

Archwilydd Cyffredinol Cymru Auditor General for Wales

Waste Service – Follow-up review – **Newport City Council**

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This document is also available in Welsh.

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Summary report

Why waste management is important

- Waste management is a Welsh Government priority. In 2011, the Welsh Government established the Collaborative Change Programme (CCP) to help introduce more sustainable waste management services to meet the objectives of Towards Zero Waste¹, the Welsh Government's Waste Management Strategy. The Welsh Government has:
 - set long-term targets for recycling/re-use of municipal waste:
 - 52% by 2012-13;
 - 58% by 2015-16;
 - 64% by 2019-20; and
 - 70% by 2024-25, some five years earlier than is currently the case in England
 - introduced a Landfill Allowance Scheme which limits the amount of biodegradable municipal waste that councils in Wales can send to landfill; and
 - put in place the potential for financial penalties to be levied for noncompliance.
- 2 There are two national performance measures for waste management:
 - percentage of municipal waste reused, recycled or composted; and
 - Kilograms of residual waste generated per person¹.
- 3 Except for 2014-15, 'Increasing recycling' has been one of Newport City Council's (the Council) improvement objectives from 2013-14 to 2017-18.
- 4 As shown in Exhibit 1, the Council's performance against the national statutory indicator for the percentage of waste reused/recycled or composted has generally improved in recent years' however, recycling performance remains consistently below the all Wales average and within the bottom quartile.
 - The 2017-18 performance decreased to 59.8% following a performance of 61.4% in 2016-17. (To put this into context, 17 of the 22 councils reported a decrease in their reuse/recycling/composting rates compared to 2016-17. This is mainly due to a combination of the drop in Incinerator Bottom Ash (IBA) reported as recycled and improvements in the accuracy of wood reporting².)
 - In 2019-20, the statutory target for the percentage of waste reused/recycled/composted increases to 64%. In 2024-25, the statutory target increases to 70%.

¹ New Public Accountability Measure introduced in 2018-19. This new measure replaces 'Percentage of waste sent to Landfill'

² Welsh Government Local Authority Municipal Waste Management, 2017-18 published 17 October 2018 (SFR 94/2018)

Exhibit 1: Newport City Council waste recycling performance³.

Year	The Council's % municipal waste reused, recycled or composted	All Wales % of municipal waste reused, recycled or composted	Welsh ranking out of 22 councils (1 st being the best)	Statutory municipal waste reused, recycled or composted target (%)
2012-13	49.2	52.3	17 th	52
2013-14	51.7	54.3	19 th	52
2014-15	52.0	56.2	20 th	52
2015-16	57.1	60.2	21 st	58
2016-17	61.4	63.8	18 th	58
2017-18	59.8	62.7	19 th	58

How we approached the review

- In August 2016, we issued the Council with a report on our review of its waste service. At that time, we concluded that, whilst the Council has prioritised increasing recycling, its waste management has not been sufficiently strategic, and it has not used its governance and performance management arrangements effectively to drive improvement, although it is now taking steps to address this.
- We made four proposals for improvement relating to governance, engagement and communication, long-term business plan⁴ and the monitoring of recycling contracts. The full report is available here on the Council's website.
- In September 2018, we carried out a follow up review to assess the Council's progress in addressing those four proposals for improvement. As part of the follow-up review, we also considered the Council's own arrangements for assessing its progress in addressing the proposals for improvement.
- 8 To inform our findings we interviewed a selection of elected members and officers in the Council's waste service. We also reviewed relevant documents and observed a scrutiny committee meeting.

³ Source: Stats Wales Reuse/Recycling/Composted rates per local authority per annum.

⁴ The Council refer to developing a long-term business plan as developing a waste strategy. Therefore, the report reflects this.

Overall finding

- Our review sought to answer the question: Has the Council effectively addressed the proposals for improvement to facilitate sustainable improved outcomes for waste management made in our 2016 report?
- Overall, we found that: The Council has made progress in addressing some of our proposals for improvement but still lacks strategic direction to secure sustainable improved outcomes. We reached this conclusion because:
 - the Council is improving the governance arrangements for its waste service;
 - the Council does not yet have a long-term waste strategy for its waste service;
 - the Council has made significant improvements to the performance management of its waste and recycling contracts; and
 - the Council's arrangements to review and monitor its progress in addressing our proposals for improvement do not provide sufficient oversight.
- 11 To enable sustained improved outcomes for waste management, the Council needs to finalise its waste strategy.

Detailed report

The Council has made progress in addressing some of our proposals for improvement but still lacks strategic direction to secure sustainable improved outcomes

12 In reaching this conclusion, we examined the four areas where we made proposals for improvement. This section of the report sets out those proposals and the conclusions we reached about the extent to which they are being addressed.

2016: Proposal for Improvement 1 – Governance

The Council should make proper and effective use of its governance arrangements by:

- making better use of its scrutiny arrangements to provide more frequent and accurate performance information and analysis to enable it to monitor and manage waste and recycling performance effectively;
- ensuring that waste and recycling performance information reported to members is accurate and consistent and that changes to targets are made in accordance with the Council's agreed protocols;
- considering whether it is appropriate for a member of the Street Scene,
 Regeneration and Safety Scrutiny Committee to be a Trustee of Waste Savers;
 and
- ensuring that members who are also members of external bodies are aware of their responsibilities and adhere to the Council's Code of Conduct, particularly about declaration and conflicts of interest.

2018: The Council is improving the governance arrangements for its waste service

- 13 The Council responded positively to our 2016 report, which stated that there was limited opportunity for the Streetscene, Regeneration and Safety scrutiny committee to challenge the Cabinet Member for Streetscene.
- As stated in our Overview and Scrutiny: Fit for the Future report, issued in August 2018, the Council has made significant changes to the scrutiny function with performance scrutiny committees replacing the previous committee structure. Three of the four new committees have an emphasis on performance.
- 15 In this follow-up review of the Council's waste service, we found the following.

The Council now provides more accurate performance information to members

- In our previous report issued in August 2016, we noted errors in reported performance information that continued to undermine the effectiveness of the Council's performance management arrangements. Officers used several spreadsheets to record performance data. This increased the risk of human error when extrapolating data for performance reports.
- 17 In our 2018 follow up review, we note a considerable improvement to performance reporting following the introduction of a Management Information (MI Hub) system in 2016 to record performance data from service areas. The MI system records service area targets and can provide consistent data on current performance for all performance reports.
- However, inaccurate data entry can still lead to errors. We identified a discrepancy in performance reporting during the initial implementation of the MI Hub. The Streetscene, Regeneration and Safety scrutiny committee received a half-year service plan review in November 2016. Performance data was incorrect due to a failure to reflect quarter two performance. Despite this example, our review of the 2017-18 quarter two, quarter three and quarter four performance reporting to the Performance scrutiny committee Place and Corporate and Cabinet, shows consistent and accurate reporting of performance.
- 19 The Performance scrutiny committee Place and Corporate received quarterly performance reports in 2017-18 in relation to recycling. The Streetscene, Regeneration and Safety scrutiny Committee that existed during our previous review received such reports just twice a year.
- 20 The 2017-18 quarterly performance reports to the Performance scrutiny committee Place and Corporate are now more detailed and Members should be able to assess progress and performance against the previous year as well as against the annual targets.
- 21 However, while quarterly reports to the Performance scrutiny committee Place and Corporate were generally timely in 2017-18, this committee and Cabinet did not receive the 2017-18 quarter three performance until April 2018 after the end of the quarter four period. This reporting did not provide members with the timely opportunity to effectively challenge and scrutinise performance during the relevant year to inform future performance in that year. The Council has adopted a change to its performance reporting to scrutiny committees for 2018-19. Scrutiny committees now receive two performance reports per annum: six-monthly and at end of year.

The Council's agreed protocol for changing targets needs clarifying

The Council has not taken clear action to address the potential that performance targets could be changed with no oversight. Officers told us that the Council has agreed that services can change targets during the year, but there were mixed views from those interviewed on what the change in target protocol is. During 2017-18, one waste related target changed to be more challenging. The Council has a

Performance Management Framework and whilst this document explains how services should set targets, it does not include the protocol to change targets during the year.

The Council has informed members of their responsibilities to declare conflicts of interest and ensured that the Council's trustees of Wastesavers are not also members of the relevant scrutiny committee

- In our previous report, we noted a lack of clarity on the governance, roles and responsibilities of members on outside bodies and partnerships. Two Newport Council elected members had voting rights on the Board of Trustees of Wastesavers. One of these Members was also on the Council's Streetscene, Regeneration and Safety scrutiny committee. While this member had declared an interest on the annual declaration form, the member did not declare any interests in scrutiny committee meetings. In addition, the other member had not declared the role of Trustee on the annual declaration form. Additionally, a third Council member represented the Council on the Board but did not have voting rights. This member also failed to disclose this on the annual declaration form.
- 24 The Council member who sat on the Wastesavers Board of Trustees and the Council's relevant scrutiny committee resigned from the Board. Full Council appointed a different member on 26 July 2016.
- 25 At the Council's annual general meeting (AGM) on 15 May 2018, the Council appointed four members to represent the Council on the Wastesavers Board. The current Chair of the Wastesavers Board is a Cabinet member and the member's register of interest form declares this role.
- At the time of our review, we found that three members signed their register of interest form before being appointed to the Wastesavers Board at the AGM. These three members had not subsequently updated the register of members' interests to reflect this appointment. The fourth member signed the register of interest form after the AGM and had included their role with Wastesavers.
- 27 Elected members did receive mandatory training on the Council's revised Code of Conduct following the local elections in May 2017. As part of the training, the Council provided a series of case studies for members to consider. One related to a conflict of interest for an elected member being a member of an external organisation and how that should be declared. The training also highlighted the ongoing guidance and support to members provided by the Monitoring Officer. However, it did not clearly state the timescales within which members should register interests.

2016: Proposals for Improvement 2 and 3 – Engagement and Communication and Waste Strategy

The Council should:

- Develop a consolidated engagement and education plan to increase recycling participation rates.
- Develop and agree a long-term business plan that sets out how the Council will
 meet future statutory waste performance targets and makes clear the
 arrangements to monitor the development and delivery of the plan.

2018: The Council does not yet have a long-term strategy for its waste service

28 The Director of Place and Head of Streetscene and City Operations have now been in post for over two years and provide a stability to the service that was lacking in 2016. The Council however, has yet to formulate a waste strategy stating how the Council will achieve future statutory recycling targets sustainably. Exhibit 2 provides a timeline of the Council's actions since we issued our previous report in August 2016, in developing a long-term waste strategy.

Exhibit 2: timeline of Council activity towards developing a long-term waste strategy

Timeline

 $\label{eq:August 2016-The Wales Audit Office is sued to the Council a waste management report containing the four proposals for improvement$

October 2016 – Wales Audit Office presented the waste management report to Streetscene, Regeneration and Safety scrutiny committee

November 2016 – Streetscene, Regeneration and Safety scrutiny committee agreed to set up a Policy Review Group to consider future delivery options of the waste service following a review of the service and modelling of different scenarios under the Welsh Government 'Collaborative Change Programme'.

Between December 2016 and February 2017, the Council decided to defer the Policy Review Group review until after local government elections in May 2017

May 2017 - Local elections

June 2017 – Cabinet member briefing on an overview of the waste service. This briefing included a recommendation for the implementation of three weekly residual waste collections as part of a waste strategy.

July 2017 – Performance scrutiny committee – Place and Corporate established and at its first meeting agreed to re-establish a Policy Review Group to consider scenarios on each of the three key areas of the developing waste strategy:

- Residual waste collections;
- Household Waste and Recycling centre; and
- Trade Waste.

Timeline

September – October 2017 – Policy Review Group met five times and considered five scenarios on each of the three key areas of the developing waste strategy.

November 2017 – Overview and Scrutiny Management Committee receives and supports Policy Review Group recommendations.

9 May 2018 – Cabinet member received the Policy Review Group report and recommendations. Cabinet member requested to note the report and consider the findings when taking a decision on the waste strategy.

Autumn 2018 – draft waste strategy developed by officers but timescales for Cabinet Member to receive the draft strategy for decision were unclear at the time of our review.

- 29 The Welsh Government Collaborative Change Programme conducted a review of the Council's waste service. This review modelled a wide range of scenarios for changes to the Council's collection of residual waste as well as changes to Trade Waste and the Household Waste and Recycling Centre. This review determined that three weekly residual waste collections outperformed other options in delivering potential financial savings and increases in recycling performance.
- Group considered five different scenarios for: Residual waste collections, the Household Waste and Recycling centre; and Trade Waste. The Policy Review Group's⁵ final report notes that its Terms of Reference were to review the five scenarios to form the basis of the Council's strategic direction for waste leading to the development of a waste strategy. The scenarios for residual waste collections all included three-weekly collections, a change from the two-weekly collections in operation at the time of the Review group. The group's final report notes that:
 - '2.2.2 The Group did not have scope to look at options outside of this report. They were asked to comment on the scenarios how they would relate to Newport, whether they would be effective within Newport and whether they would result in the necessary change in the service to meet the targets relating to recycling.'
- 31 During their discussions the group explored with officers the reasons why other options were not within their scope, and officers informed the group that:
 - 'three weekly collections was the next step change to the service that would impact upon the recycling rates in a substantial enough way to meet the 70% target'⁶.

https://democracy.newport.gov.uk/ieListDocuments.aspx?Cld=446&Mld=6959&Ver=4

⁵ Overview and Scrutiny Management Committee – 16 November 2017. Agenda item 4. https://democracy.newport.gov.uk/documents/s10144/Waste%20Strategy%20Review%2 OGroup%20-%20Final%20Report.pdf

⁶ Paragraph 3.4.2: Waste Strategy Review Group report

- 32 The Policy Review Group concluded that they were unable to support the change to three weekly residual bin collections and rejected all five scenarios. The Policy Review Group acknowledged that 'without introducing three weekly collection, the Council would not be in a position to reach the necessary targets for recycling and would be subject to the associated fines from the Welsh Assembly. This represents a significant risk to the Authority over the next 5-10 years.'⁷
- 33 The Overview and Scrutiny Management Committee considered the Policy Review Group's report and recommendations in November 2017. It agreed with the Policy Review Group's recommendations to not support the introduction of three weekly residual waste collections whilst recognising that retaining two weekly residual waste collections would not enable the Council to achieve future statutory recycling targets.
- 34 However, the Policy Review Group and Overview and Scrutiny Management Committee did support the recommendations on developing the Household Waste and Recycling Centre and the future of Trade Waste provision.
- At the time of our fieldwork in September 2018, the Director of Place was reviewing the final draft waste strategy which included options for maintaining two weekly collections that would encourage residents to increase their recycling participation. The revised option included in the draft was to retain two weekly residual waste collections but reduce the size of the receptacle from 180 litres to either 120 or 140 litres. However, the Council was mindful that the strategy requires approval by the Cabinet Member and implementation in readiness for April 2019 when the statutory target for the percentage of waste recycled/reused or composted increases from 58% to 64%. The Council plans to develop a consolidated engagement and education plan to increase participation recycling rates as part of its waste strategy.

2016: Proposal for Improvement 4 – Monitoring the performance of waste and recycling contracts

The Council should:

 ensure robust mechanisms are in place to monitor the performance of its waste and recycling contracts.

⁷ Waste Strategy Policy Review Group Report https://democracy.newport.gov.uk/documents/s10144/Waste%20Strategy%20Review%2 OGroup%20-%20Final%20Report.pdf

2018: The Council has made significant improvements to the performance management of its waste and recycling contracts

- 36 In August 2016, we noted that the Council was working with key partners to improve waste and recycling performance but the management and monitoring of partnerships needed improving.
- 37 A new contract between Wastesavers and the Council commenced in April 2016. The contract is for eight years with an option to extend by a further two years. This new contract includes performance measures. Welsh Government and the Collaborative Change Programme helped the Council to draft the contract and suggested relevant performance measures. The Council added to these and Wastesavers challenged to ensure relevance. In 2016, Wastesavers and the Council established the structure and format for the reports for the monthly contract performance meetings. These meetings have led to a greater attention and analysis of performance data, which is mutually beneficial to both parties.
- The Council's contract monitoring and management arrangements with Wastesavers have improved significantly since our previous review.
 - The arrangements are now formal with monthly and quarterly performance and financial meetings as well as annual service reviews.
 - The contract between Wastesavers and the Council includes the operational performance indicators that Wastesavers need to report to the Council.
 - Wastesavers prepare monthly reports, which include these operational
 performance indicators, such as the number and nature of complaints,
 health and safety incidences and the tonnage amounts of individual
 recycling materials collected.
- 39 However, there are some further areas for improvement:
 - the Council contract with Wastesavers states the need to set annual targets for each performance indicator, however, the monthly reports produced by Wastesavers do not include the agreed targets.
 - the monthly report contains the previous two months performance for each performance indicator, however, without the targets, it is not known if Wastesavers are delivering against the agreed performance.
- 40 Nevertheless, these new contract management arrangements improve the monitoring of performance, provide more performance information for analysis and identify operational issues more quickly for example, the number of complaints to Wastesavers. In the summer of 2018, Wastesavers experienced operational issues which led to an increase in complaints, mainly relating to missed recycling collections, missed food collections and missed assisted collections. The performance information that is now collected as part of the contract management arrangements, allowed Wastesavers and the Council to work together to reduce the number of complaints by addressing the underlying root causes and identifying suitable solutions.

41 The Council has two other main waste contracts: Prosiect Gwyrdd⁸ (incineration of residual waste) and Tomorrow's Valley⁹ (Anaerobic digestion of food waste). The Council has in place contract management and monitoring arrangements with operational staff, senior managers and members from the partner councils but we have not tested the effectiveness of these arrangements as part of this review.

2018: The Council's arrangements to review and monitor its progress in addressing our proposals for improvement do not provide sufficient oversight

- To monitor progress in addressing our Proposals for Improvement (PFI), the Council's Director of Place established a Waste Board in 2016. The Waste Board consists the Director of Place, Head of Streetscene and City Operations, Service Manager, the finance business partner and other members of the waste team depending on the subject.
- 43 On 1 December 2016, the Waste Board considered an action plan to address our PFIs. There were four sections: Governance arrangements; Engagement and Communications Plan; Waste Strategy and Monitoring recycling contracts. There are multiple actions supporting each PFI and all have a timeframe, lead officer, finance/budget (if applicable), method of measuring outcomes (if applicable) and progress update for each action. However, at the time of our fieldwork an updated action plan is not available.
- The Waste Board and Cabinet Member briefings discuss individual proposals for improvement, such as the development of a waste strategy and communication and engagement plan. There is, however, no overall view and assessment on progress. Additionally, any progress reported is not against the original timescales in the action plan developed in December 2016. Due to a lack of oversight of the whole original action plan, the Council are unable to provide an overall assessment on progress, whether the Council's actions proposed in December 2016 remain relevant, whether there is a need to introduce new actions or if there is any consideration that proposals for improvement are 'complete'.
- The Council no longer has systematic arrangements for enabling members, particularly audit committee with its governance and oversight role, to keep track of progress in addressing service level Wales Audit Office proposals for improvement.

⁸ Prosiect Gwyrdd is a partnership between, Caerphilly Borough County Council, the City and County of Cardiff, Monmouthshire County Council, Newport City Council and the Vale of Glamorgan Council

⁹ Tomorrow's Valley is a partnership between Newport City Council, Rhondda Cynon Taf County Borough Council and Merthyr Tydfil County Borough Council to provide a long-term solution to the food waste issues affecting the councils

Individual Cabinet Members can receive an update at cabinet member briefings and Cabinet receive updates on the PFIs relating to our Corporate Assessment but formal progress reports to members on other PFIs is lacking.

Appendix 1

Newport City Council's management response and action plan in response to Wales Audit Office waste service proposals for improvement

Exhibit 3: management response

Ref	Proposal for improvement	Intended outcome/ benefit	High priority (✓)	Accepted	Management response	Completion date	Responsible officer
The Co	uncil should:						
P1	make proper and effective use of its governance arrangements by: making better use of its scrutiny arrangements to provide more frequent and accurate performance information and analysis to enable it to monitor and manage waste and recycling performance effectively;	Scrutiny is given accurate and timely information to enable it to challenge performance and progress effectively. Remedial action is identified and taken forward.	•	√	New Performance Management Reporting Framework to be agreed by Cabinet will improve the visibility of and frequency of reporting Performance data to Cabinet and Scrutiny.	New reporting framework agreed by Cabinet September 2016.	Business Service Development Manager

Ref	Proposal for improvement	Intended outcome / benefit	High priority (✔)	Accepted	Management response	Completion date	Responsible officer
	ensuring that waste and recycling performance information reported to members is accurate and consistent and that changes to targets are made in accordance with the Council's agreed protocols;	Members challenge and take decisions based on accurate information and changes to targets are appropriately considered and agreed as per the Council's protocol.	√	√	The new software system that has been implemented reduces the chances of transposition errors. The Target setting process has been reiterated to all service areas and will continue to be communicated throughout the service planning process.	System implemented April 2016 February 2016 and ongoing	Business Service Development Manager
					Checking of targets to service plans and Improvement Plan by the Performance section to be increased now that the vacancy in the Performance section has been filled	July – Service Plan November – Mid-Year Reviews July – Year-End Review	

Ref	Proposal for improvement	Intended outcome/ benefit	High priority (✔)	Accepted	Management response	Completion date	Responsible officer
	considering whether it is appropriate for a member of the Street Scene, Regeneration and Safety Scrutiny Committee to be a Trustee of Waste Savers; and	Conflict of interests is minimised and there is objective challenge and consideration of issues relating to Waste Savers. Members understand their	~	✓	The Member in question is no longer a Trustee of Waste Savers – a new appointment was made at Council in July to remove any potential conflict of interest.	26 July 2016	Monitoring Officer
	ensuring that members who are also members of external bodies are aware of their responsibilities and adhere to the Council's Code of Conduct, particularly about declaration and conflicts of interest.	Responsibilities when they are members of external bodies and adhere to the Code of Conduct including declaring interests as appropriate.			Members receive training on the Code of Conduct as part of their induction programme, and are made aware that ongoing guidance and support in these matters can be sought from the Monitoring Officer at any time. A new code of conduct was agreed by Council at its AGM on 17 May 2016, and training on the revised code will be mandatory as part of the post-election induction programme from May 2017.	New Induction Programme ready for May 2017	Monitoring Officer

Ref	Proposal for improvement	Intended outcome/ benefit	High priority (✓)	Accepted	Management response	Completion date	Responsible officer
P2	Develop a consolidated engagement and education plan to increase recycling participation rates.	The Council has a clear plan which sets out its engagement and education activities to increase participation rates in order to facilitate monitoring and effective use of resources.	√	√	An education plan will be included as part of the Waste Strategy (see below)	As stated below	Recycling and Sustainability Manager

Ref	Proposal for improvement	Intended outcome/ benefit	High priority (√)	Accepted	Management response	Completion date	Responsible officer
P3	Develop and agree a long-term business plan that sets out how the Council will meet future statutory waste performance targets and makes clear the arrangements to monitor the development and delivery of the plan.	The Council has a clear plan setting out its actions to meet future statutory targets which identifies clear levels of accountability to facilitate effective monitoring. Progress against the plan is regularly challenged and monitored and remedial actions identified and taken as necessary.	✓		The aim of all the work carried out under the Collaboration Change Programme was to produce a Business Plans that sets out the way NCC can improve its recycling performance to be in the position to meet the statutory recycling targets and reach 70% recycling by 2025. Now that process is coming to an end, and NCC is planning to get the results and recommendations included in the Business Plan to draft, approve and implement its own strategy based on the		Recycling and Sustainability Manager

Ref	Proposal for improvement	Intended outcome/ benefit	High priority (✓)	Accepted	Management response	Completion date	Responsible officer
					findings of the CCP work. Proposed scheduled is as follows: • initial presentation on recycling changes and future proposals to Scrutiny; • creation of a Scrutiny Waste Policy review group for joint work on a new Waste Strategy • present Waste; Strategy to Cabinet for approval; and • implement Waste Strategy and enter continuous monitoring of performance and action implementation.	October 2016 Recommendations report by February 2016 April-May 2016 June 2016	

Ref	Proposal for improvement	Intended outcome/ benefit	High priority (✓)	Accepte d	Management response	Completion date	Responsible officer
P4	Ensure robust mechanisms are in place to monitor the performance of its waste and recycling contracts.	Performance against waste and recycling contracts is effectively monitored to ensure contract terms and conditions are adhered to, and remedial action identified and taken as necessary.	✓		New Performance Management Reporting Framework to be agreed by Cabinet will improve the visibility of and frequency of reporting Performance data to Cabinet and Scrutiny.	New reporting framework agreed by Cabinet September 2016.	Business Service Development Manager
					National data will be included in the Improvement Plan objective assessment criteria.	To be implemented in Q2 monitoring, report to Cabinet December 2016	
					New software has been implemented which makes the data more accessible to Senior Management.	Implemented April 2016	

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