Cardiff Council Response to Consultation on
‘Shared Purpose – Shared Delivery’ Draft Statutory Guidance

General Comments

1. Cardiff Council welcomes the publication of the draft statutory guidance: ‘Shared Purpose - Shared Delivery’. The Council, with its partners, was the first area in Wales to successfully develop an integrated partnership strategy (What Matters – The 10 Year Strategy for Cardiff) and has worked closely with the Welsh Government to inform the development of this guidance. The Council has also assisted a number of other areas through sharing the learning and best practice experienced in Cardiff and this has now led to the adoption of similar approaches by other partnerships across Wales.

2. The publication of the What Matters Strategy has also resulted in the development of an innovative new partnership model in Cardiff which includes the Proud Capital Leadership Group – providing strategic guidance for the city on wide ranging issues, the Integrated Partnership Board (Cardiff's LSB) – which provides strategic management of the agenda, and multi-agency neighbourhood management teams as a delivery mechanism targeted to meet the diverse needs of communities across the city. As part of the new approach, partners have successfully rationalised partnership meetings and established a robust programme management approach to ensuring the delivery of outcomes using Results Based Accountability.

3. The Council particularly welcomes the emphasis in the guidance on early intervention and prevention and the importance of delivering services based on need, not demand. The basis of Cardiff’s integrated approach was the publication of a single needs assessment which demonstrated the extent of inequalities throughout the city and the importance of targeted action at a neighbourhood level. This increased understanding of need assisted the agreement of shared outcomes by partners and was fundamental in helping to rationalise the significant number of objectives in previous partnership plans to enable a focus on a fewer number of strategic priorities.

4. Whilst there are clear contributions which single integrated plans can make towards the delivery of the Welsh Government’s (WG) Programme for Government, it is important that the local needs assessment and citizen engagement determines the priorities for partners in Cardiff. Local Service Boards (LSBs) are not delivery agents of the Welsh Government but reflect the community leadership role of local elected members working in conjunction with the key public and third sector partners.
5. Cardiff Council is pleased that the draft guidance does not dictate a ‘one size fits all’ model for LSB’s. In Cardiff, there is an overarching ‘Proud Capital Leadership Group’ which meets quarterly and is chaired by the Leader of the Council. The group sets the strategic agenda for the city and core membership includes the Executive Members with portfolio responsibilities for community safety, children & young people and health, social care & wellbeing; the Chairs of Cardiff & Vale University Health Board and Cardiff’s Third Sector Council, a Police Authority and Community Council representative and representatives from the business community, universities and environmental partners. The Leadership Group plays a key role in facilitating wider stakeholder engagement and considers longer-term issues such as the challenges facing young people not in education, training & employment and sustainable transport in the city region.

6. In addition to the Leadership Group, Cardiff has established an Integrated Partnership Board (IPB) which serves as the LSB in terms of providing strategic management of the agreed programmes of workstreams. The IPB consists of the Chief Executives of the Council (Chair), Cardiff & Vale University Health Board and Cardiff Third Sector Council, the Chief Superintendent of Cardiff Basic Command Unit, Assistant Chief Fire Officer, Assistant Chief Probation Officer and the WG’s Director-General of Local Government & Communities. The IPB essentially serves as a programme board and considers ‘highlight’ reports to review progress and identify barriers to delivery.

7. The new Integrated Partnership Model in Cardiff is innovative in its design and clearly links into the six neighbourhood management teams as delivery mechanisms for achieving the agreed outcomes. However, the implementation is still in its early stages and will be reviewed on an ongoing basis to respond to feedback from the established programmes and workstreams. Further training and awareness raising will also be undertaken with partners in relation to Results Based Accountability; strategic commissioning and alignment of resources; business intelligence and analysis; and the leadership skills required for collaborative and locality working to continue to promote cultural and organisational changes within partner organisations and inform future service redesign to meet the needs of citizens.

Consultation Questions

Does the guidance make it clear what is expected and does it provide a sufficiently robust framework for LSB partners to work within?

8. The Council believes that the draft guidance on the whole is well written and is clear in its expectations of LSBs in undertaking integrated planning. In particular the Council is pleased that the WG is not being overly prescriptive in its approach and enabling many factors to be agreed locally at the discretion of partners. This aspect is crucial if there
is to be ownership of the agenda by local partners as this will only be achieved through local problem solving and decision making.

9. Cardiff Council welcomes the reference (3rd paragraph, page 18) that Scrutiny should focus on the performance of the LSB as a whole and the added value it brings as opposed to the constitute agencies. Cardiff’s IPB is shortly to commence a new IPB Scrutiny Panel to build on the successful pilot project undertaken between 2007-2009.

10. However, there may potentially be some confusion caused by the timing of the other consultation recently issued by the WG on the Draft Statutory Guidance from the Local Government Measure 2011 as many of the issues overlap. For instance, there is a risk of confusion about how far local authorities will focus on scrutinising the overall population accountability of LSB partners, and how far they will focus on scrutinising the detailed performance accountability of specified public service providers.

11. Cardiff IPB has made explicit the fact that its own Scrutiny Panel will focus on the first of these two areas, which is consistent with the WG consultation document on ‘Shared Purpose-Shared Delivery’. Cardiff Council will, however, need to have further debate and discussion with its local strategic partners following the 2012 Council elections to ensure that it is able to comply with the potential requirements of the Local Government Measure to scrutinise the performance outcomes of individual public service providers.

12. There are a number of issues relating to joint scrutiny committees that the document does not fully address. For instance:

   ▪ The constitutional link between “joint scrutiny panels” (such as the Scrutiny Panel of Cardiff Integrated Partnership Board) and the constituted Scrutiny Committees of local authorities. In Cardiff the IPB Scrutiny Panel will act as a Task and Finish Group of a Cardiff Council scrutiny committee, so that it has a formal status in the Council’s constitution, and hence enables elected Members to exercise their democratic right to hold joint partnerships to account. By contrast, the Prosiect Gwyrdd Joint Scrutiny Panel does not have the same constitutional linkage to its five local authority “parents”, and has therefore been deemed to be less successful in holding the Prosiect Gwyrdd Joint Committee to account.

   ▪ As local authorities are required to enter into new regional collaborative arrangements (for instance the regional Education and Social Care Consortia) there will need to be clarity about the scope, extent and structure of scrutiny arrangements in these consortia, and how they link both to local authority scrutiny structures and structures set up to scrutinise local strategic partnerships.
Another example where additional clarity will be helpful is in the scrutiny of crime and disorder matters at a local and regional level. Local authorities already have a duty to manage a formal Crime and Disorder Committee at a local authority level. Crime and disorder is also a key interest of local strategic partnerships. The introduction of Police and Crime Panels later in 2012 will bring about a third level of scrutiny - this time at a regional level – and clarity at a local and regional level will be needed about the specific terms of reference of these three levels of scrutiny to avoid confusion and duplication.

Are there any parts of the guidance that require clarification?

13. There needs to be further clarification within the guidance on the statutory responsibilities associated with partnership working. Over recent years there has been a plethora of statutory guidance which has been issued by the Welsh Government and which has included a list of statutory responsibilities for the partnerships. As greater integration of partnership working has taken place, there is now significant confusion about the “must do’s” which partners need to ensure are delivered and those aspects which can be undertaken at the local discretion of partners.

14. It is important that the new statutory guidance is clear about which previous requirements are superseded and which remain as compulsory elements. It is crucial that these requirements are also communicated to the regulators as it is apparent that some recent inspections have not always understood the changing partnership landscape.

15. An example of additional guidance which needs to be included within the list of statutory guidance (Annex A) includes the ‘Young Wales’ Statutory Guidance for Youth Support Services 11–25 and Learner Support Services 14–19. This underpins section 123 of the Learning and Skills Act 2000 and the Learning and Skills (Wales) Measure 2009 in terms of the provision of youth support services which encourage, enable or assist young people to:

- participate effectively in education and training;
- take advantage of opportunities for employment; and
- participate effectively and responsibly in the life of their communities.

16. This guidance includes reference to responsibilities of either Children & Young People’s Partnerships or Children & Young People’s Plan and which in many instances now no longer exist.

17. Regarding the requirement for annual reporting, this needs to be seen in the light of the existing requirements to report by each partner e.g. the Local Government Measure (2009) Part 1 arrangements for local authorities and Fire and Rescue Service. It will be important not to add to the existing bureaucracy of reporting and also to utilise different methods of reporting to the citizens and communities that we serve. It is
unclear from the consultation document that this is what is actually intended or whether the report has a compliance focus to report activity to the Welsh Government.

Is there anything that is impractical or should be modified or deleted from the guidance?

18. Within the draft guidance, it refers to the need for “LSBs to submit their plans to the WG for comment and feedback”. Whilst partners welcome contributions from WG policy areas, it should be made clear in the final guidance that plans should not be subject to approval by the WG. Any submission process should also recognise the timescales for decision making processes of partner organisations and ensure that there is sufficient time available for any meaningful feedback.

Is anything not covered in the guidance that you think should be?

19. One omission in the draft guidance is the lack of reference to Police and Crime Commissioners (PCCs). The new Commissioners will have a responsibility to set local policing priorities and oversee their delivery. The PCC will also have commissioning powers to provide grants for delivery of services through partnership working, and yet the document makes no reference to this, nor comments on the opportunities available to strengthen integrated plans through contact with the PCC.

20. The proposed date for publication of the integrated plans in April 2013 offers the opportunity to align with the new Police and Crime Plan which the PCCs will also need to publish by this date. As part of developing the plan, the PCC is obligated, through the Police Reform and Social Responsibility Act (2011), to conduct a public consultation exercise in order to identify local priorities. This creates the potential opportunity for further integration of consultation and engagement exercises with local partners and which can subsequently inform joint commissioning, joint delivery and joint scrutiny.

21. It would be useful for the WG to set out its intentions for the future of public service outcome agreements as soon as possible, including the relationship with integrated plans and how individual partner performance management reporting requirements are developed in a consistent way to avoid duplication of effort in terms of reporting to different forums etc. These factors will also need to be resolved as part of the new successor arrangements for Ffynnon after March 2013.

Are there any policy issues in the guidance that you disagree with?

22. The reference to the need to prepare an information strategy (or needs assessment) and engagement strategy (to ensure the incorporation of citizen views) is welcomed in the draft guidance. However, it is not clear to the extent that these factors have been incorporated into the
Programme for Government? If the Programme for Government is to set out the overall population outcomes, as is implied in the guidance, then it is crucial that the same elements are included at a national level. This would mean that the work done by LSB’s should inform the priorities at a national level so that the process is both ‘bottom-up’ and ‘top-down’.

This approach is applied in a similar way in Cardiff in that the analysis and engagement in the six neighbourhood areas inform the overall priorities for the city.

Do you think that putting LSBs on a statutory footing would help deliver the policy objectives?

23. Cardiff Council does not believe that by putting LSB’s on a statutory footing this would lead to better delivery of policy objectives. The success of partnership working is based on an agreed identification of need, the willingness of partners to jointly problem-solve and ultimately an identified benefit being delivered for all those involved.

24. Many of the previous partnership arrangements have been on a statutory basis and there is widespread evidence that this hasn’t necessarily led to successful outcomes. In fact it can sometimes have a detrimental effect in that partnerships become more concerned with a “tick box” list of things they must do as opposed to creating genuine business cases for why a particular service or activity should be undertaken in partnership. However, what will be important is that the Welsh Government reaffirms the importance of LSB’s in public service reform so as all partners play their active part. This will be more effective by WG ensuring that partner’s strategic planning cycles, commissioning and performance management are aligned and that there is a consistency in the policy messages and approaches communicated from all WG Departments to individual partner organisations.

Do you have any other comments or questions?

25. A growing concern for LSB’s is that they become seen as the panacea and the vehicle for all public service improvement or partnership activity. The LSB must not be over-burdened with the numerous operational issues that either get raised by partners locally or are directed by WG. The LSB must retain its focus on the strategic priorities and facilitating the organisational change required to redesign public services. At the local level, senior managers and identified responsible officers should remain accountable for resolving many of the issues as part of ‘business as usual’ and the LSB should only be considering issues which require ‘unblocking’ or a rapid acceleration of pace due to the scale or impact on delivering outcomes for Cardiff. Similarly the WG should not use LSBs as the route to channel policy directions in relation to issues which do not have a natural ‘home’ as otherwise the focus on fewer strategic priorities will be lost.
26. The Council supports that the draft guidance advocates the use of an outcomes based approach. Cardiff has done extensive work on using Results Based Accountability (RBA), including training a significant number of people across partner organisations. However, the use of RBA and full understanding of the methodology is still in its infancy and it is important for the WG to understand the amount of resource (largely staff time) that is required to effectively facilitate partnership agreement of outcomes and success measures. In addition, there can be a time delay for measuring the impact on some high-level outcomes and partners will need to find a way of ensuring robust performance management in the short term.

27. In Annex B (page 50), one of the success measures included is “the number of statutory plans required by the WG from public service partners and produced by 2014”. The Council welcomes the recognition that the number should be reduced as it is acknowledged that often more resource goes into the production of the Strategy as opposed to the delivery and performance management components. However, it should also be highlighted that the WG often ‘requires’ partners to produce other strategies to respond to WG policy initiatives or funding requirements even if they do not have a statutory basis. The Council would welcome confirmation of the list of all required strategies across the WG policy areas with a view to further rationalisation where possible.
Does this guidance make clear what is expected and does it provide a sufficiently robust framework for LSB partners to work within?

1. Cardiff and Vale UHB welcomes this draft guidance and the clarity it provides on expectations of increased collaboration through Local Service Boards and greater integration in relation to planning and partnership working. The approach outlined in the guidance reflects the direction of travel in both Cardiff and the Vale of Glamorgan, and is one in which the UHB has played a key role in helping to shape. It sets an ambitious agenda for partner organisations but is one that we have recognised in Cardiff and the Vale as being crucial for delivering real improvements for citizens and communities and making the best use of public resources.

2. At the UHB level, it has been important to work with colleagues in both unitary authority areas to develop single integrated plans which reflect local needs and local ambitions, whilst also ensuring a level of read-across and co-ordination across the region. The guidance offers the opportunity to build on the approaches taken in developing the latest round of plans and to work more collaboratively across unitary authority areas where it best serves the interests of citizens. The UHB is committed to working to establish an increasingly consistent view of shared outcomes and integrated delivery solutions across the region. While our preference would be to work jointly with partners on the UHB footprint, we acknowledge and respect the differing partner needs to look to other geographical areas on certain service issues.

Are there any parts of the guidance that require clarification?

3. The draft guidance identifies the need for single integrated plans to be supported by Enabling Strategies including an Information Strategy. The narrative describing the proposed content of an Information Strategy talks mainly about the need to analyse information to provide business intelligence to support planning and decision making. However, there is also brief reference to sharing information with the public and working closely with the NHS as they develop their public information strategies. It would be helpful for the final guidance to provide greater clarity on the focus of the proposed Information Strategy and links being developed at a Welsh Government level to join up requirements for related strategies.

4. We would also question whether there is a need for enabling ‘strategies’ for Information and Engagement. The important point is for the single integrated plans to clearly articulate what, where, how and when these key issues are to be addressed as part of the delivery of the plans, and to demonstrate how that delivery is being monitored.
5. The guidance describes Welsh Ministers as having a legitimate interest in the development and implementation of single integrated plans and that LSBs should therefore submit their plans to the WG for comment and feedback. It would be helpful for the final guidance to set out this relationship in more detail and for there to be clarity in relation to how individual partner organisations are performance managed at a strategic level by WG.

**Is there anything that is impractical or should be modified or deleted from the guidance?**

6. The draft guidance states that single integrated plans should be formally reviewed by LSBs annually with a more thorough review undertaken approximately every 4 years in line with the local electoral cycle. This represents a discrepancy in the planning cycle with the NHS Five Year Framework. It is important for the timing to facilitate incorporation into the NHS Operational Planning cycle. A move towards common planning cycles across the public sector would be a helpful direction.

**Is anything not covered in the guidance that you think should be?**

7. No

**Are there any policy issues in the guidance that you disagree with?**

8. No

**Do you think putting LSBs on a statutory footing would help to deliver the policy objectives?**

9. No, sufficient motivations, tools and opportunities for increased partnership working and integrated planning and delivery already exist. Putting LSBs on a statutory footing would not help to deliver policy objectives.

**Do you have any other comments or questions?**

10. When Cardiff LSB was developing its innovative approach to the development of ‘What Matters’ and its radical review of existing partnership arrangements, a team of the local partners found it highly beneficial to engage in informal dialogue with Welsh Government officials, to test ideas and check direction against evolving policy. The UHB would welcome the opportunity for the same type of dialogue to be initiated through the Vale LSB, to work through how the Community Strategy matches expectations with WG colleagues and to discuss local plans to build an even more integrated approach.