monitor and improve productivity and performance, including the introduction of a bonus scheme.

112. We have made a series of recommendations about these issues, designed to improve service delivery, reduce operating costs and minimise the environmental impact of the fleet.

Appendix 1

Auditor's report on the arrangements for securing economy, efficiency and effectiveness in its use of resources in 2007/2008

Conclusion on the Council's arrangements for the year ended 31 March 2008 for securing economy, efficiency and effectiveness in its use of resources	
The Council's responsibilities	
The Council is responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources, and to ensure proper stewardship and governance. The Council is also responsible for regularly reviewing the adequacy and effectiveness of these arrangements.	
Auditor's responsibilities	
We have a responsibility under section 17(2)(d) of the Public Audit Wales Act 2004, to conclude from my audit of the Council's annual accounts and other relevant information whether we are satisfied that it has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources. For the purposes of our work in this area, we have assessed 'proper arrangements' as principally comprising an organisation's corporate performance management and financial management arrangements, significant elements of which are defined in paragraph 48 of the Auditor General's Code. We report if significant matters have come to our attention which prevent us from concluding that the Council has made such proper arrangements. In carrying out our work, we have not considered whether the arrangements in place represent all those that could be in place. We are also not required to consider, nor have we considered as part of this aspect of our work, the effectiveness of the arrangements in place in securing value for money during the year under review.	
Conclusion	
The following conclusion has been based on, and limited to, work carried out as part of our audit of the 2007/2008 accounts, together with any other information that we have considered to be relevant to our examination, to establish, in all significant respects, what arrangements the Council had in place during the year to support the achievement of its responsibility to secure economy, efficiency and effectiveness in its use of resources. Based on the Council's Statement of Internal Control and as a result of the work carried out, as described above, as part of our audit of the 2007/2008 accounts, and all other information that we have considered to be relevant, we are satisfied overall as to the existence of the arrangements that the Council had in place during the year to support the achievement of its responsibility for securing economy, efficiency and effectiveness in its use of resources. We have also raised various issues with the Council, and made recommendations to improve its arrangements. These matters are further discussed and explained in the Annual Letter.	
PricewaterhouseCoopers LLP Appointed Auditor 30 November 2008	One Kingsway Cardiff CF10 3PW

Appendix 2

Criteria for assessing the Council's arrangements during 2007/2008 for securing economy, efficiency and effectiveness in its use of resources

Corporate performance management and financial management arrangements	Questions on arrangements
Establishing objectives, determining policy and making decisions	1. Has the Council put in place arrangements for setting, reviewing and implementing its strategic and operational objectives?
Meeting needs of users and taxpayers	2. Has the Council put in place channels of communication with users and taxpayers, and other stakeholders including partners, and are there monitoring arrangements to ensure that key messages about services are taken into account?
Compliance with established policies	3. Has the Council put in place arrangements to maintain a sound system of internal control, including those for ensuring compliance with laws and regulations, and internal policies and procedures?
Managing operational and financial risks	4. Has the Council put in place arrangements to manage its significant business risks?
Managing financial and other resources	5. Has the Council put in place arrangements to evaluate and improve the value for money it achieves in its use of resources?
	6. Has the Council put in place a medium-term financial strategy, budgets and a capital programme that are soundly based and designed to deliver its strategic priorities?
	7. Has the Council put in place arrangements to ensure that its spending matches its available resources?
	8. Has the Council put in place arrangements for managing and monitoring performance against budgets, taking corrective action where appropriate, and reporting the results to senior management and the Council?
	9. Has the Council put in place arrangements for the management of its asset base?
Monitoring and reviewing performance	10. Has the Council put in place arrangements for monitoring and scrutiny of performance, to identify potential variances against strategic objectives, standards and targets, for taking action where necessary, and reporting to the Council?
	11. Has the Council put in place arrangements to monitor the quality of its published performance information, and to report the results to Council members?
Proper standards of conduct	12. Has the Council put in place arrangements that are designed to promote and ensure probity and propriety in the conduct of its business?

Audit report of the 2008/2009 Improvement Plan

Certificate

We certify that we have audited Blaenau Gwent County Borough Council's Improvement Plan in accordance with section 7 of the 1999 Act and the Auditor General's Code. We also had regard to supplementary guidance issued by the Assembly Government such as Circular 28/2005.

Respective responsibilities of the Council and the auditors

Under the 1999 Act the Council is required to prepare and publish a Best Value Performance Plan summarising:

- its assessments of performance; and
- its position in relation to its statutory duty to make arrangements to secure continuous improvement to the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.

This was supplemented by further guidance on how the WPI will be implemented under sections 3, 5 and 6 of the 1999 Act as set out in the National Assembly Circular 18/2002. Under this guidance, the statutory Best Value Performance Plan has been replaced by a statutory Improvement Plan.

Assembly Government circular 28/2005 superseded Circular 18/2002 and requires the Plan to be published no later than 31 October of the financial year to which it relates.

The Council is responsible for preparing the Plan and for the information and assessments set out within it. The Council's future work programme set out in the Plan should connect to the outcomes of the updated risk assessment.

The Council is also responsible for establishing appropriate performance management and internal control systems from which the information and assessments in its Plan are derived, and for ensuring that it provides sufficient capabilities and capacity needed to manage change and improvement. The form and content of the Plan are prescribed in section 6 of the 1999 Act and the statutory guidance issued by the Assembly Government.

As the Council's appointed auditors, we are required under section 7 of the 1999 Act to carry out an audit of the Plan, to certify that we have done so, and to report whether we believe that the Plan has been prepared and published in accordance with statutory requirements set out in section 6 of the 1999 Act and statutory guidance and, where appropriate, recommending how the Plan should be amended so as to accord with statutory requirements; and to recommend:

- Where appropriate, procedures to be followed in relation to the Plan.
- Whether the Auditor General should carry out an inspection of the Council under section 10A of the 1999 Act.

- Whether the Assembly Government should give a direction under section 15 of the 1999 Act – eg, directing the Council to amend its Plan, carry out a review of a specific function or hold a local inquiry. Details of all possible directions can be found in the 1999 Act.

Scope of the Improvement Plan audit

We planned and performed our work to obtain all the information and explanations that we considered necessary in order to report and make recommendations in accordance with section 7 of the 1999 Act.

For the purposes of our report, we have interpreted compliance with the statutory guidance issued by the Assembly Government in the document, *Wales Programme for Improvement: Guidance for Local Authorities*, as being sufficient to meet the statutory requirements under section 6 of the 1999 Act.

We are not required to form a view on the completeness or accuracy of the information, or realism and achievement, of the Plan published by the Council. Our work therefore comprised a review and assessment of the Plan and, where appropriate, an examination on a test basis of relevant evidence, sufficient to satisfy ourselves that the Plan includes those matters prescribed in legislation and statutory guidance and that the arrangements for publishing the Plan complied with the requirements of the legislation and statutory guidance.

For the purpose of determining whether or not to make recommendations on procedures to be followed in relation to the Plan, our work included:

- a review and assessment and, where appropriate, examination on a test basis of evidence relevant to the adequacy of the systems set in place by the Council for collecting and recording specified performance information; and
- the testing of specific NSPIs selected on the basis of criteria set out by the Wales Audit Office.

The work we have carried out in order to report and make recommendations in accordance with section 7 of the 1999 Act cannot be relied upon to identify all weaknesses or opportunities for improvement.

We planned our work so as to collect sufficient evidence to satisfy ourselves that the Plan includes those matters prescribed in legislation and statutory guidance, and the arrangements for publishing the Plan, complied with the requirements of legislation and statutory guidance.

PricewaterhouseCoopers LLP	One Kingsway
Appointed Auditor	Cardiff
30 November 2008	CF10 3PW

Audit and inspection fees

Your 2007/2008 audit and inspection fees were based on the risks identified and an assessment of the work needed to address those risks. They are currently expected to be in line with those set out in your Regulatory Plan as summarised below.

Audit and inspection fees 2007/2008 (excluding VAT)

	2007/2008 planned (£)	2007/2008 expected (£)
Accounts	135,000	135,000
Performance audit	78,000	78,000
Performance inspection	77,975	77,975
Total	**290,975**	**290,975**

We have undertaken a substantial amount of work investigating and responding to electors' questions. We are currently preparing a fee for our work and will agree that with officers as part of the normal process.

In addition to the fee above, we are required to certify your government grant claims and returns for which we must charge the actual time taken to undertake the work at skill related fee rates. The grant certification work is not yet complete, at this stage we anticipate this work will cost approximately £145,000 plus VAT.

Wales Audit Office
24 Cathedral Road
Cardiff CF11 9LJ
Tel: 029 2032 0500
Fax: 029 2032 0600
Textphone: 029 2032 0660
E-mail: info@wao.gov.uk
Website: www.wao.gov.uk