

Supporting Financial Resilience Follow-up Review – Blaenau Gwent County Borough Council

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Summary report

Summary

What we reviewed and why

- 1 In 2018, the Wales Audit Office carried out a Supporting Financial Resilience review which focussed on how effectively the Council maximised its funding opportunities and contained spending demands. The review concluded that the Council had an agreed Medium Term Financial Strategy and reserves of 5% but that it would need to develop a stronger financial culture if it is to remain financially resilient. In particular the review concluded:
 - the Council had the highest council tax staff costs of all Welsh councils, and its rate of in-year council tax collection was amongst the lowest in Wales, as was its use of direct debits to collect council tax;
 - there was no corporate coordination of grant applications and no central record of grants claimed;
 - the Council's approach to setting fees and charges lacked clear strategic direction, ownership by services and consistent application;
 - the Council had set out a clear financial plan for 2018-19 but faced significant challenges to its delivery and must improve the budget setting process for future years;
 - the Council had a General Reserve Fund of 5% which was above its minimum target level of 4% and the Council recognised that unforeseen budget pressures could threaten this position going forward; and
 - the Council had lots of data available to it but lacked a culture that consistently used data constructively to proactively challenge, learn and drive improvement.
- 2 The review proposed improvements in each of these areas, as set out in **Appendix 1**, and the Council responded to each, showing the action it proposed to take.
- 3 Further to this report, in his letter dated 18 January 2019, the Appointed Auditor for and on behalf of the Auditor General for Wales concluded that:
 - the Council has not yet complied with all its statutory responsibilities relating to financial reporting and use of resources;
 - whilst the Council has arrangements in place to secure economy, efficiency and effectiveness in its use of resources, there is scope to make further improvements; and
 - all local authorities in Wales face financial challenges, however, the challenge at Blaenau Gwent is significant. Given its level of reserves and budget pressures, the Council will need to develop a stronger financial culture if it is to remain financially resilient.
- 4 We undertook this review to seek assurance that the Council has made effective progress in addressing our 2018 Supporting Financial Resilience review to strengthen its financial resilience.

- 5 We undertook the review between September 2019 and March 2020. The Council provided documents to demonstrate the progress it had made. We then interviewed key officers and the Leader of the Council.

What we found

- 6 Our review sought to answer the question: **Can the Council provide assurance that it has addressed the proposals for improvement detailed in the 2018 Supporting Financial Resilience review output?**
- 7 Overall we found that: **the Council has responded positively to the findings of our report: it is making progress against the proposals for improvement and has future work planned to fully address them.**
- 8 We reached this conclusion because:
- the Council is taking steps to understand and address the reasons for its lower than average council tax collection rates and high staff costs;
 - the Council has developed a central grants register and is beginning to manage grants more strategically;
 - the Council is making good progress with its strategic review of fees and charges;
 - the Council is strengthening its financial planning and management arrangements;
 - although levels of useable reserves remain low, the Council has taken proactive steps to improve its position and the MTFs demonstrates an ongoing commitment to strengthen the General Reserve; and
 - the Bridging the Gap programme is making effective use of data and further work is underway to improve the way the Council uses data.

Detailed report

The Council has responded positively to the findings of our report: it is making progress against the proposals for improvement and has future work planned to fully address them

The Council is taking steps to understand and address the reasons for its lower than average council tax collection rates and high staff costs

2018 findings and proposal for improvement

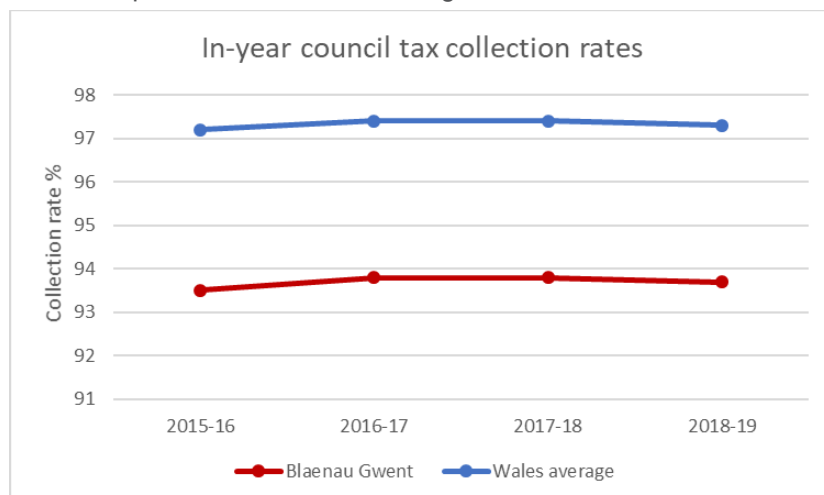
- 9 Our 2018 review found that the Council had the highest council tax staff costs of all Welsh councils, and its rate of in-year council tax collection was amongst the lowest in Wales, as was its use of direct debits to collect council tax.
- 10 As a result we made a proposal for improvement that the Council should review its administration of council tax to ensure prompt and efficient collection. In particular it should:
 - review its council tax collection arrangements with the aim of increasing in year collection rates; and
 - compare its council tax staffing costs with other Wales councils to understand the apparent cost variations and identify potential opportunities for cost savings.

What we found

- 11 We found that in 2018-19, in-year council tax collection rates remained consistent with previous years at 93.7%, as set out in exhibit 1.

Exhibit 1: council tax in-year collection rates

The following graph shows the Council's in-year council tax collection rates and how these compare with the Wales average



- 12 The lower than average in-year collection rate is in part due to deprivation levels in the county and the Council's policy to allow residents struggling with council tax payments to spread their payments over a longer period. The Council acknowledges that whilst this supports residents in financial difficulty and improves collection rates over the longer term by preventing arrears and potential debt write offs, it does impact negatively on in-year collection rates.
- 13 Exhibit 2 shows that the Council goes on to collect the majority of outstanding council tax payments over subsequent years, with around 99% collected after four to five years. The Council builds the slower collection rates into its budget process to manage the cash flow implications.

Exhibit 2: the percentage of council tax collected for prior years as at the end of 2018-19

The following table shows the percentage of council tax collected in year and over subsequent years

	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
% collected by year end	95.7	95	93.5	93.8	93.8	93.7
% collected by 31 March 2019	99	98.9	98.6	98	96.8	

- 14 Since our initial review, the Council has reviewed its council tax collection arrangements and costs by:
- process mapping its recovery and enforcement processes; and
 - visiting several councils with higher in-year collection rates to identify good practices which could be replicated at Blaenau Gwent.
- 15 Although the Council reports that there did not appear to be any significant differences in overall approach, the visits did identify some processes with the potential to improve the efficiency and cost of collection. Where appropriate, the Council is introducing these. For example:
- increased use of digital communication;
 - online self-service module for residents;
 - increased promotion of electronic payment methods, e.g. direct debit, standing orders and payroll deduction; and
 - allocating council tax payments to current rather than old debt.
- 16 The Council's review also considered council tax staff cost variations but found direct comparison was difficult due to differing structures across councils. For example, the Council told us that in Blaenau Gwent dedicated council tax staff deal with council tax queries, whereas some councils use central call centre staff whose time is not charged to council tax administration costs. Staff cost variations remain

under review and the Council expects some of the actions listed in paragraph 15 to result in cost savings.

- 17 In 2019, the Council commissioned the Chartered Institute of Public Finance and Accountancy (CIPFA) to undertake an independent review of its council tax arrangements and advise on potential opportunities for improvements. The subsequent report, published in January 2020, found that 'the collection practices within Blaenau Gwent are comparable to other local authorities with all available methods of recovery being utilised where appropriate'. CIPFA also commended the Council's work to maximise the collection of arrears and the resulting low levels of debt needing to be written off. The report includes several proposals in relation to the administration of council tax and the Council is developing an action plan to respond to these recommendations.
- 18 The Council proactively promotes and facilitates electronic payment of council tax. For example, all correspondence sent from the Revenues and Benefits service has a direct debit reminder printed on the front of the envelope. The Council has also introduced more flexible direct debit options, such as weekly payments and payment dates linked to major employer pay dates, e.g. the NHS. In addition, a payroll deduction scheme is available to Council staff. CIPFA's report notes that, at the end of September 2019, 62.8% of Council Tax accounts with a payment to make¹ were paying by direct debit. A further 1.3% of accounts were paying via payroll deduction.
- 19 Work to respond to our proposal for improvement also forms part of the Income Maximisation strand of the Council's Bridging the Gap programme. This includes plans for early intervention and prevention schemes to support the growing number of families experiencing financial difficulties. The Council expects this to have a positive impact on council tax collections rates by helping to maximise residents' household income.
- 20 For example, Revenues and Benefits staff are trialling a project with Flying Start colleagues to engage with residents at an earlier stage. This will help identify whether people struggling financially are accessing the benefits and support schemes available to them, such as council tax reduction schemes. At the time of our fieldwork, the Council had identified the areas it intended to target and planned to begin visiting Flying Start hubs in early 2020. The Council recognises that although this work could improve collection rates, it could also lead to a funding pressure as a result of increased uptake of the Council Tax Reduction Scheme.

¹ Almost a quarter of all Council Tax accounts in Blaenau Gwent have nothing to pay, for example because they are in receipt of full council tax reduction. CIPFA has therefore removed these from the base number of accounts in calculating the proportion paying by direct debit.

The Council has developed a central grants register and is beginning to manage grants more strategically

2018 findings and proposal for improvement

- 21 Our 2018 review found that there was no corporate coordination of grant applications and no central record of grants claimed.
- 22 As a result we made a proposal for improvement that the Council should manage grants strategically alongside other funding streams. In particular it should:
 - better integrate the applications for grants into the budget setting process (where possible);
 - maintain central records of potential and successful grant applications to support a strategic overview of this funding stream; and
 - review the grants made by the Council to ensure they provide value for money.

What we found

- 23 We found that the Council has now developed a corporate grants register. This provides a central database of potential revenue grants and records which have been successfully applied for. It also provides information about each grant, including purpose, amount received, number of posts it has funded and links to corporate plan priorities and key strategies where relevant.
- 24 The Council considers the register a starting point for its review of the strategic use of grants, which forms part of the Council's Bridging the Gap programme. The review is examining how grants are used to deliver outcomes for residents and consider the impact of the removal of the grants and the effect this would have on core funding. It also aims to ensure that the Council applies for those grants which support its strategic priorities and aspirations.
- 25 The Council also plans to strengthen governance arrangements for grants. The Strategic Commissioning Group, which is in the process of being established under another strand of Bridging the Gap, will be responsible for overseeing the grants register and ensuring the Council maximises the impact of grant funding and avoids duplication. In addition to this, quarterly updates on the Bridging the Gap strategic use of grants review will go to Corporate Overview Scrutiny.
- 26 The review will take place over three phases, with phase one, which focuses on the Children and Communities Grant, currently underway.
- 27 The Council has collated a register of grants and contributions it has made to other organisations in 2019-20. This provides information on the value of grants awarded, their purpose, and the application process for awarding the grants. For some grants a value for money assessment is included.

The Council is making good progress with its strategic review of fees and charges

2018 findings and proposal for improvement

- 28 Our 2018 review found the Council's approach to setting fees and charges lacked clear strategic direction, ownership by services and consistent application.
- 29 As a result we made a proposal for improvement that the Council should provide robust challenge in the setting of fees and charges to ensure they support delivery of its strategic priorities. In particular:
- develop an income generation policy to support delivery of the Council's strategic priorities;
 - Central Finance should issue clear instructions to managers about increases in fees and charges taking account of relevant external influences;
 - services should comply with budget instructions in respect of increases in fees and charges;
 - Central Finance should carry out robust checks to challenge and confirm compliance with budget instructions; and
 - budgeted income should reflect agreed levels of fees and charges and anticipated activity levels.

What we found

- 30 We found that the Council has an Income Generation Policy that sets out key considerations around charging. The policy was reviewed in 2018 by an external consultant and deemed to be robust.
- 31 As part of its Bridging the Gap programme, the Council is currently undertaking a strategic review of fees and charges. The review aims to maximise the Council's income by ensuring that fees and charges are set based on full cost recovery where appropriate, and are subject to agreed inflationary uplifts.
- 32 To inform the review, the Council has benchmarked its fees and charges register against those in other councils in Wales with similar levels of deprivation. The Council has also developed a full cost recovery calculator which it is applying to existing fees and charges and to assess new opportunities for charging. The review has so far identified an additional £0.2 million of income for 2020-21 and £0.1 million for subsequent years and this is reflected in the Council's Medium Term Financial Strategy and 2020-21 budget.
- 33 The Council's Finance department is working with budget holders to realign income budgets to reflect activity levels and ensure an annual inflationary uplift is applied. The Council reports that all fees and charges for 2019-20 have been reviewed and are in line with the policy. All uplifts agreed by the Council have also been applied.
- 34 The Council tracks forecast outturn of fees and charges in its quarterly revenue budget monitoring reports to Scrutiny, Executive Committee and Council. The Q2 report shows an income forecast of £14.1 million, a shortfall against target of £0.66 million (4.5%).

The Council is strengthening its financial planning and management arrangements

2018 findings and proposal for improvement

- 35 Our 2018 review found that the Council had set out a clear financial plan for 2018-19 but faced significant challenges to its delivery and must improve the budget setting process for future years.
- 36 As a result we made a proposal for improvement that, to deliver the 2018-19 budget, the Council should respond constructively to 2017-18 budget imbalance that may reoccur in 2018-19, utilising the skills of the Central Finance Team, Strategic Transformation team and budget holders. In particular the Council should:
- critically review and learn from the 2017-18 revenue budget overspends and underspends to identify reasons for imbalances for future year budgets;
 - take action to ensure weaknesses identified do not reoccur;
 - maximise the potential of the Strategic Transformation Team;
 - improve monitoring of savings projects and take clear corrective action to address anticipated under delivery and address the root causes;
 - review skills, capability and development needs of budget holders and provide training/support to meet them; and
 - ensure Central Finance lead on and facilitate a robust financial culture throughout the organisation.
- 37 We made a further proposal for improvement that, in planning for the 2019-20 budget, the Council should improve accountability throughout the organisation for the setting and delivery of the 2019-20 and future budgets. In particular it should:
- identify budget/service imbalances from 2017-18 and forecasts in 2018-19;
 - decide whether overspending is to be funded through extra budget or managed down by management action;
 - decide whether underspending can be maintained and reallocate budget accordingly;
 - introduce workforce planning to the budget setting process;
 - improve accountability for budget setting and delivery; and
 - strengthen budget management by holding budget holders to account and take early timely corrective action.

What we found

- 38 We found that the Council has strengthened its budget planning processes. Both ongoing and emerging cost pressures are considered as part of the MTFS and budget setting process. Cost pressure funding is then built into the budget, with base budgets adjusted as necessary.
- 39 For example, as part of the budget setting process for 2018-19 and 2019-20 the Council reviewed previous years' cost pressures and overspends to identify those likely to reoccur. It then considered whether these should be managed within existing budgets or awarded a cost pressure. As a result of this process, the Council built an additional £2.4 million into the base budget for 2018-19 and £1.4

million for 2019-20. Other cost pressures were managed through actions to reduce overspends or the use of budget virements from underspending budgets.

- 40 The Council is taking steps to improve its financial management and officers commented that there has been a recent shift in the financial culture of the organisation. Work is ongoing to restructure the Central Finance function to a business partner model and move away from the perception that budget management is a Finance responsibility. To support this, Corporate Leadership Team job descriptions now explicitly reference financial management responsibilities, and performance against budget targets forms part of the appraisal process for senior leaders.
- 41 In addition, the Council now regularly holds budget holders to account as part of strengthened arrangements to monitor and manage in-year cost pressures. For all cost pressures and overspends over £15,000, budget holders must develop action plans; these are challenged by Chief Officers and Executive Members at quarterly Cost Pressure Subgroup meetings. Cost pressures and mitigating actions are also reported in quarterly budget monitoring reports to members.
- 42 The Council recognises the need for training and systems access for budget holders and has plans to develop a financial competencies framework. This will help equip all managers and financial staff with the necessary skills. Further consideration of workforce planning and development will take place during 2020 as the Council develops its new Organisational Development Strategy.
- 43 The Strategic Transformation Team is currently supporting the Council's Bridging the Gap programme. The Council has developed wrap around teams to work on the strategic reviews that underline the programme. These multi-disciplinary teams include officers with relevant skillsets from across the Council, including the Strategic Transformation Team.
- 44 The Council recently worked with CIPFA to help identify further ways to strengthen its financial management arrangements.
- 45 Members receive quarterly budget monitoring reports, including updates on planned savings, providing them with the opportunity to scrutinise performance. Savings that are forecast to be delayed or unachieved are subject to the same monitoring and challenge process as overspends and cost pressures described in paragraph 41 above. Although the Council has a good track record of delivering its planned savings – 91% in 2018-19 and 97% forecast for 2019-20 – the transformational approach of the Bridging the Gap programme is identifying long-term savings opportunities as well as potential cost avoidance and new revenue streams. This will provide a more sustainable approach and reduce the Council's reliance on identifying annual savings.

Although levels of useable reserves remain low, the Council has taken proactive steps to improve its position and the MTF5 demonstrates an ongoing commitment to strengthen the General Reserve

2018 findings and proposal for improvement

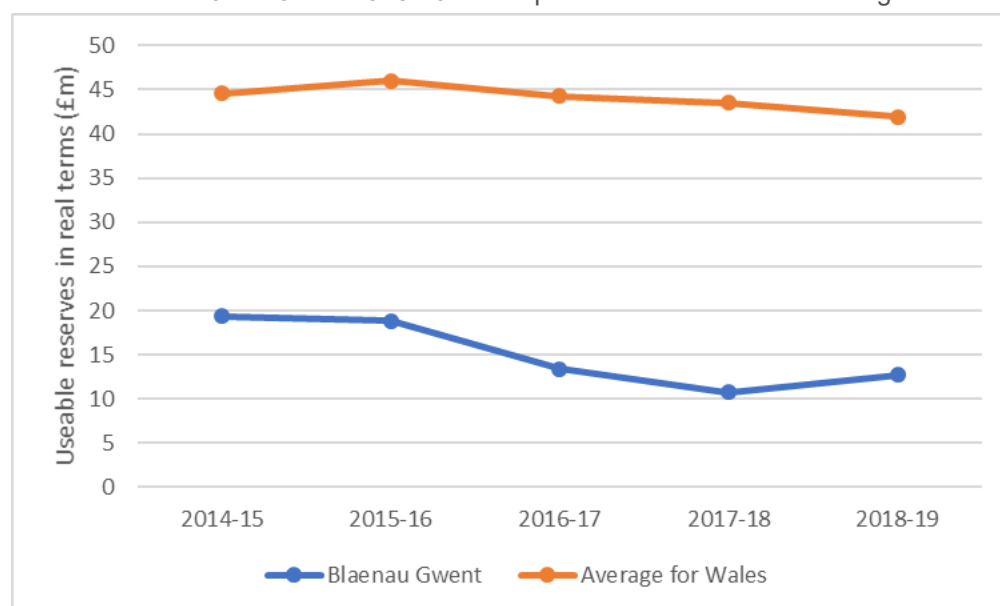
- 46 Our 2018 review found that the Council had a General Reserve Fund of 5% of actual net revenue (as reported in the latest Revenue Outturn return). This was above its minimum target level of 4% but the Council recognised that unforeseen budget pressures could threaten this position going forward.
- 47 As a result we made a proposal for improvement that the Council should maintain careful budgetary controls to ensure unforeseen budget pressures do not result in the General Reserve reducing below its minimum target level.

What we found

- 48 We found that the Council recognises the need to strengthen its reserves position and is proactive in taking opportunities to increase its General Reserve.
- 49 To this end, the Council increased its general reserve by £0.41 million to £5.89 million at the end of 2018-19 and its total useable reserves to £11.7 million.
- Exhibit 3** below sets out the recent improvement in the Council's useable reserves levels after a period of sustained depletion.

Exhibit 8: levels of useable reserves between 2014-15 and 2018-19²

This exhibit shows how the Council's levels of useable reserves have changed in real terms between 2014-15 and 2018-19 in comparison with the Wales average.



² Source: Stats Wales RO data

- 50 The Council has no plans to use the General Reserve to fund budget pressures in 2019-20 and expects to add a further £0.25 million to the Reserve in year.
- 51 The MTFS suggests that the Council has no plans to use the General Reserve to balance budgets over the life of the MTFS. It also includes a £0.2 million contribution to the General Reserve each year. Further to this, the Executive Committee recently approved a recommendation to transfer to reserves any excess savings achieved through the Bridging the Gap programme.

The Bridging the Gap programme is making effective use of data and further work is underway to improve the way the Council uses data

2018 findings and proposal for improvement

- 52 Our 2018 review found that the Council had lots of data available to it but lacked a culture that consistently used data constructively to proactively challenge, learn and drive improvement.
- 53 As a result we made a proposal for improvement that the Council should use data more effectively in managing finances and performance and in setting its budget to achieve and demonstrate value for money. In particular it should:
- review membership of external networks/professional organisations and ensure clear outputs that will benefit the Council's improvement agenda;
 - better embed data into its performance and financial management arrangements; and
 - use data more effectively in the budget setting process to identify value for money opportunities.

What we found

- 54 We found that data plays a key role in the Bridging the Gap programme. The programme includes a dedicated strategic review on using data to deliver better services. However, at the time of our fieldwork this review was not yet underway.
- 55 The Council is also using data to inform a number of other Bridging The Gap workstreams and has developed wrap around, multi-disciplinary teams, including staff with data analysis skills, to support delivery of the work programme. This approach is helping embed a culture of data use throughout the Council.
- 56 There are several examples of the way the Council is using data to inform the Bridging the Gap reviews:
- the Income Maximisation workstream has analysed debtors against the ACORN consumer classification³. This indicated that there is a correlation between debtors and deprived areas of the county. In response, the Council is

³ The ACORN classification analyses demographic data, social factors, population and consumer behaviour to provide an understanding of different types of people and their circumstances.

taking steps to help these residents maximise their income by advising them on potential benefits and signposting to further support.

- the project team working on the Third Party Expenditure review has analysed data to understand and categorise third party spend and identify opportunities to control costs and better align spend to the Council's strategic priorities.
- as part of the review of the CCG grant, the Council undertook a logic mapping exercise, using data to map the inputs, outputs and outcomes of the programmes the grant delivers. This helped identify potential duplication and efficiencies.

- 57 The Policy and Performance Team has also been working across the Council to improve data quality. For example, work is ongoing with the Revenues and Benefits team to understand and resolve previous errors with free school meal data. The team is also working with the Environment directorate to improve performance data. Officers we spoke to commented that data is now more widely used and valued throughout the Council.
- 58 The Council has not yet reviewed its membership of external networks and professional organisations.

Appendix 1

Proposals for Improvement: Supporting Financial Resilience Review, 2018

Exhibit 4: proposals for improvement from the Auditor General for Wales' 2018 Supporting Financial Resilience Review.

Proposals for improvement

P1 We propose that the Council should review its administration of council tax to ensure prompt and efficient collection. In particular it should:

- review its council tax collection arrangements with the aim of increasing in-year collection rates; and
- compare its council tax staffing costs with other Wales councils to understand the apparent cost variations and identify potential opportunities for cost savings.

P2 We propose that the Council should manage grants strategically alongside other funding streams. In particular it should:

- better integrate the applications for grants into the budget setting process (where possible);
- maintain central records of potential and successful grant applications to support a strategic overview of this funding stream; and
- review the grants made by the Council to ensure they provide value for money.

P3 We propose that the Council should provide robust challenge in the setting of fees and charges to ensure they support delivery of its strategic priorities. In particular:

- develop an income generation policy to support delivery of the Council's strategic priorities;
- Central Finance should issue clear instructions to managers about increases in fees and charges taking account of relevant external influences;
- services should comply with budget instructions in respect of increases in fees and charges;
- Central Finance should carry out robust checks to challenge and confirm compliance with budget instructions; and
- budgeted income should reflect agreed levels of fees and charges and anticipated activity levels.

Proposals for improvement

P4 We propose that to deliver the 2018-19 budget the Council should respond constructively to 2017-18 budget imbalances, that may reoccur in 2018-19, utilising the skills of the Central Finance Team, Strategic Transformation team and budget holders. In particular the Council should:

- critically review and learn from the 2017 18 revenue budget overspends and underspends to identify reasons for imbalances for future year budgets;
 - take action to ensure weaknesses identified do not reoccur maximise the potential of the Strategic Transformation Team;
 - improve monitoring of savings projects and take clear corrective action to address anticipated under delivery and address the root causes;
 - review skills, capability and development needs of budget holders and provide training/support to meet them;
 - ensure Central Finance lead on and facilitate a robust financial culture throughout the organisation.
-

P5 We propose that in planning for the 2019-20 budget the Council should improve accountability throughout the organisation for the setting and delivery of the 2019-20 and future budgets. In particular it should:

- identify budget/service imbalances from 2017-18 and forecasts in 2018-19;
 - decide whether overspending is to be funded through extra budget or managed down by management action
 - decide whether underspending can be maintained and reallocate budget accordingly;
 - introduce workforce planning to the budget setting process;
 - improve accountability for budget setting and delivery;
 - strengthen budget management by holding budget holders to account and take early timely corrective action.
-

P6 We propose that the Council should maintain careful budgetary controls to ensure unforeseen budget pressures do not result in the General Reserve reducing below its minimum target level.

P7 We propose that the Council should use data more effectively in managing finances and performance and in setting its budget to achieve and demonstrate value for money. In particular it should:

- review membership of external networks/professional organisations and ensure clear outputs that will benefit the Council's improvement agenda;

Proposals for improvement

- better embed data into its performance and financial management arrangements; and
- use data more effectively in the budget setting process to identify value for money opportunities.



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