

Agenda – Equality, Local Government and Communities Committee

Meeting Venue:

Committee Room 5 – Tŷ Hywel

Meeting date: 12 February 2020

Meeting time: 09.25

For further information contact:

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Committee Clerk

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Pre-meeting (09.25 – 09.30)

- 1 Introductions, apologies, substitutions and declarations of interest
- 2 Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015: follow-up work – evidence session 3
(09.30 – 11.00) (Pages 1 – 17)
Jane Hutt AM, Deputy Minister and Chief Whip
Alyson Francis, Deputy Director, Communities Division, Welsh Government
Christine Grimshaw, Head of Violence against Women, Domestic Abuse and Sexual Violence, Welsh Government
- 3 Papers to note (Page 18)
 - 3.1 Welsh Government response to the report "Rough sleeping follow up: Mental health and substance misuse services"
(Pages 19 – 30)
 - 3.2 Additional information provided by the Wales Audit Office in relation to the post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015: follow-up work
(Pages 31 – 89)



- 4 Motion under Standing Order 17.42 to resolve to exclude the public from the remainder of the meeting**

- 5 Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015: follow-up work – consideration of the evidence received**
(11.00 – 11.10)

Break (11.10 – 11.15)

- 6 Renting Homes (Amendment) (Wales) Bill: technical briefing**
(11.15 – 12.00)

Emma Williams, Deputy Director Housing Policy Division, Welsh Government
Simon White, Head of Housing Strategy and Legislation, Welsh Government
Rebecca Raikes, Lawyer, Welsh Government
Nia Evans, Legislative Counsel, Welsh Government

- 7 Renting Homes (Amendment) (Wales) Bill: consideration of scope and approach to scrutiny**
(12.00 – 12.10)

- 8 Consideration of the forward work programme**
(12.10 – 12.30)

(Pages 90 – 101)

Document is Restricted

Jane Hutt AC/AM
Y Dirprwy Weinidog a'r Prif Chwip
Deputy Minister and Chief Whip



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MA/JH/0031/20

John Griffiths AM
Chair, Equality, Local Government and Communities Committee
National Assembly for Wales
Cardiff Bay
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29 January 2020

Dear John,

Thank you for inviting me to attend the Equality, Local Government and Communities Committee on Wednesday 12 February 2020 for a session about the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, following the recent report by the Wales Audit Office.

The evidence paper attached responds to the Wales Audit Office report and provides an update on the implementation of the Act.

Yours sincerely,



Jane Hutt AC/AM
Y Dirprwy Weinidog a'r Prif Chwip
Deputy Minister and Chief Whip

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Equality and Local Government Committee

Scrutiny Session on the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 Following Publication of the Wales Audit Office Review of the Act -

9:30 – 11:00, 12th February 2020

Evidence Paper

1. The evidence paper sent to you in advance of your scrutiny session in November 2018 on the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 laid out progress since the previous update in February 2018. You have also received quarterly updates from the National Advisers up until the end of December 2019. This paper provides a brief overview of the Wales Audit Office's recent report, and provides a further update on progress.

2. The Wales Audit Office Report

2.1. The Wales Audit Office (WAO) published its report on progress in implementing the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 on 21st November 2019. Publication was timed to coincide with the International Day for the Elimination of Violence Against Women and White Ribbon Day.

2.2. The WAO found that the Act is transforming services and training is raising awareness of violence against women, domestic abuse and sexual violence (VAWDASV). There was recognition that collaboration is working well in some areas of Wales, despite partnerships being relatively new and needing time to mature. Social housing landlords are supporting victims and taking action against perpetrators; and almost all respondents to the WAO's survey had mapped VAWDASV services when preparing their local strategies.

2.3. However, there is clearly more to be done and while the report contains no recommendations for Welsh Government, we are working with partners to address the findings. The review for this report began around 18 months ago; inevitably over the course of a review things move on, especially in an area such as this, where a lot of action has been taken and good progress made during this time. The Welsh Government has already put a range of measures in place which will provide further support to partners in implementing the Act. These are outlined below against the recommendations.

2.4. Wales Audit Office Recommendation R1

Part 1 of the report highlights that despite public bodies having an increasing understanding of, and demand for, VAWDASV services, significant gaps remain and engagement with survivors and victims in reviewing and developing services is inconsistent. To address this, we recommend that needs assessment and mapping of service provision by

public bodies should be revisited and involvement widened and enhanced to include all relevant stakeholders to build a more accurate picture of current service provision and identify gaps.

2.5. Response WG1

This is a requirement laid out in statutory guidance for Local Strategies (published February 2018) and also for Regional Commissioning of VAWDASV Services (published May 2019). Regional boards have been undertaking mapping in response to this requirement and Welsh Government provided additional funding to the regions at the beginning of the year 2019 to support this work.

2.6. Wales Audit Office Recommendation R2

Part 1 of the report describes how victims and survivors of VAWDASV often find it difficult to navigate a fragmented system of service delivery.

To support victims and survivors to access and use services we recommend that public bodies:

- produce comprehensive and relevant information in a variety of media on the full range of services available to protect and support victims and survivors; and
- create a joint pathway to access services and support for both victims and professionals and advertise access arrangements widely

Response WG2

The Live Fear Free helpline and website provide this information via multiple channels and the Welsh Government provides details of both the helpline number and the website in all its communications campaigns, at all training and information sharing events, through digital media, door stickers, information posters, pop-up banners, and hand-outs. All relevant authorities have been supplied with information materials and the police forces have been provided with business cards to give to victims and survivors.

We are developing a survivor engagement framework and have piloted a survivor panel which will enable us to consult in a consistent manner with survivors to inform work that will improve services through policy development and delivery.

2.7. Wales Audit Office Recommendation R3

Part 2 of the report notes that whilst it is important that organisations comply with relevant data protection legislation, they also need to share data with partners to better meet the needs of victims and survivors. We recommend that authorities:

- ensure all staff who are likely to come into contact with victims and survivors should have appropriate VAWDASV training
- Service managers should have refresher training to ensure they know when and what data they can share and cannot share; and
- Authorities should review and update data sharing protocols to ensure they support services to deliver their data sharing responsibilities.

Response WG3

The National Training Framework requires all staff in relevant authorities to undertake, as a minimum, the VAWDASV e-learning or its face-to-face equivalent, and front line staff undertake Ask and Act training to help them identify signs of abuse, ask sensitive questions, and know how to signpost victims and survivors to appropriate support. So far, 167,500 public sector workers have undertaken training through the National Training Framework since it was introduced in March 2016.

We agree that it is important that staff in all authorities understand what they are able to share.

2.8. Wales Audit Office Recommendation R4

Part 2 of the report highlights that while some good progress has been made with regional working, there are not always appropriate levers in place to support service transformation in line with VAWDASV legislation. To ensure the benefits of regionalisation are realised, delivery agencies (local authorities, health bodies, the police, fire and rescue authorities and the third sector) should review their approach to regional working to better integrate services and maximise the positive impact they can make on victims and survivors.

Response WG4

Guidance on this is provided in the statutory regional commissioning guidance published in May 2019.

The Local Government and Elections (Wales) Bill, introduced on the 18th November, proposes the development of a framework and powers to facilitate more consistent and coherent regional working mechanisms for the delivery of local authority functions. In addition, the Welsh Government is working with the WLGA to develop an Improvement and Support function which would be able to support and encourage service transformation within local authorities to include regionalisation and regional delivery with partners.

2.9. Wales Audit Office Recommendation R5

Part 3 of the report highlights that the complex and short-term funding mechanisms, lack of data and insufficient consultation with stakeholders, are not supporting sustainable commissioning of VAWDASV services. Local authorities should review their commissioning arrangements to:

- remove duplication and overlap between different approaches within the authority and with partners;
- rationalise administration arrangements to improve efficiency and value for money;
- streamline and standardise commissioning arrangements to reduce the burden of administration on all parties; and

- set appropriate performance measures, targets and benchmarks to judge the impact and outcome of commissioned services.

Response WG5

The Welsh Government has streamlined ten of its own grants into just two grants, these being the Housing Support Grant and the Children and Communities grant; both of which are accessed by local authorities to tackle VAWDASV. Work to streamline the grants has included efforts to reduce bureaucracy and local authorities have also been granted greater flexibility to use these grants to meet local needs and specified outcomes. Key stakeholders are part of the group developing an outcomes framework for the grants.

The Welsh Government is working with stakeholders to develop a sustainable funding model which includes mapping funding and services and supporting service providers to access the full range of funding available. The statutory regional commissioning guidance resulted from this work and when fully implemented by local authorities will help to meet this recommendation.

Cardiff Council has shared with stakeholders its approach to funding and commissioning. North Wales region has also adopted a more collaborative approach to funding, with the PCC acting as banker for the region.

The Welsh Government published its National Indicators in the summer of 2019 to facilitate measurement of progress in implementing the Act. A series of workshops based on each of the key objectives in the National Strategy are underway to further refine and augment these indicators and these will also inform development of the next five year national strategy due in 2021.

2.10. Other findings

There was criticism of the timeliness of Welsh Government's guidance. This is fair in terms of guidance for developing local strategies, but should inform action plans and delivery. There have, however, been a wide range of statutory and good practice guidance and toolkits published in the four years since the Act, including a whole education approach to preventing and tackling VAWDASV; working with perpetrators in the public sector; safeguarding older people from domestic abuse; guidance on female genital mutilation; forced marriage; and honour-based violence; guidance for CAF/CASS practitioners on domestic abuse.

2.11. There has also been concern that once guidance is issued, it is not followed up. This has been reported to Welsh Government in particular in relation to the statutory commissioning guidance. A monitoring framework will be developed for implementation of the guidance and will support reporting against the National Indicators.

2.12. The report highlighted the time taken to develop the National Indicators. This has been challenging as comprehensive, robust national data sources are limited. This has resulted in the indicators having a heavier emphasis on

criminal justice than other areas. The National Indicators were published in June 2019 and Welsh Government is undertaking further work with stakeholders to refine and extend them. This work is proving very fruitful.

- 2.13. While roll out of training was generally received positively, there were a number of shortcomings identified by the WAO. The report does not refer specifically to Ask and Act, but we recognise the feedback based consultation with the regional training partnerships, so in re-letting the contract for Ask and Act in December 2018 we revised the specification to address those shortcomings.
- 2.14. The report states that work with perpetrators remains the most challenging and weakest area of prevention activity. This is mostly accurate and Welsh Government has increased its own activity to support delivery of perpetrator services in the last two years, including: a rapid review of what works with perpetrators; the introduction of national standards for working with perpetrators; piloting promising approaches; funding a Masters in Research to study stalking and harassment; holding practice-sharing events; and publishing guidance for local authorities in working with perpetrators.

3. Progress in Implementing the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015

- 3.1. The purpose of this Act is to improve:
 - arrangements for the prevention of gender-based violence, domestic abuse and sexual violence;
 - arrangements for the protection of victims of gender-based violence, domestic abuse and sexual violence; and
 - support for people affected by gender-based violence, domestic abuse and sexual violence.

The Act introduces a number of duties as outlined below:

- 3.2. Duties placed on Welsh Ministers:
Welsh Ministers must publish and implement a National Strategy. The Welsh Government published its five-year National Strategy in November 2016. This has six key objectives and is supported by a delivery framework.
- 3.3. Welsh Ministers must publish annual reports on progress in implementing the Strategy. Three annual reports have been published and a fourth will be published in the summer.
- 3.4. Welsh Ministers must publish and may revise National Indicators to measure progress towards implementing the purposes of the Act. These were published in June 2019 in collaboration with key stakeholders. Work has continued this year through a series of workshops with stakeholders to further refine the indicators.
- 3.5. Welsh Ministers must appoint a National Adviser for VAWDASV. Rhian Bowen Davies was appointed as the first National Adviser in September

2015. Following her departure the post was extended to full time and filled on a job share basis by the current post holders, Yasmin Khan and Nazir Afzal in January 2018.

- 3.6. The National Advisers have a duty to submit to Welsh Ministers an annual plan and an annual report. Welsh Ministers have a duty to publish these. The National Advisers' annual plan for 2018-19 was published in September 2019 and their annual report for 2020-21 was published in November 2019. The National Advisers also provide you with quarterly reports on actions the Welsh Government has taken to implement the strategy and you received the most recent report on 24th January 2020.
 - 3.7. Powers granted to the Welsh Ministers
Welsh Ministers may introduce regulations requiring local authorities to publish information about how they are exercising their education functions to promote the purpose of the Act. Ministers have not exercised this power to date to avoid imposing unnecessary bureaucratic burdens on local authorities and because they anticipate the introduction of provisions in the new curriculum will have a more effective impact.
 - 3.8. Welsh Ministers may issue guidance to higher education institutions on how they may contribute to the pursuit of the purposes of the Act. Welsh Government officials have worked with HEFCW to develop guidance which is currently being revised following consultation.
 - 3.9. Welsh Ministers may issue statutory guidance to relevant authorities on how they must exercise their functions in respect of the Act. Relevant authorities are local authorities, local health boards, fire and rescue services and a National Health Service trusts. The Welsh Government has issued statutory guidance on implementation of the National Training Framework; Local Strategies; and Regional Commissioning of VAWDASV Services.
 - 3.10. Duties placed on Relevant Authorities
Local authorities and local health boards must publish a local VAWDASV strategy. Since the local authorities are brought together on the same footprint as Health for the purpose of delivering strategies for preventing and tackling VAWDASV, they have chosen published joint regional strategies with the local health boards. The first strategies were published in April 2018.
 - 3.11. Local authorities and local health boards must also publish annual reports on how they are implementing their strategies. These were received in the summer of 2019.
- 4. Other Work to Implement the National Strategy**
- 4.1. The Welsh Government's annual reports, the National Advisers' annual reports and the National Advisers' periodic reports to you lay out the actions Welsh Government has taken to implement the Act and the National Strategy. These include:
 - 24 hour support, seven days a week through the Live Fear Free helpline and website;

- the Dyn project and helpline for male victims and survivors who prefer a male only helpline or support; and
 - statutory guidance on the National Training Framework, local strategies and regional commissioning.
- 4.2. .We have published a range of guidance and toolkits and delivered training through our National Training Framework. Our Ask and Act training to help professionals recognise VAWDASV and signpost to support has received widespread recognition and several regions of the UK have approached us to ask if they may deliver something similar.
- 4.3. The Committee scrutinising the UK Government's Domestic Abuse Bill has recommended that the Bill should introduce a requirement for training to follow Wales's lead and Welsh Women's Aid reports that they attribute increased referrals to services to greater awareness resulting from training.
- 4.4. We have run a number of successful communications campaigns, the most recent focussing on coercive control, building on the initial burst which raised awareness of coercive control and where to get help, moving on to coercive control in diverse groups such as BME, LGBTQ, and the elderly. A campaign targeted at young people aged 16-25 and was launched during Freshers' Week and supports other work to teach children and young people about healthy relationships through the Welsh Government-funded Spectrum project.
- 4.5. Our newest campaign, launching during Sexual Violence Week on 6th February, is focussed on control and sexual violence. We have seen an increase in calls to our Live Fear Free helpline following the launch of each burst, with callers frequently referring to the campaign.
- 4.6. Our awareness raising work has most recently included a letter from the Deputy Minister and Chief Whip to all local authorities in Wales encouraging them to follow the Welsh Government and Neath Port Talbot Council's lead and offer their staff paid leave to deal with issues relating to domestic abuse. At the same time the Minister for Local Government and Housing wrote to all public services in Wales highlighting the Wales Partnership Council's joint statement on paid leave for domestic abuse.

5. Looking to the Future

In view of the fact that 2020 will be the fifth anniversary of the Act, we have asked the National Advisers to invite partner agencies to a conference to celebrate progress in implementing the Act and to look to the next five years, beginning the process of developing the new National Strategy.

Agenda Item 3

Equality, Local Government and Communities Committee

12 February 2020 – papers to note cover sheet

Paper no.	Issue	From	Action point
ELGC(5)-06-20 Paper 2	Rough sleeping follow up: Mental health and substance misuse services	Welsh Government	To note
ELGC(5)-06-20 Paper 3	Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015: follow-up work	Wales Audit Office	To note
ELGC(5)-06-20 Paper 4	Post legislative inquiry into the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015: follow-up work	Wales Audit Office	To note

Written response by the Welsh Government to the report of the Equality, Local Government and Communities Committee entitled Rough sleeping follow up: Mental health and substance misuse

Both the Minister for Health and Social Services and myself would like to extend our thanks to the members of the Equality, Local Government and Communities Committee and to all those who took the time to provide evidence based on their experience and expertise to the committee in their follow-up work on rough sleeping.

The Welsh Government recognises in ‘Prosperity for All’ it is unacceptable that people are forced to sleep on the streets in a prosperous society. As set out in our strategy for ending homelessness, rough sleeping is the most acute form of homelessness and we recognise those living rough often have complex needs and require a joined up response from a range of services to support them.

Whilst the focus of this committee is rough sleeping, it is important to recognise this is one aspect of a wider homelessness issue, albeit the most acute and visible form. In order to ensure a holistic, whole-system strategic approach, Welsh Government is keen to move away from segmenting different forms of homelessness and instead ensure we focus our policy and resources on preventing and tackling homelessness in all its forms.

We recognise homelessness is a public services issue and as such we are working across public services and sectors to address its root causes.

Recommendation 1

The Committee recommends that:

The Welsh Government provide the Committee with an update on the implementation of the relevant actions in the Rough Sleeping Action Plan; and to what extent the Service Framework for the treatment of people with co-occurring mental health and substance misuse problem has been implemented across Wales.

Response: Accept

The relevant actions in the Rough Sleeping Action Plan concern improving access to health and substance misuse services for rough sleepers and developing joint working protocols for those with co-occurring substance misuse and mental health problems. This work has been taken forward on a cross Government basis and has resulted in ongoing work to strengthen implementation of the Support and Treatment Framework for People with Substance Misuse and Accommodation Problems; shared actions in the Substance Misuse Delivery Plan 2019 to 2022 and the Together for Mental Health Delivery Plan 2019 to 2022; and specific funding for those with complex needs.

This work is ongoing as we recognise the importance of treatment for co-occurring mental health and substance misuse and have established a Welsh Government Co-occurring Substance Misuse/Mental Health Deep Dive to consider progress in the development of co-occurring mental health and substance misuse and the challenges that remain. The group is made up of a range of experts including policy experts, commissioners and practitioners, including both health and housing, to support this work.

Providing appropriate, integrated support for co-occurring substance misuse and mental health are clearly identified as priorities within both the Substance Misuse Delivery Plan 2019–2022 and the Mental Health Delivery Plan 2019–2022. The Mental Health and Substance Misuse Delivery Plans both include the commitment to undertake a detailed analysis on the pathways for an individual with a co-occurring problem. This will involve looking at the barriers and good practice on work in this area (work being led by the Welsh Government’s Co-occurring Substance Misuse/Mental Health Deep Dive) in particular to unblock issues that may be preventing the full implementation of the Service Framework for the Treatment of People with a Co-occurring Mental Health and Substance Misuse Problems. In addition, there are commitments in both delivery plans to ensure services commissioned to support co-occurring cases are aligned and working in partnership with housing and homelessness services; ensure barriers to joint work between mental health and substance misuse services are being reduced. We will monitor

local implementation of this this through the Area Planning Boards and Local Mental Health Partnership Boards.

As the report notes the Minister for Health and Social Services has provided £1.3million to support people with complex needs who are homeless or in housing need. The funding is working closely with Housing First Projects and will support improved access and integration of substance misuse and mental health services.

Financial Implications – None. Any additional costs will be drawn from existing programme budgets.

Recommendation 2

The Committee recommends that:

The Welsh Government identifies best practice to improve sharing across the sector, and ensures that the commissioning process does not act as a barrier to this.

Response: Accept

As outlined in previous evidence sessions, the development of the Housing Support Grant provides an opportunity to improve commissioning processes through the greater alignment of the Supporting People and Homelessness Prevention Grants. New guidance to support the Housing Support Grant, which was consulted on last year, seeks to strengthen collaborative and multi-agency approaches and encourage joint commissioning of services.

Whilst there is some organic development and improvement made possible by sharing and learning between service providers, the structural responsibility for defining and sharing good practice falls to the commissioner themselves, namely the Local Authorities. It is their responsibility to analyse what works as part of their strategic role, to recognise good practice and to test innovative practice. They should learn from providers as part of this strategic commissioning role and Welsh Government has for example required Authorities to constitute stakeholder engagement events or other mechanisms to conduct this conversation.

Welsh Government's role is to build on this local sharing through research, evaluation and facilitating pan-Wales conversations through mechanisms such as the Housing Support Ministerial Advisory Board or the Housing Support Network.

The Welsh Government is also supporting Area Planning Boards to ensure their services are well aligned with homelessness services, including Housing First, and the Substance Misuse Delivery Plan contains specific actions for this. The recent complex needs funding provided by the Minister for Health and Social Services

further encouraged a collaborative approach, requiring bids to be both developed and delivered in collaboration with housing services.

Financial Implications – None. Costs will be drawn from existing programme budgets.

Recommendation 3

The Committee recommends that:

The Welsh Government takes more steps to support harm reduction initiatives. These should include:

- **Clarifying whether the devolution settlement enable safe injecting rooms to be set up in Wales; and if not, whether they will seek such powers; we would expect any decision to be informed by the evidence base demonstrating the effectiveness of this intervention, and;**
- **Working with the UK Government and non-devolved bodies such as the police to minimise the risk of landlords being prosecuted where residents or tenants are using drugs on their property, as part of a harm reduction programme.**

Response: Accept in principle

Tackling substance misuse continues to be a priority for the Welsh Government. Our '*Substance Misuse Delivery Plan 2019-22*' is rooted in a harm reduction approach which recognises addiction as a health and care issue as opposed to one that is solely related to criminal justice.

A growing area of concern for everyone working to tackle substance misuse in Wales is the latest data showing a rise in drug related deaths across the population. We are currently working closely with stakeholders to evaluate the reasons behind the increase and support the implementation of initiatives to address this, including support for homeless people.

In December 2017, the former Advisory Panel on Substance Misuse (APoSM) completed a report on Enhanced Harm Reduction Centres (EHRCs), which is another name for safe injecting rooms. This included European and International evidence of the effectiveness of EHRCs and also provided some background information on current drug use practices in Wales. The report concluded with one recommendation that stated APoSM could not, based on the evidence available, currently recommend that EHRCs are implemented in Wales. The report stated that

further work would need to be undertaken in this area in order to determine the feasibility of EHRCs in Wales.

There are also significant concerns with the compatibility of Enhanced Harm Reduction Centres with current criminal law. The current Welsh Government position is that it could not currently support EHRCs as the law on the misuse of drugs is non-devolved and therefore a matter for the UK Government.

In respect of Housing First projects, as part of their role in administering the Housing First Network, Cymorth Cymru have been working with social landlords, the Welsh Police Forces and commissioners to examine the potential to issue 'letters of comfort' to landlords. These letters, which have been developed as part of the Scottish approach to Housing First, provide reassurances to landlords in relation to potential prosecution. Work is ongoing in this area and we will update the committee in due course as work progresses.

Financial Implications – None

Recommendation 4

The Committee recommends that:

The Welsh Government takes a lead role in working with organisations across sectors to drive forward the necessary cultural change to bring organisations together to deliver fully integrated services. The Welsh Government should update the Committee on the actions it has taken and timescales for future actions to deliver this recommendation at six, nine and twelve months.

Response: Accept in principle

The Welsh Government recognises the need to drive forward culture change to deliver fully integrated services and deliver the public service response required to achieve the goal of ending homelessness. Our strategy for preventing and ending homelessness sets out the whole system approach required across public services to tackle homelessness in all its forms. The work of the Homelessness Action Group will help inform the action plan which will sit underneath the strategy and upon which the Welsh Government will report annually. The Action Group has been looking at workforce and culture as part of its remit, and I anticipate it being reflected in its next report.

It is important to acknowledge however that culture change takes time to effect and cannot be achieved by Welsh Government intervention alone. The purpose of creating the Housing Support Grant (HSG) is to help Local Authorities deliver on their Well-Being of Future Generations Act duties and the 5 ways of working, in

particular integration and collaboration. The new guidance, which has been developed through extensive engagement with stakeholders, sets out a clear strategic lead role for Authorities, with the flexibility and freedom to innovate and bring together services to avoid duplication and maximise impact. The new funding framework includes mechanisms for engaging local stakeholders and, through regional collaborative groups, a structure to work across public functions such as Health and Criminal Justice to ensure services operate in a joined up fashion and offer users a more streamlined response to their needs.

In offering more freedom to Authorities we are challenging them to step more fully into the space that has often been occupied by Welsh Government direction in the past. This recognises both their understanding of local needs and the local democratic mandate they enjoy. The cultural change we are seeking therefore is a more mature strategic lead from Authorities for the integrated services the Committee references in its report.

Of course this cultural change will require nurturing through ongoing engagement and shared learning. Welsh Government will continue to support this through the implementation of the new grant framework and through fora such as the Housing Support Network, which brings together Local Authority homelessness and housing related support leads to share good practice and support continuous improvement.

Implementing Housing Support Grant will be the key mechanism through which we will achieve this objective. We will keep the Committee up to date on progress as the grant and its supporting guidance is implemented. However, we recognise that reporting progress on the implementation of the HSG may fall outside of the suggested reporting intervals.

Financial Implications – None

Recommendation 5

The Committee recommends that:

The Welsh Government reviews the training available to all those who provide support to rough sleepers; identifies any particular gaps and considers supporting the development of training to ensure that all those who work with rough sleepers have sufficient knowledge and skills to support those with co-occurring disorders. As part of this, the Welsh Government should consider the efficacy of specialist psychiatric training.

Response: Accept

Our Substance Misuse Delivery Plan has identified workforce development as an action and this work is currently being taken forward, including the need to consider joint training with other relevant service areas. The Welsh Government's Co-occurring Substance Misuse/Mental Health Deep Dive working group, which includes representatives from the Royal College of Psychiatry, is considering if there is a requirement for further training and will provide an update on this as part of their report of progress of the group. To support the implementation of the Service Framework for the Treatment of People with a Co-occurring Mental Health and Substance Misuse Problem the Welsh Government with APBs undertook a staff training audit to identify gaps in service where there was a particular need for learning and development. From this, training and support was developed to assist and meet the needs of people with a Co-occurring Mental Health and Substance Misuse problems.

The curriculum is split into four programmes of study aimed at different professional levels:

- Level 1 - Awareness (for professionals in related sectors, or volunteers)
- Level 2 - Primary Care (Open Access and Engagement Staff, Recovery Communities, General Practitioners, First Point of Contact Centres)
- Level 3 - Secondary Care (for those offering structured and Care Planned Interventions)
- Level 4 - Advanced Practitioner / Strategic - Responsible Clinicians, Commissioners, Strategists and Executives).

Agored Cymru accreditation is available for each of these units and the training will shortly be reviewed.

In the wider context of homelessness prevention, a key policy principle underpinning our approach is that all services should place the individual at the centre, and, that those services work together in a trauma informed way. Welsh Government has already invested in the development and delivery of the PATH (Prevention. ACEs. Trauma Informed. Homelessness) training programme. This training was developed together with psychologists working with Cymorth Cymru to develop psychologically informed approaches. Cymorth Cymru worked with the ACE support hub and the Local Authority Housing Support Network to deliver the programme to organisations which support people who are at risk of or experiencing homelessness, including rough sleepers. Welsh Government is continuing to invest in the further roll-out of this training.

The Homelessness Action Group is also considering the wider needs of the workforce as part of its remit and I anticipate this being reflected in its next report, which will subsequently inform our annual action plan.

Financial Implications – None. Costs will be drawn from existing programme budgets.

Recommendation 6

The Committee recommends that:

The Welsh Government either undertake or commission an urgent review into the commissioning practices and guidelines to investigate the concerns raised, in particular looking at whether better performance management approaches, shared outcomes; pooled budgets; more long-term commissioning and addressing potential conflicts of interest would help support better integrated services for rough sleepers with co-occurring disorders. It should also consider the impact of the barriers to pooling statutory and non-statutory funding, and how collaborative approaches including both statutory and third sector providers can be developed. While the focus should be on these services, the findings could be applied more widely across the sector.

Response: Accept in principle

The creation of the Housing Support Grant has already resulted in a review of the funding and commissioning arrangements for what were previously known as the Supporting People and Homelessness Prevention grants. The new guidance was developed in a co-productive manner, through extensive engagement with stakeholders, including providers, commissioners and service users. This provided an opportunity to examine the issues identified in the committee report and for stakeholders to inform the development of the new guidance, which seeks to address many of these issues. The new guidance was formally consulted upon late in 2019, providing stakeholders with a further opportunity to feed in their views and inform the final guidance, which will be issued shortly.

Welsh Government strongly recognises the value of collaborative working and has put structures in place to encourage and enable effective collaboration. Regional Partnership Boards (RPBs) are one structure which provide a mechanism through which collaborative working between Health, Social Care and Housing can be developed. They are a mechanism to build close working relationships so that services can be jointly designed and commissioned, so as to optimise the purposes of housing, health and social care.

There are also collaborative approaches being taken forward around funding for substance misuse and mental health, which are overseen by Local Mental Health Partnership Boards and Substance Misuse Area Planning Boards. The Minister for

Health and Social Services has provided £1.3m (£0.3m 2019/20, £1m 2020/21) specifically to support people with complex needs who are homeless or in housing need. The funding is working closely with Housing First projects and will support improve access and integration of substance misuse and mental health services. In further demonstration of our joined up approach, we have also made £100,000 available from the Health budget in this financial year (2019-20) to specifically fund residential treatment for people who are homeless or being discharged from prison.

Financial Implications – None. Costs will be drawn from existing programme budgets.

Recommendation 7

The Committee recommends that:

The Welsh Government undertake further work to understand the scale and extent of the barriers faced by rough sleepers with co-occurring disorders and neuro-diverse conditions in getting appropriate help to secure accommodation and help for their substance misuse and mental health difficulties.

Response: Accept

Engagement with rough sleepers to ascertain barriers to services has historically been a difficult process. As part of the extensive independent evaluation of Housing First projects in Wales, Welsh Government will be seeking to better understand the exact barriers faced by service users, including those with co-occurring disorders and neuro-diverse conditions, and the steps than can be taken to overcome them. Capturing the views of those with lived experiences will be a fundamental part of this research.

Area Planning Boards are also currently working closely with housing outreach services and in many areas joint outreach teams operate together ensuring that support is available to reach out and engage rough sleepers in services.

Ensuring services for those with co-occurring problems are accessible and fully integrated is a key priority and the Welsh Government is currently undertaking further work to understand the barriers to progress of Service Framework for the Treatment of People with a Co-occurring Mental Health and Substance Misuse Problem and how they can be overcome. Engaging with Service Users who have experienced services will form part of developing future services which better meet the needs of vulnerable individuals.

Financial Implications – None. Costs will be drawn from existing programme budgets.

Recommendation 8

The Committee recommends that:

The Welsh Government provide their views on the recommendations in the APPG on ADHD report that relate to devolved responsibilities in sections 1a Early intervention and prevention – screening at second exclusion from school (temporary or otherwise); section 2, adherence to the NICE guidelines for ADHD within the prisons system; and section 3 screening for ADHD.

- **Services need to be responsive and focused on the needs of the people they are supporting. They should be designed to meet their needs, rather than fitting the support around the design of the service.**
- **For those who need the support offered by Housing First, we need to ensure there is sufficient suitable accommodation in the right location. The concept of Housing First is based on the accommodation being a long-term home for the individual, not on being moved on once their support needs reduce. This means ensuring a pipeline of suitable accommodation that can be used for the Housing First model.**
- **There needs to be an increase in residential and community detox capacity. We heard that for many community detox is the most appropriate solution, but for some residential detox is the answer, and there is not enough current capacity within Wales to meet the needs for Tier 4 detox.**

Response: Accept in principle

The Welsh Government notes with interest the work of the All Party Parliamentary Group in respect of ADHD. We acknowledge that people are presenting with more complex issues, many affecting their ability to maintain treatment and recover, and that services need to be responsive to the differing needs of individuals.

As set out in our strategy for preventing and ending homelessness, one of the key policy principles is that services adopt a whole person approach, based on strengths and trauma informed practice. To support this we are strengthening our multiagency working and care planning to ensure the needs of individuals are met. Our Substance Misuse Delivery Plan includes a specific action to work with Housing First projects to support this aim.

We fully agree with the Committee's conclusion that Housing First is based on the accommodation being a long-term home for the individual, not on being moved on once their support needs reduce. Welsh Government acknowledges the need to

increase the supply of suitable accommodation to meet both the need for Housing First and more widely our proposed move to a rapid re-housing approach. To achieve this we are committed to building more social housing at scale and pace, and are launching an innovative new scheme to increase the supply of suitable accommodation in the private rented sector.

Residential rehabilitation and inpatient detoxification play an important role in helping service users secure their long term recovery including community based rehabilitation and detoxification, which plays an equally important role.

The reference to community and residential rehabilitation is addressed in recommendation 9 below.

Financial Implications: None. Costs will be drawn from existing programme budgets.

Recommendation 9

The Committee recommends that:

The Welsh Government ensures that there is sufficient capacity and funding for residential and community detox in Wales to ensure all who require this form of detox are able to access it in a timely manner.

Response: Accept

Residential rehabilitation and inpatient detoxification play an important role in helping service users secure their long term recovery including community based rehabilitation and detoxification, which plays an equally important role.

The Welsh Government remains committed to ensuring that such services are available and as such allocates £1m ring fence annual funding from the Substance Misuse Action Fund to Area Planning Boards (APBs) for the provision on Tier 4 services. This is in addition to the over £25 million provided to APBs to commission and deliver a range of substance misuse services within their areas. It is a matter for Area Planning Boards, in line with clinical guidance and with input from service users, to decide which is the most appropriate intervention when accessing a number of services from Tier 1 to Tier 4, ensuring accessibility at all levels is suitable tailored for individuals based on their population needs assessment.

The Welsh Government is currently tendering for a contract for an All Wales Substance Misuse Residential Rehabilitation Framework which will provide a list of approved residential rehabilitation and detoxification service providers. In addition the Welsh Government wrote to Directors of Social Services, to remind them of their responsibilities for social care assessments and funding for residential rehabilitation,

ahead of the introduction of a new framework and to ensure that sufficient funding is provided not only from commissioned substance misuse services but from wider sources.

The Partnership Agreement for Prison Health sets out agreed priorities between Welsh Government, HMPPS, Public Health Wales and the Health Boards, to improve the health and wellbeing of those in prison. This includes the development of the new Substance Misuse Treatment Framework for prisons (priority 3 in the Partnership Agreement for Prison Health) and delivering new standards for mental health services in prisons (priority 2 in the Partnership Agreement for Prison Health). As part of this work, there will be a specific focus on improving transfer of care on release.

We have also made £100,000 available in this financial year (2019-20) to specifically fund residential treatment for people who are homeless or being discharged from prison.

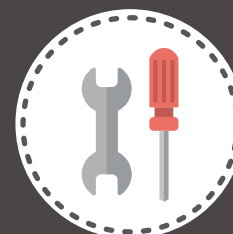
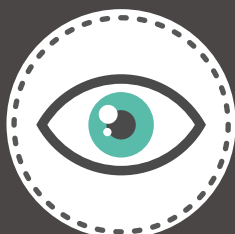
Financial Implications – None. Costs will be drawn from existing programme budgets.

Archwilydd Cyffredinol Cymru
Auditor General for Wales

The maturity of local government in use of data



WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU



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Mae'r ddogfen hon hefyd ar gael yn Gymraeg.

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Introduction

Local authorities are slowly developing a culture that values and uses data to its full potential to help improve services and outcomes

- 1 The growth of 'big data'¹ strategies in the private sector and the availability of 'open data'² has been unprecedented in recent times, and has revolutionised the way organisations make decisions. With the technology available today, and the rate of technological change, data-driven decision making is becoming the norm rather than the exception. However, is this approach extending to local authorities in Wales?
- 2 Being smart and strategic in using data brings many benefits for local authorities, their partners, the communities they work in and the citizens they serve. Making better use of data supports authorities to take better and quicker decisions. It also allows authorities to make best use of resources by identifying waste and inefficiency, and thus increasing productivity. Most importantly, maximising use of data is good for democracy because it strengthens governance and accountability.

- 1 Big data requires making sense of the vast amounts of data a local authority collects – processing, analysing and exploiting it for local authority, partner and community gain. Big data refers to digital information that is massive and varied, and that requires technology and best practices to sort, process, store and analyse.
- 2 Open data is the idea that some data should be freely available to everyone to use and republish as they wish, without restrictions from copyright, patents or other mechanisms of control. One of the most important forms of open data is open government data because making government and local authority information available to the public can facilitate transparency, accountability and public participation.

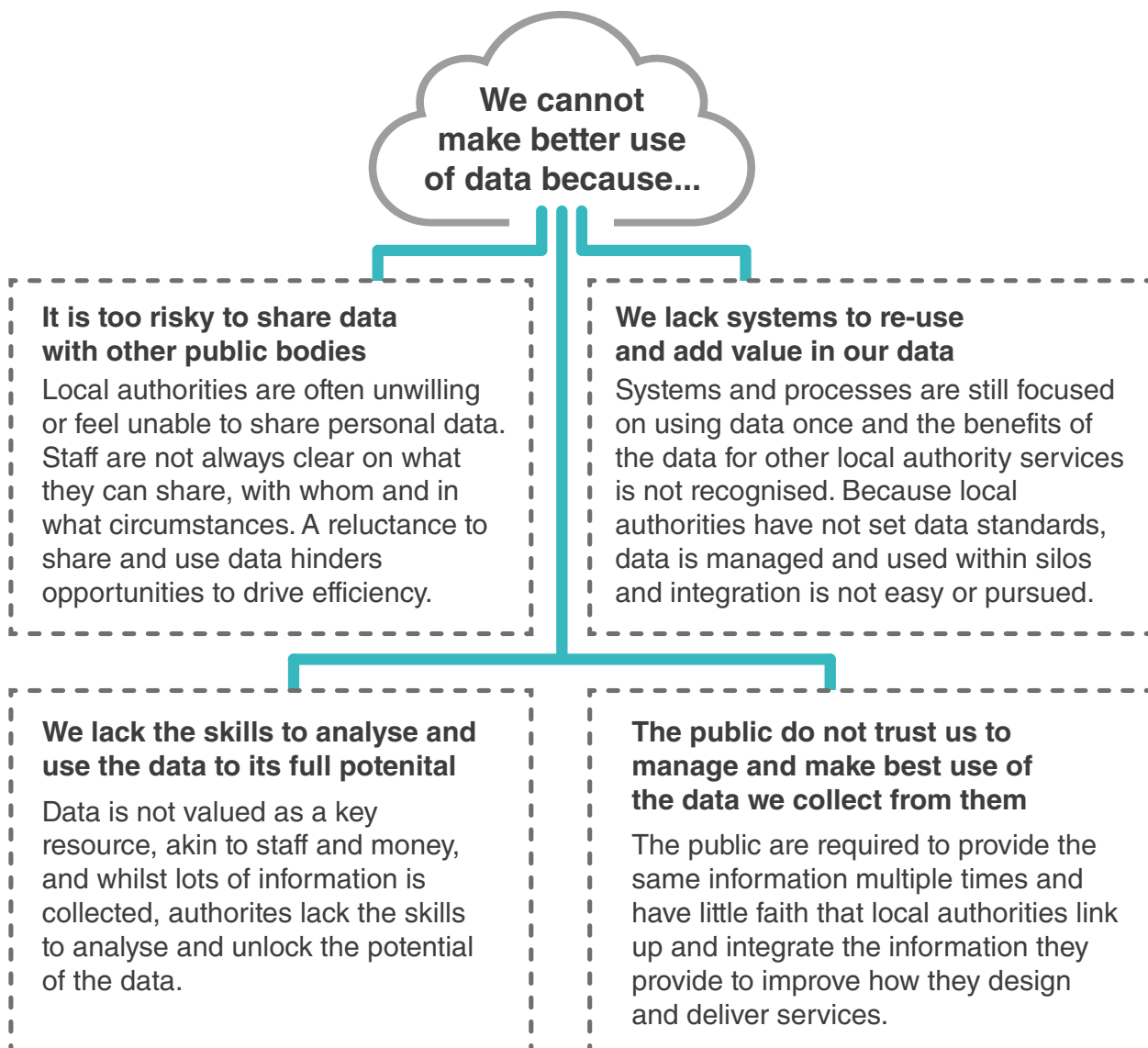
Exhibit 1 – Why making better use of data is important for local authorities



Source: Wales Audit Office

3 Local authorities are sitting on a ‘rich vein’ of personal, financial and community level data that could help them deliver more efficient and effective services. To do this, local authorities need to ensure they have the right building blocks in place to unleash this data potential, specifically; agreed management standards, common coding, and the right culture, leadership and skills. The benefits of linking and using data, both within local authorities and with partners, is challenging and authorities need to overcome some significant barriers if they are to maximise their use of data – **Exhibit 2**.

Exhibit 2: The barriers to why local authorities are not making better use of data



Source: Wales Audit Office

- 4 Given these challenges, this study assesses whether local government has the right building blocks and culture in place to capitalise on the data³ that it holds. Our methods are set out in [Appendix 1](#).

3 This study is not about technology, software or hardware. Rather, it is a study of the key characteristics of a mature organisation that uses and values data to plan and deliver services

Summary report


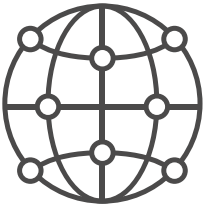
Summary





- 5 In **Part 1** of the report, we study the strategic approach taken by local authorities to making better use of data. We found that local authorities are not taking advantage of the massive amounts of data they collect to operate as efficiently and as effectively as possible. Too often services and teams hold information in silos and use it for a single purpose. Because authorities lack corporate data standards, duplication of information is common and integration of data often poor. Consequently, the potential for reusing data can be overlooked. In the age of big data, breaking down organisational silos to drive a culture change is a priority. Authorities generally lack a clear vision for use of data and the leadership needed to help create the right strategic environment to maximise the benefits of data is not consistently present.
- 6 In **Part 2** we summarise local authorities' data protection work and how they are progressing sharing data with other public bodies. Local authorities can collect and hold very personal and sensitive data to help them deliver their services. This data can assist their partners but using and sharing data is a delicate balancing act. We found that authorities have generally good arrangements for data protection but are often risk-averse and not prepared to share information, despite the availability of national approaches like the Wales Accord on the Sharing of Personal Information (WASPI). Public sector partners need to do more to unlock the full potential of the data that they hold.
- 7 In **Part 3** we examine whether local authorities have the skills and capacity to gather, share and analyse data. A key component of maturity in using data is ensuring staff are equipped in data analytics, to use the data that they, and partners, hold to understand events, predict future scenarios and model potential demand. We found local authorities recognise they do not always have the right skills nor the capacity to make the best use of data.
- 8 In **Part 4** we consider how effectively local authorities use available data to agree future priorities and allocate resources. Authorities with high levels of data maturity use data to trial approaches to learn what works and make available open data in real time to support a wide range of organisations to develop new services and approaches. We found local authorities are using data to review performance, but gaps and weaknesses in the data they use mean that decisions are not always based on the full range of evidence. In general, local authorities can understand past performance but are not so adept at using data to help anticipate the future or model possible scenarios.


- 9 Based on these findings, the Auditor General has concluded that **local authorities are slowly developing a culture that values and uses data to its full potential to help improve services and outcomes**. From our work, we have identified what we consider to be the key aspects of data maturity in local government, and these are set out in **Exhibit 3**.

Exhibit 3 – Data Maturity in local government

The Exhibit sets out the key aspects of data maturity. Level 1 describes an organisation with low levels of data maturity, and level 3 an organisation with high levels of data maturity. **Overall, we conclude that most authorities are characterised by the descriptors at level 1 and level 2.**

Key Characteristic	Level 1	Level 2	Level 3
<p>Leadership</p> 	<p>Leadership on data and organisational culture encourages a risk-averse approach, which does not value or seek to maximise data usage.</p>	<p>Leaders recognise the value of streamlining and improving use of data, both within the local authority and with partners. The culture in most of the authority has not progressed from 'identifying' the opportunities of integrating and sharing data to actually 'doing' it.</p>	<p>The organisation has a strong leadership culture based on transparency and valuing and using data to underpin decisions. The authority openly shares data and insights with citizens, partners and stakeholders setting out the rationale for choices. Data is valued and used across the authority.</p>
<p>Corporate standards</p> 	<p>Services operate independently in silos, and define their own data requirements. The local authority lacks corporate standards for how services should capture and use data and little integration or sharing of data takes place internally or externally.</p>	<p>The local authority knows what data is collected by services and has some linked databases, but data networking has developed organically. The local authority lacks data standards and whilst data sharing and integration takes place, it is in narrowly defined areas.</p>	<p>The local authority has corporate data standards and coding structures. The local authority has identified its long-term data requirements and is streamlining systems to reduce duplication and improve accessibility. Data is integrated and coding gaps when identified are addressed.</p>

Key Characteristic	Level 1	Level 2	Level 3
<p>Integrated customer data</p> 	<p>Service users often apply multiple times for services or assistance. Duplication of data is common and some services rely on paper-based manual systems.</p>	<p>Duplication is known, but not always addressed. Some standardisation takes place, usually around established parameters such as property gazetteers, but is limited. Most data is digitised but not linked.</p>	<p>Citizens apply once, and services are configured to meet their needs. Data is entirely digitised and regularly cleansed to ensure it is accurate. Data sharing and integration is well advanced. Duplication is kept to a minimum.</p>
<p>Data protection</p> 	<p>Data protection legislation is understood and complied with, but is a block to sharing data.</p>	<p>Data protection legislation is understood and complied with and is not seen as a block to making better use of data.</p>	<p>Data protection legislation is complied with and implementation is supporting the local authority to appropriately share data internally and with other bodies.</p>
<p>Data analytics</p> 	<p>Investment in data analytics – segmentation analysis, forecasting and predictive analysis – is limited. There is little capacity and a deficit in skills to improve use of data. There is no or little investment in upskilling staff.</p>	<p>The need to build skills and capacity and invest in making better use of data is recognised, but not always addressed. Improving capacity and upskilling staff is a known risk but progress to address this is slow or limited.</p>	<p>Staff have been equipped in data analytics, and services regularly use data from a range of sources to understand events, predict future scenarios and model potential demand. Data analytics is recognised and valued as a core function and is resourced sufficiently.</p>
<p>Data-driven decisions</p> 	<p>Data is reported and performance is analysed. The focus of performance reporting is limited to local authority service information, is mostly historical and backward looking, and not reported in real time. Data analytics is rarely used.</p>	<p>Data is reported and performance is analysed. The local authority is focusing on monitoring and measuring impact. The importance of data analytics is growing but not embedded or sufficiently developed in most services.</p>	<p>Data is reported and through performance evaluation, corrective action is taken when the data shows a change in direction is needed. The local authority has a record of accomplishment of using data analytics to manage services and is focused on understanding future demand.</p>

Key Characteristic	Level 1	Level 2	Level 3
<p>Open data</p> 	<p>The local authority is not using data to effectively support decision making. Open data and public reporting is very limited.</p>	<p>The local authority uses data to underpin decisions but limitations in its coverage and analysis weakens 'real time' choices. Open data is produced but coverage is limited.</p>	<p>Data-driven decision making is well established and accepted as the 'way to do things'. Open data is made available in real time and a wide range of organisations use the information to develop new service and business opportunities.</p>

Source: Wales Audit Office

Recommendations

10 Through our study, we have made the following recommendations to support improvement.

Recommendations

R1 Part 1 of the report highlights the importance of creating a strong data culture and clear leadership to make better use of data. We recommend that local authorities:

- have a clear vision that treats data as a key resource;
- establish corporate data standards and coding that all services use for their core data;
- undertake an audit to determine what data is held by services and identify any duplicated records and information requests; and
- create a central integrated customer account as a gateway to services.

R2 Part 2 of the report notes that whilst it is important that authorities comply with relevant data protection legislation, they also need to share data with partners to ensure citizens receive efficient and effective services. Whilst these two things are not mutually exclusive, uncertainty on data protection responsibilities is resulting in some officers not sharing data, even where there is agreement to provide partners with information. We recommend that authorities:

- provide refresher training to service managers to ensure they know when and what data they can and cannot share; and
- review and update data sharing protocols to ensure they support services to deliver their data sharing responsibilities.

R3 In Part 3 of our report, we conclude that adequate resources and sufficient capacity are ongoing challenges. However, without upskilling staff to make better use of data, authorities are missing opportunities to improve their efficiency and effectiveness. We recommend that authorities:

- identify staff who have a role in analysing and managing data to remove duplication and free up resources to build and develop capacity in data usage; and
- invest and support the development of staff data analytical, mining and segmentation skills.

Recommendations

R4 Part 4 of our report highlights that authorities have more to do to create a data-driven decision-making culture and to unlock the potential of the data they hold. We recommend that local authorities:

- set data reporting standards to ensure minimum data standards underpin decision making; and
- make more open data available.

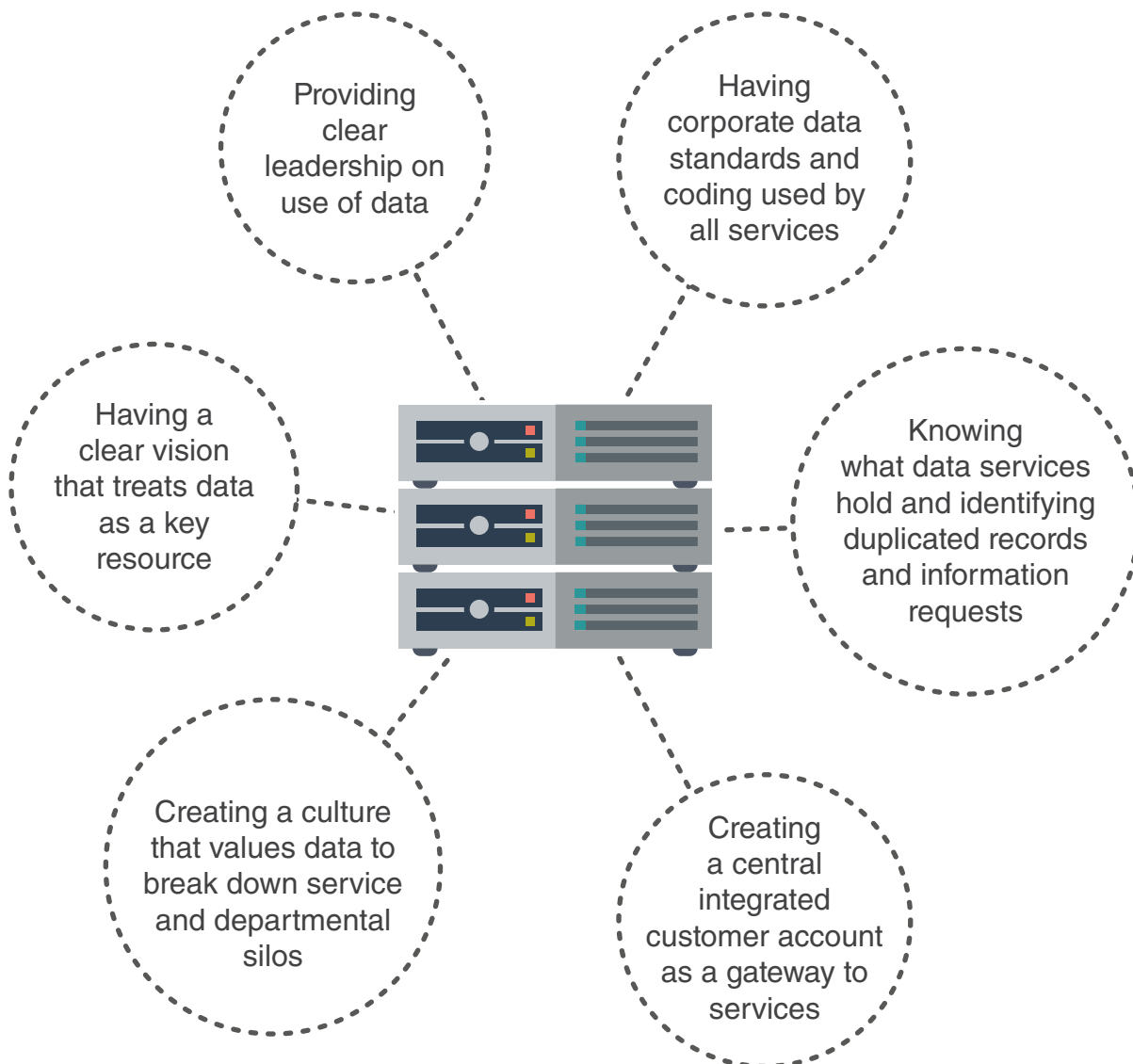
Part 1

A clear vision and effective leadership help create the culture needed to maximise the use of data, but few local authorities have focused on building an environment to get the most from the data they hold



1.1 A strong data culture and making good use of data are intertwined, and authorities cannot have one without the other. Creating a culture where Elected Members, senior officers and front-line staff think about and use data differently is the key challenge facing authorities in making better use of data. Summarised in **Exhibit 4** are some of the key steps we have identified from our study that help local authorities create a data-driven environment.

Exhibit 4 – Creating a data-driven environment



Source: Wales Audit Office

Authority leaders need to do more to create a strong data culture

- 1.2 Local authorities collect a lot of data that supports them to plan and deliver a wide range of services. However, much of the data collected is not capable of being shared or re-used because it is held in silos. Research suggests that 90% of unstructured data is never analysed, remaining 'dark' and unexplored; and this is despite organisations investing significant resources in collecting this data⁴. Joining up and integrating data has been a problem since databases have existed, but the amount of potentially relevant data available now is thousands of times larger. A mature local authority will move from identifying the potential benefits of data, to using all of the data in making choices, decisions and determining service delivery changes.
- 1.3 Linking up authority data can be difficult because it requires departments, services and teams to replace long-standing processes with new ways of working. It also requires staff to be less risk-averse and more accepting of the benefits data can provide for colleagues, partners and citizens. The culture of an organisation has a great effect on maximising the potential held in data and can be a major barrier to a local authority fully utilising it. The way an authority is set up, how services and staff work and how senior leaders recognise and value data, influence culture. Despite some passionate authority leaders who recognise the potential benefits of unlocking data, more needs to be done.
- 1.4 People we interviewed highlighted that breaking down barriers and silos in the established, and often risk-averse culture of an authority, is challenging and requires support from key decision-makers. In particular, interviewees noted that frontline staff are critical to success and need to understand the importance of their role in collecting customer data. If there is no will or leadership setting the right 'tone at the top', then it is difficult for authorities to maximise their use of data.



The biggest challenge to making better use of data is...

"A culture of silo management, a reluctance to innovate and a lack of awareness of how data can be used"

Operational Manager

"Culture change and the reluctance to share information across services"

Head of ICT

"Leadership and culture and formal recognition of the role of data in and across the organisation to support every facet of operational, tactical and strategic decision making"

Information Compliance Officer

- 1.5 We found that no local authority has a designated senior officer who purely leads on data, and who has no other responsibilities. From our fieldwork, we found that some authorities see leadership on data as technical in nature giving responsibilities to the Head of ICT, or shaped by compliance with data protection legislation with the Senior Information Risk Officer taking the lead. These posts provide important technical and specialist views, but are often not ‘advocates’ who can influence and create change at different levels and in different areas of activity, especially breaking down silos on re-using data within customer-facing services.
- 1.6 Effective leadership is also about ambition and having a clear vision for data underpinned by specific outcomes that recognises data as a key resource, like finance and staff. Our research found that despite highlighting that making better use of data is a weakness, most authorities lack a vision, strategy or plan for improving data and are not clearly articulating what they need to do to improve. A number of interviewees felt that this was a particularly pressing challenge because without a vision and plan, it was unlikely that any concrete actions could be developed and implemented, and even less likely that there would be improvements.
- 1.7 Local authority officers noted that in the absence of a clear and consistent corporate focus on data, improvement actions are generally left to individual services to take forward, thus making it difficult to determine who is (or should be) taking the lead and is accountable for coordinating efforts to improve data usage. In addition, the absence of targets and goals for improving data usage, vital for signalling what an authority hopes to achieve with improved data, makes it difficult to measure progress and improvement. This creates a risk that services will view data-related issues differently, which can lead to duplication of action, no action at all, and/or reinforcement of inconsistencies and weaknesses when collecting, managing and using data.



The biggest challenge to making better use of data is...

“Culture, moving to a use of insight from a data-driven rather than experience perspective”
Head of Policy

“Cultural issues surrounding data use”
Corporate Management Team Member

Managing data as a corporate asset helps support integration, but few authorities have adopted standards that help unlock this potential

1.8 Whilst authorities are mostly clear on the data they need to deliver services, many authorities have not carried out a data audit to determine future data requirements. In particular, ICT Managers and Information Compliance Officers flagged issues of concern that operational managers are not considering their future data needs, nor identifying which information they collect is common across services. Many responding to our data tool noted that within their authorities, it is not commonplace to integrate data across services, and this is despite authorities having the ability to join up data to offer greater insight, which helps them to deliver earlier and less expensive interventions.

1.9 Local authority Heads of ICT services in particular, highlighted a continuing risk that local authorities are doing too little to standardise their data, and still do not use common data coding across services to make integration easier. Too often the data collected by a service is determined by professionals who are clear on what they need to deliver their functions, but are less aware of (or do not consider) the wider corporate/ community benefits of the data they collect and its potential re-use. The way data systems are developed, how information is coded, and the lack of standardisation in commonly used data fields (eg personal names, addresses, ethnicity, etc) can therefore make connecting and joining up data much harder than it needs to be.



The biggest challenge to making better use of data is...

“ Different data collection systems that don’t talk to each other and the lack of understanding of how data collected for one service area can impact on the delivery of services elsewhere”

Operational Manager

“ Different service areas within the Council use different systems which makes it difficult to provide coherent joined up provision for the public”

Operational Manager

“ There are so many bespoke and separate systems it is difficult to know what is held where and by whom”

Operational Manager



1.10 For instance, property data collected by authority departments is often referenced differently. Some services use bespoke reference numbers created as part of the system implementation, some use street gazetteer addresses (which can often be incomplete or partial), and others use northings/eastings⁵. Within each of these, the way information is recorded can vary. To bring information held in disparate systems together can, therefore, be expensive and time consuming. Local authorities that do not have the ability to join up and match records held in the different ICT systems within their own organisation will also find it difficult to collaborate with partners to integrate data.

1.11 Nevertheless, we identified some positive examples of how local authorities are seeking to standardise data to improve integration and insight. Newport City Council's central property identification code has enabled the authority to link service data. Although this does not cover all departments and all areas of work, it is nonetheless helping the authority to draw together information from a variety of different databases to support officers delivering frontline services. Similarly, Denbighshire County Council use their local land and property gazetteer (LLPG) for addresses, which is helping the authority to map service provision and coverage. Likewise, both the Vale of Glamorgan Council and Rhondda Cynon Taf County Borough Council integrate some service data to help identify vulnerable households who need support but to also target action for anti-social behaviour.

1.12 Overall, however, we found limited evidence of authorities using corporate data standards, and current approaches to integration of data are mostly one-off initiatives and pilots developed within services. Corporate data standards describe and specify how to 'record data', and can help breakdown departmental silos and make integration and analysis easier. We concluded that not developing and using common coding is a missed opportunity that makes integration more difficult and costly.

The biggest challenge to making better use of data is...

"Whilst the Council is good at holding a significant amount of data ... often it is held in systems that are difficult to interrogate and, therefore, a lot of the data held is not used effectively"

Operational Manager

"Consistent standards in the collection and use of data"

Corporate Management Team Member

5 The terms 'easting' and 'northing' are geographic Cartesian coordinates for a point. Easting refers to the eastward-measured distance (or the x-coordinate), while northing refers to the northward-measured distance (or the y-coordinate).

With the growth in ‘big data’ it is important that local authorities ensure the accuracy of their information, but data quality remains an ongoing challenge for some

- 1.13 The concept of data quality, and having robust management processes to record reliable and accurate data (service specific, financial and performance) is not a new one. Having quality data gives you better insight and is an important part of a mature approach to governance and decision making. Conversely, poor quality data can lead to flawed decision making, wasted resources, and can leave vulnerable people at risk.
- 1.14 Quality control and data accuracy is an integral part of data management and should take place at various stages: during data collection, data entry, data checking and use of data. Checking data to ensure accuracy can typically involve both automated and manual procedures, including checking the completeness of records, verifying a random sample of information for accuracy, and checking for double entries. Documenting in detail the data controls at each of these stages, can help maintain quality.
- 1.15 Despite recognising the importance of data quality, it can be challenging to get right. Whilst local authorities consider data quality is improving, data accuracy⁶ remains a challenge for some organisations. Problems with systems not being efficient or effective to hold and use data, double counting, duplicated records and incomplete and partial information were all highlighted as ongoing difficulties in raising and maintaining data standards. There are also still too many inconsistencies between systems, which is having a huge impact on quality and reporting which can result in decisions being based on incomplete or inaccurate data. A number of third sector and national organisations we interviewed raised concerns that from their experience the quality of local authority data varies widely.



The biggest challenge to making better use of data is...

“Need to ensure adequate capacity to undertake enough quality assurance and quality control of data sets”

Operational Manager

“Ensuring quality and not just having data for data’s sake, we should only have what we need and not waste any valuable resources capturing the unnecessary”

Operational Manager

6 Accuracy – data should be sufficiently accurate for its intended purposes. Accuracy is most likely to be secured if data is captured as close to the point of activity as possible. Data should be captured once only, although it may have multiple uses.

Citizens are required to provide the same information multiple times when applying for services, but authorities are not integrating management systems to improve data efficiency



- 1.16 Reducing duplication and linking up data can help save on content management systems⁷ and hosting costs⁸. It also produces better quality intelligence and supports integrated service delivery and decision making. ‘Collect once, use numerous times’ is a valuable principle. We found that whilst local authorities recognise that duplication is present, the extent of duplication is often unknown.
- 1.17 All groups of officers responding to our data tool noted that their local authority had not removed duplicated data collection processes, and that work to streamline information demands is at best progressing slowly. A number noted that linking data held on old ICT technology, and the continued reliance on paper-based databases to collect and manage data, are not helping to identify nor reduce duplication.
- 1.18 Advocacy groups we spoke to think public services repeatedly, and unnecessarily, ask for personal data, requesting the same information multiple times, for instance; address, age and family make up – creating ‘data fatigue’ and putting people off from applying for services, especially as it is not always clear to citizens why local authorities collect the data. For example, our survey of citizens found that 82% of respondents did not know why their local authority collects so much information on them, and what the authority does with the data they hold about them.

The biggest challenge to making better use of data is...

“Removal of duplicate data and ensuring future effective management of information”

Operational Manager

“Making efficient use of data will be ensuring that we only collect what is necessary once and use effectively across the Authority. Traditionally all service areas have their own data systems that are difficult to share across each other”

Head of ICT

“Developing smart systems that integrate data holding between departments, reduce duplication and allow effective analysis of data”

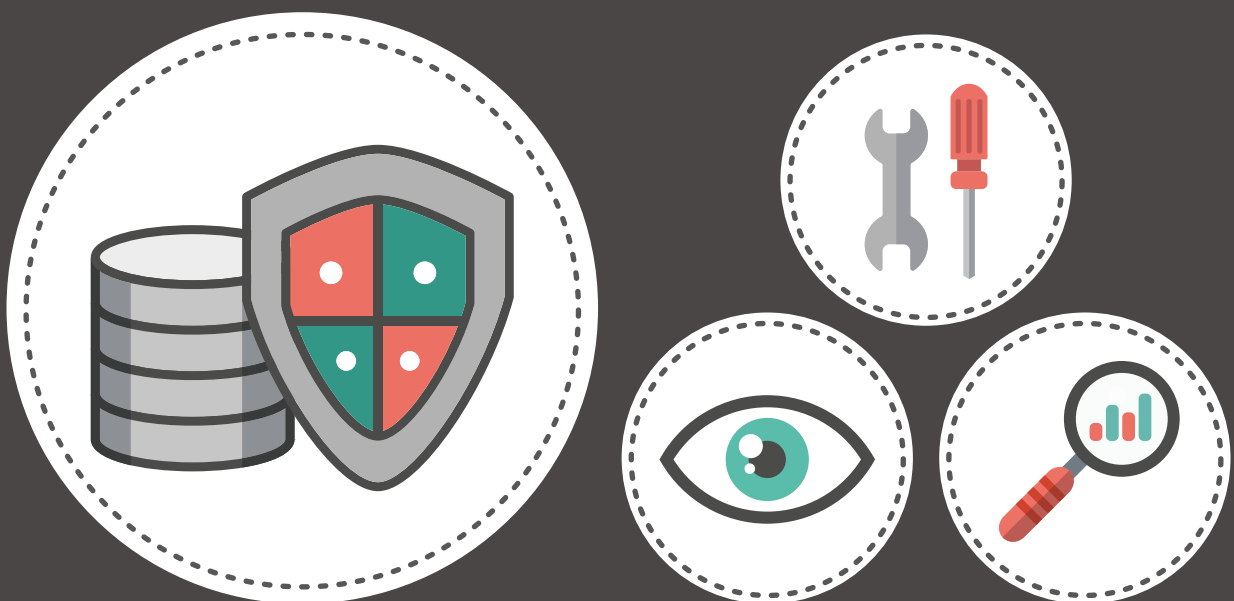
Operational Manager

- 7 A content management system manages the creation and modification of digital content and typically supports multiple users in a collaborative environment.
- 8 A hosting service provides shared or dedicated hosting of a service or services to customers, most often websites, data files, images and similar content. Hosting is often outsourced on basis to reduce cost and to ensure there is a disaster recovery coverage in case of core system failure.

1.19 The needs of professionals and services, not citizens and service users, mostly determines how data is collected. We found that no Welsh local authority operates a central single customer account that links all services to individuals. Some authorities have online portals for services – Gwynedd Council for example – but no authority has created a comprehensive single account that places the service user at the centre of the services they receive. For instance, the London Borough of Camden through its Camden Resident Index is integrating data and matching information from multiple sources to provide a comprehensive and linked overview of residents, properties and businesses – see [Appendix 3](#).

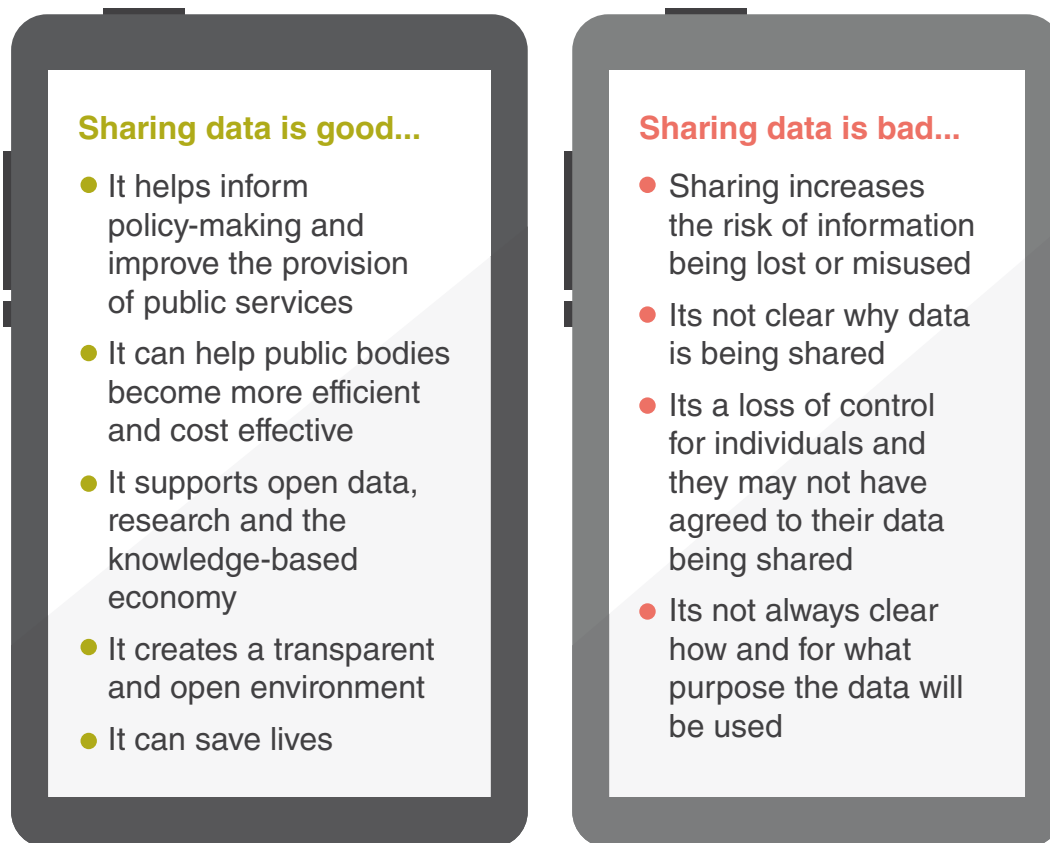
Part 2

Local authorities are generally good at complying with data protection regulations, but do not always share the personal data they collect with partners



2.1 Local authorities are often the gatekeepers of very personal and very sensitive information. They handle all sorts of data on a daily basis, covering everything from income to detailed health and care records. Technological advancements present authorities with opportunities to exploit the wealth of information they possess, by mining, sharing and integrating data with partners. However, using data in the public sector is a delicate balancing act. Local authorities need to protect personal information from data misuse, but in a way that does not suffocate innovation. As a result, many public sector organisations wrestle with the benefits and risks of sharing information with other organisations – **Exhibit 5.**

Exhibit 5 – The benefits and risks of sharing data with other public bodies



Source: Wales Audit Office

2.2 Authorities are making some progress in discussing the need to share data, but too often potential partners are not prepared to participate because of data protection concerns. The introduction of the General Data Protection Regulation (GDPR) in May 2018 has brought these tensions into even greater focus.

2.3 The GDPR requires all public sector organisations to understand how they manage the privacy of data about anyone classed as an EU citizen. This covers citizens, customers, contractors, agency staff, volunteers and employees – anybody that is an EU citizen and where a local authority holds privacy-related data about them. The new regulation means that citizens have significantly more rights and powers on how their data is used and consumed, with large fines available for breaches of the regulation. Citizens also have the ability to request that a local authority provide the details of all the information held about them (called a ‘Subject Access Request’ or SAR).

2.4 Many of the changes introduced by GDPR are enhancements to existing data privacy regulations⁹, but they still present significant challenges. Authorities need to find all the data on ‘persons’, not just most of it. As noted above, this is challenging given data is held in silos, in different systems and in different formats, including data left by citizens using electronic channels and social media. Authorities also need to ‘enact consent’, defining what they will do with data, by whom and what data elements can or cannot be used. They will also need to ensure they have a clear understanding of the ‘right to be forgotten’¹⁰ requirements and constraints.



The biggest challenge to making better use of data is...

“GDPR, the UK Data Protection Bill and the Digital Economy Act all need to be aligned and used as opportunities rather than barriers”

Information Compliance Officer

“The new GDPR requirements and public willingness to allow data to be shared”

Corporate Management Team member

“New regulations (GDPR) coming into force... will be a challenge and current arrangements will require complete review”

Operational Manager

“GDPR... just at the time that we are looking to join data together to help us predict demand and intervene early, residents have the right to tell us to forget what we know about them!”

Corporate Management Team member

9 Personal data is also governed by the requirements of the Data Protection Act 2018 and is defined in the Act as information relating to the racial or ethnic origin; political opinions, religious or other beliefs; membership or otherwise of a trade union; physical or mental condition; sexual life of a person and the commission or alleged commission of any offence or the disposal or sentence in any such proceedings by a court.

10 Under Article 17 of the GDPR, data subjects have an important right to erasure, which is sometimes referred to as ‘the right to be forgotten’.

2.5 From our research, we found that local authorities are confident that they are fulfilling their responsibilities under the 2018 Data Protection Act and making steady progress implementing GDPR. We found that officers:

- a are broadly clear on when and in what circumstances they can share data with other bodies or individuals;
- b know their responsibilities to ensure that the data is processed in accordance with data protection legislation, and know what controls their authority has over personal data;
- c are clear on what they should do if something goes wrong in managing and controlling data; and
- d know where to obtain help and guidance within their organisation on sharing personal data with another public body.

2.6 We also identified a number of continuing challenges, especially an enduring cultural resistance to sharing information in some authorities. Heads of Policy and Operational Managers responsible for frontline services raised concerns about data protection legislation stopping them undertaking projects that involve the use of personal and sensitive data. A number also commented that data protection and GDPR stops them sharing information with partners. Others noted that the legislation is burdensome to comply with, has too many standards and requirements, and is out of kilter with the current policy drive to develop 'big data' capabilities and make available greater amounts of 'open data' online.

2.7 Most importantly, concerns over data protection is encouraging risk-aversion and stifling innovation in using data, because local authority staff fear being penalised. The legal implications of a data error can be severely damaging, not only to the reputation of the organisation but can also mean large civil penalties, criminal prosecution or litigation against individuals for compensation.



The biggest challenge to making better use of data is...

“Convincing business areas that it is possible to share data with appropriate safeguards put in place to erode misconceptions that ‘their’ data cannot be shared”

Information Compliance Officer

“ICT security and data protection constraints can prevent data sharing”

Operational Manager

“Data protection... limits data sharing”

Elected Member

2.8 The **Wales Accord on the Sharing of Personal Information (WASPI)** is a tool to help public bodies share personal information between agencies. WASPI covers public bodies and organisations directly dealing with health, education, safety, crime prevention and social well-being, and can help an organisation meet its data protection responsibilities and support the collaboration and integration of services. We found that there are mixed views on the benefits of WASPI. Although Information Compliance Officers are generally positive about its benefits, members of Corporate Management Teams and Heads of Policy saw it as less helpful.

2.9 We also identified several issues of concern. WASPI has been in place for several years, but the size of agreements can be off-putting and need updating. Furthermore, whilst all major public bodies in Wales are signatories, a number commented that from their experience not all partners act in accordance with, or in the ‘spirit’ of, WASPI. Like much of the data protection legislation, some officers treat WASPI as another reason to block the sharing of data, rather than an enabler for sharing information, mainly because frontline staff are not always confident of their legal responsibilities and when to share data with others.

2.10 The nature of WASPI agreements are not in themselves particularly conducive to sharing because you have to be clear on what you want to access/ share, and how the data will be used, prior to setting up a data sharing agreement. Often, however, the benefits of sharing are not apparent until the agreement is in operation. Finally, ICT issues, including secure methods of data transfer and system compatibility, remain an ongoing challenge to sharing information for some and influence how well, or not, WASPI works.



The biggest challenge to making better use of data is...

“Possible infringement of data protection legislation”

Operational Manager

“Data protection – used as an excuse to prevent data being shared”

Operational Manager

“As staff are more aware of data protection they become scared of it and see it as a barrier to sharing – we need to promote data protection more as a means of sharing information within a legal framework and not as a barrier”

Information Compliance Officer

- 2.11 Even authorities who are using WASPI, and consider it to be working well, such as Denbighshire County Council, have taken the time to clearly set out and specify the personal information they can share, and this can take a long time to get right. It is clear, however, that some individuals will not share information if they do not feel supported to do so. There is no doubt that a strong message from leaders can make a difference. Problems with data sharing between public bodies has therefore practical, legal and cultural risks. Moreover, local authority staff have varying appetites for sharing their data, even in cases where mostly non-personal and non-sensitive data is involved.
- 2.12 With all of this in mind, do the benefits of sharing data with partners outweigh the risks? As one interviewee summarised the challenge, 'no one ever died by sharing too much data, but plenty of people have died by not sharing.' The consequences of not sharing information can be extreme, as judged by the findings of a number of high profile Child Practice and Serious Case Reviews¹¹ and Domestic Homicide Reviews¹², which have identified weaknesses in information sharing that resulted in missed opportunities for intervention¹³. The findings of these reviews provide a persuasive case for sharing information in a balanced, reasonable and permissible way. Local authorities and their partners, who are on top of the legislation, can seek to mitigate potential risks and start to reap the benefits of using, integrating and sharing their data.

11 These are held after a child or vulnerable adult dies or is seriously injured under circumstances where abuse or neglect are thought to have been involved.

12 Domestic Homicide Reviews (DHR) are carried out when someone aged 16 or over dies as a result of violence, abuse or neglect by a relative, household member or someone they've been in an intimate relationship with. The DHR looks at the circumstances that led to the death to enable professionals to understand what happened and what needs to change to reduce the risk of something like this happening again.

13 For example, the February 2015 findings of the South East Wales Safeguarding Children Board Overview Report of children who died in a house fire in 2012.

Part 3

Local authorities are not investing sufficiently in developing their data management capacity and analytics skills



- 3.1 Local authorities hold a vast resource of insight, intelligence and data that has the potential to drive efficiency, direct resource allocation and fundamentally improve the delivery of services. A mature local authority will use data to improve services and transform their organisation, and will have staff and Elected Members who are skilled and confident data users. Having good data analytical skills to inform and direct resource decisions is therefore a key component of a mature approach to using data.

Data analytics refers to the process of crosschecking, cleaning, reorganising and modelling data for decision making. Data analysts gather, arrange, process and model data from different sources to arrive at a conclusion. Analysts are capable of evaluating large volumes of data, be it structured or unstructured, and prepare and present data in the right form for decision-makers and to help solve problems. In the era of big data, data analytics plays a business critical role.

- 3.2 Local authorities, in general, do not have the right skills and capacity to manage data effectively. The weakest area and most significant challenge we identified is reducing resources and a lack of skills, especially in data management and analytics. Despite recognising that good quality and timely data is business critical for authorities, data is not consistently valued as a key resource similar to money, people and buildings.
- 3.3 Local authorities recognise that recruiting and retaining people with the right skills is an ongoing challenge. A number of interviewees noted that budget cuts are stretching resources and capacity, and authorities can sometimes struggle to maintain ICT skills. Local authority Heads of ICT and Policy are generally more negative about the adequacy of resources for data management projects, highlighting in particular insufficient capacity to maintain the integrity and accuracy of databases. Similarly, local authorities recognise they need to do more to identify their specific long-term future data and intelligence needs, and map resource requirements against these.



The biggest challenge to making better use of data is...

“Resources! More resources are required in terms of staff and technology to make the most efficient and effective use of data”

Corporate Management Team Member

“Resources – poor systems and inadequate resilience within staff group”

Operational Manager

“Lack of resources to manage and analyse data properly”

Head of ICT

3.4 Good practice in developing staff in this area does exist. Local authorities who exhibit greater levels of maturity in data management such as Newport City Council have integrated critical corporate functions such as information governance, business improvement and policy development. Newport City Council gauged existing data analysis capacity and identified roughly 50 employees who undertook data analysis as part of their day-to-day duties. As a result, the local authority is creating a central resource to develop and enhance staff skills and capacity to help embed data-driven decision making and generate greater insights into customer demand for services. Another example is the well-considered information management strategy produced by Conwy and Denbighshire Public Services Board (PSB) that focuses on building data skills and capacity – see [Appendix 3](#) for more details.

3.5 Documentation reviewed as part of our study work often highlights that data and information management policies are focused on ICT technology – computer hardware and software, cloud storage and integrated telecommunications – but not enough on improving data usage and analytics skills amongst staff. Whilst ICT infrastructure and the architecture that connects systems and data is important for data to be shared and interrogated, the capabilities and data literacy of local authority staff also need to be developed and improved. Too often, however, local authority staff are not being equipped to match the scale and pace of technological change and the demand for data analytics.

3.6 For example, we found little evidence of local authorities embedding data skills into their work force strategies, and poor levels of data literacy is a reoccurring theme from our data tool. Staff and elected members are often not confident in using the data that they have, in particular information from third parties. Some local authorities also see analytics as the function of data specialists and outside the core business of managing and delivering services.



The biggest challenge to making better use of data is...

“Reductions in staffing levels and skill gaps – specifically staff with good knowledge and understanding of different software systems used for data management”
Operational Manager

“Having the resources to capture and then analyse data to create information needed to secure sustainable quality services”
Corporate Management Team Member

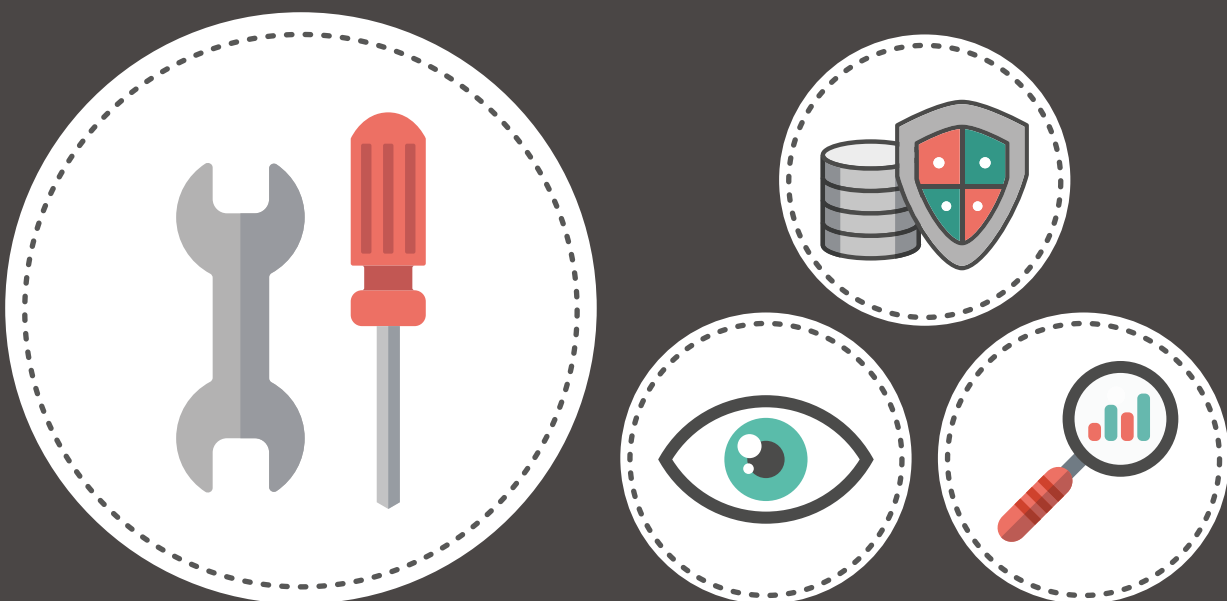
“Understanding of the power of data, the skills to make good use of data”
Elected Member

“Resources and skills shortage in data analytics”
Head of Policy

“Resource to maintain data to appropriate levels of accuracy and updating to reflect those elements that have changed”
Operational Manager

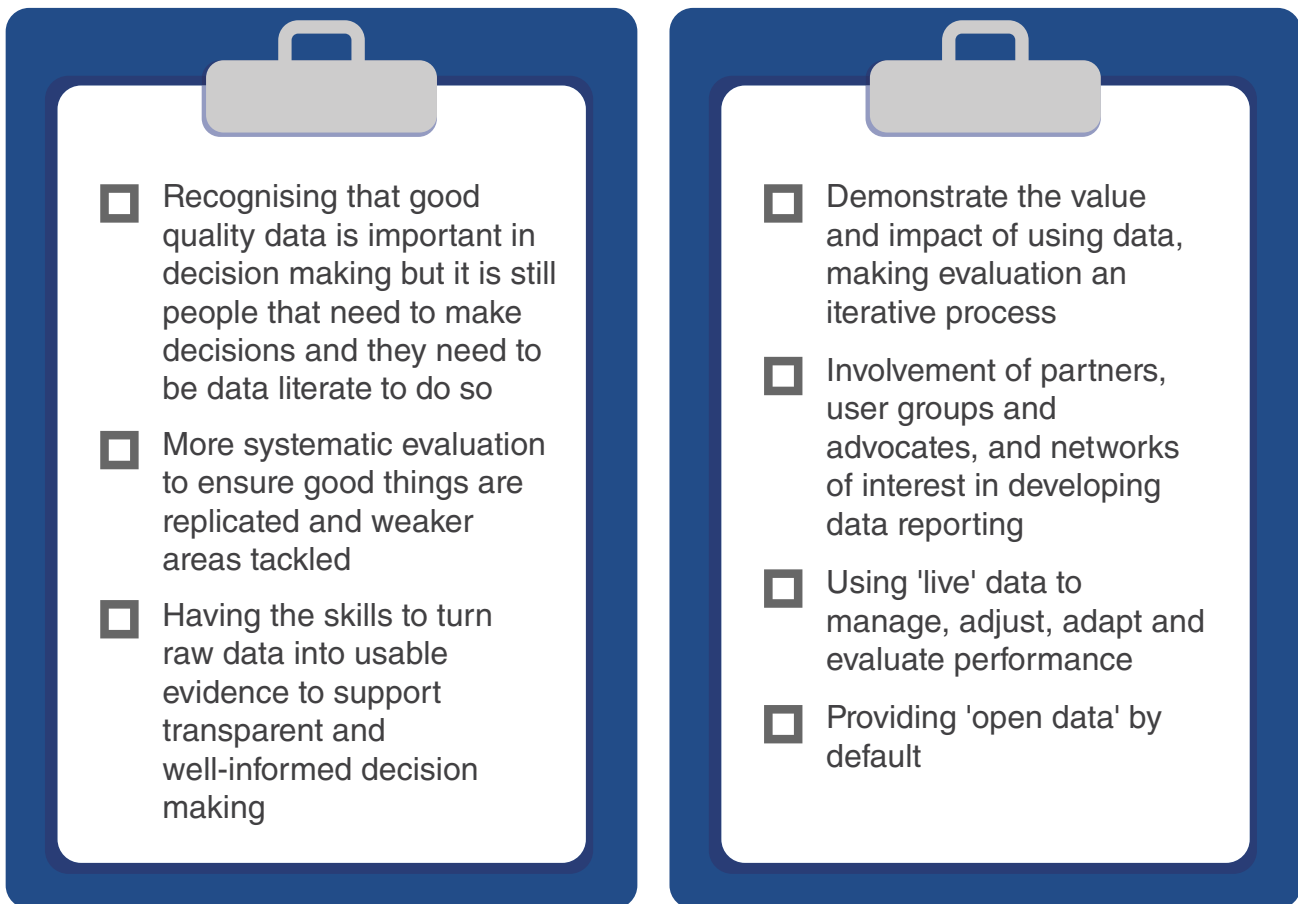
Part 4

Local authorities use data to manage performance, but gaps and weaknesses mean that decisions are not always based on a full range of evidence



4.1 Data-driven decision making is an approach to governance that values decisions that are underpinned by verifiable data. However, the success of the data-driven approach is reliant upon the quality of the data gathered, the effectiveness of its analysis and interpretation, and the processes established to judge impact and performance. **Exhibit 6** summarises the key conditions of a mature local authority with data-driven decision-making culture that we have identified from our study.

Exhibit 6 – Creating a 'data-driven decision-making' culture



Source: Wales Audit Office

Analysing performance is often limited

- 4.2 The fundamentals of good and mature approaches to scrutinising local authority performance have not changed, and reviewing the wide range of available data to judge how well services are performing is critical. The findings of our study highlights some long-standing weaknesses in the effectiveness of local authority scrutiny arrangements remain. The quality and trustworthiness of data remains a concern, especially linking up and drawing evidence from multiple sources. Stakeholders such as research bodies and service user groups we interviewed have generally negative views about the quality and accessibility of local authority performance reporting. Interviewees noted poor use of benchmarking, and a focus on internal rather than external audiences in reporting, which makes it hard for service users and citizens to judge how local authorities are performing.
- 4.3 Some Elected Members noted that the information they receive is often limited in coverage and does not provide sufficient insight for them to be able to challenge performance. Others noted that repeatedly officers overburden scrutiny committees, providing lots of information but little useful evaluation and analysis of the salient issues. We also found a minority of Elected Members raising concerns that the information they receive is ‘manipulated’ or only partial in coverage to avoid bad news and further scrutiny.
- 4.4 Stakeholders we interviewed echo these views, commenting that they have concerns that the data used to justify decisions is not robust nor reliable. For example, the limitations in the data used in equality impact assessments, an issue we have repeatedly flagged in our most recent national audit work¹⁴. Accurate reporting and effective balanced scrutiny are fundamentals of good governance. To build public trust in data, it is essential that local authorities report transparently and accurately, and Elected Members ensure they act responsibly in challenging services and scrutinising performance.



The biggest challenge to making better use of data is...

“Getting members to understand the data. As a Cabinet member I come before Overview & Scrutiny and I do not get questioned as I should be because members either have not read the reports or do not understand them”

Elected Member

“The authority is very selective in the data it shares with members and can be evasive when more detail is sought”

Elected Member

“Knowing how to distinguish between useful and less useful data and knowing what to do with it to measure performance and drive change”

Elected Member

14 See the Auditor General's reports on **How Local Government manages Demand – Homelessness and Housing Adaptations**.

Local authorities are increasing the amount of open data they publish

- 4.5 Open data is an important characteristic of data maturity, and making information available in real time can assist a wide range of organisations to develop new businesses and services. Open data can enable better data sharing across organisations and geographical areas. However, whilst open data supports transparent decision making, we found there is still a way to go to convince some that open data is an opportunity and not a threat. For instance, some Elected Members and local authority officers raised concern that open data can make some aspects of their professional judgement redundant.
- 4.6 The perception by some user and advocacy groups we interviewed is that local authorities are taking small steps in the right direction to use open data to encourage the development of new products or services to meet customers' needs. Stakeholders think that open data only works where local authorities can create demand for it and there is local pool of educated/skilled applicators. Third sector and representative bodies that we interviewed think there is a major skills deficit in maximising open data at this time in many areas of Wales.
- 4.7 Notwithstanding this, the availability of open data is increasing. Examples include customer-facing work in Newport such as the **My Newport**¹⁵ information portal containing detailed ward profiles. Torfaen County Borough Council make open data available through their website and **MyCouncilServices**¹⁶ portal, covering food hygiene ratings, locations and condition of ancient monuments, locations of authority assets such as grit bins, and school catchment areas. South Wales Police are using a neighbourhood **YourArea** section to inform people about crime and events in their area, and to gain feedback. Each page includes future meeting details, local priorities, details for every local officer and PCSO, and a link to the Police.uk page which provides crime statistics published by the Home Office. Camden's **Open Data portal**¹⁷ and **Open Data Charter** is particularly innovative. See **Appendix 3** below for more details of good practice.



The biggest challenge to making better use of data is...

“I think open data is a big opportunity for all Councils to improve engagement with their residents, & to minimise the increasing trend of FOIs. Data is a resource & could be an income generator too”

Elected Member

15 See newport.gov.uk/iShare/mynewport

16 See torfaen.gov.uk/MyCouncilServices

17 See opendata.camden.gov.uk

Decision making is not always driven by effective analysis or evaluation of data

- 4.8 Data-driven decision making is a key element in the maturity of local government in use of data. Our criteria for a local authority with high levels of data maturity are set out in [Exhibit 3 \(Paragraph 9](#) on pages 9, 10 and 11), and suggests the highest level of maturity exists where data-driven decision making is well established and accepted as the 'way to do things'. An organisation that embodies a mature approach to data-driven decision making has some important characteristics. It is derived from, and built on:
- clear leadership;
 - robust policies, systems and processes;
 - adequate resources and evolving skills; and
 - good analysis, reporting and evaluation.

Our work shows that all of these conditions are required, and are linked and mutually supportive.



The biggest challenge to making better use of data is...

“Any performance indicators which are described as good seem to be because the Council is doing a great job, while those which show them not doing well we are told other local authorities submit information in a different way or because of a lack of finance”

Elected Member

“The data, especially that relating to schools' performance, is often unreliable and is frequently presented to members without being subject to any statistical tests”

Elected Member

- 4.9 From our fieldwork, we found that, universally, Elected Members, officers and stakeholders, recognise that data can help local authorities set priorities and make better choices when planning initiatives to deliver desired outcomes. However, most authorities are only just starting to get to grips with all the data they have, and all the ways they could use it to improve decisions and outcomes. Overall, we conclude that local authorities still have some way to go in creating a data-driven decision-making culture.
- 4.10 We found that authorities are not always taking the opportunity to link data sets to build up analysis and deliver more focused insight, especially linking cost and performance data to understand the cost of core activities, such as determining a planning application or collecting a rubbish bin.
- 4.11 Our examination of all 22 local authority corporate plans finds some common shortcomings. Overall, benchmarking, comparative data analysis, and forecasting is weak. Comparative information and data is limited with few comparisons with other areas and with comparable organisations outside of Wales. For example, there is limited predictive analysis¹⁸, which encompasses a variety of statistical techniques to model current and historical facts to make predictions about future scenarios. Likewise, few authorities noted the use of data mining¹⁹ or segmentation analysis²⁰.
- 4.12 Generally, local authorities continue to focus on historical management information, and agree that not enough analysis is undertaken on projecting demands or estimating longer-term trends in performance. The ability to compare with others and to look ahead are important management tools, but local authorities' limited capacity and insufficient skills in data analytics limits the potential for using data to model and transform services.

18 Predictive modelling helps to capture relationships among many factors to allow an assessment of risk or potential associated with a particular set of conditions. Predictive models uncover patterns in historical and transactional data to identify opportunities for decision makers

19 Data mining is the process of discovering patterns in big data to extract information into a comprehensible structure for further use.

20 Segmentation is the activity of dividing a market, normally consisting of existing and potential customers or service users, into sub-groups (segments) based on shared or common characteristics such as needs, common interests, similar lifestyles or even similar demographic profiles to identify potential growth to be able to plan for change and better target responses.

- 4.13 We found some examples of local authorities analysing data to improve services and make better-informed decisions. For example, Swansea City and County Council has analysed the coordination of employment services, and as a result has rationalised and refocused its efforts to support job creation. Likewise, Denbighshire County Council is using data to provide insight on citizens' needs when considering library opening times and in designing efficient waste collection routes. Likewise, Torfaen County Borough Council analysed its data on blockages in foster caring, and used social media and recruitment campaigns to increase the numbers of foster carers.
- 4.14 A consistent message from our fieldwork is that one of the biggest challenges is to make better use of 'live' data to both manage services but also evaluate performance. Unlike emergency services, such as the Police and Fire and Rescue services, who increasingly rely on live data to direct resources and quickly respond to emergencies, local authorities only occasionally use 'live' information (for example, social media feedback) to adjust service delivery and optimise performance. Similarly, whilst authorities use data to manage and decide on resources, financial reporting is often not agile enough to make real time decisions because of the time lag in producing budget data for decision makers. National policy makers echo these conclusions noting that there are some significant challenges in how local government can improve how it uses data²¹. We conclude that there is more for local authorities to do to create a data-driven decision-making environment which supports service improvement and transformation.

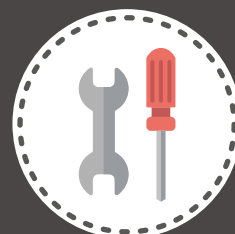
21 For example, the Welsh Government's [Digital Baseline of local authorities in Wales 2017](#)

Appendices

Appendix 1 – Study Methodology

Appendix 2 – Glossary

Appendix 3 – Good practice in use of data



Appendix 1 – Study Methodology

Data Tool – completed by all 22 local authorities covering Corporate Management Team, Operational Managers, Heads of ICT and Policy, Information Compliance Officer and Elected Members. The responses to our Data Tool are set out below:

Respondent Groups	Number invited	Number responding	% responded
Corporate Management Team Members	203	94	46%
Elected Members	1,259	295	23%
Operational Managers	851	434	51%
Information Compliance Officer	22	13	59%
Head of Policy	22	14	64%
Head of ICT	23	14	61%
Total	2,380	864	36%

National interviews with leaders in use of data: Nesta UK, Nesta Wales, Information Commissioner's Office (ICO), Welsh Government Chief Statistician, WLGA, Ofcom, Google UK, Satori Lab, Pinacl Solutions, Alliance for Useful Evidence, UCL Centre for Data Science, StatsWales, Office for National Statistics, Greater London Authority, London Fire Brigade and Camden Council.

Interviews with user and advocate groups including: CVS Cymru, Carers Wales, Gypsies and Travellers Wales, Welsh Third Sector Statistics User Panel and Cardiff Citizens Panel.

Fieldwork at Denbighshire County Council, Newport City Council, Torfaen County Borough Council and the Vale of Glamorgan Council.


Review of use of data in Public Service Board Well Being Plans.



Sample survey of 750 members of the public across all of Wales about awareness of local authorities' use of information held about them.


Appendix 2 – Glossary


- **Data** is factual information such as measurements or statistics used as a basis for reasoning, discussion or calculation that can be transmitted or processed.
- **Statistics** are numbers, data and information which are the underlying basis and evidence for decisions.
- **Information** is practical insight generated by practitioners to help make the best use of available data and knowledge for improving the execution of the organisation's mandate.
- **Intelligence** comprises the strategies and technologies used by organisations for the data analysis of information. The term is often used by the Police to track and predict crime with a view to preventing or curbing it.
- **Evidence** is often analysed data that can help decision makers understand what works, where, why and for whom. It can also point to what does not work, and can avoid repeating the failures of others by learning from evaluations of unsuccessful programmes.
- **Digitisation** means the facility for citizens and business to engage with a local authority over the internet, as well as for staff and elected members to carry out their responsibilities with new and emerging computer-based resources. It also means the ability for businesses and citizens to engage in online life with and beyond the local authority.
- **Data protection.** Personal data is information relating to an identifiable living individual. Whenever personal data is processed, collected, recorded, stored or disposed of it must be done within the terms of the Data Protection Act (DPA). The General Data Protection Regulation aims to give control to citizens and residents over their personal data and applies to data 'controllers'/'processors'
- **Sharing data.** The disclosure of data from one or more organisations to a third party organisation, or the sharing of data between different parts of an organisation see [ICO data sharing code of practice.pdf](#).
- **Big data** can give enhanced insight and aid decision making but can be difficult to analyse using traditional data analysis methods.
- **Open data.** Public services in Wales are putting more and more valuable data into the public domain, allowing citizens to find out more than ever about the performance of public services and hold public bodies to account.
- **Data analytics.** The process of crosschecking, cleaning, reorganising and modelling data for decision making.
- **Personal data.** Information relating to the racial or ethnic origin; political opinions, religious or other beliefs; membership or otherwise of a trade union; physical or mental condition; sexual life of a person and the commission or alleged commission of any offence or the disposal or sentence in any such proceedings by a court.


Appendix 3 – Good practice in use of data

Key Characteristic	Good practice examples
<p>Leadership</p> 	<p>National data leadership</p> <p>Welsh Government’s Digital Action Plan 2017-2020 promotes data as a valuable resource and aims to provide leadership and more support to digital leaders across Welsh Government. The plan identifies the need to improve the way the Welsh Government operates by: Being where citizens are; Empowering Welsh citizens; and use resources efficiently by using digital to a provide step-change in its ability to achieve these goals. The plan provides a framework for achieving this and is based on having inspiring and confident digital leaders at all levels, new skills, and by involving people in the development of policymaking and legislation, and making data open by default.</p> <p>Developing data leadership into organisational transformation</p> <p>Carmarthenshire County Council’s Digital Transformation Strategy 2017-2020 recognises appropriate digital technology is needed for the council to save money and improve services by collaborating with partners and seamlessly sharing and using good quality data. The Council recognises that central to improving access to services and supporting the move towards the generation of more open data is building public confidence in robust information security that protects citizen and business data from misuse and cyber threats.</p>
<p>Corporate standards</p> 	<p>Capacity building to drive a more collaborative culture</p> <p>Digital Flintshire 2017-2022 outlines how Digital Information and Technology will be used to support the County Council’s Improvement Priorities and strategic plans over the next five years. What makes Digital Flintshire different from other strategies is the focus on improving the local digital infrastructure, and in ensuring customers have the digital skills to access services and information online. This includes working with local training providers, partners and the third sector to identify and deliver effective customer training to ensure take up of digital services and support inclusion.</p>

Key Characteristic	Good practice examples
<p>Integrated customer data</p> 	<p>Single ‘Gateway’ to local authority services</p> <p>In 2013, the London Borough of Camden developed a Residents Index (CRI) uniting information from multiple council data sources to create a single, consistent view of residents across the borough and the council services that they are accessing. Camden, like all local authorities, was under pressure to deliver cost savings, whilst at the same time delivering continuous improvement to its service levels and meeting its social objectives. To address these challenges, Camden decided to unite previously siloed information into a 360-degree view of residents’ service engagement.</p> <p>Camden realized that adopting a ‘systems thinking’ approach could help it ensure that residents who registered their details with one service – for example, housing – would not need to give the same information again to other services. Similarly, the council wanted to empower its own staff to work more efficiently by automatically gathering information from other departments.</p> <p>There have been several positive outcomes from the creation of the CRI, including:</p> <ul style="list-style-type: none"> • helping to identify cases of illegal subletting of council housing and in identifying cases of school admissions fraud, thus ensuring that valuable resources go to the residents eligible for them; • enabling the Electoral Services team to maintain an accurate register of electors in the borough. The CRI could validate 80% of data from the electoral roll (which is higher than the 50% rate of the Department for Work and Pensions, which usually validates the council’s electoral data); and • providing critical information to support the council’s Multi Agency Safeguarding hub to identify changes in the composition of households of vulnerable children.
<p>Data protection</p> 	<p>Safe and secure data sharing</p> <p>The Conwy and Denbighshire Local Service Board (LSB) has developed a range of information and policies to encourage safe and secure data sharing amongst constituent partners. The PSB has built on the previous work of the Local Services Board and an Information Strategy and Information Sharing Toolkit will be updated. Training material focuses on lawful data sharing including the Wales Accord on the Sharing of Personal Information (WASPI) and the development of a range of information sharing protocols and products. The PSB is more able to demonstrate how it has used good quality data to derive its strategic priorities for Good Mental Well-being for All Ages; Community Empowerment; and Environmental Resilience. A realistic discussion about the PSB’s role was agreed which is to provide leadership and scrutiny within existing structures, rather than manage projects and integrate services delivery.</p>

Key Characteristic	Good practice examples
<p>Data analytics</p> 	<p>Using data to target prevention work</p> <p>Mid and West Wales Fire and Rescue Authority (FRA) is preventing arson fires and anti-social behaviour by gathering, sharing and using data and intelligence to target their work in priority areas and locations. The FRA collaborates with partners such as the police and council social services to share data to ensure effective targeting of efforts. Data on the cause of fire is captured through the national Information Recording System (IRS). This data is analysed to ensure that intervention activity and future safety messages reflects the risks of fires occurring. For example, with written guidance on hoarding and on giving tailored safety advice to the Gypsy and Traveller Communities. Information from the FRA's Data Portal is analysed at monthly management and station meetings to monitor the number of incidents, injuries and fatalities and to plan resource accordingly.</p> <p>Using data to build shared capacity and make efficiencies</p> <p>Dyfed Powys Police is improving the way it uses data to improve asset management. A wide range of incident and demand data is used to pinpoint optimum locations for police stations. Police officers can to look at crime and performance data on a county, ward and beat level. Data sets are also increasingly being combined, for example in integrating cost and performance information to understand performance and re-direct resources. As a result, investment is directed towards the most suitable assets and opportunities are pursued in to collocating police stations with fire stations, and to create specialist hubs of police expertise.</p> <p>Improving data analytics</p> <p>Dyfed Powys Police is increasing its capacity and capabilities to understand and analyse data more effectively. Examples include analysing data to close some outdated police stations, to co-locate police stations with fire stations, and to create specialist hubs of police expertise. Senior managers look for the peaks, trends, and forecasts in demand to allocate resources. Data sets are increasingly being combined, for example in integrating cost and performance information to understand performance and re-direct resources. Data mining is improving and for an increasing number of data sets, police officers can to look at crime and performance data on a county, ward and beat level. Analytical data is now aligned to operational matters, such as safeguarding and domestic abuse. Using data to profile organised crime and fraud is helping direct specialist resources such as scientific support and cybercrime. Dyfed Powys Police see themselves as a data hungry organisation and recognise where they need to do better.</p>

Key Characteristic	Good practice examples
<p>Data-driven decisions</p> 	<p>Data driven decision making to mobilise resources</p> <p>London Fire Brigade (LFB) operates from more than 100 fire stations across London, and is the busiest fire and rescue service in the UK. LFB developed a Dynamic Cover Tool (DCT) with a private sector provider to assist decision making in emergency service control rooms. The DCT helps to improve incident and risk coverage and ensures resources are used as efficiently as possible. Dynamic cover is the process of relocating available resources to maintain appropriate standards of risk and response cover across an area. DCT software provides a real-time visual aid to support the emergency control officer in moving emergency response vehicles.</p> <p>Integrating data to improve insight and plan strategic responses</p> <p>The Greater London Authority GLA is promoting the development and use of open data. The GLA see the greatest opportunities for open data are in modelling of extreme weather, predicting demand for natural resources, improving air quality monitoring, parking space utilisation, improving information on public transport connections, and on the availability of housing and community assets. Early GLA data open projects included tackling the problems of unlicensed housing in multiple occupations (HMOs), and in reducing the numbers of gambling premises in parts of London with particularly vulnerable people. The GLA is now moving away from its Borough Data Partnership to a data hub based on San Francisco's Data Academy See Data Academy aimed at improving consistency and quality of data sharing, data management, visualisation, analysis and data skills.</p>

Key Characteristic	Good practice examples
<p data-bbox="137 501 261 528">Open data</p> 	<p data-bbox="408 501 1246 562">Using open data to build community capacity and drive economic wellbeing</p> <p data-bbox="408 593 1321 969">Data Mill North is a collaborative project originally set up to tackle the challenge of increasing demands and decreasing resources in Leeds. The aim is to enable people and organisations to explore the different complex relationships between the city’s services and businesses, by collecting open data from multiple sources in a single hub, offering a greater insight into the workings of the city than ever before. The project’s three top priorities are to visibly improve health & wellbeing, drive more housing growth & standards and improve travel & transport infrastructure. Data Mill North is now the single repository in the region for all public services to share data, insight and intelligence on a wide range of topics including local public services, detailed business and economic performance, adult education, and a high number of datasets and sources of housing information.</p> <p data-bbox="408 1001 1321 1218">The project founders are supporters of the Open Data Institute HQ which was established in November 2013. ODI Leeds works to bring social, environmental, and economic value in Leeds by improving data literacy and skills development. To date the project has hosted 668 events, raised an additional £883k in funding and helped 228 people find better paid jobs. All data sources in Yorkshire are currently being mapped – including the private, public and voluntary sector.</p>

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Checklist for local authorities effectively engaging and working with the third sector



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Area	In place	Under development	Not in place
1. Strategic arrangements			
Vision			
The local authority has an agreed vision on how it will work with the third sector that covers all services and all third sector funding.			
The vision has been shared with, and is understood by, all relevant staff in the local authority.			
The vision has been shared with, endorsed by and is understood by elected members.			
The vision has been shared with, and is understood by, the local county voluntary council.			
The vision has been disseminated to third sector organisations working with the local authority.			
Corporate strategy			
The local authority has a corporate strategy for working with the third sector that covers all departments and services.			
The strategy translates the corporate vision into practical actions.			
The local authority has designated a corporate lead for the third sector who is responsible for overseeing and coordinating the totality of the local authority's third sector funding.			

Area	In place	Under development	Not in place
Compact			
The local authority has an up-to-date compact with the third sector.			
The compact clearly outlines and defines the relationship and expectations of the local authority and the third sector in working together.			
There is a shared understanding between the local authority and the third sector about what can be achieved through working together.			
The compact is tailored to the needs of the local area and has been developed in partnership with the third sector.			
The compact is reviewed regularly.			
The compact considers funding made to the third sector from health bodies and police and crime commissioners.			
County voluntary council			
The local authority and the county voluntary council have agreed the latter's remit and responsibilities as well as its limitations.			
There is agreement on how and what the county voluntary council represents the third sector on.			

Area	In place	Under development	Not in place
Partnership arrangements			
The role of the third sector is identified and agreed on all suitable and required partnerships and committees at a:			
<ul style="list-style-type: none"> corporate level – in the work of strategic partnerships and corporate scrutiny committees; 			
<ul style="list-style-type: none"> department level – in specific partnership arrangements to support wider policy agendas within defined areas; and 			
<ul style="list-style-type: none"> service level – on local partnerships and specific service-led initiatives. 			
Understanding engagement with the third sector			
The local authority has a central record of all funding to third sector organisations made by the local authority which is refreshed annually.			
The local authority collates financial information and reports at least annually on the totality of its third sector funding showing:			
<ul style="list-style-type: none"> which organisations are funded by the local authority; 			
<ul style="list-style-type: none"> the contract value; 			
<ul style="list-style-type: none"> which funding mechanisms, either grant or contracts, has been used; 			
<ul style="list-style-type: none"> the length of the contract; 			
<ul style="list-style-type: none"> which department/service has contracted the third sector organisation; 			
<ul style="list-style-type: none"> the measures of success established for the work; and 			
<ul style="list-style-type: none"> what the intended benefits of the work are. 			

Area	In place	Under development	Not in place
2. Funding processes			
Designing services			
The local authority draws on the third sector's expertise and knowledge in designing new services to be provided by the third sector.			
In designing services, the local authority clearly sets out:			
<ul style="list-style-type: none"> • what demand the service is meeting; 			
<ul style="list-style-type: none"> • how it has decided on the type of service that it requires; 			
<ul style="list-style-type: none"> • whether innovative solutions are required; and 			
<ul style="list-style-type: none"> • how the local authority will engage with current and potential providers to further refine and develop the service. 			
Effective award systems			
The local authority has established a single centralised and corporate funding system for the management and ward of all third sector monies.			
The local authority has effective systems to award funding to organisations that sets out:			
<ul style="list-style-type: none"> • a clear funding timetable that is available to all potential bidders so that they can prepare for opportunities; 			
<ul style="list-style-type: none"> • the process that will be used to make a decision (for example, seeking quotations or using a tender or proposal process); 			
<ul style="list-style-type: none"> • the value and risk associated with the various funding routes; 			

Area	In place	Under development	Not in place
<ul style="list-style-type: none"> whether light-touch processes in line with the EU Public Contracts Directive are possible for appointing organisations to deliver the work; 			
<ul style="list-style-type: none"> clear and published criteria that are understood by all organisations seeking funding, including community benefit clauses; 			
<ul style="list-style-type: none"> the cost and resources required for the local authority to oversee and administer the process; 			
<ul style="list-style-type: none"> the length of time that funding will be provided; and 			
<ul style="list-style-type: none"> how full cost recovery will be addressed. 			
Efficient award systems			
The local authority has efficient corporate systems to award funding based on:			
<ul style="list-style-type: none"> concise and clear application processes; 			
<ul style="list-style-type: none"> use of online and electronic systems to distribute and collate information and bids; 			
<ul style="list-style-type: none"> short end-to-end decision-making arrangements; 			
<ul style="list-style-type: none"> the minimum number of stages and processes required to make a decision; and 			
<ul style="list-style-type: none"> decisions being delegated to the lowest level. 			

Area	In place	Under development	Not in place
Grants or contracting			
The local authority has set out the circumstances when it will use grant funding and when it will contract for services. This has been shared with all potential bidders, including the third sector.			
The local authority ensures that this process is consistent and appropriate to the risks and size of the funding provided.			
The local authority's contract terms and conditions are proportionate to the level of funding being made and are specific to the work that is being funded.			
The local authority reviews these funding processes to ensure they are not unintentionally excluding third sector organisations from securing local authority work.			
Training			
The local authority provides training to support the third sector covering:			
<ul style="list-style-type: none"> • how to apply for funding – the dos and don'ts; 			
<ul style="list-style-type: none"> • complying with the local authority's procurement systems; 			
<ul style="list-style-type: none"> • data collection processes; 			
<ul style="list-style-type: none"> • performance management and scrutiny arrangements; 			
<ul style="list-style-type: none"> • payment cycles and performance targets; and 			
<ul style="list-style-type: none"> • contract termination/continuation requirements. 			

Area	In place	Under development	Not in place
3. Managing performance			
Information collection			
The local authority has specified the information required to monitor and evaluate the performance of third sector organisations it funds and this is set out in the agreement for funded work.			
The information only measures relevant activity.			
The systems to collect information are streamlined and efficient, and third sector organisations only submit information once and electronically on agreed timescales.			
Performance review			
The local authority regularly reports third sector funding to scrutiny committee(s) against a balanced and local-authority-wide set of performance information. This covers:			
<ul style="list-style-type: none"> • clear standards of how and what third sector organisations are required to perform against specific to the service the local authority funds; 			
<ul style="list-style-type: none"> • conclusions of external audit/inspection reviews; and 			
<ul style="list-style-type: none"> • relevant service-based performance data. 			
The local authority has the right processes in place to scrutinise and judge performance. These should be proportionate to the value of the funding but ensure that they provide the local authority with assurance that its funding is achieving the expected outcomes.			

Area	In place	Under development	Not in place
Risk management and internal audit			
Risks associated with third sector funding are considered at both a corporate and service level in developing and agreeing risk management plans across the local authority.			
A rolling programme of internal audit systems testing and compliance reviews is undertaken on the local authority's funding of third sector services, systems and practices.			

Agenda Item 8

By virtue of paragraph(s) vi of Standing Order 17.42

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