



24 Cathedral Road / Heol y Gadeirlan  
Cardiff / Caerdydd  
CF11 9LJ  
Tel / Ffôn: 029 20 320500  
Fax / Ffacs: 029 20 320600  
Email / Epost: [wales@wao.gov.uk](mailto:wales@wao.gov.uk)  
[www.wao.gov.uk](http://www.wao.gov.uk)

Mr John Cook  
Brecon Beacons National Park Authority  
Plas y Ffynnon  
Cambrian Way  
Brecon  
Powys LD3 7HP

Date 28 August 2012  
Our reference HVT1709/fgb  
Pages 1 of 8

Dear John

### Improvement Assessment

I am required, under the Local Government (Wales) Measure 2009 (the Measure) to report my audit and assessment work in relation to whether Brecon Beacons National Park Authority (the Authority) has discharged its duties and met the requirements of the Measure.

This letter summarises:

- my views on whether the Authority has discharged its statutory duties in respect of improvement planning;
- my views on the Authority's compliance with requirements to make arrangements to secure continuous improvement, based on work carried out to date by the Wales Audit Office and relevant regulators, including:
  - the Authority's progress on areas for improvement and recommendations identified in my previous assessments; and
  - any relevant issues that may have emerged since my last report, including comments on how the Authority is addressing financial challenges, my further proposals for improvement and/or recommendations; and
- updates to the Wales Audit Office work plan and timetable for delivering my Improvement Assessment work.

I shall update my views during the year and will provide a further letter by the end of November 2012.

**The Authority has discharged its improvement planning duties under the Measure and has acted in accordance with Welsh Government guidance**

I have reached this conclusion because:

- the Authority's improvement objectives for 2012-13:
  - were developed in the context of consultation with stakeholders that was at an appropriate level for a relatively small organisation;
  - were developed with the involvement of members and staff and subsequently formally approved by the Authority;
  - support delivery of the outcomes set out in the Authority's longer-term corporate goals; and
  - are generally focused on outcomes, rather than actions;
- the Authority's improvement plan for 2012-13:
  - is much improved from previous years, using a format which clearly sets out the relevant context and expected outcomes for each improvement objective;
  - includes measures and targets, where appropriate, for its improvement objectives;
  - contains information on how communities or stakeholders may propose new improvement objectives during the year; and
  - was formally approved by the Authority and was published in early June which was as soon as practical after the start of the financial year.

As a small organisation, the Authority does not carry out extensive consultation every year. The Authority based its 2012-13 improvement objectives on information obtained from a variety of sources. These included:

- community stakeholder consultations from previous years;
- meetings with Community Councils;
- a Future Directions Forum involving members;
- Joint Management Team workshops;
- the Welsh Government's strategic grant letter; and
- results-based-accountability workshops.

It plans to carry out further consultation during October 2012 to help it identify those elements that stakeholders would expect to see in an excellent planning service. The improvement objectives were agreed in February 2012, before council elections in Wales led to changes in the membership of the Authority. However, the new administration has had an opportunity to review the improvement objectives when they were presented to members as part of the Authority's induction process for new members.

The Authority's improvement plan for 2012-13 is a significant improvement over its plans in recent years. It is now easy to read and tells a story around each improvement objective, using headings such as 'Why we are focusing on this Improvement Objective', 'What we will do', 'How we will do it' and 'How will we know if we have achieved.....'. While the information that appears under these headings, particularly in relation to measures of success, is not always as meaningful as one would hope, once again, this is an area showing significant progress.

**Based on, and limited to, work carried out to date by the Wales Audit Office I believe that the Authority is likely to comply with the requirement to make arrangements to secure continuous improvement during this financial year**

I have reached this conclusion because, since my letter to you of 22 July 2011, the Authority has:

- agreed an improvement plan that sets out the Authority's plans for delivering improvements and established, where appropriate, measures and targets for its improvement objectives;
- established a programme that ensures that members can scrutinise progress towards achieving individual improvement objectives;
- continued its development and use of outcome-focused scorecards linked to each improvement objective;
- made progress in responding to our proposals for improvement; and
- developed an approach that sets out the relevant milestones, timescales and processes involved in agreeing the Authority's priorities and how they are to be delivered, evaluated and monitored.

**The Authority has moved quickly to respond to our proposals for improvement.**

I have previously reported a number of proposals for improvement. Progress on these matters is summarised below and described in more detail in Appendix 1:

- although quarterly reporting to members on performance is still grouped under directorate headings, the Authority now also includes exception reports relating to progress on priorities;
- the Authority's Audit and Scrutiny Committee is to receive a progress report on one improvement objective every quarter; training has been given to members on results based accountability (RBA) and the Authority is increasing the use of RBA as a means of identifying and measuring expected benefits; and
- the Authority's forward looking improvement plan was published in early June 2012.

**Recent changes to the Authority's membership provide both a challenge and an opportunity, although it is too early to assess their overall impact.**

The Authority consists of 24 members: eight appointed by the Assembly Government; eight from Powys County Council; two from each of Monmouthshire and Carmarthenshire County Councils; and one each from Merthyr Tydfil, Torfaen, Blaenau Gwent and Rhondda Cynon Taf County Borough Councils. These members make decisions about priorities and the use of resources. Council elections in May 2012 resulted in 13 of the 24 being new members, five of whom have never been councillors before. Some continuity has been maintained with, for example, the re-appointment of the Chairs of the Authority, its Audit and Scrutiny Committee and its planning committee.

Both the chair of the Authority and its chief executive see the fresh influx as being an opportunity to reinvigorate membership, offering fresh insights. It is true that members who have no previous experience of how a national park authority works can often be more robust in challenging the status quo. On the other hand, new members can take more time to understand the context in which a national park authority operates and can critically influence the Authority's existing arrangements and plans for improvement. New members also represent an additional training and induction requirement. This training and induction has already begun with further member development events planned over the coming months and whilst this represents an additional workload, this is viewed within the Authority as an excellent opportunity to build a professional working relationship between members and officers. However, this opportunity will become a significant burden if, as has happened in the past, local authority nominees change periodically.

**The Authority is continuing to improve its approach to performance management and to the identification of its priorities, although embedding some of the more demanding aspects of its methodology will be challenging.**

The 'How we will do it' section of the Authority's improvement plan sets out activity in general terms. More details about supporting activities are set out in individual performance management review (PMR) documentation. PMRs are held every three months and these reviews include an assessment under headings such as:

- 'What will I do?'
- 'What will success look like?' and
- 'What progress is being made? Does anything need to change during the next quarter or further ahead?'

Service business plans are also produced but these are developed by individual services. There is no standard corporate format for service business plans. However, examples we looked at did include explicit links to the Authority's priorities. Actions that are required to be carried out are entered into the Ffynnon performance monitoring software system and, as in previous years, outcome focused score cards are prepared for each improvement objective.

As part of the Authority's continuing aim of improving scrutiny and increasing its focus on ensuring its priorities are being delivered, its Audit and Scrutiny Committee has introduced a programme which includes a review of an individual improvement objective every quarter.

During the year to 31 March 2012, supported by the Welsh Government Scrutiny Development Fund, the Authority carried out a joint project with Pembrokeshire Coast National Park Authority to develop a model for effective scrutiny within the governance structure of a National Park Authority. Subsequently, the Authority has adopted a scrutiny model and in 2102-13 will, for the first time, carry out scrutiny reviews of one improvement objective for the previous year and one for the current year.

The Authority has recently developed and adopted a 'Directors toolkit'. The main impetus for this initiative was the Authority's desire to improve and simplify the way that the priorities for action, linked to its National Park Management Plan, were monitored, evaluated and reported. A task and finish group held a series of workshops that carried out a number of tasks, including:

- mapping the linkages between current work programmes, priorities for action and outcome agreements;
- identifying as 'orphans' those priorities for action that were not part of a work programme or were not linked to an outcome agreement;
- estimating staff time requirements; and
- reviewing outcome agreements and assigning reporting responsibilities.

Based on this work, the task and finish group developed a toolkit for directorates for setting annual work programmes, including an approach that requires directorates to carry out an annual peer review of work programmes.

Taken together, this continuing development of the Authority's approach to performance management and identification of its priorities, with an emphasis on the importance of outcomes, rather than actions, has significant potential for making a positive contribution to the delivery of improvements. However, the challenge, as is often the case for performance management, will be to ensure that this wide-ranging approach is embedded and adhered to by relevant staff.

### **The Authority's continuing focus on its planning function has the potential to deliver and demonstrate further improvement**

In order to address under performance in its planning enforcement service the Authority introduced different management arrangements to the enforcement function on an interim basis. This has had the desired effect of improving enforcement processes.

This improvement, together with increased capacity has led to better performance. Cases are now dealt with as they are received and further process development is being undertaken aimed at reducing the backlog of cases. The Authority's intention is to return the enforcement function to the planning service directorate, once it has confidence that re-integration will not adversely affect the gains already made.

Planning excellence continues to be an improvement objective for the Authority. The Authority has agreed measures in its improvement plan that aim to measure the extent to which this objective is achieved in 2012-13. However, it recognises that these measures rely heavily on speed of processing and that speed is not necessarily the main factor in defining an excellent planning service. As such, it continues to explore more appropriate ways of defining and measuring excellence. The director of planning submitted a report to the Authority on 30 April, outlining eight quantitative and qualitative measures that he considered to be better focused on outcomes. The Authority approved the proposals and, subject to refinement and to the results of consultation, these are likely to be adopted as measures in 2013-14.

We understand that the Planning Officers' Society for Wales and the Welsh Government have held meetings to discuss how planning authorities across Wales could use more meaningful measures of performance. These meetings form part of a wider-ranging review by the Welsh Government of the planning service framework across Wales. It will be important that the Authority ensures that any measures it adopts for 2013-14 take account of the results of this work.

**The potential benefits of the Authority's Annual Governance Statement will not be fully realised until that statement incorporates greater evaluation of the effectiveness of the Authority's governance arrangements**

The production of an Annual Governance Statement (AGS), which replaces the previous Statement of Internal Control, is a relatively new requirement for local authorities. As with so many other local authorities across Wales, the Authority is still refining its approach to how it is prepared.

An AGS should evaluate the effectiveness of the arrangements an authority has in place, not just describe them. In evaluating its arrangements using a robust and challenging approach, an Authority is much better placed to identify weaknesses in its arrangements and to take steps to make appropriate improvements. As with many other AGSs produced by local authorities across Wales, there was very little evaluation of arrangements within the Authority's AGS for this year. However, the officers and members we spoke to recognised that omission and, in response to their request, we subsequently made available to the Authority further information on how evaluation could be incorporated in future.

**Further proposals for improvement/recommendations**

Some new proposals for improvement are being suggested in this letter. We will continue to monitor and report on the progress made by the Authority in implementing the proposals set out in my previous reports and letters.

**Proposals for improvement**

- P1 Consider introducing a corporate format for business planning that can be used by the different services within the Authority.
- P2 Ensure that, in moving towards a new set of measures for its planning service, it takes account of any relevant results from the Welsh Government's ongoing review of the framework for planning services across Wales.
- P3 Take steps to ensure that, in future years, its Annual Governance Statement incorporates a robust evaluation of the effectiveness of the Authority's governance arrangements.

**Updates to the work plan and timetable**

My Improvement Assessment Team will keep the Authority informed of the detailed arrangements for the delivery of my assessment work.

The work plan and timetable takes account of my consultation with improvement authorities over my proposals for 2012-13 performance audit work. In particular, I shall be asking my Improvement Assessment Team to consider during the year the reliance that we can place upon the self-assessment processes (including your review of governance in producing the Annual Governance Statement and your Annual Performance Report). I shall comment on this approach in my Annual Improvement Report.

I am grateful to the Authority for the way in which it has helped to facilitate our work and hope to see even more effective and efficient arrangements developing over time. I remain committed to providing appropriate levels of public assurance while supporting you in mitigating the inevitable risks to services and accountability that stem from reducing resources and consequential change.

Yours sincerely



**HUW VAUGHAN THOMAS**  
**AUDITOR GENERAL FOR WALES**

cc *Mr Carl Sargeant, Minister for Local Government and Communities*  
*Mr John Griffiths, Minister for Environment and Sustainable Development*  
*Mr John Roberts, Performance Audit Lead*

## Appendix 1

Proposals for improvement	Progress
<p>1 Improve the Authority’s ability to monitor and evaluate improvement by:</p> <ul style="list-style-type: none"> <li>ensuring the proposed reporting structure focuses on progress on priorities, rather than just on service performance; and</li> <li>being clear about the anticipated benefits of its activities, and assessing the extent to which those have been achieved.</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly reports to the Authority’s Audit and Scrutiny committee now includes exception reports on progress towards delivering priorities.</li> <li>Audit and Scrutiny Committee are to receive a progress report on one improvement objective every quarter.</li> <li>Continued development and use of outcome focused scorecards linked to each improvement objective.</li> <li>Training has been given to members on results based accountability.</li> <li>Increasing use of results based accountability as a means of identifying and measuring expected benefits.</li> <li>Developing new performance indicators for the planning service which try to focus more on outcomes and the benefits for users.</li> <li>Performance management reviews which are held every three months with individual staff ask the question ‘What will success look like?’</li> </ul>
<p>2 Build on the improvements made to its internal arrangements so as to focus on and deliver measureable outcomes for the Park and people.</p>	<ul style="list-style-type: none"> <li>Continued use of outcome focused scorecards linked to each improvement objective;</li> <li>Developing new performance indicators for the planning service which try to focus more on outcomes and the benefits for users.</li> <li>Outcome focused score cards are prepared for each improvement objective.</li> <li>Identifying as ‘orphans’ those priorities for action that were not part of a work programme or were not linked to an outcome agreement.</li> </ul>
Proposals for improvement	Progress
<p>3 Ensure that, in future, forward-looking improvement plans are published much earlier after the start of the financial year.</p>	<ul style="list-style-type: none"> <li>This year’s forward-looking improvement plan was published in early June.</li> </ul>