

**CABINET: DYDD IAU, 14 RHAGFYR 2023 am 2.00 PM**

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Bydd Cyfarfod Cabinet yn ae lei gynnal yn YB 4, Neuadd y Sir, Cyfarfod Aml-Leoliad ar am 2.00 pm

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**A G E N D A**

- 1 Cofnodion y Cyfarfodydd Cabinet a gynhaliwyd ar 26 Hydref 2023 a 23 Tachwedd 2023 (*Tudalennau 3 - 10*)

**Newid yn yr Hinsawdd**

- 2 Adroddiad Monitro Ansawdd Aer Blynyddol (*Tudalennau 11 - 166*)

**Cyllid, Moderneiddio a Pherfformiad**

- 3 Strategaeth Gwrth-dwyll, Llwgwrwbrwyo a Llygredd a Dogfennau Gweithredol - Diweddariad (*Tudalennau 167 - 312*)
- 4 Asesiad Perfformiad Canol Blwyddyn 2023/24 (*Tudalennau 313 - 392*)
- 5 Rheoli Risg Corfforaethol – Chwarter 2 2023/24 (*Tudalennau 393 - 422*)
- 6 Cyfrifo Sail y Dreth Gyngor 2024/25 (*Tudalennau 423 - 444*)
- 7 Adolygiadau Polisi Gwaith Teg (Gweithiwr Asiantiaeth Hirdymor) (*Tudalennau 445 - 456*)

**Tai a Chymunedau**

- 8 Pennu Rhent Tai Cyngor a Thâl Gwasanaeth 2024/25 (*Tudalennau 457 - 524*)
- 9 Argyfwng Tai yng Nghaerdydd (*Tudalennau 525 - 796*)

**Gwasanaethau Cymdeithasol**

- 10 Datblygu Canolfan Lles Byw'n Annibynnol (*Tudalennau 797 - 850*)
- 11 Adolygiad o'r Farchnad Cartrefi Gofal i bobl hŷn a'r dull o bennu ffioedd ar gyfer gwasanaethau gofal a chymorth ar gyfer 2024/5 (*Tudalennau 851 - 930*)

**PAUL ORDERS**  
Prif Weithredwr



**CARDIFF COUNCIL  
CYNGOR CAERDYDD**



**MINUTES**

**CABINET MEETING: 26 OCTOBER 2023**

Present	Councillor Huw Thomas (Leader) Councillors Peter Bradbury/ Julie Sangani (job share) Councillor Jen Burke Councillor Dan De'Ath Councillors Norma Mackie/ Ash Lister (job share) Councillor Sarah Merry Councillor Lynda Thorne Councillor Chris Weaver Councillor Caro Wild
Observers:	Councillor John Lancaster Councillor Rhys Livesy Councillor Joe Carter
Also:	
Officers:	Sarah McGill, Corporate Director Chris Lee, Section 151 Officer Richard Crane, Acting Monitoring Officer Claire Deguara, Cabinet Office
Apologies:	Councillor Russell Goodway

**149 ST DAVID'S HALL UPDATE**

***Appendix 3 of this report is not for publication as it contains exempt information of the description contained in paragraphs 14 and 16 of Part 4 of Schedule 12A of the Local Government Act 1972. In all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.***

***Public and confidential Scrutiny letters were circulated.***

Cabinet considered a report providing an update on the proposed lease of St David's Hall to AMG following the recent enforced closure of the building due to the presence of RAAC (Reinforced Autoclaved Aerated Concrete) planks.

The Cabinet's satisfaction that best consideration duty will be met by the lease to AMG was stated, noting that the Council's ability to bear the continued liability for St

David's Hall and put in the investment required, having regard to the current financial climate, was considered to be beyond the Council's means.

The impact on staff was noted, and it was highlighted that staff and Trade Unions have been fully engaged with. The Leader thanked the staff for their work over the years and noted their continued dedication to St David's Hall.

The Council's commitment to re-open St David's Hall was stated, however, it was noted that the timeline for re-opening is dependent on the ability to obtain contractors to undertake the work given the demand across the UK. In addition, the Council's commitment to the classical programme at St David's Hall was restated and it was highlighted that this is a contractual obligation under the AMG lease.

RESOLVED: that

- 1) authority be delegated to the Director of Economic Development in consultation with the Cabinet Member for Culture, Parks and Events, the Section 151 Officer, and the Legal Officer to conclude negotiations with AMG and other relevant stakeholders to:
  - a. Finalise and enter into a Conditional Agreement for Lease with AMG on the basis of the principles set out in the draft Conditional Agreement for Lease set out at **Confidential Appendix 3**;
  - b. Enter into the lease and associated documents as set out at **Confidential Appendix 3** upon satisfaction of the conditions within the Conditional Agreement for Lease;
  - c. Complete the business sales agreement with AMG for St David's Hall based on the principles set out in the draft business sales agreement attached at **Confidential Appendix 3** upon satisfaction of the conditions within the Conditional Agreement for Lease;
- 2) the continued closure of St David's Hall and the associated consequences set out in this report until AMG satisfy the conditions within the Conditional Agreement to Lease be noted.
- 3) In light of the above, it is unlikely that all employees will transfer to AMG under the Transfer of Undertaking (Protection of Employment Regulations 2006) as envisaged in the July 2023 Cabinet report. As a result, the Council's proposed staff engagement strategy, to manage the closure of St David's Hall as set out in this report, be noted.

MINUTES

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**CABINET MEETING: 23 NOVEMBER 2023**

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Present                               Councillor Huw Thomas (Leader)  
  Councillors Peter Bradbury/ Julie Sangani (job share)  
  Councillor Jen Burke  
  Councillor Dan De'Ath  
  Councillor Russell Goodway  
  Councillors Norma Mackie/ Ash Lister (job share)  
  Councillor Sarah Merry  
  Councillor Lynda Thorne  
  Councillor Chris Weaver  
  Councillor Caro Wild

Observers:                           Councillor John Lancaster  
  Councillor Rodney Berman

Also:

Officers:                             Paul Orders, Chief Executive  
  Chris Lee, Section 151 Officer  
  Debbie Marles, Monitoring Officer  
  Claire Deguara, Cabinet Office

Apologies:

**150   MINUTES OF THE CABINET MEETING OF 19 OCTOBER 2023**

The minutes of the Cabinet meeting of 19<sup>th</sup> October 2023 were approved.

**151   BUDGET MONITORING – MONTH 6 REPORT**

***A letter from the Policy Review and Performance Scrutiny Committee was circulated.***

Cabinet considered the month 6 budget monitoring report for 2023/24. The report provides Cabinet with the details of the projected 2023/24 financial monitoring position as at the end of September 2023 (month 6).

It was noted that the overall monitoring position, as at Month 6, reflects a total projected net annual Council overspend of £5.388 million. This is detailed in Appendix 1 to the report and includes a total directorate net overspend of £7.688

million, partly offset by an underspend against the capital financing budget of £1.500 million and release of contingency for the Council Tax Reduction Scheme.

Overspends due to budget pressures were noted in the following areas –

- Economic Development - largely due to income shortfalls within Culture, Venues and Events and pressures within Property Services, partly offset by a surplus in the Building Services Trading Unit.
- Education – pressures in Home to School Transport, Out of County Placements and Catering were noted. In relation to Universal Free School Meals, uncertainty has been mitigated by a drawdown of £1 million for earmarked reserves.
- Children’s Services – the overspend is primarily due to the placements costs for the authority’s children looked after with sustained demand pressures and price increases resulting in costs exceeding budget.

Slippage on projects was referenced; it was noted that there are a variety of reason for this including increased costs which require value engineering. This in turn creates delays and subsequent inflationary pressures, which serves to highlight the challenging financial climate.

In reference to the budget setting process, it was noted that Cabinet are mindful of the challenges related to budget planning and achievement of savings and will consider how further accuracy can be brought to the modelling process to provide more confidence on achievability.

RESOLVED: that

1. the revenue financial outturn based on the projected position at Month 6 2023/24 be noted.
2. the capital spend and projected position at Month 6 2023/24 be noted.

## 152 INDOOR ARENA FUNDING STRATEGY

***Appendices 1 and 2 of this report are not for publication as they contain exempt information of the description contained in paragraphs 14 and 16 of Part 4 and paragraph 21 of Part 5 of Schedule 12A of the Local Government Act 1972.***

***Public and confidential letters from the Economy and Culture Scrutiny Committee were circulated***

Cabinet received a report seeking agreement to the funding strategy for the new Indoor Arena project, and seeking authority to enter into and execute the DFA suite of legal agreements previously approved by Cabinet in July 2023. The economic benefits that the new arena will bring to Cardiff were highlighted.

The report highlights that, due to inflationary pressures, the cost of the new Indoor Arena had increased from £180m to £280m; Live Nation consortium will take full responsibility for these additional costs. The Live Nation consortium has worked to

reduce the level of cost increase through a review of the Arena design and reconsideration of site infrastructure requirements.

It was noted that the design has now been developed to RIBA Stage 3, including cost plans, which indicate that the scheme is now within the Live Nation consortium's revised affordability envelope, and without any additional financial contributions from the Council.

Appended to the report is a report from the Council's Treasury Advisors (LINK). The report sets out the economic and interest rate outlook, Authority's current capital financing requirement, borrowing policy and options available, accounting and statutory issues for consideration and financial modelling scenarios.

The proposed funding strategy focuses on temporary borrowing arrangements during the three year construction phase of the Arena whilst the Council continues to monitor the interest rate market, with a view to entering into a more long-term borrowing arrangement at a fixed interest rate either a) once the Arena is open and operational, or b) at such a time when the S151 officer, in their professional judgement, and after considering the latest treasury management advice, concludes entering into long-term funding arrangements is most appropriate and affordable for the Council.

It was highlighted that this strategy is different to previous options considered, in that it would mean the Council carrying interest rate risk after signing the Arena DFA. However, a balance is required between certainty of rates and affordability if the Arena Affordability Envelope is to be met.

The key principles of the funding strategy were highlighted to Members with particular attention drawn to the risk mitigation and milestone reviews that will be put into place.

RESOLVED: that

- 1) the Indoor Arena Funding Strategy as set out within this report and in more detail at **Confidential Appendix 2** be approved.
- 2) entry into and execution of the Development and Funding Agreement (DFA), previously approved by Cabinet in July 2023, be authorised and in so doing approve any amendments to the legal documentation as may be necessary, for reasons including but not limited to ensuring consistency between them and finalising any outstanding areas of further deeds and documents which are ancillary to the legal documents approved, subject to consultation with S151 Officer and Legal Officers.
- 3) It be noted that, subject to entering into a DFA with the Arena Developer/Operator and approval by Cabinet of the MSCP Business Case at a future meeting, relevant financial implications will be updated in the Medium-Term Financial Plan, Capital, and Treasury Management Strategies to be consistent with this funding strategy, to form a revised affordability envelope.
- 4) It be noted that Treasury Management Activities are delegated to the S151 Officer and implementation and review of this funding strategy will be

undertaken as part of the annual updates to the strategy and checkpoints in respect to this project specifically as part of post project review.

### 153 **ADVICE SERVICE CONTRACT RECOMMISSIONING**

Cabinet considered a report regarding Advice Service contract recommissioning. The report sets out the proposed procurement arrangements for the advisory services contract from 1 April 2024.

The report details the advice services provided by the local authority and sets out the current and proposed procurement arrangements. The consultation undertaken with the sector was highlighted. Following a consultation event, a new referral system will be put into place alongside a refreshed triage system to ensure customers are directed to the correct level of service first time.

RESOLVED: that

1. the overarching approach for the procurement of the external Advice Service provision be approved.
2. authority be delegated to the Director of Adults, Housing & Communities in consultation with the Cabinet Member with responsibility for Tackling Poverty, Equality & Public Health, to determine all aspects of the procurement process (including finalising the evaluation criteria to be used, commencement of the procurement process, the award of the contracts and all ancillary matters pertaining to the procurement).

### 154 **ACHIEVING A SUSTAINABLE YOUTH WORK OFFER FOR CARDIFF**

***A letter from the Children & Young People's Scrutiny Committee was circulated to Members.***

Cabinet received a report setting out the proposals to deliver a sustainable youth work offer for Cardiff. The report follows the Cardiff Youth Service Review in 2022 and draws upon the recommendations contained within the review report to ensure that the Youth Service offer in Cardiff is sustainable.

The demands on the service post-pandemic were noted given the reported decline in young people's mental health and well-being, increasing poverty and other ongoing societal challenges.

The funding of the service was highlighted; it was noted that funding has been challenging due to the economic climate, however the teams' efforts were congratulated as delivery in such a climate has been challenging. It was highlighted that SPF funding has provided some stability and that, given the extremely challenging financial outlook, discussions on the future funding arrangements for the service would take place as part of the budget process.

The report highlights the proposals for change and the future vision and operating model. This is to develop strong locality teams to respond to the unique needs of the individual communities they serve. It was noted that the locality teams will be located in the areas of highest deprivation, however, a level of universal provision will be available.

RESOLVED: that

1. the proposed vision, principles, and new operating model for Cardiff Youth Service be agreed.
2. the proposed focus upon locality working, to strengthen and integrate youth work disciplines in a locality area, ensuring that teams are responsive to the needs of the community that they serve, be endorsed.
3. It be noted that the Director of Education and Lifelong Learning will provide updates to the relevant Cabinet Member(s) on the delivery of the actions identified within the report, including assurance that resources are appropriately prioritised to address the needs of the most vulnerable and at-risk children and young people.
4. It be noted that senior managers will provide updates to the relevant Cabinet Member(s) on the work being undertaken to integrate the Cardiff Youth Service more effectively with wider services for adolescents.

Mae'r dudalen hon yn wag yn fwriadol



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**LOCAL AIR QUALITY MANAGEMENT – CARDIFF COUNCIL AIR  
QUALITY ANNUAL PROGRESS REPORT 2022**

**CLIMATE CHANGE (COUNCILLOR WILD) AND TRANSPORT &  
STRATEGIC PLANNING (COUNCILLOR DE'ATH)**

**AGENDA ITEM: 2**

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**Reason for this Report**

1. The purpose of this report is to seek approval for the 2023 Cardiff Council (CC) Local Air Quality Management (LAQM) Annual Progress Report (APR), based upon on air quality datasets obtained in 2022, for submission to Welsh Government for approval.

**Background**

2. Poor air quality is now considered the largest environmental risk to public health in the UK.<sup>1</sup> There is clear scientific evidence that shows that air pollution exposure reduces life expectancy by increasing mortality and morbidity risk from heart disease, and strokes, respiratory diseases, lung cancer and other conditions.
3. In the UK, in the context of air quality management, the main air pollutants that are the primary public health concern are particulate matter and Nitrogen Dioxide (NO<sub>2</sub>). In the UK, it has been estimated that an equivalent of 23,500 deaths can be attributed to long-term exposure to NO<sub>2</sub> each year.<sup>2</sup>
4. The principal source of these pollutants is from road transport emissions, particularly from diesel cars. In 2012, the International Agency for Research on Cancer listed diesel exhaust pollution as a Class 1 carcinogen<sup>3</sup> and extended this to all ambient air pollution in 2013<sup>4</sup>.
5. Public Health Wales has stated that poor air quality is the second greatest public health concern after smoking and is the most significant

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<sup>1</sup> Estimating local mortality burdens associated with particulate air pollution', Public Health England, (2014)

<sup>2</sup> Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities: UK overview document' Defra (2015)

<sup>3</sup> International Agency for Research on Cancer, (October 2013)

<sup>4</sup> Every breath we take: the lifelong impact of air pollution', Royal College of Physicians and Royal College of Paediatrics and Child Health (2016).

environmental determinant of health. In Wales, based on data for the period 2011-2012, it has been estimated that an equivalent of 1,100 avoidable deaths can be linked to NO2 exposure each year.

6. Poor air quality does not only cause ill health, but it also has a wider societal cost. Accounting for health service costs and reduced productivity through lost workdays in the UK this is significant, standing at around £20bn every year<sup>5</sup>.
7. Some people are more at risk than others. Air pollution can disproportionately affect vulnerable population groups (e.g., children, older people, people with underlying chronic disease), as well as those exposed to higher levels because of living or commuting in urban or deprived locations<sup>6</sup>.
8. Examining the most recent datasets (2017) made available by Public Health Wales for the total number of all-cause non-accidental deaths registered in the Cardiff and Vale University Health Board area, the long-term mortality burden attributable to air pollution (fine particulate matter and nitrogen dioxide combined) is an estimated effect equivalent to 178-227 deaths.
9. Under Section 82 of the Environment Act 1995 every local authority has an obligation to regularly review and assess air quality in their areas, and to determine whether or not air quality objectives to protect health are likely to be achieved. Where the air quality reviews indicate that the air quality objectives are not being achieved, or are not likely to be achieved, Section 83 of the 1995 Act requires local authorities to designate an Air Quality Management Area ('AQMA'). Section 84 of the Act ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves.
10. The air quality objectives applicable to LAQM in Wales are set out in the Air Quality (Wales) Regulations 2000, No. 1940 (Wales 138) and Air Quality (Amendment) (Wales) Regulations 2002, No 3182 (Wales 298).
11. The 2023 Annual Progress Report provides details on the ratified data for air quality monitoring undertaken in 2022 within the Cardiff Council area.
12. Welsh Government issue statutory policy guidance to Local Authorities under section 88 of the Environment Act 1995 to bring the local air quality management system in Wales into line with the sustainable development principle outlined in Welsh Government's Well-being for Future Generations legislation, 2015. This guidance, with which local authorities must have regard to when carrying out their air quality functions under the Environment Act 1995, sets out that authorities in Wales have to publish an Annual Progress Report (APRI) by 31<sup>st</sup> December at the latest. This report must include monitoring results for the previous calendar year,

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<sup>5</sup> National Institute for Health and Care Excellence 2017

<sup>6</sup> WHO Regional Office for Europe 2016

a progress report on action plan implementation and an update on any new policies or developments likely to affect local air quality.

13. The APR attached in Appendix 1 satisfies the above criteria examining ratified datasets for air quality monitoring undertaken in 2022 within the Cardiff Council area.

### **Background: Welsh Government Clean Air Direction**

14. In 2020, Cardiff Council received a direction from Welsh Government. In response, the Council's published [Full Business Case](#) (Final Plan) set out a series of measures not only aimed at ensuring compliance on the A4161 Castle Street could be achieved in the shortest possible time, but provided city wide air quality improvements. The measures set out and approved by Welsh Government included:
  - Implementation of Electric Buses – 36 Electric Buses;
  - Bus Retro Fitting Programme;
  - Taxi Mitigation Scheme; and
  - City Centre Transportation Improvements.
15. A key component of the Clean Air Plan to deliver compliance was the full implementation of the City Centre Schemes, particularly the City Centre North (Castle Street) Scheme. The schemes would establish a high-quality active travel infrastructure for the city and improve connectivity between key developments by strategically aligning bus routes and enhancing links with the new Transport Interchange. These schemes were due to commence in early 2020, prior to the onset of the COVID pandemic.
16. In June 2021 Cabinet approved the construction of the original City Centre North Scheme as detailed in the Clean Air Plan, albeit on an interim basis. This basis of implementing an interim scheme was on the need that any wider impacts following a full post Covid recovery period could be fully accounted for to ensure that no detrimental impacts in terms of congestion and air quality would result from the Clean Air Scheme.
17. Following implementation of the interim scheme the Council has maintained regular monitoring and assessment of traffic and air quality impacts on Castle Street to demonstrate that compliance is being maintained. The results for 2022 detailed that compliance was achieved with concentrations of 33.8 µg/m<sup>3</sup> recorded.
18. Owing to the decision for an interim scheme being implemented in late 2021, the Council ensured that constant dialogue and ongoing collaboration with Welsh Government officials was maintained to ensure that the Plan remains on course to deliver and maintain compliance.
19. In order to formalise a time period to bring forward a permanent scheme on Castle Street, the Welsh Government have issued the Council with a further legal direction under Part IV of the Environment Act 1995 <sup>7</sup> in

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<sup>7</sup> <https://gov.wales/environment-act-1995-activity-ensure-nitrogen-dioxide-compliance-air-quality-direction-2022-cardiff>

September 2022. The direction sets out measures the Council needs to implement to ensure that compliance for the NO<sub>2</sub> limit value on Castle Street is maintained.

20. In 2022 in order to comply with the Direction, additional assessment works were commissioned to update the previous air quality and transportation modelling, to account for post COVID traffic flows to be assessed in terms of the impact and effectiveness of the Castle Street Scheme. In addition, a further option of removing general traffic from Castle Street was also assessed to provide a possible alternative option for the Council to consider.
21. The modelling works were completed in early 2023, and a report was presented to Cabinet in April 2023, with a view of supporting the original Castle Street Scheme as the preferred option. In August 2023, Welsh Government provided initial approval of the Council's preferred option, subject to the submission of an updated Final Plan. The Council has now submitted this Final Plan and at that time of writing this report is awaiting final approval from Welsh Government.

### **Air Quality in Cardiff**

22. There are currently four Air Quality Management Areas (AQMAs) declared across Cardiff which have all been declared due to exceedances of the annual mean NO<sub>2</sub> Air Quality Standard (40 µg/m<sup>3</sup>), the main source of the pollution being derived from road transport emissions. The established AQMAs are:
  - **Cardiff City Centre AQMA** (declared 1/4/13 to incorporate Westgate Street; formerly St Marys St AQMA);
  - **Ely Bridge AQMA** (declared 1/2/07);
  - **Stephenson Court AQMA** (declared 1/12/10); and
  - **Llandaff AQMA** (declared 1/4/13).
23. **The 2023 Annual Progress Report presents monitoring data captured in 2022.** In line with the Cardiff Council's (CC) statutory duties under Part IV of the Environment Act 1995, Shared Regulatory Services on behalf of CC undertakes regular air quality monitoring at specifically allocated locations across Cardiff using automated and non-automated principles for ambient air Nitrogen Dioxide (NO<sub>2</sub>), Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>), Sulphur Dioxide (SO<sub>2</sub>), Carbon Monoxide (CO) & Ozone (O<sub>3</sub>).

### **Automated Monitoring Network**

24. In 2022, Cardiff had four automatic air quality monitoring sites located at Frederick Street in the City Centre, Richard's Terrace, just off Newport Road, Castle Street and Lakeside Primary School.
25. The Frederick Street (Urban Background) site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub>, SO<sub>2</sub>, CO and O<sub>3</sub> feeding data directly into Defra's Automatic Urban and Rural Network (AURN).

26. The Richard's Terrace site (Urban Traffic/ Roadside monitors on a 24/7 basis measuring levels of NO<sub>2</sub> & PM<sub>10</sub> at that location, feeding data directly into Defra's Automatic Urban and Rural Network (AURN).
27. The Castle Street site was installed as part of the Council's Clean Air Plan and the site monitors on a 24/7 basis measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub> at that location, forming part of the Welsh Air Quality Network.
28. The 2022 results of the monitoring for NO<sub>2</sub>, and PM<sub>10</sub>, at the above-mentioned stations is presented in
29. Table 1.

**Table 1 - Summary of Automated Results for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> as annual averages**

Site Name	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> )	PM <sub>2.5</sub> Annual Mean Concentration (µg/m <sup>3</sup> )
Frederick Street City Centre	17	16	11
Richards Terrace Newport Rd	22	18	N/A
Castle Street	34	20	10

29. The results obtained at all 3 sites demonstrate compliance with the national air quality objectives for both NO<sub>2</sub> and PM<sub>10</sub> which are set at 40 µg/m<sup>3</sup> as an annual average. Full datasets for these monitors are available on the Welsh Air Quality Forum Website <https://airquality.gov.wales/>.
30. Lakeside Primary School (Urban Background) site monitors on a 24/7 basis measuring levels of Polycyclic aromatic hydrocarbons (PAH) at that location, feeding data directly into Defra's PAH Digital (solid phase) Network. SRS serve as a local site operator to this site, however data interpretation is sanctioned by the consultants Ricardo Energy and Environment Ltd. Therefore, the purpose of this site and results derived are not corresponded to any of the limit values outlined for the purposes of LAQM in Wales.
31. In addition to the above monitoring, four additional air monitoring sensors were located across Cardiff during 2022. These monitors provide indicative air quality monitoring data for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. The number of sensors operated in 2022 reduced from seven monitors owing to operational issues with some of the sensors and to allow completion of works on Tudor St for one of the monitors.
32. However, in 2023 the Council has installed a further 47 real time analysers as detailed in paragraph 69.

33. Results captured from the AQMesh analysers in 2022 are summarised in Table 2 below and shows compliance for the relevant air quality objectives where met.

**Table 2 - AQ MESH Data Summary 2022**

Site ID	NO <sub>2</sub> Annual Concentration (µg/m <sup>3</sup> )	PM <sub>10</sub> Annual Mean Concentration (µg/m <sup>3</sup> )	PM <sub>2.5</sub> Annual Mean Concentration (µg/m <sup>3</sup> )
Lower Cathedral Road AQMesh	27.7	12.7	7.6
North Road AQMesh	26.7	9.2	7.1
Lansdowne Road, Canton AQMesh	30.6	17.2	11
Llandaff AQMA AQmesh	27.5	13.9	8.4

### Non-automatic Monitoring Sites

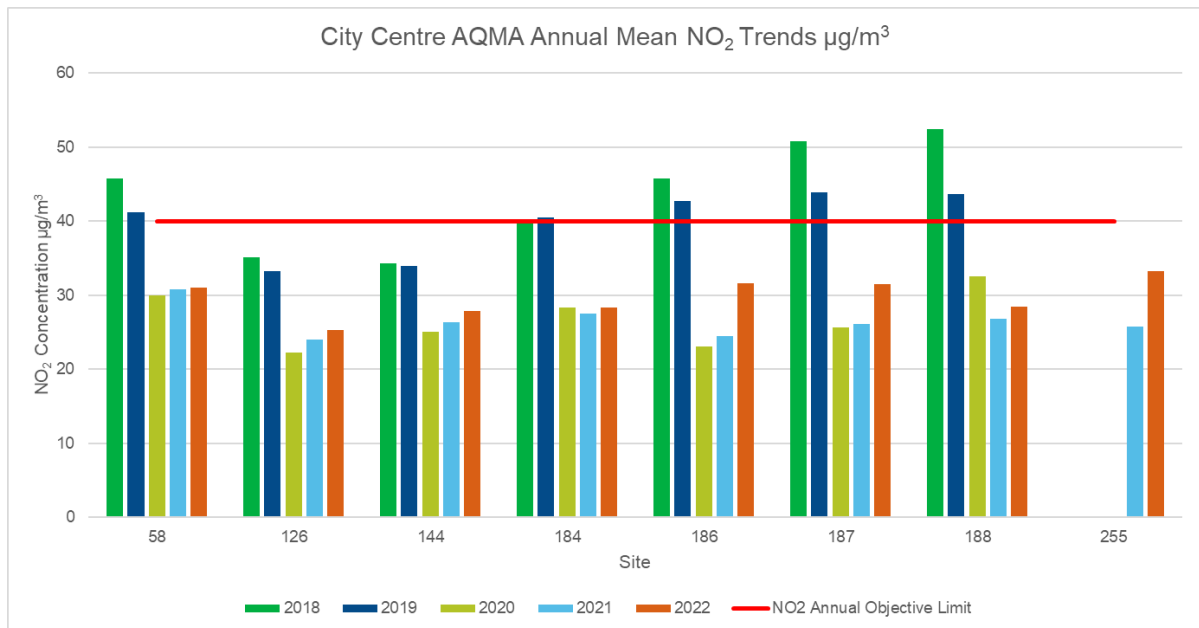
34. In 2022 the Council operated 135 specifically allocated non automatic monitoring sites in Cardiff which monitor levels of Nitrogen Dioxide (NO<sub>2</sub>).
35. **In 2022, out of the 135 non automatic monitoring locations across the entire City, no monitoring sites recorded exceedances of the annual average objective set for NO<sub>2</sub> (40 µg/m<sup>3</sup>).**
36. The results are indicative that the levels of air pollution have improved, across Cardiff compared to pre COVID levels. Given no further COVID restrictions were implemented in 2022, the results from 2022 are likely to be more representative of 'settled' transportation patterns.
37. In accordance with Welsh Government's (WG) Local Air Quality Management Policy Guidance, July 2017, Cardiff Council recognise that there is no defined "safe level" when describing levels of air quality and work remains ongoing to reduce air pollution across Cardiff.

### Results in AQMAs

#### City Centre AQMA

38. Figure 1 displays trends in NO<sub>2</sub> concentrations from non-automatic sites in the Cardiff City Centre Cardiff AQMA. All locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) at all locations in 2022. Improvements in NO<sub>2</sub> concentrations are evident when compared to 2019, although there is a slightly increasing trend in NO<sub>2</sub> concentrations since 2020, reflective of the easing of COVID restrictions and revised transportation behaviours in Cardiff.

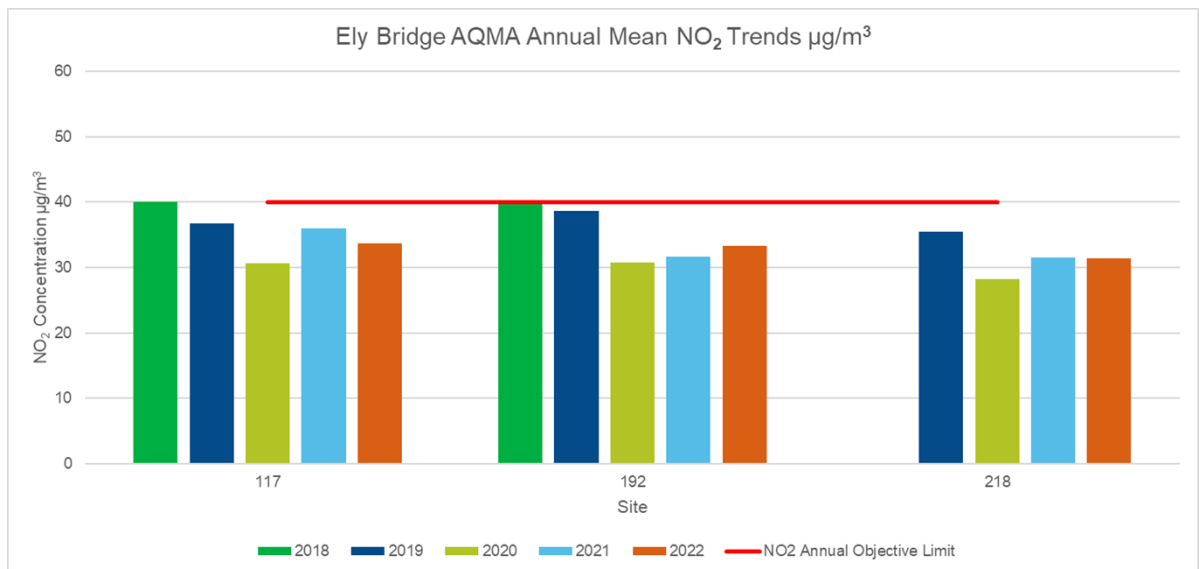
**Figure 1 - City Centre AQMA NO<sub>2</sub> Trends**



### Ely Bridge AQMA

39. Figure 2 displays trends in NO<sub>2</sub> concentrations from non-automatic sites in Ely Bridge AQMA. All locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) at all locations in 2022. Further all locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40 µg/m<sup>3</sup>) since 2018, and a stable trend in NO<sub>2</sub> concentrations since 2020.

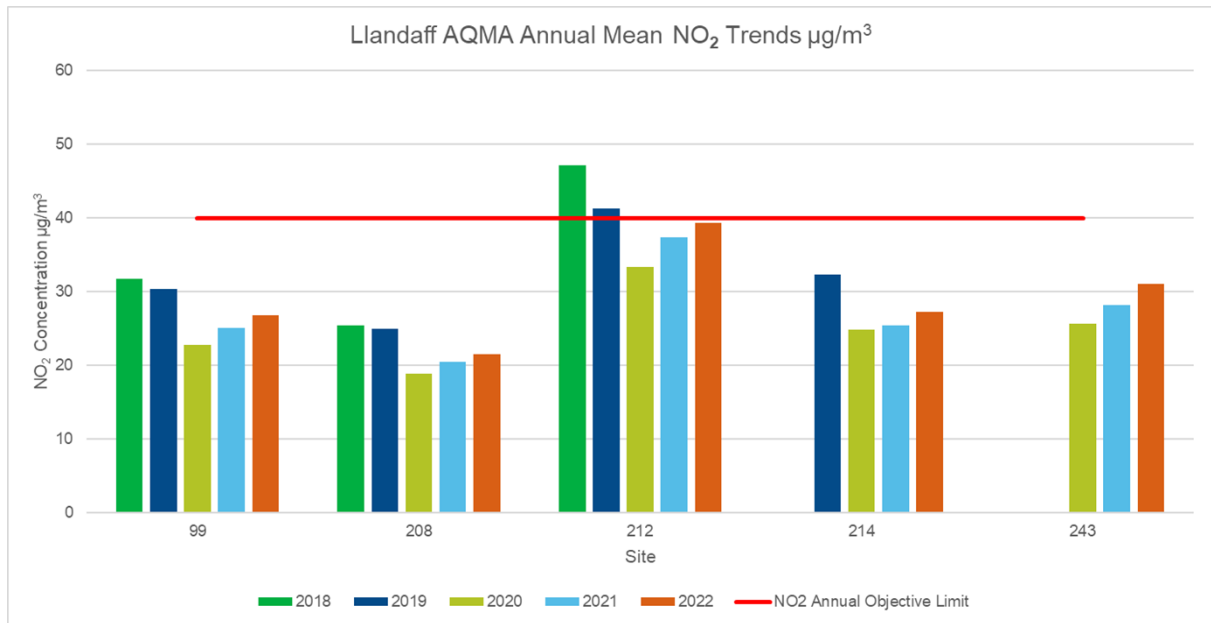
**Figure 2 – Ely Bridge AQMA NO<sub>2</sub> Trends**



### Llandaff AQMA

40. Figure 3 displays trends in NO<sub>2</sub> concentrations from non-automatic sites in Llandaff AQMA. In 2022 all locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>). However, Site 212 is close to exceeding the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) and there is a slight increasing trend in NO<sub>2</sub> concentrations since 2020.

**Figure 3 - Llandaff AQMA NO<sub>2</sub> Trends**



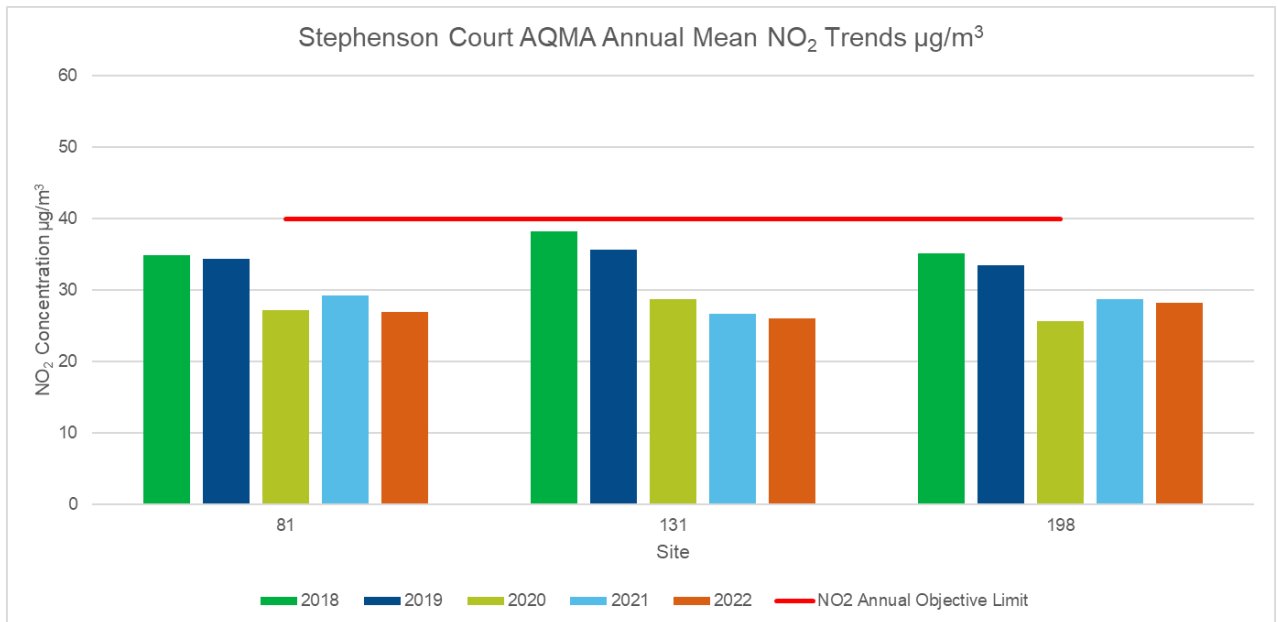
41. Site 212 which did indicate an exceedance of the annual average objective in 2019 with an annual average reading of 41.3 µg/m<sup>3</sup> recorded a concentration of 33 µg/m<sup>3</sup> in 2020. This increased to 37 µg/m<sup>3</sup> in 2021 and has further increased to 39.3 µg/m<sup>3</sup> in 2022.
42. Owing to the continued increase of NO<sub>2</sub> concentrations at this location it will be necessary for the Council to consider additional specific actions for the Llandaff AQMA.
43. As part of this work it will be necessary to develop and assess potential options in order to identify appropriate actions that will look to improve air quality in Llandaff to ensure breaches of the air quality standards do not occur, and that levels of NO<sub>2</sub> start to decrease within the AQMA. This work can be included in an updated Clean Air Strategy for Cardiff, which will be progressed once the implementation of the Castle Street scheme has commenced.
44. As detailed in paragraph 70 below the Council has increased its real time monitoring capabilities and this data will be utilised in these assessments.

### **Stephenson Court AQMA**

45. Figure 4 displays trends in NO<sub>2</sub> concentrations from non-automatic sites in Stephenson Court AQMA. In 2022 all locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) Furthermore all locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) since 2018, and a stable trend in NO<sub>2</sub> concentrations since 2020.



**Figure 4 – Stephenson Court AQMA NO<sub>2</sub> Trends**



### Summary of Results

46. There were no exceedances in either the annual or short-term Air Quality Objectives for NO<sub>2</sub> at any automatic and non-automatic monitoring site during 2022. Results from most monitoring sites in 2022 show slightly increased NO<sub>2</sub> concentrations compared to 2021, but still maintain a reduction compared to 2019 pre-Covid.
47. It is encouraging that for both the Ely Bridge and Stephenson Court AQMAs, concentrations are showing stable and continued compliance with the AQS for NO<sub>2</sub>. Whilst monitoring has continued in 2023 and has been enhanced by the expansion of the real time monitors installed in 2023, the Council may wish to consider future actions at these two AQMAs, which could include reviewing the boundaries or indeed revoking the AQMAs. The Technical Guidance document LAQM TG22 document states *The revocation of an AQMA should be considered following three consecutive years of compliance with the relevant objective as evidenced through monitoring. Where NO<sub>2</sub> monitoring is completed using diffusion tubes, to account for the inherent uncertainty associated with the monitoring method, it is recommended that revocation of an AQMA should be considered following three consecutive years of annual mean NO<sub>2</sub> concentrations being lower than 36µg/m<sup>3</sup> (i.e. within 10% of the annual mean NO<sub>2</sub> objective).*
48. However, any decision on the revocation of AQMA will need to consider the potential of any revised air quality targets as a result of the Environment (Air Quality and Soundscapes) (Wales) Bill.
49. The results to date for 2022 are currently suggesting a stabilisation of results owing to the removal of all Covid restrictions. It is therefore imperative that focussed monitoring within the AQMAs continues and the need for any further action reviewed accordingly.

50. In accordance with LAQM best practise guidance, there are no monitoring sites in the district with annual average concentrations above  $60 \mu\text{g}/\text{m}^3$  in 2022. This is therefore indicative that it is unlikely that the hourly  $\text{NO}_2$  objective was exceeded during this monitoring period.
51. Section 84 of the Environment Act 1995 ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves. Therefore, Cardiff Council has a statutory requirement to produce an Air Quality Action Plan (AQAP) for each identified AQMA.
52. In 2017 the Council gave a commitment to produce a Clean Air Strategy and Action Plan by 2018. This objective of this report was to develop an Action Plan to address air quality issues not only in the AQMAs, but across all of Cardiff.
53. Highlighting this commitment, in 2018, SRS & CC developed a citywide Clean Air Strategy & Action Plan (CASAP) for Cardiff. The strategy coincided with Cardiff's Capital Ambition report and helps to implement and deliver the priorities with an overarching aim to improve air quality to protect and improve public health in Cardiff. The CAS & Action Plan appoints strategic measures that will look to generate a positive impact to citywide air quality levels, in particular traffic derived  $\text{NO}_2$  levels. Each measure has endured a cost benefit appraisal procedure by weighting the measures in terms of air quality impact, cost and timescale. The key theme of the strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff.
54. The CASAP fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP).
55. It will be imperative that the CASAP is reviewed following the full implementation of the Clean Air Plan in order to further prioritise measures, to ensure air quality levels are continuously improved in Cardiff. Therefore, it is likely that the CASAP will need a full review and update in 2024/25, and as detailed earlier specific focus will need to be afforded to improving the  $\text{NO}_2$  concentrations in the Llandaff AQMA as a key priority.
56. Cabinet will be aware of the ongoing work on Road User Pricing (RUP) following previous agreement by Cabinet to progress the WeITAG Stage 2 report at the April 2023 meeting of Cabinet. One of key outcomes of the work will be to provide further improvements to air quality across Cardiff and this will be linked to any updates to the Clean Air Strategy and Action Plan as detailed above. It should therefore be recognised that the work on RUP will be a major policy intervention to deliver long-term continued improvements to air quality and public health in Cardiff.

57. In view of the corporate commitment to deliver active travel plans for all schools, SRS was commissioned by Cardiff Council's Transportation, Policy and Strategy Team to assist with Cardiff Council's Schools Streets pilot project in October 2019, which involves the temporary closure of road links surrounding and initial 6 specific schools in Cardiff.
- Whitchurch High Lower;
  - Ysgol Melin Gruffydd;
  - Peter Lea Primary;
  - Llandaff Church in Wales Primary;
  - Pencaerau School; and
  - Lansdowne Primary.
58. These initial schools were selected for the pilot project owing to an assessment made by the Road Safety Team following numerous concerns and correspondence received relating to road safety issues at these schools. The road layouts at these schools allowed for the project to be accommodated.
59. The Traffic Regulation Order (TRO) is effective during the schools' morning and afternoon drop-off and pick-up hours. This project is seen as an excellent opportunity to take action to encourage parents, staff and children to adopt an alternative mode of travel.
60. Shared Regulatory Services (SRS) has continued to support this project by providing additional air quality monitoring, with a total of 17 schools now being monitored.
61. SRS gather monthly datasets for NO<sub>2</sub> using non- automated passive diffusion tubes, undertaken at the schools' premises, inside the TRO zone at a residential façade and outside the TRO zone at a residential façade. This strategic placement of monitoring sites allows the examination of potential displacement impacts as a result of the adopted TRO zone.
62. The results obtained from each of the school sites indicated **full compliance with the NO<sub>2</sub> annual average objective of 40 µg/m<sup>3</sup> at all sites.**
63. Full details of the results are presented in the Annual Progress Report.

### Welsh Government Legal Direction Update

64. Following on from the development of the temporary approach to mitigating poor air quality impacts on Castle St, Welsh Government, working in full partnership with Cardiff Council, issued the Council with a further legal direction under Part IV of the Environment Act 1995.<sup>8</sup> This direction set out measures the Council needed to implement to ensure that compliance for the NO<sub>2</sub> limit value on Castle Street is maintained.

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<sup>8</sup> <https://gov.wales/environment-act-1995-activity-ensure-nitrogen-dioxide-compliance-air-quality-direction-2022-cardiff>

65. In 2022 additional assessment works were commissioned to update the previous air quality and transportation modelling, to account for post COVID traffic flows to be assessed in terms of the impact and effectiveness of the Castle Street Scheme. In addition a further option of removing general traffic from Castle Street was also assessed to provide a possible alternative option for the Council to consider.
66. The modelling works were completed in early 2023, and a report was presented to Cabinet in April 2023, with a view of supporting the original Castle Street Scheme as the preferred option. In August 2023, Welsh Government provided initial approval of the Councils preferred option, subject to the submission of an updated Final Plan. The Council has now submitted this Final Plan and at that the time of writing this report is awaiting final approval and funding commitment from Welsh Government.

### **EV Taxi Scheme and Taxi Fleet**

67. In Q3 of 2021 the Council procured 5 fully electric wheel chair accessible Dynamo Hackney Carriage Taxis. In partnership with a local vehicle hire company the Council launched an EV Taxi Lease Scheme for licensed Cardiff drivers to take up an EV Taxi. This scheme was initially launched in January 2022. Further details for this scheme can be found at <https://www.electrictaxiswales.co.uk/english/cardiff-scheme>.
68. Unfortunately, the scheme has not seen the uptake of vehicles that was anticipated, and ongoing discussions with Welsh Government have taken place to identify potential improvements to the scheme. In addition, during 2022 Cardiff Council/ SRS as the licensing authority have undertaken further consultation with the Taxi Trade on future licensing amendments. This has resulted in a recent report to the Licensing Authority whereby the committee approved the lifting of the existing moratorium on issuing new hackney carriage plates. The revised agreement will allow new hackney carriage licenses to be issued but only to EVs or Wheelchair Accessible Vehicles with an emission standard of Euro 6 or better. In Q3 of 2021 the Council procured 5 fully electric wheelchair accessible Dynamo Hackney Carriage Taxis. It is hoped this amendment may encourage the uptake of the available lease taxis.

### **Establishing a real-time city-wide air quality monitoring network**

69. In April 2023 the Council completed the installation of a further 47 indicative real time monitors across Cardiff, which monitor for NO<sub>2</sub>, PM10 and PM2.5
70. The location of the monitors were selected on a risk based approach in line with government Technical Guidance and where sensitive receptors are likely to be exposed. The monitors were placed in the city's four AQMAs and more widely across the whole of the city, near areas of concern like schools and health centres.

71. The full results from these monitors will be detailed in the Council's 2024 APR, as this report will provide details of monitoring data from 2023. An initial review of the data from May 2023-September 2023, will shortly be published on the SRS website.

### **Local Member consultation (where appropriate)**

#### **Reason for Recommendations**

72. To enable Cardiff Council to agree a final version of the Annual Progress Report on Local Air Quality Management to Welsh Government to meet statutory reporting requirements.

#### **Financial Implications**

73. The Shared Regulatory Service has an existing budget to complete a programme of air quality management and monitoring across Cardiff. This report sets out the annual progress report based on data monitoring undertaken in 2022 for approval and submission to Welsh Government in line with statutory reporting requirements.
74. Welsh Government issued an additional Air Quality Legal Direction in September 2022 setting out measures necessary to ensure ongoing compliance at Castle Street. Modelling works in this regard were completed and a report presented to Cabinet in April 2023. A final scheme plan for Castle Street has been submitted and is awaiting approval from Welsh Government.
75. The report to Cabinet in April identified that funding would be made available from the Welsh Government towards the capital construction costs of any final approved scheme at Castle Street. The Council will need to continue to work with Welsh Government to maximise any financial contribution and to ensure that terms and conditions of any funding made available are met accordingly.
76. Future reports will need to update on the ongoing work regarding the full review of the Clean Air Strategy and Action plan to take place in 2024/25 and following implementation of any approved Castle Street scheme. The report identifies that consideration will also need to be given to options to address results for the Llandaff AQMA.
77. As part of the development of scheme options, any incremental revenue costs would need to be identified. Where such identified costs cannot be managed within the existing budget framework and/or at the expense of existing maintenance obligations and minimum condition standards set for existing assets, this would need to be considered along with other pressures as part of future medium term budget planning, consistent with an approved asset management plan.

#### **Legal Implications (including Equality Impact Assessment where appropriate)**

78. The recommendations in this report are mainly to note the air quality monitoring results, the update to the Air Quality Legal Direction, and to approve the submission of the Annual Progress Report attached to this report as part of the Council's ongoing reporting requirements.
79. The legislative framework is set out in the body of this report. The decision maker needs to be satisfied that it has all the relevant information available before making any decision and have regard to the further general advice set out in these implications.

### General Advice

80. Any decision must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all circumstances and comply with all equalities legislation.

### Equality Act 2010

81. In considering this matter the decision maker must have regard to the Council's duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must, in making decisions, have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are: (a). Age, (b) Gender reassignment (c) Sex (d) Race – including ethnic or national origin, colour or nationality, (e) Disability, (f) Pregnancy and maternity, (g) Marriage and civil partnership, (h) Sexual orientation (i) Religion or belief –including lack of belief.
82. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers ([WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 \(gov.wales\)](#)) and must be able to demonstrate how it has discharged its duty.
83. The decision maker should be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.

### The Well-being of Future Generations (Wales) Act 2015

84. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible. In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The wellbeing objectives are set out in Cardiff's Corporate Plan 2023-26.
85. When exercising its functions, the Council is required to take all reasonable steps to meet its wellbeing objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the wellbeing objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
86. The wellbeing duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals.
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them.
87. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible online using the link below:  
<http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

### **HR Implications**

88. There are no HR Implications as a result of this report.

### **Property Implications**

89. There are no Property Implications as a result of this report.

## **RECOMMENDATIONS**

Cabinet is recommended to:

1. Note and accept the monitored results gathered in 2022.
2. Approve the 2023 Annual Progress Report (as attached as Appendix 1) for submission to Welsh Government for approval by 31<sup>st</sup> December 2023.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Andrew Gregory</b> Director Planning, Transport & Environment
	8 December 2023

*The following appendices are attached:*

Appendix 1: Cardiff Council Annual Air Quality Progress Report 2023.





# Cardiff Council 2023 Air Quality Progress Report

In fulfilment of Part IV of the Environment Act 1995, as  
amended by the Environment Act 2021

Local Air Quality Management

Date: November 2023

<b>Information</b>	Cardiff Council
<b>Local Authority Officer</b>	Adam Spear
<b>Department</b>	Specialist Enterprise Services
<b>Address</b>	Civic Offices, Holton Road, Barry CF63 4RU
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<b>Report Reference Number</b>	SRS/CC/APR2023
<b>Date</b>	November 2023

## Executive Summary: Air Quality in Our Area

What has become distinctly apparent is that air Pollution is a local and national problem. Long-term exposure reduces life expectancy by increasing mortality, as well as increasing morbidity risks from heart disease and strokes, respiratory diseases, lung cancer and other effects.

What we know is that poor air quality in Wales poses a significant concern for Public Health and is regarded as the most significant environmental determinant of health. Its associated adverse risk to public health is particularly prevalent within urban areas and near major roads. The pollutants of primary concern for public health are particulate matter and primary/ secondary derived nitrogen dioxide (NO<sub>2</sub>). Both pollutants primarily originate from motor vehicles.

The UK expert Committee on the Medical Effects of Air Pollution (COMEAP) estimated that air pollution is responsible for “an effect equivalent of between 28,000 and 36,000 deaths (at typical ages) each year” in the UK. In 2022, the UK Health Security Agency updated this estimate; the burden range is now reported as the equivalent of between 29,000 and 43,000 deaths per year<sup>1</sup>.

The burden range does not reflect ‘actual’ deaths from air pollution exposure but is an estimate of the ‘equivalent’ reduced life expectancy, when summed, which everyone experiences because of air pollution exposure (6-8 months on average but could range from days to years).

In Wales – based on modelled air pollution data pre-pandemic – Public Health Wales estimated the burden of long-term air pollution exposure to be around the equivalent of 1,000 to 1,400 deaths each year<sup>2</sup>. This estimate was calculated using a more accurate method that considers the combined effects of different pollutants, meaning that the overlapping effects of PM<sub>2.5</sub> and NO<sub>2</sub> are accounted for.

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<sup>1</sup> <https://airquality.gov.wales/about-air-quality/health-advice>

<sup>2</sup> <https://phw.nhs.wales/services-and-teams/environmental-public-health/air-quality/air-pollution-and-health-fact-sheet/>

Impact estimates are uncertain, however, which is why they should always be presented as a range of values, rather than a single, central estimate. The estimates are also relevant only to a single time and place and should not be used for comparisons.

Although estimating the burden of air pollution is difficult, there is clear and strong evidence that it does harm health. It is therefore important to take action to reduce air pollution and the harms that go with it.

### **Pandemic Restrictions and the Impact on Air Quality**

The emergency public health restrictions introduced during the pandemic (e.g. lock down and working from home policies) showed just how closely travel, transport and air pollution are connected.

In work commissioned by Welsh Government<sup>3</sup>, the changes in concentrations of different air pollutants during lock-down phases were assessed. It showed that travel and transport are significant contributors to air pollution, and that changes in the need to travel and mode of travel can improve air quality.

Policies that recognise these changes and aim to support them being adopted in the long-term are likely to benefit air quality and health.

Remote and Hybrid working has remained higher than pre-pandemic levels. These working practices contribute towards decreased traffic and emissions on our roads. Data is presented by the ONS (Office of National Statistics) for the UK Annual Population Survey in 2019<sup>4</sup>. In the 12-month period from January to December 2019, in the UK there were an estimated 1.7 million people who said that they work mainly from home; this represents just over 5% of the total workforce.

Levels of working from home peaked during the pandemic, with almost half of working adults (49%) reporting having worked from home at some point in the past seven days in the first half of 2020 (3 to 13 April and 11 to 14 June 2020). Two years later (27 April to 8 May 2022), when guidance to work from home was lifted in Great Britain, around 38% of working adults reported having worked from home. In the most recent period (25 January

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<sup>3</sup> <https://airquality.gov.wales/reports-seminars/reports?page=1>

<sup>4</sup> [Coronavirus and homeworking in the UK labour market - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/employmentandwork/articles/coronavirusandhomeworkingintheuklabourmarket/2020-12-01)

to 5 February 2023) around 40% of working adults reported having worked from home at some point in the past seven days.

### **The Environment (Air Quality and Soundscapes) (Wales) Bill**

The Environment (Air Quality and Soundscapes) (Wales) Bill<sup>5</sup> was introduced to the Senedd on Monday 20 March 2023, giving the Welsh Government (WG) greater ability to tackle air and noise pollution.

The new Bill is part of a package of measures to improve the quality of the air environment in Wales. It will give powers to Welsh Government to introduce new long-term targets for air quality under a national framework taking account of the latest scientific knowledge including the World Health Organisation Air Quality Guidelines

The Bill will help create low emission zones on Welsh Government trunk roads where needed and will give local authorities more power to tackle vehicle idling.

## **Air Quality in Cardiff**

Local authorities have a statutory duty under Part IV of the Environment Act 1995 & Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007 to manage local air quality. Under Section 82 of the Environment Act 1995 the Local Air Quality Management (LAQM) process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether air quality objectives are likely to be achieved.

The air quality objectives applicable to LAQM in Wales are set out in the Air Quality (Wales) Regulations 2000, No. 1940 (Wales 138) and Air Quality (Amendment) (Wales) Regulations 2002, No 3182 (Wales 298). Where the air quality reviews indicate that the air quality objectives may not be met the local authority is required to designate an Air Quality Management Area (AQMA). Action must then be taken at a local level and outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area

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<sup>5</sup> <https://www.gov.wales/new-powers-tackle-air-and-noise-pollution-will-lead-cleaner-healthier-and-greener-future>

improves. Details for Air Quality Objectives Included in Regulations for the Purpose of LAQM in Wales can be found in Table 12.

In line with the Cardiff Council's (CC) statutory duties under Part IV of the Environment Act 1995, Shared Regulatory Services (SRS) on behalf of Cardiff Council (CC) undertakes regular air quality monitoring at specifically allocated locations across Cardiff using automated and non-automated principles for ambient air Nitrogen Dioxide (NO<sub>2</sub>), Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>), Sulphur Dioxide (SO<sub>2</sub>), Carbon Monoxide (CO) & Ozone (O<sub>3</sub>).

With regards to prioritising ambient air quality sampling locations, the Council adopts a risk-based approach to any allocation of monitoring sites, considering the requirements of The Department for Environment, Food and Rural Affairs' (Defra) Local Air Quality Management Technical Guidance (TG22). The designated monitoring locations are assigned based on relevant exposure and where the certain Air Quality Objective levels for a particular pollutant applies. TG22 states that annual mean objectives should apply at "All locations where members of the public might be regularly exposed. Building facades of residential properties, schools, hospitals, car homes etc."

There are currently four Air Quality Management Areas (AQMAs) within Cardiff. These areas are at locations within Ely Bridge, Llandaff, Stephenson Court on Newport Road, and Cardiff City Centre. In 2022, all monitoring locations within the AQMAs were compliant with the relevant objectives for NO<sub>2</sub>. However, one non-automatic monitoring site located within the Llandaff AQMA was close to the annual air quality objective limit of 40µg/m<sup>3</sup>, with a result of 39.3µg/m<sup>3</sup>.

In 2022, all other locations monitored locations within Cardiff show concentrations below the relevant objectives for both nitrogen dioxide and particulate matter.

## **Actions to Improve Air Quality**

SRS and CC are very aware of the concerns for air quality impacts. SRS & CC are committed to achieving levels as low as reasonably practicable by demonstrating levels beyond the annual objectives set for pollutants. In order to improve the air quality in Cardiff, action needed to be taken across the city as a whole. The main air pollutants which cause a public health concern and primarily worsen air quality in Cardiff are particulate matter and primary/ secondary derived nitrogen dioxide (NO<sub>2</sub>), derived by transport vehicles.

Welsh Government's publication: Local Air Quality Management, Policy Guidance, June 2017<sup>6</sup> recommended two clear goals:

- (1) achieve compliance with the national air quality objectives in specific hotspots; and
- (2) reduce exposure to pollution more widely, to achieve the greatest public health benefit.

Collective efforts, therefore, should look beyond targeted action in localised air pollution hotspots and do this in parallel with universal action to reduce risks for everyone.

Section 84 of the Environment Act 1995 ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves. After declaring an AQMA the authority must prepare a **DRAFT** Air Quality Action Plan (AQAP) within 18 months setting out measures it intends to put in place to improve air quality to at least the air quality objectives, if not even better. The AQAP must be **formally** adopted prior to 24 months has elapsed. AQMA(s) are seen by local authorities as the focal points to channel resources into the most pressing areas of pollution as a priority.

In view of the statutory obligation to produce an AQAP for each AQMA, in 2019 SRS & CC developed a citywide Clean Air Strategy & Action Plan (CASAP) for Cardiff. The strategy is an evolving document and coincides with Cardiff's Capital Ambition report, helping to implement and deliver the priorities outlined in the Ambition report with an overarching aim to improve air quality to protect and improve public health in Cardiff. The CAS & Action Plan appoints strategic measures that will look to generate a positive impact to citywide air quality levels, in particular traffic derived NO<sub>2</sub> levels. Each measure has endured a cost benefit appraisal procedure by weighting the measures in terms of air quality impact, cost, and timescale. The key theme of the strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff. The CASAP fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP).

It will be imperative that the CASAP is reviewed following the full implementation of the Clean Air Plan to further prioritise measures and to ensure air quality levels are

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<sup>6</sup> <https://www.gov.wales/sites/default/files/publications/2019-04/local-air-quality-management-in-wales.pdf>

continuously improved in Cardiff. Therefore, it is likely that the CASAP will need a full review and update in 2024/25.

## Local Priorities and Challenges

In addition to Cardiff's four AQMAs and CASAP work, following the formal publication of Defra's UK detailed air quality plan to tackle roadside nitrogen dioxide (NO<sub>2</sub>) concentrations in July 2017, it was identified from air quality monitoring undertaken by Cardiff Council (CC) and modelled projections from WG that Cardiff would continue to exceed EU & UK Air Quality Directive Limit Values for NO<sub>2</sub> beyond 2020. The report detailed modelled projections from the Joint Air Quality Unit (JAQU) which showed continued non-compliance of the national annual average NO<sub>2</sub> standard by 2021 along identified road networks. The roads which have been modelled as exceeding the annual limit value are the A4161, the A4232, the A4234, the A470 and the A48. These areas of exceedence are also featured in the CAS & Action Plan document as any mitigation measures implemented on the referenced road links will have an impact on the LAQM AQMAs.

As a result of the detail in the UK Plan, and a subsequent High Court ruling, in March 2018, under Part IV of the Environment Act 1995, Section 85(7), WG issued a formal direction to CC to address its air quality concerns, with particular reference to the specified five road links. The direction has been governed by the Welsh Minister for Environment who has determined that the direction deemed necessary to meet obligations placed upon the United Kingdom under the **EU Ambient Air Quality Directive (2008/50/EC)**.

The Direction specified that CC had to undertake a feasibility study in accordance with the HM Treasury's Green Book approach, to identify the option which will deliver compliance with legal limits for nitrogen dioxide in the area for which the authority is responsible, **in the shortest possible time.**

Cardiff Council has developed a Clean Air Project Team who have met the necessary reporting requirements outlined by the Direction.

The results of the local modelling presented in the Initial Plan, differed to that undertaken by Defra using the Pollution Climate Mapping model. Defra's modelling identified two road links under baseline conditions which were projected to show non-compliance beyond 2021, namely the A48 and the A4232. The localised modelling identified only one road link



under baseline conditions projected to show non-compliance beyond 2021, this being the A4161 Castle Street, in the City Centre.

Within the Initial Plan Report a long list of measures developed from the CASAP were qualitatively assessed against a primary objective of achieving compliance with set air quality objectives in the shortest possible time. The measures were considered against secondary objectives and were subjected to further qualitative assessments against the WelTAG Well-being Aspects.

The Council's published [Full Business Case](#) (Final Clean Air Plan) documents early intervention measures as well as aspired measures the Council are endorsing to improve localised air quality on the outlined A4161 Castle Street with a vision of improving citywide air quality levels. These measures include;

- Implementation of Electric Buses – 36 Electric Buses to be implemented on a number of routes within the City Centre;
- Bus Retro Fitting Programme;
- Taxi Mitigation Scheme;
- City Centre Transportation Improvements; and
- Active Travel Measures.

The Clean Air Plan initially demonstrated that the outlined package demonstrates the greatest level of compliance on Castle Street, with  $31.9\mu\text{g}/\text{m}^3$  forecasted in 2021 as a result of the implementation of the measures. In addition to achieving compliance on Castle Street, the impact of the package of measures has also been modelled at local air quality monitoring locations, including those locations within existing Air Quality Management Areas (AQMAs). The results of the modelling indicated that all monitoring locations are expected to have concentrations below the  $40\mu\text{g}/\text{m}^3$  which further demonstrates that the package of measures will improve local air quality including within existing AQMAs.

A key component of the Clean Air Plan to deliver compliance was the full implementation of the City Centre Schemes, particularly the City Centre North (Castle Street) Scheme. The schemes would establish a high quality active travel infrastructure for the city and improve connectivity between key developments by strategically aligning bus routes and

enhancing links with the new Transport Interchange. These schemes were due to commence in early 2020, prior to the onset of the COVID pandemic.

In June 2021 Cabinet approved the construction of the original City Centre North Scheme as detailed in the Clean Air Plan, albeit on an interim basis. The decision to install the scheme as an interim measure was done so on the basis it would be necessary to assess any residual impacts following a full post Covid recovery period, to ensure that no detrimental impacts in terms of congestion and air quality would emerge.

Following implementation of the interim scheme the Council has maintained regular monitoring and assessment of traffic and air quality impacts on Castle Street to demonstrate that compliance is being maintained on Castle Street.

Constant dialogue and ongoing collaboration with Welsh Government officials has been to ensure that the Plan remains on course to deliver compliance in the shortest possible time.

In order to formalise a time period to bring forward a permanent scheme on Castle Street, the Welsh Government have issued the Council with a further legal direction under Part IV of the Environment Act 1995 <sup>7</sup> in September 2022. This direction sets on measures the Council needs to implement to ensure that compliance for the NO<sub>2</sub> limit value on Castle Street is maintained.

In 2022 additional assessment works were commissioned to update the previous air quality and transportation modelling, to account for post COVID traffic flows to be assessed in terms of the impact and effectiveness of the Castle Street Scheme. In addition a further option of removing general traffic from Castle Street was also assessed to provide a possible alternative option for the Council to consider.

The modelling works were completed in early 2023, and a report was presented to Cabinet in April 2023, with a view of supporting the original Castle Street Scheme as the preferred option. In August 2023, Welsh Government provided initial approval of the Councils preferred option, subject to the submission of an updated Final Plan. The Council has now submitted this Final Plan and at that the time of writing this report is awaiting final approval from Welsh Government.

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<sup>7</sup> <https://gov.wales/environment-act-1995-activity-ensure-nitrogen-dioxide-compliance-air-quality-direction-2022-cardiff>

## **Electric Buses**

Cardiff Council has been successful in supporting the transition of buses on the Cardiff network to becoming fully electric. Cardiff Bus introduced 36 new electric buses into their fleet from January 2022. It was delivered through a collaboration between Cardiff Bus and Cardiff Council after a successful bid for funding from the Department for Transport's (DfT) Ultra-Low Emissions Bus (ULEB) Scheme that received funding of £5.7m.

## **Bus Retrofit Scheme**

Following an open application process which ended on the 31<sup>st</sup> December 2020, and subsequent review process, two application submissions were deemed successful. Here 80% funding to cover capital costs has been awarded to two bus operators/ companies, a total of £561,612 awarded.

£191,920 has been awarded to Cardiff City Transport Services Ltd (Cardiff Bus) to retrofit 20 buses, and £369,692 has been awarded to Red and White Services Ltd, T/A Stagecoach South Wales to retrofit 29 vehicles.

Both operators completed the programme of works in Q4 of 2021, and have ensured that some of their older buses have improved their NOx emissions by some 90%.

## **EV Taxi Scheme**

In Q3 of 2021 the Council procured 5 fully electric wheel chair accessible Dynamo Hackney Carriage Taxis. In partnership with a local vehicle hire company the Council launched an EV Taxi Lease Scheme with for licensed Cardiff drivers to take up an EV Taxi. This scheme was initially launched in January 2022. Further details for this scheme can be found at <https://www.electrictaxiswales.co.uk/english/cardiff-scheme>.

Unfortunately the scheme has not seen the uptake of vehicles that was anticipated, and ongoing discussions with Welsh Government have taken place to identify potential improvements to the scheme. In addition during 2022 Cardiff Council/ SRS as the licensing authority have undertaken further consultation with the Taxi Trade on future licensing amendments, This has resulted in a recent report to the Licensing Authority whereby the committee approved the lifting of the existing moratorium on issuing new hackney carriage plates. The revised agreement will allow new hackney carriage licenses

to be issued but only to EVs or Wheelchair Accessible Vehicles with an emission standard of Euro 6 or better.

## How to Get Involved

CC welcomes any correspondence relating to air quality enquiries or concerns. Shared Regulatory Services (SRS) Specialist Services Team represents CC for local air quality management and therefore is contactable using the following email address [AirQuality-SRSWales@valeofglamorgan.gov.uk](mailto:AirQuality-SRSWales@valeofglamorgan.gov.uk)

For any enquiries surrounding Cardiff's Clean Air Plan, specifically the roll out of mitigation measures please contact Cardiff's Clean Air Team on [cleanairproject@cardiff.gov.uk](mailto:cleanairproject@cardiff.gov.uk).

Hourly and Monthly average automatic monitoring data for pollutants measured in Cardiff are available to view at <https://airquality.gov.wales/>

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# 1 Actions to Improve Air Quality

## Previous Work in Relation to Air Quality

### Phase 1

The Local Air Quality Management regime commenced with the Air Quality Regulations 1997, which came into force in December of that year. These Regulations were revoked and superseded by the current Air Quality (Wales) Regulations 2000 (as subsequently amended in 2002).

The first phase of the review and assessment process concluded that for six of the seven pollutants included in the regulations there was little or no risk of the objectives being breached and that Air Quality Management Areas (AQMAs) for these pollutants were not necessary. Measures taken at the national level would be sufficient to ensure that there would be no local “hot-spots” of these pollutants and therefore local controls in addition to the national measures would not be required.

However, for the seventh of these pollutants, nitrogen dioxide (NO<sub>2</sub>), it was concluded that national control measures such as vehicle emission and fuel standards, controls on industrial emissions, etc., would not, of themselves, be sufficient to ensure that the air quality objectives for this pollutant would not be met in all areas of Cardiff.

Whilst the vast majority of the area would meet the objectives, there were predicted to be local “hot-spots” close to heavily-trafficked road junctions where there were buildings close to the road and significant amounts of queuing traffic where the objectives would not be met.

As a result, four AQMAs were declared, each having been declared on the basis of measurements and modelling showing predicted breaches of the annual average objective for NO<sub>2</sub>. These AQMAs were known as;

- The Cardiff West AQMA
- The Newport Road AQMA
- The Philog AQMA
- The St Mary Street AQMA

The first three of these came into force on 1st December 2000 and the latter on 1st September 2002. AQAPs the first three were published in November 2002 and for St Mary Street in February 2010.

## **Phase 2**

The Council's 2003 USA concluded that for five of the seven pollutants regulated under the LAQM regime there was no evidence to suggest that local "hot-spots" for these pollutants had been missed in the first phase of the review and assessment process and that there was no need to consider these pollutants further at this time.

The 2003 USA also concluded that no local hot-spots of nitrogen dioxide had been overlooked during the first phase of review and assessment and that further detailed assessment of this pollutant was not necessary.

However, whilst the USA concluded that there was no evidence to suggest a likely breach of the 2004 objective for particulate matter (PM10), there was considerable doubt that the provisional 2010 objectives for PM10 would be achieved.

As a result of the conclusions of the 2003 USA the Council issued Progress Reports in 2004 and 2005.

## **Phase 3**

Following the 2006 USA, the Council published and consulted upon an Air Quality Management Area (AQMA) Review during the autumn of 2006. This concluded that two of the four AQMAs could be revoked and that the then Cardiff West AQMA should be reduced in size and renamed as the Ely Bridge AQMA. Orders making the changes came into force on 1st February 2007.

The 2007 Progress Report highlighted a potential problem with regard to nitrogen dioxide concentrations on Newport Road in the immediate vicinity of Stephenson Court, where concentrations had been marginally, but consistently, above the Air Quality objective for a few years. It was concluded that the possibility of declaring a new AQMA would be assessed in the 2008 Progress Report.

The monitoring data for the Stephenson Court area presented in the 2008 Progress Report led to the conclusion that a further "watching brief" would be kept with a view to reaching a firm conclusion once ratified monitoring data for the 2008 calendar year became available.

The monitoring data for 2007 presented in the 2008 Progress Report provided reassurance that the Council's decisions in respect of the 2006 AQMA Review were soundly based.

#### **Phase 4**

The 2009 USA concluded that a Detailed Assessment for the Stephenson Court area of Newport Road was required as the annual mean concentration of nitrogen dioxide at three sites representative of relevant exposure in the area were above the air quality Objective.

A Detailed Assessment for this area was consulted upon during the summer of 2010 and the AQMA came into force on 1st December 2010.

The Council's 2010 Progress Report was submitted in December 2010 and the 2011 Progress Report in June 2011.

The 2011 Progress Report highlighted abnormally high NO<sub>2</sub> 2010 annual mean concentrations across the Council's monitoring network which could not be attributed to a particular source and evidence was presented to show that this was a regional issue probably associated with a prolonged period of unusually cold weather during November and December 2010. After dialogue with Welsh Assembly Government with regard to the conclusions reached about this data it was concluded that the Council would proceed to Detailed Assessments for the Llandaff and Westgate Street areas of the city and review the situation with regard to other exceedences when 2011 data is available and reported in 2012.

A Further Assessment for the Stephenson Court AQMA was submitted to WAG for review in December 2011, i.e. one year after the AQMA was declared, in compliance with Section 84(2)(a) of the Environment Act 1995.

#### **Phase 5**

The 2012 USA was the first report in Phase 5 of the review and assessment process. Monitoring data for 2011 largely confirmed that the annual mean concentrations of nitrogen dioxide previously reported for 2010 were unusually elevated, both locally and regionally, and local concentrations had returned to more typical values in 2011. Detailed Assessments in respect of nitrogen dioxide in Westgate Street and for the Llandaff area

were consulted upon during the summer of 2012 and as a result a new AQMA for Llandaff was declared on 1st April 2013 and Westgate Street was incorporated into the St Mary Street AQMA; this latter AQMA is now named Cardiff City Centre AQMA.

The Council's 2013 Progress Report recommended proceeding to a Detailed Assessment for the Fair oak Road Roundabout in the Plasnewydd Ward of the city as monitoring data over previous years indicated the need. This was submitted for review during 2014. The Assessment concluded that, as monitoring data for 2013 had returned to Objective compliance, there was no need to declare an AQMA at that time. It was proposed to continue monitoring in the area and review the results year-on-year.

The Further Assessment for the City Centre AQMA was submitted in April 2014 and the conclusion that the declaration of the AQMA was justified was accepted.

A Further Assessment for the Llandaff AQMA was also submitted for review in 2014. This concluded that the declaration of the AQMA was justified based upon monitoring data available at the time. However, as monitoring data for 2013 showed compliance with the Objective, it was concluded that there was no need to develop an Action Plan at that time. Monitoring would continue and the situation would be reviewed year-on-year.

In summary, there are currently four AQMAs in Cardiff; all have been declared in respect of NO<sub>2</sub> resulting from road-traffic emissions:

- Cardiff City Centre AQMA
- Ely Bridge AQMA
- Stephenson Court AQMA
- Llandaff AQMA

## **Phase 6**

The 2015 USA was the first report in Phase 6 of the review and assessment process. Monitoring data for 2014 largely confirmed that the annual mean concentrations of nitrogen dioxide previously reported for 2010 were unusually elevated, both locally and regionally, and local concentrations had returned to more typical values in 2011.

Monitoring data for 2015 indicated that annual mean concentrations of nitrogen dioxide were not unduly elevated during the year and that in some locations concentrations may

have been lower than expected. The 2016 Progress Report showed a number of sites representative of relevant exposure with exceedences of the  $40\mu\text{g}/\text{m}^3$  annual mean objective, however these sites and recorded exceedences were not out of character as were predominantly contained within the declared AQMAs.

### **2017 Annual Progress Report**

There are a number of sites representative of relevant exposure with exceedences of the  $\text{NO}_2$  annual mean objective ( $40\mu\text{g}/\text{m}^3$ ). These sites are predominantly contained within the declared AQMAs. However, there are four monitoring locations (Site IDs 172, 180, 181, 185) which are not located within AQMAs.

Site 172 (Ocean Way) is a kerbside location situated up to 650m from any relevant exposure, used to examine potential impacts of traffic resulting from industrial development in the area.

Sites 180 & 181 were implemented due to new developments with the potential for adverse air quality impacting the amenity of future occupants (Windsor House, Windsor Lane & Fitzalan Court, Newport Road). Both developments were under construction in 2016, therefore influencing any datasets recorded. Only recently has the student accommodation at Windsor House been completed and construction still continues at the Fitzalan Court site.

Site 185 is not representative of relevant exposure and does not apply to the annual mean objective set for  $\text{NO}_2$ . Therefore, datasets collected at this monitoring location would apply to the 1-hour objective set for  $\text{NO}_2$  ( $200\mu\text{g}/\text{m}^3$ , not to be exceeded more than 18 times per year).

Monitoring for other pollutants did not result in other exceedences of National Air Quality Standards.

Due to technical issues, Cardiff City Centre's AURN site recorded low data capture for  $\text{PM}_{10}$  measured by a TEOM- FDMS sampler. The total data capture for the year was 47.1%. As outlined in LAQM (TG16) the data from the sampler has been annualised in accordance with Box 7.9 and the 90.4th Percentile value has been given to examine the 24 hour objective.

It was decided not to revoke the Llandaff AQMA. Since the declaration of the Llandaff AQMA in 2013, results have highlighted that levels of  $\text{NO}_2$  are generally improving and are

now below the national objective of  $40\mu\text{g}/\text{m}^3$  at locations of relevant exposure. Based on recent results the Council could be minded to revoke the AQMA. However, the 2017 APR highlighted that any decision made to revoke the AQMA needs to be mindful of the potential development of the strategic LDP sites to the north of the AQMA, Plasdwr and BBC Studios. Whilst detailed air quality assessments undertaken as part of the planning process have modelled that there is unlikely to be a detrimental impact on air quality levels in the AQMA, this can only be fully verified through on going monitoring.

Therefore, in an effort to reassure local residents and to be totally satisfied that levels will remain compliant with the  $\text{NO}_2$  standard, SRS on behalf of CC reviewed the non-automatic monitoring network of  $\text{NO}_2$  diffusion tubes for 2018. As a result, new and amended monitoring sites have been allocated. Officers will further assess the potential to implement real-time capabilities in the Llandaff AQMA as part of the Council's statutory duties under Part IV of the Environment Act 1995. There are now four monitoring locations within the Llandaff AQMA.

Monitoring for other pollutants did not result in other exceedences of National Air Quality Standards.

### **2018 Annual Progress Report**

Monitoring data for 2017 indicates that annual mean concentrations of nitrogen dioxide recorded at sites of relevant exposure, within the already established AQMAs, continue to be elevated or exceed the annual mean  $\text{NO}_2$  Air Quality Standard ( $40\mu\text{g}/\text{m}^3$ ).

The datasets indicate that the annual average objective for  $\text{NO}_2$  was breached at monitoring locations outside of the existing AQMAs (Sites 172, 179, 180 & 181).

It is felt that at this stage no further detailed assessments are required;

Site 172 is placed on Ocean Way to monitor potential impacts of traffic resulting from industrial developments in the area. The site is not representative of relevant exposure, the nearest being  $>650\text{m}$  away. For 2018 Site 172 has been revoked from the monitoring network as it is felt that a strong trend of data has been collected at this location.

The 1-hour objective for  $\text{NO}_2$  need only apply to site 179.

Sites 180 & 181 were implemented to monitor air quality levels and therefore the potential impacts to future occupants at new development sites. These developments were still under construction in 2017 and therefore datasets collected will be negatively influenced.

The report also documented the works ongoing to produce the CASAP document, as well as outlining the development of the Feasibility Study in line with the Legal Direction received from the Welsh Minister.

### **2019 Annual Progress Report**

Monitoring undertaken in 2018 confirmed annual average NO<sub>2</sub> levels continued to breach or encroach upon set limit values/ air quality standards within already established AQMAs (7 exceedances of the annual mean objective in total).

The report provided an update regarding the completion of the Clean Air Strategy and Action Plan document (CASAP), as well as an update of mitigation measures proposed to address air quality concerns for Cardiff. The report also documented the finalisation of the Full Business Case (FBC) and its outcome in accordance with Welsh Government's issued Legal Direction.

### **2020 Annual Progress Report**

The 2020 reported identified that in 2019, out of the 100 diffusion tube monitoring locations, 6 monitoring sites recorded exceedances of the annual average objective set for NO<sub>2</sub> (40 µg/m<sup>3</sup>). All 6 monitoring locations were recorded within the already established City Centre and Llandaff air quality management areas (AQMA).

The report provided an update on the monitoring undertaken at 9 schools across Cardiff where previous studies from Client Earth identified the schools to be in close proximity to road links likely to cause exceedances of the NO<sub>2</sub> air quality standards. Monitoring undertaken at the 9 schools fully demonstrated continuous compliance with the annual average air quality standard for NO<sub>2</sub> for two success years. The report also provided an update of monitoring undertaken at a further 6 schools as part of a citizens science project funded by Natural Resources Wales. Again monitoring at these 6 schools demonstrated compliance with the objective for NO<sub>2</sub>.

The report documented the approval from Welsh Government of the Final Clean Air Plan and awarding of funding to ensure the Council delivered compliance with the NO<sub>2</sub> limit value under the legal duties of the Ambient Air Quality Directive.

## 2021 Annual Progress Report

Monitoring data for 2020 indicated that annual mean concentrations of nitrogen dioxide recorded at sites of relevant exposure, within the already established AQMAs, all showed compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>). The results are indicative that the impacts of the COVID lockdowns and restrictions therein have had an impact on pollution levels in Cardiff which is likely owing to traffic volumes having decreased. It is therefore likely that the concentrations recorded in 2020 are not representative of a true business as usual scenario and the results have generated a bias/ underestimation of levels of pollution across Cardiff in 2020.

## 2022 Annual Progress Report

Monitoring data for 2021 indicates that annual mean concentrations of nitrogen dioxide recorded at sites of relevant exposure within the already established AQMAs are compliant with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>). The results are indicative that the impacts of the COVID lockdowns and restrictions at the beginning of 2021, and the subsequent behavioural changes once restrictions were lifted, may have influenced pollution levels in Cardiff in 2021. It is therefore likely that the concentrations recorded in 2021 are not representative of a true business as usual scenario and the results have generated a bias/ underestimation of levels of pollution across Cardiff in 2021.

Therefore, monitoring within the AQMAs has continued in 2022, consideration of any future actions for the AQMAs will be assessed by the Council once an assessment of the longer-term recovery from Covid has been determined.

The implementation of COVID measures in the City Centre accelerated the Council's achievement of compliance with limit values for NO<sub>2</sub> under the Ambient Air Quality Directive, on Castle Street. The Interim implementation of the Castle Street Scheme as approved by Welsh Government, was completed at the end of October 2021. The Council has ensured ongoing monitoring has been undertaken. At the time of writing this report further assessments using updated traffic data, collected post Covid, are being undertaken so as the Council can undertake further detailed assessments in order to identify the most suitable permanent solution for Castle Street. The assessments will enable the Council to comply with the most recent legal direction from Welsh Government.



## Air Quality Management Areas

Air Quality Management Areas (AQMAs) are declared when air quality is close to or above an acceptable level of pollution (known as the air quality objective (Please see [Appendix A](#)). After declaring an AQMA the authority must prepare an Air Quality Action Plan (AQAP) within 18 months setting out measures it intends to put in place to improve air quality to at least the air quality objectives, if not even better. AQMA(s) are seen by local authorities as the focal points to channel resources into the most pressing areas of pollution as a priority.

A summary of AQMAs declared by Cardiff Council can be found in Table 1. Further information related to declared or revoked AQMAs, including maps of AQMA boundaries are available online at <https://uk-air.defra.gov.uk/aqma/list>

Table 1 - Declared Air Quality Management Areas

AQMA	Relevant Air Quality Objective(s)	Comments on Air Quality Trend	Description	Action Plan
Cardiff City Centre	NO <sub>2</sub> annual mean	This year's monitoring results indicate an improvement in air quality compared to pre-covid data obtained in 2019.	Former St Mary Street AQMA with the addition of Westgate Street in Cardiff City Centre	<a href="#">Cabinet 13 June 2019 Clean Air Appendix 1 Clean Air FBC.pdf (modern.gov.co.uk)</a>
Llandaff	NO <sub>2</sub> annual mean	This year's monitoring results indicate an improvement in air quality compared to pre-covid data obtained in 2019. However, one monitoring locations displays NO <sub>2</sub> concentrations close to the objective limit	Centre on Cardiff Road through Llandaff village	
Stephenson Court	NO <sub>2</sub> annual mean	This year's monitoring results indicate an improvement in air quality compared to pre-covid data obtained in 2019.	From NE and NW boundaries of Stephenson Court, NW boundary of Burgess Court, NW and SW boundaries of Four Elms Court, SW corner of Four Elms Court south across Newport road to the junction with Orbit street, West across Newport Road to the SE corner of Stephenson Court	
Ely Bridge	NO <sub>2</sub> annual mean	This year's monitoring results indicate an improvement in air quality compared to pre-covid data obtained in 2019.	A number of residential premises along the A48 Cowbridge Road West,	

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AQMA boundary maps within Cardiff can be viewed at [https://uk-air.defra.gov.uk/aqma/local-authorities?la\\_id=394](https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=394) and are included in Appendix D.

## Implementation of Action Plans

Cardiff Council has taken forward several measures in pursuit of improving local air quality. Details of all measures completed, in progress or planned are set out in Table 2. More detail on these measures can be found in the Air Quality Action Plan relating to designated AQMAs.

Air Quality Action Plans are continuously reviewed and updated whenever deemed necessary, but no less frequently than once every five years. Such updates are completed in close consultation with local communities.

Each of the outlined AQMAs were declared as a result of road-traffic derived Nitrogen Dioxide (NO<sub>2</sub>).

Section 84 of the Environment Act 1995 ensures that action must then be taken at a local level which is outlined in a specific Air Quality Action Plan (AQAP) to ensure that air quality in the identified area improves. After declaring an AQMA the authority must prepare a **DRAFT** Air Quality Action Plan (AQAP) within 18 months setting out measures it intends to put in place to improve air quality to at least the air quality objectives, if not even better. The AQAP must be **formally** adopted prior to 24 months has elapsed. AQMA(s) are seen by local authorities as the focal points to channel resources into the most pressing areas of pollution as a priority.

In view of the statutory obligation to produce an AQAP for each AQMA, in 2019 SRS & CC developed a citywide Clean Air Strategy & Action Plan (CASAP) for Cardiff. The strategy is an evolving document and coincides with Cardiff's Capital Ambition report, helping to implement and deliver the priorities outlined in the Ambition report with an overarching aim to improve air quality to protect and improve public health in Cardiff. The CAS & Action Plan appoints strategic measures that will look to generate a positive impact to citywide air quality levels, in particular traffic derived NO<sub>2</sub> levels. Each measure has endured a cost benefit appraisal procedure by weighting the measures in terms of air quality impact, cost and timescale. The key theme of the strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff. The CASAP fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP).

Table 2 - Progress on Measures to Improve Air Quality

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
<b>Modal Shift &amp; Influencing Travel Choice</b>											
1.1	Increase Bus Use	Alternatives to private vehicle use	Proposals are in place for a park and ride system at Junction 33 which would look to intercept traffic on the A470, north Cardiff.	CC	No definite Start Date		Bus patronage figures produced via telematics	Unknown	The preparation of a draft Park and Ride Strategy for Cardiff has begun, and the Park and Ride at Junction 33 is being planned for delivery by the developer	Ongoing	
1.2	Promotion of cycling and walking	Promoting Travel Alternatives	DRAFT Cycling Strategy sets out to double number of cycling trips by 2026; 9.2%	CC	Ongoing		Cycle trips generated/ questionnaires	Unknown	Draft report and Cabinet Report seeking approval to undertake statutory consultation	Ongoing	

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No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 56			modal share in 2015 to 18.4% in 2026. Five cycleways proposed. The INM prioritises cycling and walking routes over 15 year period.						has been prepared and will be considered by Cabinet in JThe number of responses and technical work required means that it will not be possible to evaluate comments and make appropriate adjustments to draft Map and complete it in time to meet Welsh Government's (WG) 31st December 2021 deadline. WG		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 57									officers to be informed that Cardiff unable to meet 31st December 2021 deadline and Council officers will seek extension of deadline in light of exceptional level of engagement on Cardiff's Active Travel Network Map		
	1.3	School Travel Plans	CC has engaged with 'Living Streets' charity and have developed a 'WOW' (Walk	CC & Living Streets Charity	Ongoing		Report updates from Living Streets	Unknown	In 2021 this has increased to 43 schools	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
1.4	School Travel Plans		Once a Week) scheme in 7 allocated schools in Cardiff.								
			Cardiff Council's Schools Streets Project and its Traffic Regulation Order (TRO) pilot project.	CC	Ongoing	Monthly average NO <sub>2</sub> levels examined at School property, Inside TRO and Outside TRO zone at residential facades.  Questionnaires for school pupils and parents.	Unknown	15 schools assigned to the TRO Zone pilot project.	End of 2022 (Subject to funding, possibly longer)		
1.5	Personalised Travel Planning	Promoting Travel Alternatives	Public Service Board Staff Charter.	Public Health Wales/ Vale and	Working initially through Cardiff Public Services Board, a Healthy Travel Charter for Cardiff has been developed with		Modal shift counts.	Unknown	The Charter was signed by 11 public sector organisations at launch in April 2019, employing over 33,000 staff, with additional public and private sector		

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No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
				Cardiff Health Board	major public sector employers and was launched in April 2019.		Number of participating public sector organisations.		organisations subsequently invited to sign up to the Charter.		
1.6	Increase awareness of air quality concerns	Public Information	Cardiff 'car-free' day	CC	Completed 2019		Air Quality Measurements.	No target	When comparing Sunday 19th May to Car-Free Day event 12th May, the daily average reduction for NO2 is as follows;  Duke Street/ Castle Street- 16.11%  Stephenson Court on Newport Road- 28.15%  Westgate Street- 13.62%  Lower Cathedral Road- +9.14%		Try to geographically expand and hold car-free days more regularly in Cardiff.
			Tredegarville CIW Primary School "Green Wall" project.	CC	Complete	August 2019	Air quality levels recorded at the school via non-automated	No target	Successful application under the Landfill Communities Fund to cover the supply and installation of outdoor green walls at Tredegarville CIW Primary	Investigate monthly average diffusion tube results following implementation.	

Tudalen 59

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 60							principle diffusion tubes.		School. Successfully installed August 2019.  Additional Schools have been included in further Living Wall Projects in 2022.		
	1.8		Dusty Forge/ Kitchener Primary School/ Birchgrove Primary School. Green Wall Projects	CC	Ongoing	November 2020	Air quality levels recorded via non-automated principle diffusion tubes.	No Target	Welsh Government's 'Local Places for Nature' scheme. In summary it is proposed to install green walls at 2 Council owned buildings in areas of poor air quality and develop a citizen science project with the local community to monitor changes in air quality and biodiversity.		Investigate monthly average diffusion tube results following implementation
<b>Infrastructure</b>											
2.1	Bus Route Improvement	Transport Planning and Infrastructure	City Centre Improvement Schemes (3	CC & WG	2018	2019 (City Centre West Initiated)	FBC	To ensure development does not cause	City Centre West (central Sq Scheme)	2024	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 61			elements East side/ City Centre North/ City Centre West)			2020 (city centre north and east initiated)		any adverse impact and where possible reduce levels to as low as reasonably practicable. Package of City Centre Schemes deemed to improve air quality levels for Castle Street. Revised modelling shows levels of 28 µg/m <sup>3</sup> will be achieved.	continued construction throughout 2021, with view of completion by 2023 for opening of Bus Interchange in 2023.  Castle Street remained closed through most of 2021, with interim scheme installed and opened from bnov 2021.  City Centre East scheme commenced site preparation works in		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									November 2021, with main works commencing early 2022.		
2.2 Tudalen 62	Public Cycle hire Scheme		Ovo Bike Hire Scheme	CC	Ongoing		Daily reports on usage provided to CC. 150,000 rentals reported since March 2018.	Unknown	50 docking stations installed providing 500 bicycles for public use. Extra 500 bicycles assigned to Cardiff for the end of Summer 2019.  Completion of the rollout of the Ebike fleet by September 2021, delivering a new fleet of	Completed and continues to be expanded and enhanced.	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									125 bikes in up to 15 rental stations. Completion was delayed into Q1/2 of 2022		
2.3	Cycle Network		Proposed Cycleways	CC & WG	Ongoing		Cycling trip counts.	3.5% modal shift which aligns with the assumptions derived in the feasibility study.	Cycleway 1 St Andrew's Crescent to Senghennydd Road ( <b>works are complete for phase 1 of cycleway 1.Phase 2 constructed in 21/22</b>  Phase 1 between Cowbridge Road and Western Avenue via	Ongoing	

Tudalen 63

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress In Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		<p>Sophia Gardens and Pontcanna Fields has been fully delivered and the Council has completed a detailed consultation on the options for Phase 2 which will connect Western Avenue with Llandaff village.</p> <p><b>Pop Up Cycleways</b></p> <ul style="list-style-type: none"> <li>•Cross City Scheme complete and ready for</li> </ul>									Tudalen 64

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress In Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		<p>junction switch on when traffic conditions allow</p> <ul style="list-style-type: none"> <li>•Bay Pop Up complete, now requires new street lighting to be compliant with safety regulations.</li> <li>•Scheme to open officially once the lighting work is complete</li> </ul> <p>Hailey Park</p> <ul style="list-style-type: none"> <li>•Scheme awaiting tender following consultation outcome</li> </ul>									Tudalen 65

Comments Relating to Emission Reductions	Estimated Completion Date	Progress to Date/ Progress In Last 12 Months	Target Annual Emission Reduction in the AQMA	Indicator	Implementation Phase	Planning Phase	Lead Authority	Focus	Category	Measure	No.
		<p>Cycleway 5</p> <ul style="list-style-type: none"> <li>•Scheme out to consultation</li> <li>•Scheduled to be on site Q1/2 2022-23</li> </ul> <p>Cycleway 1</p> <ul style="list-style-type: none"> <li>•Scheme entered on site September 2021</li> <li>•Work progressing well</li> <li>•Controlled Parking Scheme to follow early 2022</li> </ul>									Tudalen 66



No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
2.4	Public transport improvements- interchanges stations and services		New Cardiff Central Interchange development	CC	Ongoing		Detailed AQAs quantifying the level of impact to air quality levels.	To ensure development does not cause any adverse impact and where possible reduce levels to as low as reasonably practicable	Construction of the Interchange has continued throughout 2021, and remains on course to be completed in 2023.	S106 funding acquired for the amount of £10,000 to enhance air quality monitoring capabilities.	
	Public transport improvements- interchanges stations and services 20 mph zones		Cardiff Capital Region Metro -Proposed by WG (Rail and bus based rapid transit routes).	CC	Ongoing			Unknown- supporting AQA will be a likely during the design and application stages	Good progress has been made to identify measures to encourage the use of sustainable travel as the economy recovers in partnership with the Welsh Government, the Burns Delivery Unit, Transport for Wales, City Region, public transport operators and key stakeholders. These measures include corridor improvements for Active Travel, bus priority, ongoing financial support for the bus services,	Ongoing	

Tudalen 67

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 68 2.5									integrated ticketing pilot between Cardiff and Newport in 2022, plans for new transport interchanges (Cardiff Central, Waungron and Cardiff Parkway) and study work on new Metro station and line improvements.		
			Implement further speed restrictions and enhance those already established "20mph Zones"	CC & WG	Ongoing		Safety figures & Monthly Average Diffusion tube results.	Unknown	CC has introduced 'signs only' 20mph limits in Cathays and Plasnewydd area. Approach coincides with the Safe Routes to School Programme.  Plans are in place to	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
									hopefully expand 20mph limit areas in Grangetown. This is complete.		
2.6 Tudalen 69	20 mph Zones	Traffic Management		CC	Implementation		Realtime Monitoring	Unknown	Cardiff North Area has been included as a Pilot Area for WG assessment into 20 mph where existing limits are 30 mph. This study will assist in National roll out of 20 mph as default urban speed limit.	2022	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
2.7	20 mph Zones	Traffic Management		Welsh Gov	Implementation		Realtime Monitoring	Unknown	Cardiff North Area has been included as a Pilot Area for WG assessment into 20 mph where existing limits are 30 mph. This study will assist	Nationwide September 2023.	
<b>Lower Emission Vehicles</b>											
3.1	Public Vehicle Procurement		Ultra-Low Emission Bus (ULEB) fund made available by the Department		Ongoing	Three year rolling programme 2019- 2021	Improvements to air quality levels (NO <sub>2</sub> ) monitored by indicative methods by CC at sensitive receptor	Approximately >2µg/m <sup>3</sup> reductions in NO <sub>2</sub> sensitive receptor locations along Westgate Street	Application received by DfT and deemed successful. Initial buses delivered in November 2021 and all 36 launched in January 2022.		

Tudalen 70

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
			for Transport (DfT).				locations on specified routes				
3.2	Company Vehicle Procurement- Prioritising uptake of low emission vehicles/ EV recharging	Promoting Low Emission Transport	Sustainable fuels strategy- assessment of Cardiff Council vehicle fleets	CC, DfT & Cardiff Bus	Ongoing	Economic savings and reduced Carbon footprint	Unknown	End of 2021 59 charge points across 7 Council sites fully implemented.  6 Rapid chargers which will support charging for 12 refuse Vehicles.  7 E RCV in service with.  11 EVs on order for purchase or	Ongoing		

Tudalen 71

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 72								being delivered prior 31st March. 1 on pre-order, which will be in by the end of the year. The total will be 37 on fleet by the end of 2022, which are all purchased, owned vehicles.			
	3.3	EV recharging	Increase EV charging points for Cardiff residents/workers.	CC	Ongoing		EV vehicle counts/ EV point usage.	Unknown	Progression of residential EV charging locations has ensured that 15 locations with a total of fast charging points have been	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 73									<p>installed across the City. Second phase of 5 sites with 1 charge points was being progressed before being impacted by COVID – these are now planned for late August/ early September.</p> <p>6 Rapid Charging stations have been installed with site operator Osprey Charging at</p>		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 74									locations in the City Centre and Bay .  Two additional schemes looking will increase to increase the number of publicly accessible charging stations in the city from 58 to around 75 before the end 2022.		
	Taxi incentive to operate cleaner vehicles		Improve the emission standard profile of Cardiff's licensed	CC	Ongoing		Uptake for the funding.	To ensure development does not cause any adverse impact and where possible	Due to COVID-19, the launch of the scheme was impacted and ongoing discussions with WG on use of allocated funding..		To achieve greatest air quality improvements zero emission or ULEV classified



No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 75 3.5			Hackney and Private Hire Vehicles. Clean Air Funding allocated to provide EV grants for taxis.					reduce levels to as low as reasonably practicable			vehicles need to be incentivised.
	Cardiff Clean Bus Retrofit Scheme 2020-21		Improve the emissions profile by improving the euro standard composition of bus fleets operated in Cardiff. Via a competitive tender application process, Cardiff	CC & WG	COMPLETED 2021/22		Number of bus vehicles converted;	FBC identifies that the retrofit alone would achieve compliance on Castle Street 39.6 µg/m <sup>3</sup> with 150 vehicles retrofitted.	Scheme went live on 1 <sup>st</sup> October 2020 and a total of 49 buses have been retrofitted as of September 2021.		

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress in Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
Tudalen 76			Council will administer a retrofit scheme aimed at improving the emission output of bus vehicles operated in Cardiff.								
	<b>Policy</b>										
4.1	Citywide strategy to reduce emissions and improve air quality		Cardiff Clean Air Strategy and Action Plan (CASAP)		2018		Recorded Improvements to air quality levels (NO <sub>2</sub> ) monitored by indicative methods by CC at sensitive receptor locations	Annual average NO <sub>2</sub> levels to be recorded at <35µg/m <sup>3</sup> at residential façade locations with specified AQMAs.	Finalised and approved by Cabinet. Submitted to Welsh Government for review.	Ongoing	

No.	Measure	Category	Focus	Lead Authority	Planning Phase	Implementation Phase	Indicator	Target Annual Emission Reduction in the AQMA	Progress to Date/ Progress In Last 12 Months	Estimated Completion Date	Comments Relating to Emission Reductions
4.2	Taxi Licensing Conditions	Policy Guidance and Development Control	Amendments made to Cardiff taxi licensing conditions to promote a cleaner fleet.	CC	2019- 2020		Taxi fleet composition %.		Impacted owing to COVID impacts on Taxi trade during 2020-21	Ongoing and will need to be reviewed in 2023	
4.3	Transport White Paper	Promoting Low Emission Transport	The Transport White Paper was launched on 15 January 2020 and lays out an ambitious 10-year plan to tackle the climate emergency, reduce congestion and improve air quality.	CC	2020- 2030		Improved air quality levels/ journey time. Sustainable modes patronage.	To generate air quality levels as low as reasonably practicable.	Published document 2020.		

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## 2 Air Quality Monitoring Data and Comparison with Air Quality Objectives

### Summary of Monitoring Undertaken in 2022

#### 2.1.1 Automatic Monitoring Sites

This section sets out what monitoring has taken place and how results compare with the objectives.

SRS on behalf of CC undertook automatic (continuous) monitoring at three sites during 2022. Table 3 presents the details of the sites.

National monitoring results are available at <https://airquality.gov.wales/>.

In addition to the above monitoring, four additional air monitoring sensors were located across Cardiff. These monitors provide indicative air quality monitoring data.

Maps showing the location of the monitoring sites are provided in Figure 1 and Figure 2. Further details on how the monitors are calibrated and how the data has been adjusted are included in Appendix C.

#### 2.1.2 Non-Automating Monitoring Sites

SRS on behalf of Cardiff Council undertook non- automatic (passive) monitoring of NO<sub>2</sub> at 135 sites during 2022. Table 4 presents the details of the sites.

Maps showing the location of the monitoring sites are provided in Figure 3 to Figure 7. Further details on Quality Assurance/Quality Control (QA/QC) and bias adjustment for the diffusion tubes are included in Appendix C.

Table 3 - Details of Automatic Monitoring Sites

Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Monitoring Technique	Relevant Exposure? (Y/N with distance (m) to relevant exposure)	Distance to kerb of nearest road (N/A if not applicable)	Does this location represent worst-case exposure?
Cardiff City Centre AURN	Urban Background	318416	176525	NO <sub>2</sub>	N	Chemiluminescence	Y (5m)	200m	N
				PM <sub>10</sub> , PM <sub>2.5</sub>		TEOM- FDMS	Y (5m)	200m	N
				SO <sub>2</sub>		UV Fluorescence	Y (5m)	200m	N
				CO		Infra-Red GFC	Y (5m)	200m	N
				O <sub>3</sub>		UV Absorption	Y (5m)	200m	N
Cardiff Newport Road AURN	Roadside/ Urban Traffic	320095	177520	NO <sub>2</sub>	N	Chemiluminescence	Y (12m)	4.5m	N
				PM <sub>10</sub>		Beta Attenuation Monitor with Gravimetric Equivalence	Y (12m)	4.5m	N
Cardiff Castle Street	Roadside/ Urban Traffic	318055,	176459	NO <sub>2</sub>	N	Chemiluminescence	Y(2m)	2m	Y

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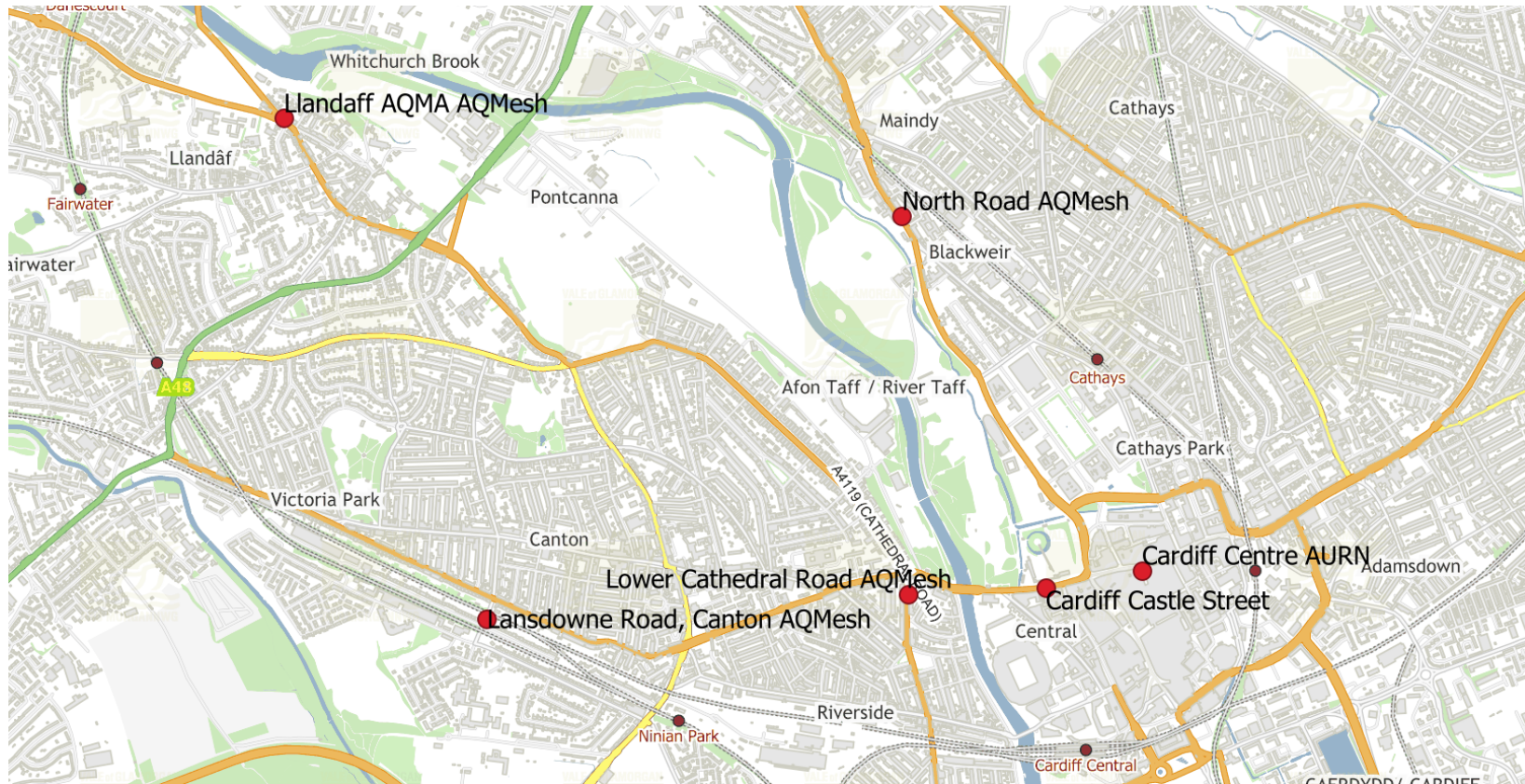
Site Name	Site Type	X OS Grid Ref	Y OS Grid Ref	Pollutants Monitored	In AQMA?	Monitoring Technique	Relevant Exposure? (Y/N with distance (m) to relevant exposure)	Distance to kerb of nearest road (N/A if not applicable)	Does this location represent worst-case exposure?
				PM <sub>10</sub> , PM <sub>2.5</sub>	N	Beta Attenuation Monitor with Gravimetric Equivalence	Y(2m)	2m	Y
Lower Cathedral Road AQMesh	Roadside/ Urban Traffic	317540	176437	NO <sub>2</sub>	N	Electrochemical Sensor	Y (0.5m)	1.5m	Y
				PM <sub>10</sub> , PM <sub>2.5</sub>					
North Road AQMesh	Roadside/ Urban Traffic	317516	177854	NO <sub>2</sub>	N	Electrochemical Sensor	Y (2m)	1.5m	N
				PM <sub>10</sub> , PM <sub>2.5</sub>					
Lansdowne Road, Canton AQMesh	Roadside/ Urban Traffic	315960	176345	NO <sub>2</sub>	N	Electrochemical Sensor	N (5m)	1.5m	N
				PM <sub>10</sub> , PM <sub>2.5</sub>					
Llandaff AQMA AQMesh	Roadside/ Urban Traffic	315198	178220	NO <sub>2</sub>	Y	Electrochemical Sensor	Y (0.5m)	1.5m	Y
				PM <sub>10</sub> , PM <sub>2.5</sub>					

**Notes:**

(1) 0m indicates that the sited monitor represents exposure and as such no distance calculation is required.

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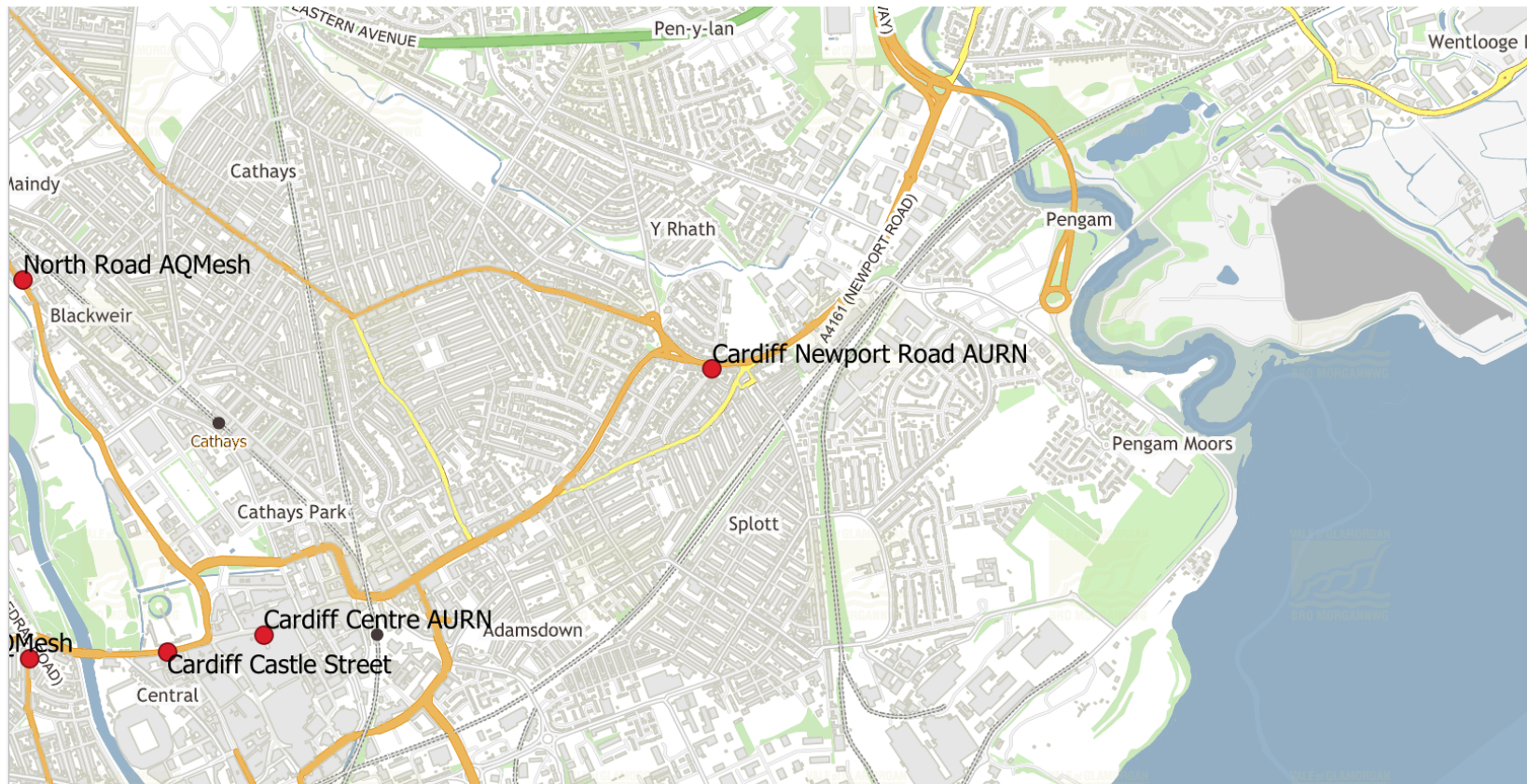
Figure 1 - Map(s) of Automatic Monitoring Sites



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Figure 2 - Map(s) of Automatic Monitoring Sites



Tudalen 83

Table 4 - Details of Non-Automatic Monitoring Sites

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
16	167 Ninian Park Road	Roadside	317040	176060	NO2		0.0	5.0
258	Lampost 116 Penarth Road	Roadside	317760	175310	NO2		4.0	2.0
58	Westgate Street	Kerbside	317937	176400	NO2	City Centre AQMA	5.0	0.0
81	Stephenson Court	Roadside	319387	176980	NO2	Newport Road AQMA	0.0	5.0
86	19 Fair oak Road	Roadside	318452	178805	NO2		0.0	10.0
96	Manor Way Junction	Roadside	316601	179653	NO2		0.0	5.0
98	Western Avenue (premises)	Roadside	314805	177345	NO2		0.0	10.0
99	Cardiff Road Llandaff	Roadside	315275	178117	NO2	Llandaff AQMA	0.0	3.0
259	Wellfield Road	Kerbside	319201	178031	NO2		4.0	1.0
260	St Marys Catholic School,Canton	Roadside	316847	176762	NO2		0.0	2.0
261	Caer Ceffyl	Urban Background	311186	180196	NO2		0.0	50.0
106	30 Caerphilly Road	Roadside	316851	179520	NO2		0.0	5.0
112	17 Sloper Road	Roadside	316613	175910	NO2		0.0	5.0

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Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
115	21 Llandaff Road	Roadside	316604	176641	NO2		0.0	3.0
117	25 Cowbridge Road West	Roadside	314458	176735	NO2	Ely Bridge AQMA	0.0	2.0
126	Westgate Street Flats	Roadside	317946	176387	NO2	City Centre AQMA	0.0	5.0
128	117 Tudor Street	Roadside	317540	175979	NO2		0.0	5.0
131	Dragon Court	Roadside	319292	176932	NO2	Newport Road AQMA	0.0	5.0
143	Windsor House	Roadside	318009	176337	NO2		0.0	6.0
144	Marlborough House	Roadside	318046	176307	NO2	City Centre AQMA	0.0	6.0
147	211 Penarth Road	Roadside	317636	175161	NO2		0.0	7.0
148	161 Clare Road	Roadside	317695	175389	NO2		0.0	5.0
149	10 Corporation Road	Roadside	317764	175174	NO2		0.0	5.0
156	2a/4 Colum Road	Roadside	317997	177412	NO2		0.0	5.0
157	47 Birchgrove Road	Roadside	316605	179703	NO2		0.0	8.0
158	64/ 66 Cathays Terrace	Roadside	318093	177716	NO2		0.0	3.0

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Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
159	IMO façade replacement	Roadside	320709	177918	NO2		0.0	4.0
166	163 Lansdowne Road	Roadside	315950	176424	NO2		0.0	5.0
168	570 Cowbridge Road East	Roadside	314856	176929	NO2		0.0	5.0
174	76 North Road	Kerbside	317508	177868	NO2		0.0	1.0
179	Altolusso, Bute Terrace	Roadside	318627	176039	NO2		5.0	2.0
183	Station Terrace	Kerbside	318765	176623	NO2		5.0	0.0
184	Hopouse, St Mary Street	Roadside	318335	176074	NO2	City Centre AQMA	0.0	3.0
186	Dempsey's Public House, Castle Street	Roadside	318044	176449	NO2	City Centre AQMA	0.0	3.0
187	Angel Hotel	Roadside	317944	176436	NO2	City Centre AQMA	0.0	3.0
188	Westgate Street (45 Apartments)	Roadside	318229	176154	NO2	City Centre AQMA	0.0	3.0
191	7 Mackintosh Place	Roadside	318724	177776	NO2		0.0	3.0
194	115 Cowbridge Road West	Roadside	313870	176212	NO2		0.0	12.0
195	244 Newport Road	Roadside	320147	177523	NO2		0.0	6.0

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
196	2 Pencisely Road	Roadside	316223	177305	NO2		0.0	6.0
198	Next Building to Stephenson Court	Roadside	319348	176958	NO2	Newport Road AQMA	0.0	5.0
199	157 Newport Road	Roadside	319599	177174	NO2		0.0	12.0
200	350 Whitchurch Road	Roadside	317038	179073	NO2		0.0	3.0
201	23 Lower Cathedral Road	Roadside	317547	176411	NO2		0.0	3.0
202	22 Clare Street	Roadside	317604	176053	NO2		0.0	3.0
203	10 Fair oak Road	Roadside	318255	178533	NO2		0.0	4.0
204	53 Neville Street	Roadside	317487	176303	NO2		0.0	5.0
207	42 Waungron Road	Roadside	314769	177343	NO2		0.0	7.0
208	2 Llantrisant Road	Roadside	315152	178245	NO2	Llandaff AQMA	0.0	3.0
209	178 North Road	Roadside	317200	178537	NO2		0.0	3.0
210	485 Caerphilly Road	Roadside	316692	181088	NO2		0.0	7.0
211	19 Well Wood Close, Penylan	Roadside	320247	178903	NO2		0.0	28.0

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Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
212	Bridge Road	Kerbside	315197	178221	NO2	Llandaff AQMA	0.0	1.0
214	Mitre Place	Roadside	315254	178153	NO2	Llandaff AQMA	0.0	3.0
218	16-18 Cowbridge Road West	Roadside	314471	176770	NO2	Ely Bridge AQMA	0.0	4.0
254	Girraffe Nusery Cathedral road	Roadside	317529	176340	NO2		0.0	2.0
220	Fitzalan Court Newport Road	Kerbside	318919	176676	NO2		6.0	1.0
221	Stuttgarter Strasse (New student flats)	Kerbside	318530	177468	NO2		8.0	1.0
190	3 Pearson Street	Roadside	319056	177343	NO2		0.0	1.0
224	110 Cardiff Road	Roadside	315714	177740	NO2		0.0	4.0
243	25 Cardiff Road	Kerbside	315318	178042	NO2	Llandaff AQMA	4.0	1.0
244	25 Bridge Road	Roadside	314910	176584	NO2		0.0	4.0
245	47 Willows Ave	Urban Background	321006	179081	NO2		0.0	0.0
263	Pierhead Street	Roadside	319715	174791	NO2		0.0	4.0
247	Radyr Primary school	Roadside	321709	176022	NO2		4.0	2.0



Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
262	54 Llandaff Road	Kerbside	316593	176728	NO2		2.0	2.0
249	Wentloog Road, Rumney	Roadside	318201	180367	NO2		0.0	3.0
250	Central Square Cardiff, City Centre	Roadside	313244	176769	NO2		4.0	2.0
251	Heol Isaf, Radyr	Kerbside	313244	180367	NO2		0.0	5.0
255, 256, 257	Castle Street Co-Location 3	Roadside	314505	176769	NO2	City Centre AQMA	0.0	1.5
192	3 Cowbridge road West	Roadside	314505	176769	NO2	Ely Bridge AQMA	0.0	3.0
TRO-001	Whitchurch High Lower School	Kerbside	315621	180320	NO2		4.0	5.0
TRO-002	Glan-Y-Nant Terrace (inside)	Roadside	315589	180316	NO2		0.0	2.0
TRO-003	Crossroads of Old Church Rd and Glan-Y-Nant terr (outside)	Kerbside	315548	180315	NO2		5.0	2.0
TRO-004	Ysgol Melin Gruffydd School	Roadside	315620	180360	NO2		0.0	2.0
TRO-005	34 Glan-Y-Nant Rd (inside)	Roadside	315608	180151	NO2		0.0	3.0
TRO-006	36 Old Church Rd (outside)	Roadside	315497	180140	NO2		0.0	2.0
TRO-007	Peter Lea Primary	Roadside	313878	178319	NO2		0.0	3.0

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Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
TRO-008	36 Carter Place	Roadside	313894	178331	NO2		0.0	4.0
TRO-009	3 Carter Place	Roadsie	314022	178334	NO2		0.0	5.0
TRO-010	Llandaff Church in Wales Primary	Kerbside	315274	177784	NO2		5.0	5.0
TRO-011	20 Hendre Rd Llandaff	Kerbside	315279	177750	NO2		0.0	1.0
TRO-012	48 Hendre Rd Llandaff	Roadside	315209	177668	NO2		0.0	3.0
TRO-013	Pencaeru School	Kerbside	312803	175519	NO2		0.0	3.0
TRO-014	16 Cyntwell Avenue	Roadside	312809	175496	NO2		0.0	4.0
TRO-015	6A Cyntwell Avenue	Roadside	312734	175411	NO2		0.0	3.0
TRO-016	29 Norfolk St	Roadside	315811	176555	NO2		0.0	3.0
TRO-017	209 Lansdowne Rd	Roadside	315801	176492	NO2		0.0	4.0
TRO-018	Lansdowne Primary School	Roadside	315801	176492	NO2		0.0	4.0
TRO-019	St Cuthberts Primary School	Kerbside	319027	175493	NO2		0.0	1.0
TR0-020	Letton Road	Kerbside	318910	175456	NO2		2.0	1.0



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Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
TRO-021	58 Letton Road	Kerbside	318945	175546	NO2		2.0	1.0
TRO-022	Tredegarville	Roadside	319268	176804	NO2		0.0	4.0
TRO-023	Newport Road School Lane Zone	Kerbside	319228	176777	NO2		0.0	1.0
TRO-024	Glossops Road	Kerbside	319283	176827	NO2		5.0	1.0
TRO-025	St Peters Primary School	Roadside	319394	177096	NO2		0.0	1.0
TRO-026	Southey Street	Kerbside	318378	177086	NO2		2.0	1.0
TRO-027	Wordsworth Avenue	Kerbside	319327	177080	NO2		2.0	1.0
TRO-028	St Monica's / Gladstone Primary School	Roadside	317982	178180	NO2		0.0	3.0
TRO-029	Pentyrch Street	Kerbside	317987	178156	NO2		2.0	1.0
TRO-030	Cwmdare Street	Kerbside	317855	178921	NO2		2.0	1.0
TRO-031	Lakeside Primary School	Roadside	319031	179949	NO2		0.0	1.0
TRO-032	Ontario Way	Kerbside	319012	180050	NO2		2.0	1.0
TRO-033	Woolaston Avenue	Kerbside	318898	180012	NO2		2.0	1.0

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Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
TRO-034	Bryn Hafod Primary School	Roadside	321817	180406	NO2		0.0	1.0
TRO-035	8 Blagdon Close	Kerbside	321847	180402	NO2		2.0	1.0
TRO-036	Uphill Road	Kerbside	321834	180331	NO2		2.0	1.0
TRO-037	Glan Y Afon Primary School	Roadside	321705	181427	NO2		0.0	1.0
TRO-038	Browning Close	Kerbside	321738	181398	NO2		2.0	1.0
TRO-039	Thackerey Crescent	Kerbside	321834	181282	NO2		2.0	1.0
TRO-040	Willow Brook Primary School	Kerbside	324489	180953	NO2		0.0	1.0
TRO-041	Bullrush Close	Kerbside	324519	180949	NO2		2.0	1.0
TRO-042	Sandbrook Road	Kerbside	324529	180975	NO2		2.0	1.0
TRO-043	Creigau Primary School	Kerbside	307904	181561	NO2		0.0	1.0
TRO-044	Tregarth Court	Kerbside	307896	181569	NO2		2.0	1.0
TRO-045	TY-Nant Road	Kerbside	307967	181585	NO2		2.0	1.0
TRO-046	Rhiwbina Primary School	Roadside	315760	181322	NO2		5.0	1.0

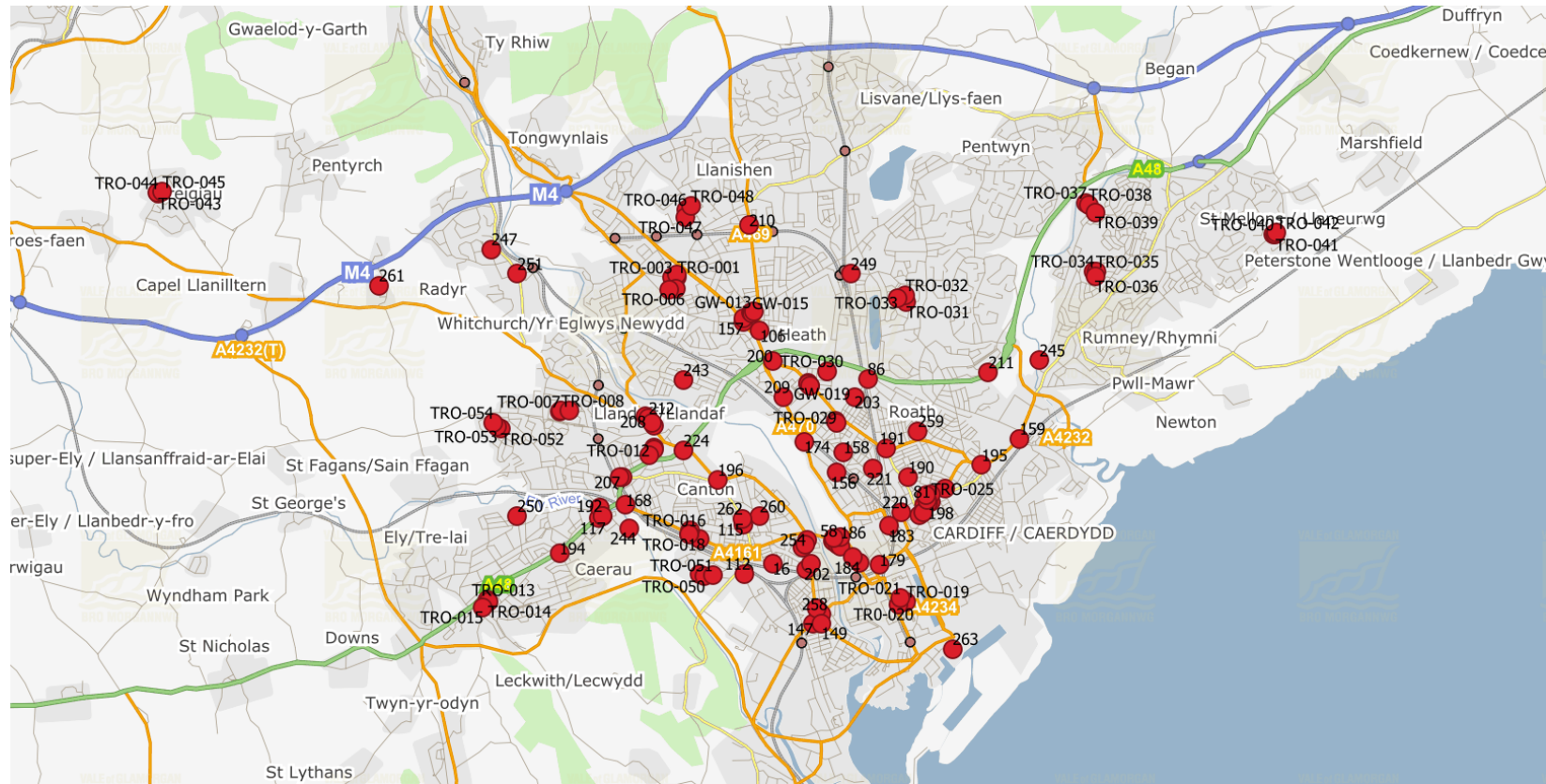
Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
TRO-047	Lon-Y-Dail	Roadside	315746	181209	NO2		5.0	1.0
TRO-048	Heol-Y-Deri	Roadside	315825	181374	NO2		5.0	1.0
TRO-049	Fitzalan School	Roadside	315955	175898	NO2		20.0	1.0
TRO-050	Ysgol Gymraeg Pwll Coch	Roadside	316032	175869	NO2		5.0	1.0
TRO-051	Lawrenny Avenue	Roadside	316150	175887	NO2		3.0	2.0
TRO-052	Coed Y Gof	Roadside	313000	178061	NO2		5.0	2.0
TRO-053	Lime Grove	Roadside	312944	178097	NO2		6.0	1.0
TRO-054	Maple Road	Roadside	312883	178154	NO2		5.0	1.0
GW-013	Birchgrove Primary Traffic lights (Outside school)	Kerbside	316720	179799	NO2		4.0	1.5
GW-014	Birchgrove Primary sign (Outside school)	Kerbside	316744	179810	NO2		4.0	1.5
GW-015	Birchgrove Primary Facacde 1	Roadside	316736	179783	NO2		0.0	5.5
GW-016	Birchgrove Primary Façade 2	Roadside	316767	179801	NO2		0.0	5.5
GW-017	Ysgol Mynydd Bychan Signpost (Outside school)	Kerbside	317602	178703	NO2		4.0	1.5

Diffusion Tube ID	Site Name	Site Type	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Pollutants Monitored	In AQMA? Which AQMA?	Distance to Relevant Exposure (m)	Distance to Kerb of Nearest Road (m)
GW-018	Ysgol Mynydd Bychan Signpost (Outside school)	Kerbside	317561	178746	NO2		4.0	1.5
GW-019	Ysgol Mynydd Bychan Façade 1	Roadside	317564	178735	NO2		0.0	5.5
GW-020	Ysgol Mynydd Bychan Façade 2	Roadside	317590	178708	NO2		0.0	5.5

**Notes:**

(1) 0m indicates that the sited monitor represents exposure and as such no distance calculation is required.

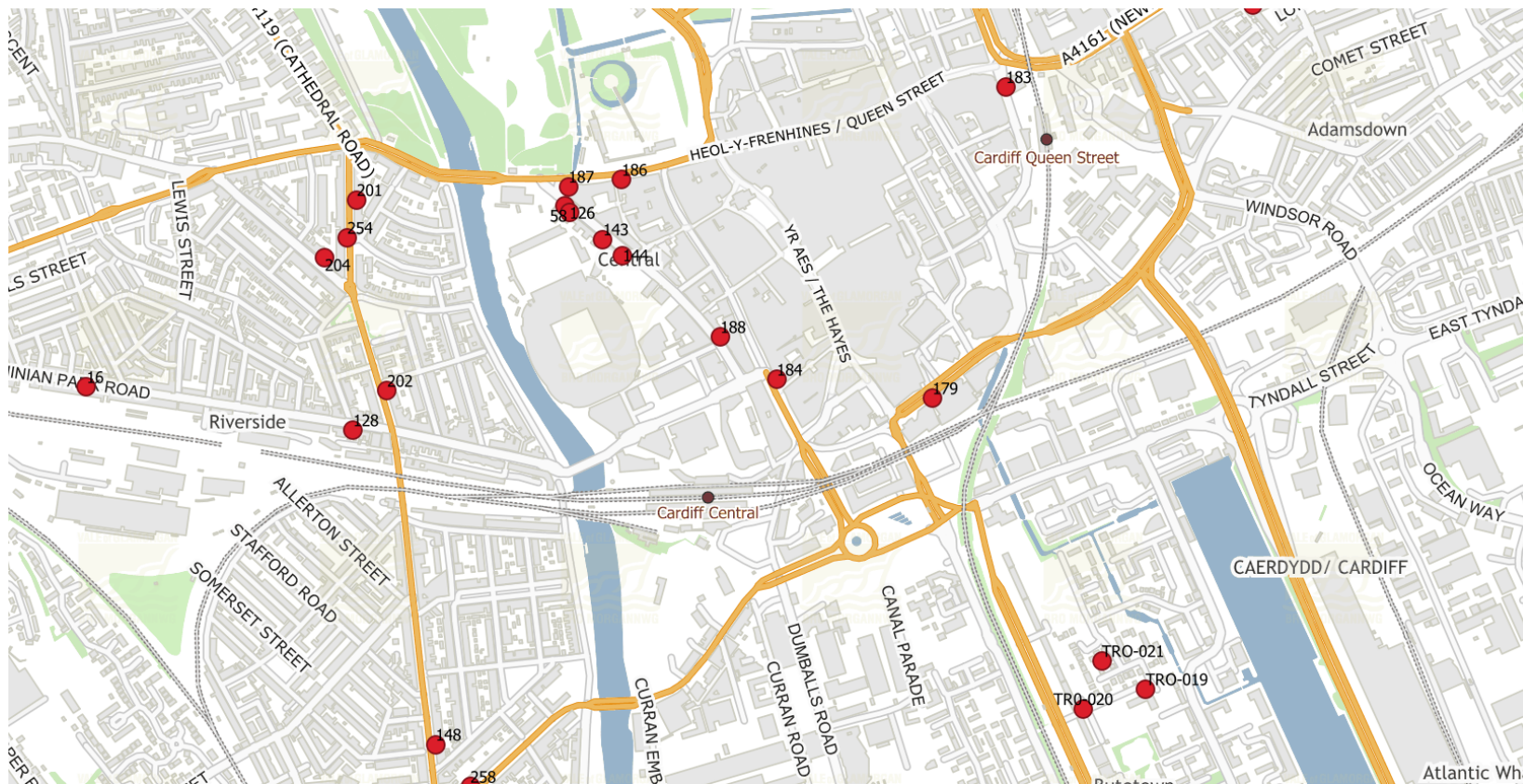
Figure 3 - Map of Non-Automatic Monitoring Sites in Cardiff



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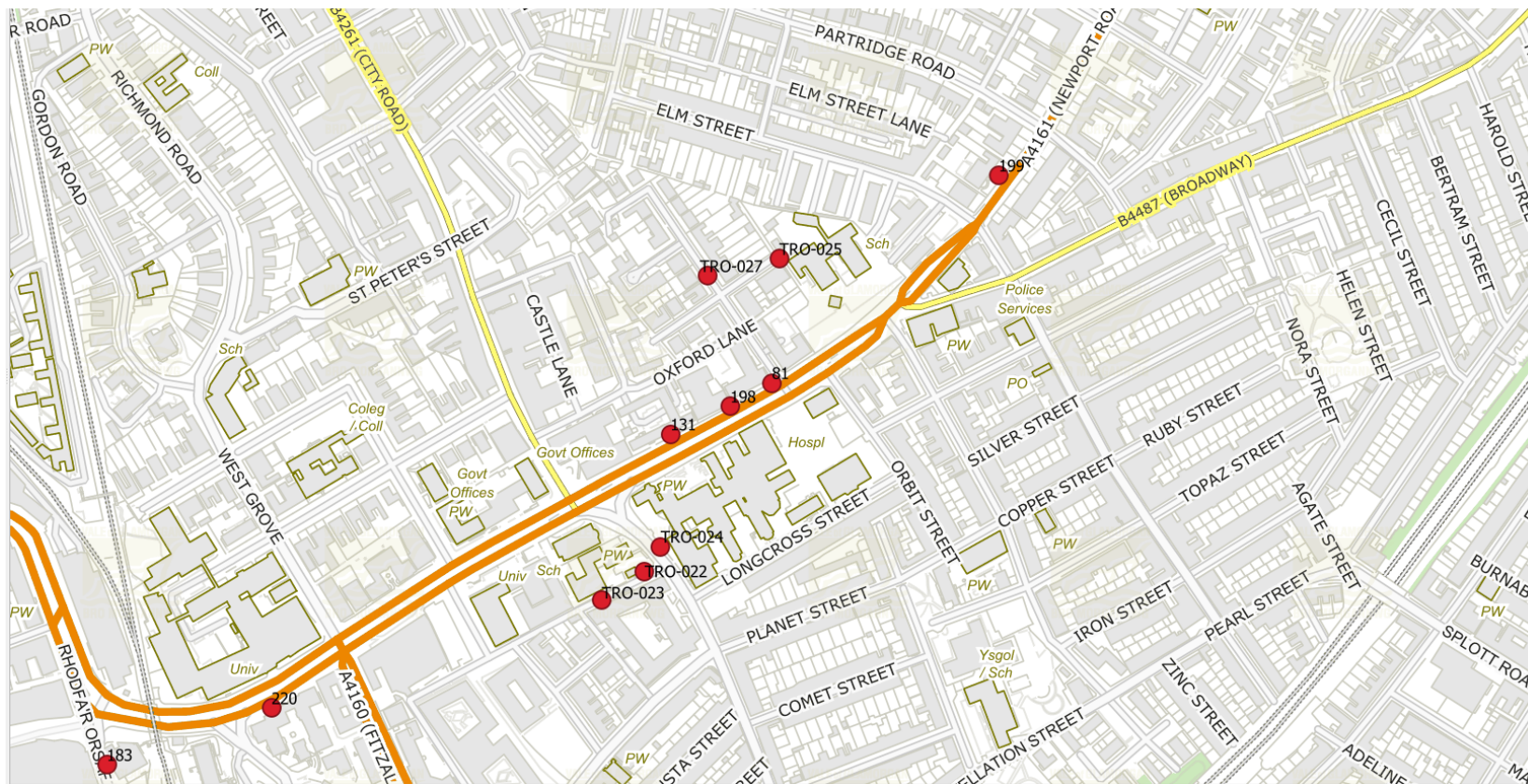


Figure 4 – Map of Non-Automatic Monitoring Sites in Cardiff City Centre AQMA



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Figure 5 - Map of Non-Automatic Monitoring Sites in Stephenson Court AQMA



Tudalen 97



Figure 6 - Map of Non-Automatic Monitoring Sites in Llandaff AQMA



Tudalen 98



Figure 7 – Map of Non-Automatic Monitoring Sites in Ely Bridge AQMA



Tudalen 99

## 2022 Air Quality Monitoring Results

Table 5 - Annual Mean Automatic NO<sub>2</sub> Monitoring Results 2022

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2022 (%) <sup>(2)</sup>	2018	2019	2020	2021	2022
Cardiff City Centre AURN	Urban background	Automatic	88	88	18	12	16	16	17
Cardiff, Newport Road AURN	Roadside	Automatic	97	97		29	19	22	22
Cardiff Castle Street	Roadside	Automatic	100	100				25	34
Lower Cathedral Road AQMesh	Roadside	Indicative Automatic	71	71				19.9	27.7
North Road AQMesh	Roadside	Indicative Automatic	100	100				22.1	26.7
Lansdowne Road, Canton AQMesh	Roadside	Indicative Automatic	100	100				25.6	30.6
Llandaff AQMA AQmesh	Roadside	Indicative Automatic	100	42				25.6	27.5

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Table 6 - Annual Mean Non-Automatic NO<sub>2</sub> Monitoring Results 2022

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
16	317040	176060	Roadside	100.0	100.0	27.8	27.3	23.6	23.2	24.1
258	317760	175310	Roadside	100.0	100.0				29.4	29.5
58	317937	176400	Kerbside	100.0	100.0	45.8	41.2	30	30.8	31.0
81	319387	176980	Roadside	100.0	100.0	34.9	34.4	27.2	29.3	27.0
86	318452	178805	Roadside	100.0	100.0	33.4	31.7	25.8	27	28.6
96	316601	179653	Roadside	100.0	100.0	31.4	29.4	22.2	24.2	25.2
98	314805	177345	Roadside	100.0	100.0	26.1	24.6	20	20.8	22.0
99	315275	178117	Roadside	100.0	100.0	31.7	30.4	22.8	25.1	26.8
259	319201	178031	Kerbside	100.0	100.0					26.1
260	316847	176762	Roadside	100.0	100.0					20.6
261	311186	180196	Urban Background	100.0	100.0					11.5
106	316851	179520	Roadside	100.0	100.0	27.8	28.3	24.5	23.7	24.5

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Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
112	316613	175910	Roadside	92.1	92.1	26.7	25.8	20.7	23.1	22.9
115	316604	176641	Roadside	100.0	100.0	30.0	30.6	25.3	25.6	27.5
117	314458	176735	Roadside	90.4	90.4	<b>40.0</b>	36.8	30.7	36.0	33.7
126	317946	176387	Roadside	92.1	92.1	35.1	33.3	22.3	24.0	25.3
128	317540	175979	Roadside	100.0	100.0	28.3	29.8	25.0	25.0	27.2
131	319292	176932	Roadside	100.0	100.0	38.2	35.7	28.8	26.7	26.0
143	318009	176337	Roadside	92.3	92.3	37.3	35.6	23.5	25.7	25.7
144	318046	176307	Roadside	92.6	92.6	34.3	33.9	25	26.4	27.9
147	317636	175161	Roadside	100.0	100.0	29.3	26.9	20.5	23.8	24.3
148	317695	175389	Roadside	100.0	100.0	26.6	25.6	21.3	23.9	24.0
149	317764	175174	Roadside	100.0	100.0	31.3	30.1	26.8	25.9	27.1
156	317997	177412	Roadside	100.0	100.0	26.8	24.8	17.4	20.1	21.9
157	316605	179703	Roadside	100.0	100.0	25.1	23.6	19.3	19.4	19.3

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
158	318093	177716	Roadside	100.0	100.0	26.2	24.2	17.6	21	22.4
159	320709	177918	Roadside	100.0	100.0	35.6	32.2	26.4	27.4	28.7
166	315950	176424	Roadside	100.0	100.0	30.6	31.4	26.3	26.7	27.1
168	314856	176929	Roadside	100.0	100.0	26	24.7	21.1	22.7	23.6
174	317508	177868	Kerbside	100.0	100.0	28.2	26.8	17.7	20	23.2
179	318627	176039	Roadside	84.9	84.9	43	33.1	32.4	37.6	31.7
183	318765	176623	Kerbside	100.0	100.0	31.1	30.9	23.5	23.7	25.9
184	318335	176074	Roadside	82.5	82.5	39.9	40.5	28.3	27.5	28.3
186	318044	176449	Roadside	66.0	66.0	45.8	42.7	23.1	24.5	31.6
187	317944	176436	Roadside	57.5	57.5	50.8	43.9	25.7	26.1	31.5
188	318229	176154	Roadside	90.4	90.4	52.4	43.7	32.5	26.8	28.5
191	318724	177776	Roadside	100.0	100.0	29.7	27.9	22.5	24.3	25.4
194	313870	176212	Roadside	100.0	100.0	22	20.4	15.8	18.4	20.2

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Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
195	320147	177523	Roadside	100.0	100.0	31.6	31.2	24.2	24.6	25.0
196	316223	177305	Roadside	100.0	100.0	24.9	25.2	19.4	22	22.6
198	319348	176958	Roadside	100.0	100.0	35.1	33.5	25.7	28.7	28.3
199	319599	177174	Roadside	100.0	100.0	23.9	25	20.7	20.1	20.1
200	317038	179073	Roadside	100.0	100.0	33.4	31.1	27.4	27.4	27.6
201	317547	176411	Roadside	84.4	84.4	30.3	28.9	22.1	24	27.0
202	317604	176053	Roadside	84.7	84.7	27.8	27.6	23.3	24.5	26.3
203	318255	178533	Roadside	100.0	100.0	21.6	20.6	17.2	17.1	17.6
204	317487	176303	Roadside	100.0	100.0	23.3	22.1	18.7	20.1	20.9
207	314769	177343	Roadside	100.0	100.0	21.7	20.6	16.7	18.3	18.6
208	315152	178245	Roadside	100.0	100.0	25.4	24.9	18.9	20.5	21.5
209	317200	178537	Roadside	100.0	100.0	22.7	22.3	15.2	16.6	19.1
210	316692	181088	Roadside	100.0	100.0	21.7	20.4	16.6	17.5	18.2

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
211	320247	178903	Roadside	100.0	100.0	21.7	21.8	18.1	19.7	18.4
212	315197	178221	Kerbside	100.0	100.0	47.1	41.3	33.4	37.4	39.3
214	315254	178153	Roadside	100.0	100.0		32.3	24.8	25.4	27.3
218	314471	176770	Roadside	100.0	100.0		35.5	28.2	31.6	31.4
254	317529	176340	Roadside	92.3	92.3				27.7	30.2
220	318919	176676	Kerbside	80.8	80.8		38.4	27.9	30.4	31.3
221	318530	177468	Kerbside	100.0	100.0			30.4	26.9	33.8
190	319056	177343	Roadside	100.0	100.0	23.2	23.4	20.7	20.1	21.1
224	315714	177740	Roadside	100.0	100.0		23.1	18.5	18.8	18.5
243	315712	178789	Kerbside	92.1	92.1			25.7	28.2	31.1
244	314910	176584	Roadside	92.3	92.3			18.2	18	18.7
245	321006	179081	Urban Background	100.0	100.0			14.3	15	15.4
263	319715	174791	Roadside	67.4	67.4					14.4

Tudalen 105



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Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
247	321709	176022	Roadside	100.0	100.0				11.4	12.7
262	316593	176728	Kerbside	42.5	42.5					15.3
249	318201	180367	Roadside	100.0	100.0			17.3	16.5	16.2
250	313244	176769	Roadside	82.2	82.2			26.7	28.4	26.3
251	313244	180367	Kerbside	100.0	100.0			13.5	14.9	15.6
255, 256, 257	314505	176769	Roadside	90.4	90.4				25.8	33.3
192	314505	176769	Roadside	100.0	100.0	39.7	38.6	30.8	31.7	33.3
TRO-001	315621	180320	Kerbside	76.4	76.4			10.9	11.9	12.6
TRO-002	315589	180316	Roadside	100.0	100.0			12.9	13.4	13.6
TRO-003	315548	180315	Kerbside	84.9	84.9			15.6	16	15.0
TRO-004	315620	180360	Roadside	90.4	90.4			9.8	11.9	12.0
TRO-005	315608	180151	Roadside	100.0	100.0			11.5	11.6	12.2
TRO-006	315497	180140	Roadside	77.3	77.3			17	17	19.3



Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
TRO-007	313878	178319	Roadside	100.0	100.0			9.4	10.4	11.0
TRO-008	313894	178331	Roadside	100.0	100.0			8.4	8.6	8.6
TRO-0099	314022	178334	Roadsie	100.0	100.0			9.3	9.2	9.8
TRO-010	315274	177784	Kerbside	92.3	92.3			10.5	10.6	12.5
TRO-011	315279	177750	Kerbside	100.0	100.0			12.2	10.9	12.2
TRO-012	315209	177668	Roadside	100.0	100.0			10.6	10.4	11.2
TRO-013	312803	175519	Kerbside	100.0	100.0			9.9	9	9.3
TRO-014	312809	175496	Roadside	67.4	67.4			14.1	13.7	10.3
TRO-015	312734	175411	Roadside	92.1	92.1			11.5	11.8	10.4
TRO-016	315811	176555	Roadside	100.0	100.0			16.9	15.9	16.1
TRO-017	315801	176492	Roadside	92.3	92.3			21.1	16.1	25.1
TRO-018	315801	176492	Roadside	92.3	92.3				23.3	17.1
TRO-019	319027	175493	Kerbside	100.0	100.0				14.5	14.5

Tudalen 107

Tudalen 108

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
TRO-020	318910	175456	Kerbside	55.6	55.6				14.7	15.3
TRO-021	318945	175546	Kerbside	100.0	100.0				17.2	16.5
TRO-022	319268	176804	Roadside	40.8	40.8				19.3	19.9
TRO-023	319228	176777	Kerbside	77.0	77.0				19.5	19.2
TRO-024	319283	176827	Kerbside	77.3	77.3				29.6	32.4
TRO-025	319394	177096	Roadside	100.0	100.0				15.3	15.5
TRO-026	318378	177086	Kerbside	100.0	100.0				14.8	16.0
TRO-027	319327	177080	Kerbside	100.0	100.0				16.4	18.5
TRO-028	317982	178180	Roadside	90.1	90.1				13.4	16.4
TRO-029	317987	178156	Kerbside	82.5	82.5				14.4	14.6
TRO-030	317855	178921	Kerbside	100.0	100.0				13.8	15.1
TRO-031	319031	179949	Roadside	92.3	92.3				10.5	11.2
TRO-032	319012	180050	Kerbside	92.3	92.3				10	10.2

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
TRO-033	318898	180012	Kerbside	92.1	92.1				11.1	11.1
TRO-034	321817	180406	Roadside	92.9	92.9				10.3	9.4
TRO-035	321847	180402	Kerbside	100.0	100.0				11.1	11.3
TRO-036	321834	180331	Kerbside	57.5	57.5				11.3	10.6
TRO-037	321705	181427	Roadside	22.5	22.5				4.1	10.6
TRO-038	321738	181398	Kerbside	100.0	100.0				11.8	11.8
TRO-039	321834	181282	Kerbside	100.0	100.0				13.4	13.8
TRO-040	324489	180953	Kerbside	84.7	84.7				13.2	12.2
TRO-041	324519	180949	Kerbside	90.4	90.4				11.5	10.8
TRO-042	324529	180975	Kerbside	100.0	100.0				13.4	12.2
TRO-043	307904	181561	Kerbside	100.0	100.0				7.9	8.6
TRO-044	307896	181569	Kerbside	100.0	100.0				8	8.5
TRO-045	307967	181585	Kerbside	100.0	100.0				10.7	10.3

Tudalen 109

Tudalen 110

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
TRO-046	315760	181322	Roadside	75.0	24.9					10.8
TRO-047	315746	181209	Roadside	100.0	34.8					9.8
TRO-048	315825	181374	Roadside	100.0	34.8					13.0
TRO-049	315955	175898	Roadside	100.0	34.8					11.1
TRO-050	316032	175869	Roadside	75.0	27.4					11.5
TRO-051	316150	175887	Roadside	100.0	34.8					11.4
TRO-052	313000	178061	Roadside	50.0	15.3					-
TRO-053	312944	178097	Roadside	50.0	17.0					-
TRO-054	312883	178154	Roadside	50.0	17.0					-
GW-013	316720	179799	Kerbside	100.0	100.0					20.5
GW-014	316744	179810	Kerbside	100.0	100.0					21.0
GW-015	316736	179783	Roadside	100.0	100.0					16.9
GW-016	316767	179801	Roadside	100.0	100.0					17.9

Diffusion Tube ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%)	Valid Data Capture 2022 (%)	NO <sub>2</sub> Annual Mean Concentration (µg/m <sup>3</sup> )				
						2018	2019	2020	2021	2022
GW-017	317602	178703	Kerbside	100.0	77.0					16.5
GW-018	317561	178746	Kerbside	100.0	77.0					18.9
GW-019	317564	178735	Roadside	76.0	59.5					17.4
GW-020	317590	178708	Roadside	100.0	77.0					18.7

**Notes:**

Exceedances of the NO<sub>2</sub> annual mean objective of 40µg/m<sup>3</sup> are shown in **bold**.

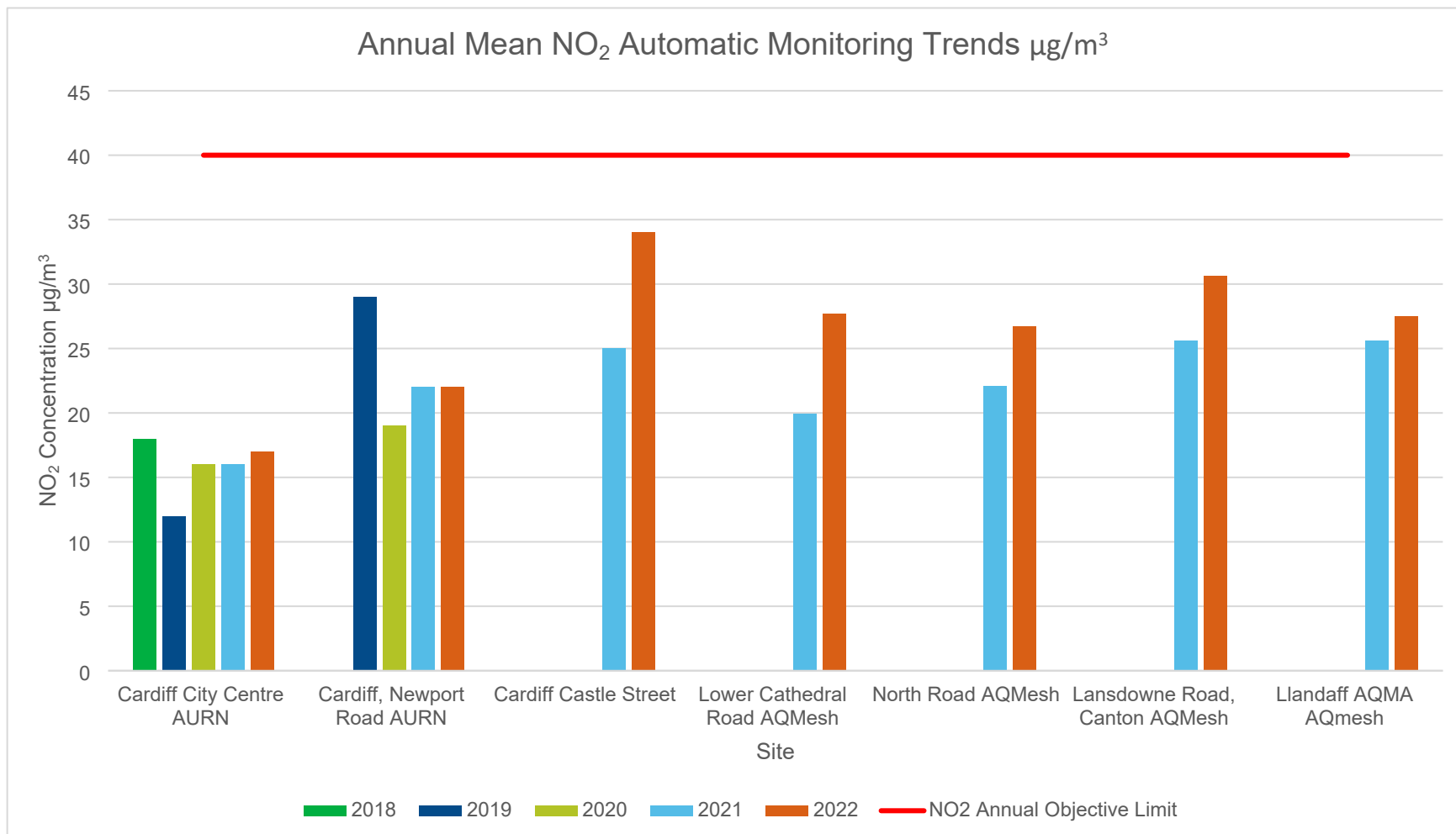
NO<sub>2</sub> annual means exceeding 60µg/m<sup>3</sup>, indicating a potential exceedance of the NO<sub>2</sub> 1-hour mean objective are shown in **bold and underlined**.

Means for diffusion tubes have been corrected for bias. All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

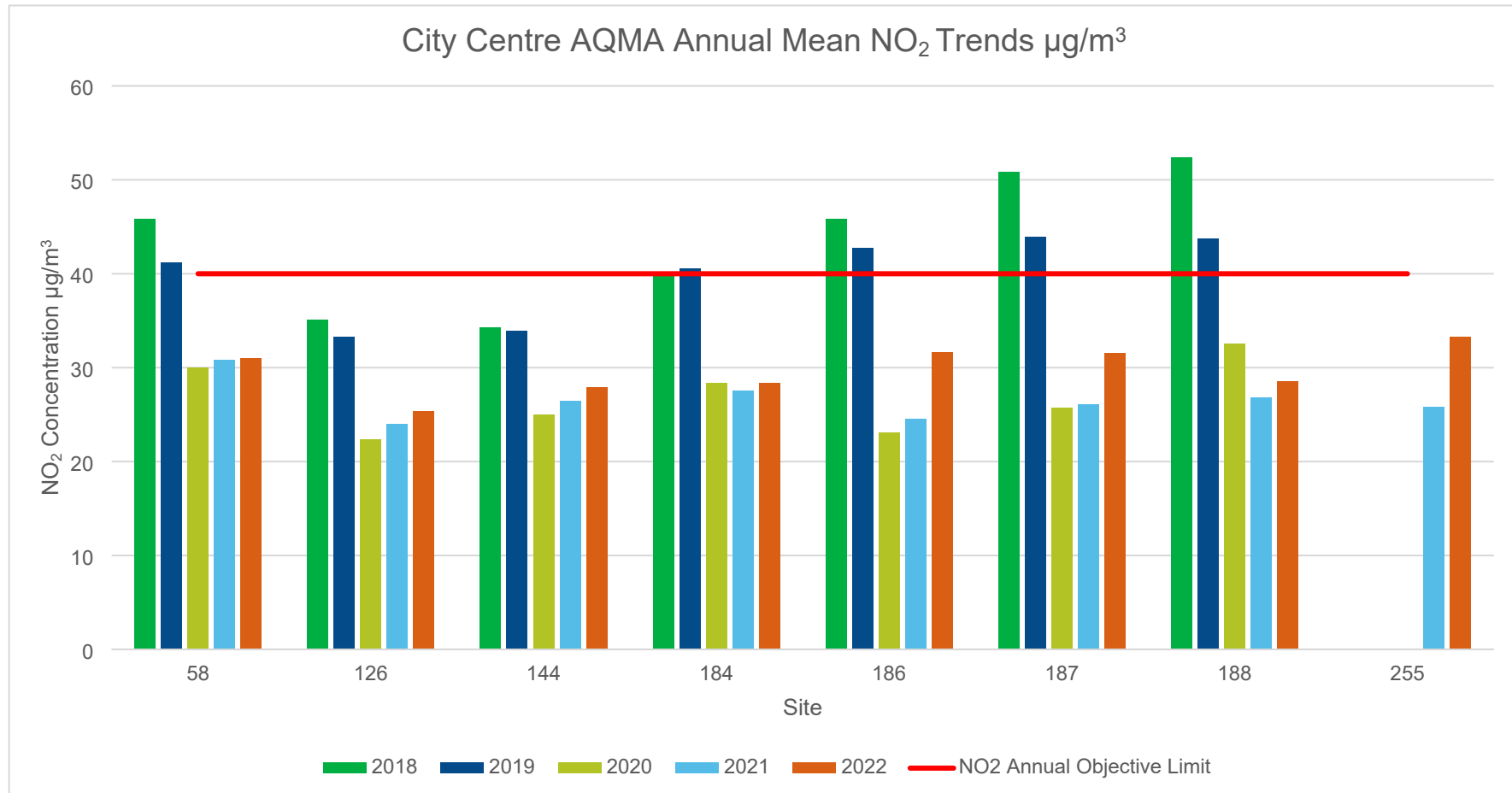
Figure 8 - Annual Mean NO<sub>2</sub> Automatic Monitoring Trends µg/m<sup>3</sup>



Tudalen 112

Figure 8 displays trends in NO<sub>2</sub> concentrations from automatic monitors in Cardiff. All locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) at all locations in since 2018. There is a slight increasing trend in NO<sub>2</sub> concentrations since 2020.

Figure 9 - City Centre AQMA Annual Mean NO<sub>2</sub> Trends µg/m<sup>3</sup>

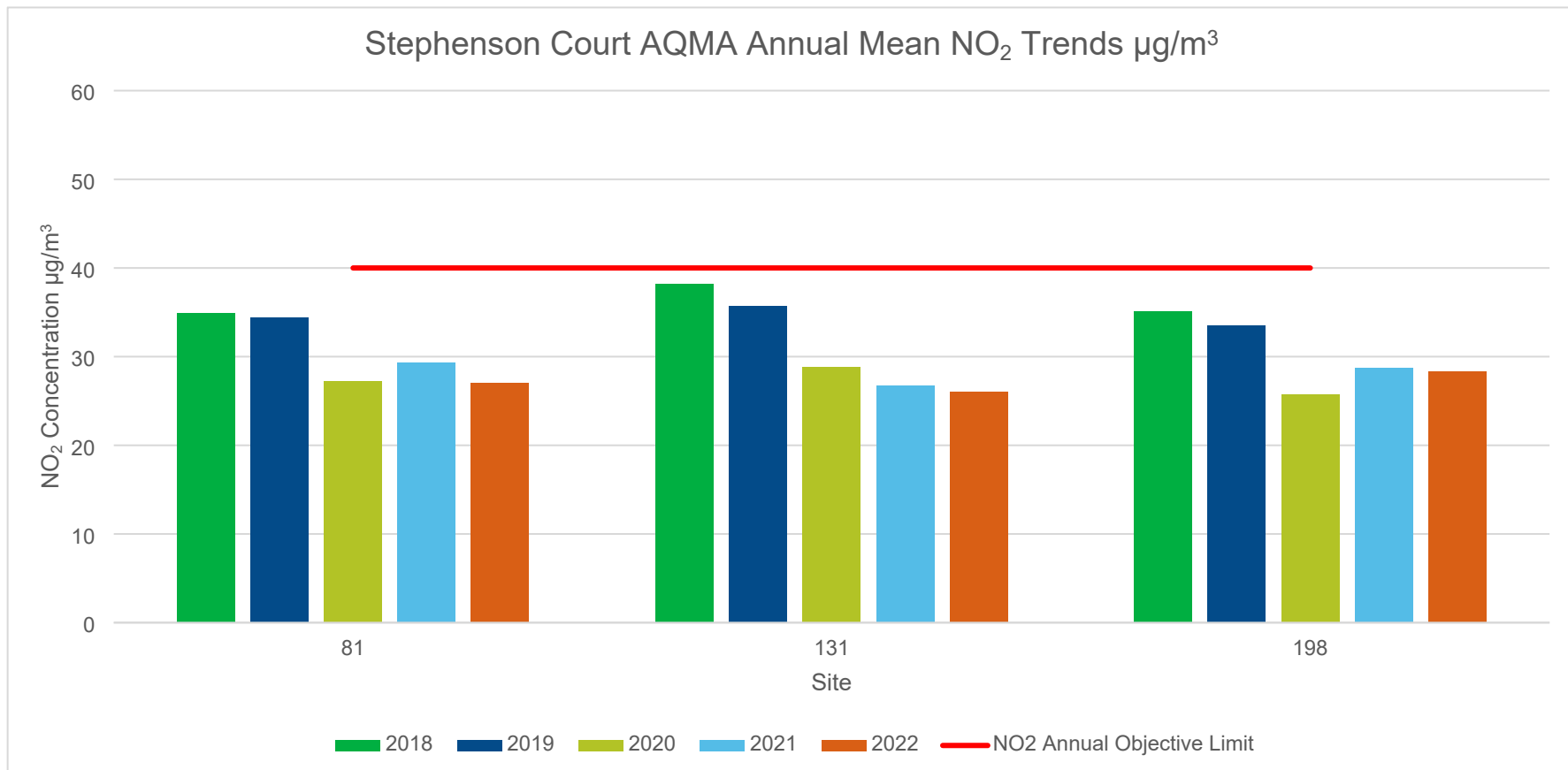


Tudalen 113

Figure 9 displays trends in NO<sub>2</sub> concentrations from non-automatic sites in the Cardiff City Centre AQMA. All locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) at all locations in 2022. Improvements in NO<sub>2</sub> concentrations are

evident when compared to 2019, although there is a slight increasing trend in NO<sub>2</sub> concentrations since 2020, reflective of the easing of COVID restrictions.

**Figure 10 – Stephenson Court AQMA Annual Mean NO<sub>2</sub> Trends µg/m<sup>3</sup>**



Tudalen 114



Figure 10 displays trends in NO<sub>2</sub> concentrations from non-automatic sites in Stephenson Court AQMA. All locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) since 2018, and a stable trend in NO<sub>2</sub> concentrations since 2020.

Figure 11 - Llandaff AQMA Annual Mean NO<sub>2</sub> Trends µg/m<sup>3</sup>

Tudalen 116

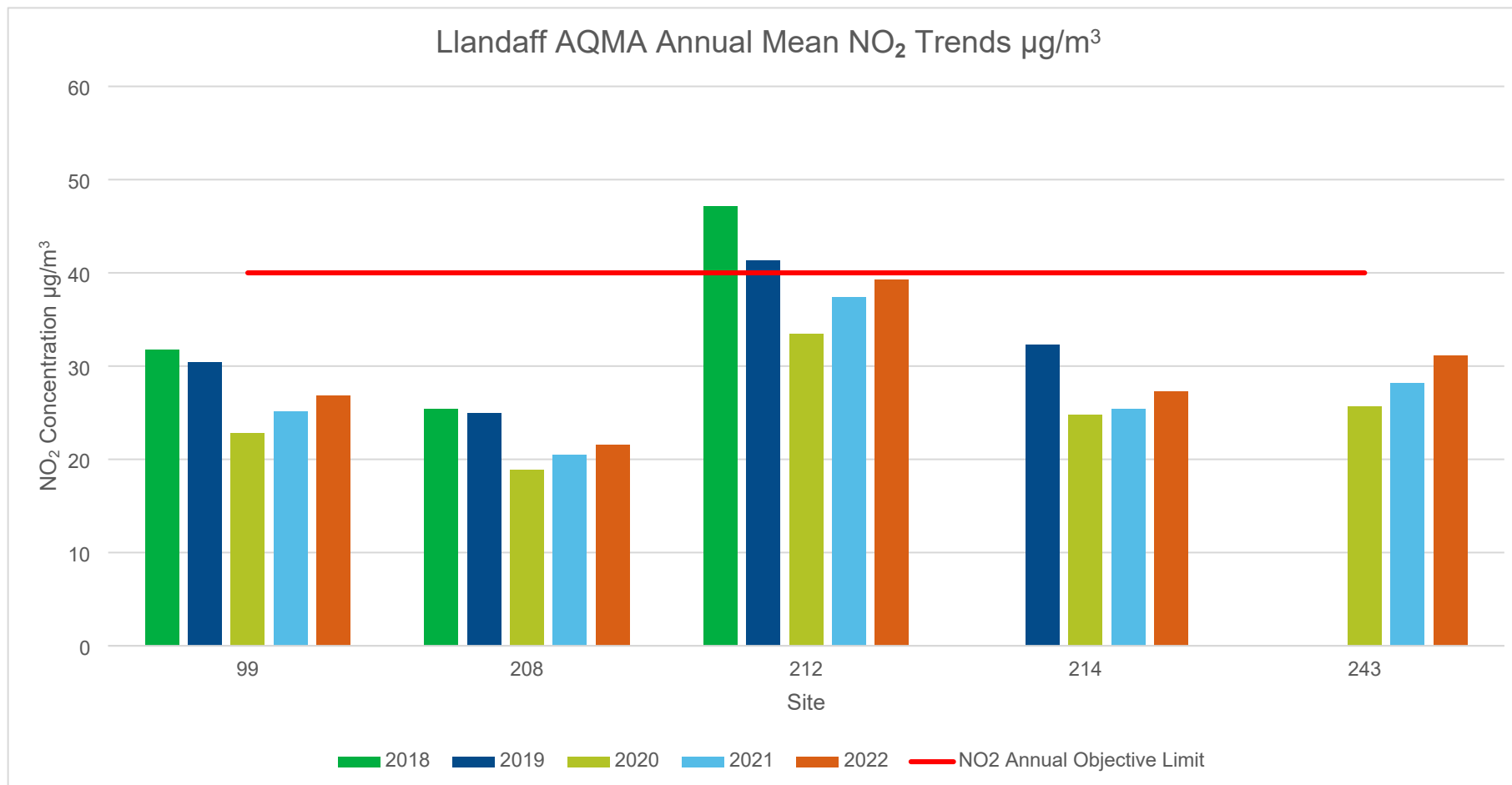
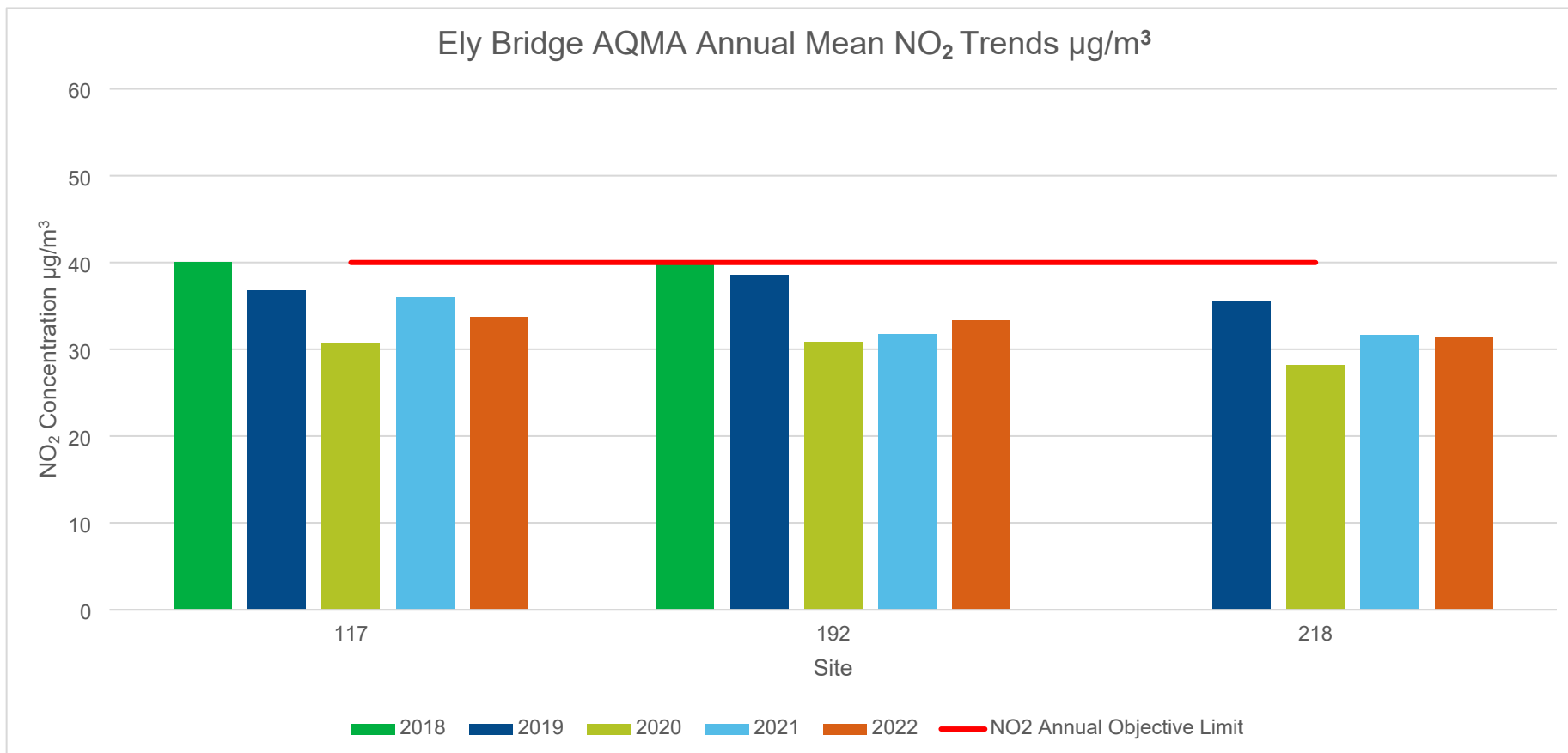


Figure 11 displays trends in NO<sub>2</sub> concentrations from non-automatic sites in Llandaff AQMA. In 2022 all locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>). However, Site 212 is close to exceeding the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>). There is a slight increasing trend in NO<sub>2</sub> concentrations since 2020.

Figure 12 - Ely Bridge AQMA Annual Mean NO<sub>2</sub> Trends µg/m<sup>3</sup>



Tudalen 117

Figure 12 displays trends in NO<sub>2</sub> concentrations from non-automatic sites in Ely Bridge AQMA. All locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) since 2018, and a stable trend in NO<sub>2</sub> concentrations since 2020.

**Table 7 - 1-Hour Mean NO<sub>2</sub> Monitoring Results, Number of 1-Hour Means > 200µg/m<sup>3</sup>**

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2022 (%) <sup>(2)</sup>	2018	2019	2020	2021	2022
Cardiff City Centre AURN	Urban background	Automatic	88	88	0	0	0	0	0
Cardiff, Newport Road AURN	Roadside	Automatic	97	97	0	0	0	0	0
Cardiff Castle Street	Roadside	Automatic	100	100				0	0

**Notes:**

Exceedances of the NO<sub>2</sub> 1-hour mean objective (200µg/m<sup>3</sup> not to be exceeded more than 18 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 99.8th percentile of 1-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

**Table 8 - Annual Mean PM<sub>10</sub> Monitoring Results (µg/m<sup>3</sup>)**

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2022 (%) <sup>(2)</sup>	2018	2019	2020	2021	2022
Cardiff City Centre AURN	Urban background	Automatic	88	88	17	23	14	13	16
Cardiff, Newport Road AURN	Roadside	Automatic	97	97		19	17	17	18
Cardiff Castle Street	Roadside	Automatic	100	100				12	20
Lower Cathedral Road AQMesh	Roadside	Indicative Automatic	71	71				11.1	12.7
North Road AQMesh	Roadside	Indicative Automatic	100	100				9.5	9.2
Lansdowne Road, Canton AQMesh	Roadside	Indicative Automatic	100	100				16.6	17.2
Llandaff AQMA AQmesh	Roadside	Indicative Automatic	100	42				9.3	13.9

Tudalen 119

**Notes:**

Exceedances of the PM<sub>10</sub> annual mean objective of 40µg/m<sup>3</sup> are shown in **bold**.

All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

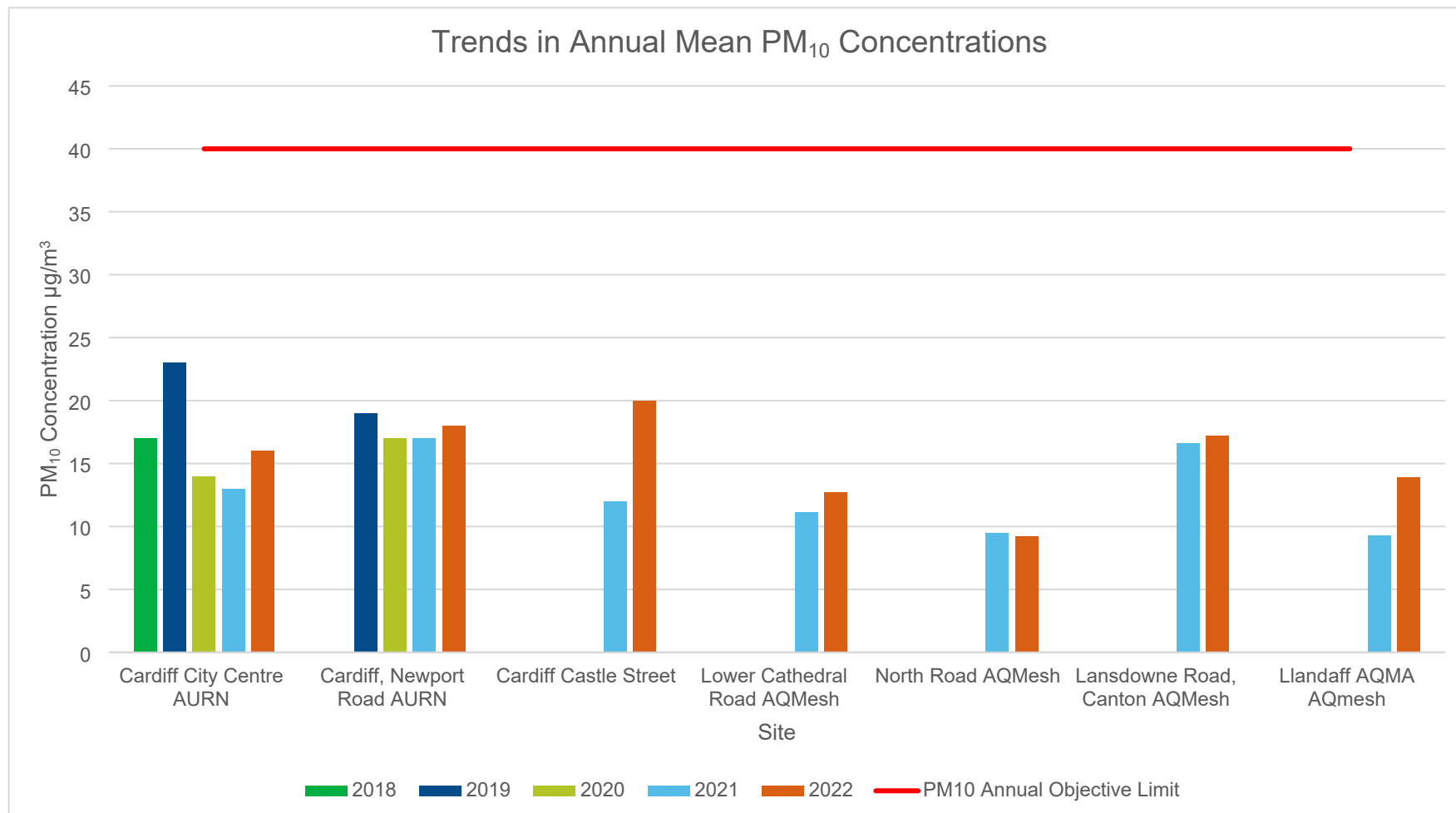


Figure 13 displays trends in PM<sub>10</sub> concentrations from automatic sites in Cardiff. All locations display compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>) since 2018.

**Table 9 - 24-Hour Mean PM<sub>10</sub> Monitoring Results, Number of PM<sub>10</sub> 24-Hour Means > 50µg/m<sup>3</sup>**

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2022 (%) <sup>(2)</sup>	2019	2020	2021	2022
Cardiff City Centre AURN	Urban background	Automatic	88	88	0	0	0	0
Cardiff, Newport Road AURN	Roadside	Automatic	97	97	0	0	0	0
Cardiff Castle Street	Roadside	Automatic	100	100			0	0

**Notes:**

Exceedances of the PM<sub>10</sub> 24-hour mean objective (50µg/m<sup>3</sup> not to be exceeded more than 35 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 90.4<sup>th</sup> percentile of 24-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

**Table 10 - PM<sub>2.5</sub> Monitoring Results (µg/m<sup>3</sup>)**

Site ID	Site Type	Monitoring Type	Valid Data Capture for Monitoring Period (%) <sup>(1)</sup>	Valid Data Capture 2022 (%) <sup>(2)</sup>	2019	2020	2021	2022
Cardiff City Centre AURN	Urban background	Automatic	88	88	12	7	9	11
Cardiff Castle Street	Roadside	Automatic	100	100			9	10
Lower Cathedral Road AQMesh	Roadside	Indicative Automatic	71	71			8.5	7.6
North Road AQMesh	Roadside	Indicative Automatic	100	100			7.8	7.1
Lansdowne Road, Canton AQMesh	Roadside	Indicative Automatic	100	100			11.4	11
Llandaff AQMA AQmesh	Roadside	Indicative Automatic	100	42				8.4

Tudalen 122

**Notes:**

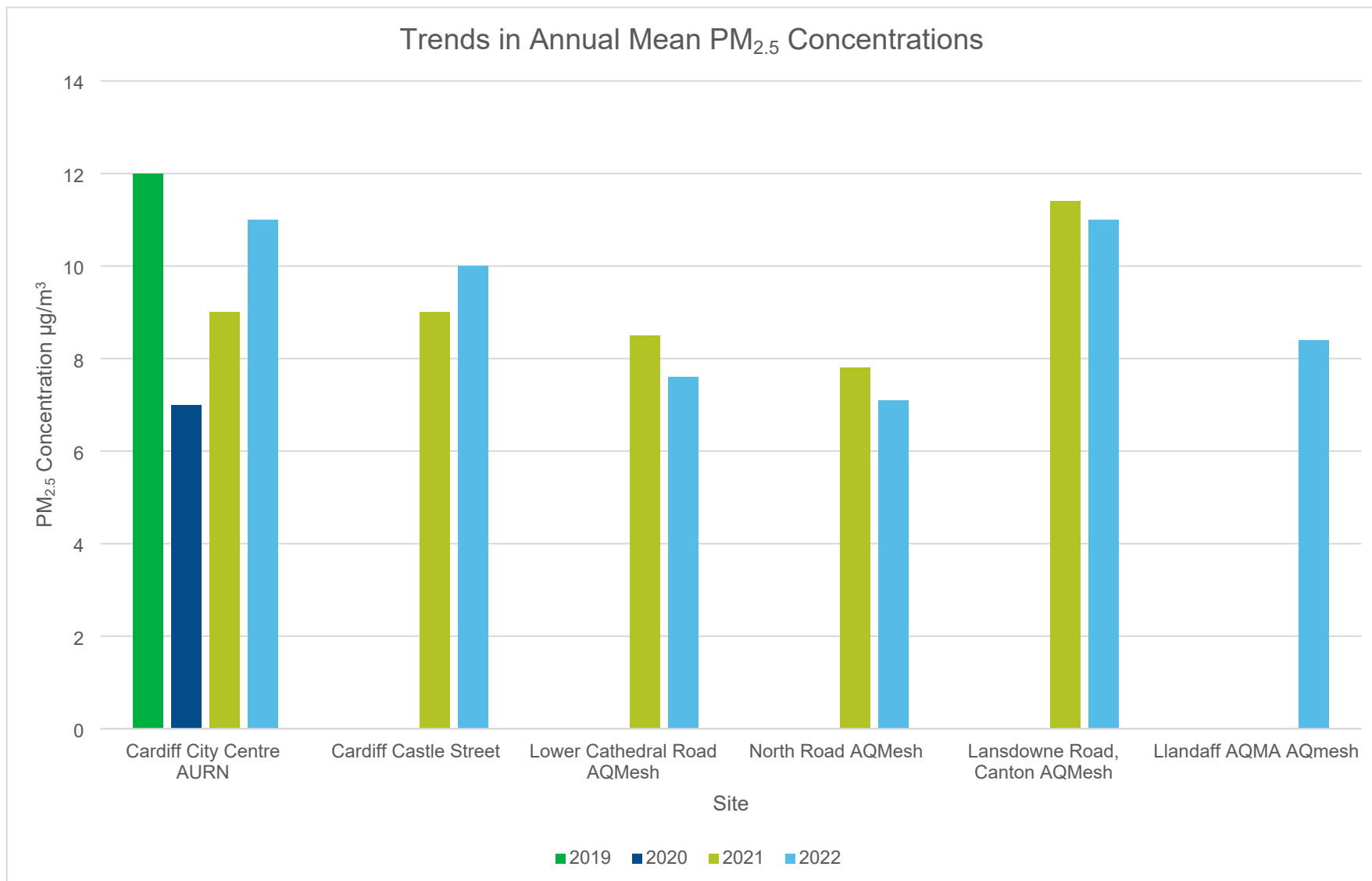
All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).



Figure 13 – Trends in Annual Mean PM<sub>2.5</sub> Concentrations



Tudalen 123

## Comparison of 2022 Monitoring Results with Previous Years and the Air Quality Objectives

During 2022, monitoring was carried out for nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM<sub>10</sub>), sulphur dioxide (SO<sub>2</sub>), carbon monoxide (CO) and ozone (O<sub>3</sub>).

### 2.1.3 Nitrogen Dioxide (NO<sub>2</sub>)

Nitrogen dioxide was measured during 2022 at three sites equipped with an automatic NO<sub>x</sub> analyser and by a network of 135 diffusion tubes. NO<sub>2</sub> was also measured by four indicative automatic monitors in various locations.

In order to ratify the 2022 diffusion tube dataset, a local bias adjustment factor of 0.79 was applied to the annual average readings. The factor was derived from a co-location study carried out at the Castle Street automatic monitor. The local bias correction factor was utilized as it would provide results representative of a worst-case scenario.

There were no exceedances in either the annual or short-term Air Quality Objectives for NO<sub>2</sub> at any automatic and non-automatic monitoring site during 2022. Results from most monitoring sites in 2022 show slightly increased NO<sub>2</sub> concentrations compared to 2021, but still maintain a reduction compared to 2019 pre-Covid.

### 2.1.4 Particulate Matter (PM<sub>10</sub>)

As described in previous sections, monitoring of PM<sub>10</sub> has been carried out at the Cardiff Centre AURN, Newport Road AURN and Cardiff Castle Street monitoring sites. PM<sub>10</sub> monitoring was also carried out by four indicative automatic monitors. The results of the monitoring indicate that recorded PM<sub>10</sub> concentrations at these monitoring stations are compliant with both the annual mean (40µg/m<sup>3</sup>) and 24-hour mean (>50 µg/m<sup>3</sup> not to be exceeded more than 18 times per year) Air Quality Objectives set for PM<sub>10</sub>.

### **2.1.5 Particulate Matter (PM<sub>2.5</sub>)**

Monitoring for PM<sub>2.5</sub> was carried out at the Cardiff Castle Street, Cardiff Centre AURN and four indicative monitoring sites. There is no formal Air Quality Objective in Wales for PM<sub>2.5</sub>, although all concentrations are compliant with the EU target value of 25 µg/m<sup>3</sup>.

### **2.1.6 Other Pollutants Monitored**

#### **Sulphur Dioxide (SO<sub>2</sub>)**

Sulphur dioxide was measured at the Cardiff Centre AURN automatic monitoring site during 2022. The site is classified as “Urban Background” and is a relevant location for the 15-minute and 1-hour Objectives. There were no exceedences of the set objectives during 2022.

#### **Ozone (O<sub>3</sub>)**

Ozone monitoring is useful due to its potential correlations with other pollutants. In 2022, ozone was measured at the Cardiff City Centre AURN site. The results are compared with the running 8-hour mean objective as set by the Expert Panel on Air Quality Standards (EPAQs) which states the running 8-hour mean should not exceed 100µg/m<sup>3</sup> on more than 10 days per year. There were no exceedences of the ozone objective in Cardiff in 2022.

#### **Carbon Monoxide (CO)**

Carbon monoxide was also monitored at Cardiff City AURN site during 2022. There were no exceedences of the Air Quality Strategy Objective for (CO) 8-hour running mean > 10 mg/m<sup>3</sup> during this period.

## **Summary of Compliance with AQS Objectives as of 2022**

SRS on behalf of Cardiff Council has examined the results from monitoring in the Cardiff. Concentrations of NO<sub>2</sub> at site 212 within Llandaff AQMA have been found to be close to the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>), therefore further investigation and assessment of the local issues in the AQMA is required before deciding on whether further action may be necessary.

SRS will continue to monitor and review results in the Ely Bridge and Stephenson Court AQMAs. It may be feasible to consider revoking the AQMAs due to continued compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>). Any such decision to revoke the AQMAs will require statutory consultation and approval from Welsh Government. The Council will need to undertake a detailed assessment to demonstrate that compliance will continue. Any decision on the revocation of AQMA will need to consider the potential of any revised air quality targets as a result of the Environment (Air Quality and Soundscapes) (Wales) Bill.

At all other locations, concentrations are all below the Objectives, therefore no further action is required.

### 3 New Local Developments

The Council continues to monitor the impact of proposed developments and recent developments already underway or in use.

There have been several planning applications for residential and commercial developments within the last year which required air quality assessments due to the introduction of new receptors or increased emissions due to additional vehicle movements. No air quality assessment received by the council have predicted adverse air quality impacts related to any new developments.

The following developments may either be of significance in respect of local air quality or be a proposed development where air quality is a consideration.

#### **Velindre Cancer Centre**

Application was received for the temporary construction access route for the construction of the approved Velindre Cancer Centre, for a period of no more than 48 months following the completion of the related highway improvement works.

A revised air quality assessment (AQA) was undertaken as part of this application to ascertain the likely air quality impacts associated with the amended proposal through its construction phase. The results from the assessment show that the changes in construction traffic on Pendwyallt Road and Park Road from using this access route is expected to have a negligible air quality impact on nearby sensitive human health or ecological receptors. The predicted concentrations of pollutants at receptors also remain well below the air quality objectives and therefore the air quality impacts associated with the southern access route are considered to be not significant in accordance with guidance set out by EPUK and IAQM.

As such no specific planning condition was initially requested for further mitigation in terms of air quality impacts. However the planning committee, took into consideration a number of concerns raised by local residents placed the following condition on the approval notice dated 2<sup>nd</sup> February 2021:

Condition 11: Prior to commencement of the development hereby approved details of an air monitoring unit and its location shall be submitted to and approved in writing with the Local Planning Authority. The monitoring unit shall be implemented in accordance with the

approved details and remain operational until cessation of the development. Data from the air monitoring unit shall be provided to the Local Planning Authority on request.

Reason: To monitor air quality in accordance with Policy EN13 of the adopted Cardiff Local Plan (2006-2026).

The developer's appointed consultants have now installed automatic air monitoring units at various locations along the access road measuring nitrogen dioxide and particulate matter as well as implementation of a diffusion tube monitoring program. Monthly reports are issued displaying data collected in this area and can be found at the following link, <https://velindre.nhs.wales/transforming-cancer-services/news/tcs-news/air-quality/air-quality-documents/>

## **Road Traffic Sources (and Other Transport)**

Cardiff Council has considered road traffic sources extensively in both this and each year in earlier reports; the monitoring network is very largely focused on measuring concentrations of nitrogen dioxide close to many of them. These have been discussed either in previous reports or earlier in this report.

There are no newly identified road traffic sources which need to be considered.

For 2022 SRS on behalf of Cardiff Council confirms that there are no new/newly identified congested streets with a flow above 5,000 vehicles per day and residential properties close to the kerb, that have not been adequately considered in previous rounds of Review and Assessment.

## **Industrial / Fugitive or Uncontrolled Sources / Commercial Sources**

SRS on behalf of Cardiff Council can confirm that in 2022 there were no new or proposed Industrial / Fugitive or Uncontrolled Sources / Commercial Sources for which an air quality assessment has been carried out.

## Other Sources

### Domestic Wood Burners

Previous reports have confirmed that there are no known areas in Cardiff where coal or solid fuel burning provides a significant level or primary household heating. Nothing has changed in this regard since the 2018 APR, despite the potential for increasing popularity of solid fuel heating with increased fossil-fuel prices, and there is no need to consider this further at this time.

It should be noted that the Council receives a number of enquiries each year from residents in respect of national or local requirements were they to wish to install log-burners or similar appliances in their homes. There are no smoke control areas in Cardiff and hence no legal requirements with regard to appliances that may be installed.

However, residents are always reminded of the legislation in respect of statutory smoke nuisance and, where they can't be persuaded otherwise for reasons of air quality and health, recommended to seek out an appliance certified for use in a smoke control area.

SRS on behalf of Cardiff Council can confirm that there are no areas of significant domestic fuel use in the Local Authority area.

## 4 Policies and Strategies Affecting Airborne Pollution

### Local / Regional Air Quality Strategy

SRS on behalf of Cardiff Council have coordinated and developed a Clean Air Strategy (CAS) & Action Plan document. The document outlines a citywide approach to mitigate poor air quality in Cardiff and recognises that interventions to address poor air quality cannot be utilised and implemented locally. Therefore, citywide measures need to be put into practise to hopefully provide citywide improvements to air quality.

The document fulfils the requirements of the LAQM process to produce an Air Quality Action Plan (AQAP). The document also captures the Direction given to CC in March 2018 by WG for Cardiff to address its air quality concerns along highlighted major road networks.

### Air Quality Planning Policies

Cardiff's LDP 2006-2026, forms the basis for decisions on land use planning in Cardiff up to 2026 and assumes that, within the plan's time frame, approximately 40,000 new jobs and 41,100 new dwellings will be developed in Cardiff as a direct response to Cardiff's role as the economic driver of the City- region.

In addition to its independent examination, the LDP was subject to a Strategic Environmental Assessment (SEA) to ensure that the policies reflect sustainability principles and take into account environmental impacts.

Policy KP2 of the LDP allocates 8 Strategic Sites to help meet the need for new dwellings and jobs. These strategic allocations on both greenfield and brownfield sites will include 500 homes or more and/or include significant employment/mixed uses which will bring significant benefits to the city. The sites are:

- (i) Cardiff Central Enterprise Zone;
- (ii) Former Gas Works, Ferry Road;
- (iii) North West Cardiff;
- (iv) North of Junction 33 on the M4;
- (v) South of Creigiau;



- (vi) North East Cardiff (West of Pontprennau);
- (vii) East of Pontprennau Link Road; and
- (viii) South of St. Mellons Business Park – Employment Only.

The LDP identifies that sustainable transportation solutions are required in order to respond to the challenges associated with new development by setting out an approach aimed at minimising car travel, maximising access by sustainable transportation and improving connectivity between Cardiff and the wider region.

The Plan sets out a strategy to achieve this by making the best use of the current network, managing demand and reducing it where possible by widening travel choices. The aim is to secure a modal split of 50% car and 50% non-car modes.

The following LDP policies are of relevance to air quality;

#### **KP8: SUSTAINABLE TRAVEL**

*For Cardiff to accommodate the planned levels of growth, existing and future residents will need to be far less reliant on the private car. Therefore, ensuring that more everyday journeys are undertaken by sustainable modes of transport, walking, cycling and public transport, will be essential.*

Development in Cardiff will be integrated with transport infrastructure and services in order to:

- i. Achieve the target of a 50:50 modal split between journeys by car and journeys by walking, cycling and public transport.
- ii. Reduce travel demand and dependence on the car;
- iii. Enable and maximise use of sustainable and active modes of transport;
- iv. Integrate travel modes;
- v. Provide for people with particular access and mobility requirements;
- vi. Improve safety for all travellers;
- vii. Maintain and improve the efficiency and reliability of the transport network

- viii. Support the movement of freight by rail or water; and
- ix. Manage freight movements by road and minimise their impacts

#### **KP14: HEALTHY LIVING**

*Cardiff will be made a healthier place to live by seeking to reduce health inequalities through encouraging healthy lifestyles, addressing the social determinants of health and providing accessible health care facilities. This will be achieved by supporting developments which provide for active travel, accessible and useable green spaces, including allotments.*

#### **KP18: NATURAL RESOURCES:**

*In the interests of the long-term sustainable development of Cardiff, development proposals must take full account of the need to minimise impacts on the city's natural resources and minimise pollution, in particular the following elements.....minimising air pollution from industrial, domestic and road transportation sources and managing air quality.*

#### **EN13: AIR, NOISE, LIGHT POLLUTION AND LAND CONTAMINATION**

*Development will not be permitted where it would cause or result in unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of nature conservation, landscape or built heritage importance because of air, noise, light pollution or the presence of unacceptable levels of land contamination.*

#### **C6: HEALTH**

*Priority in new developments will be given to reducing health inequalities and encouraging healthy lifestyles through:*

- i. Identifying sites for new health facilities, reflecting the spatial distribution of need, ensuring they are accessible and have the potential to be shared by different service providers; and*
- ii. Ensuring that they provide a physical and built environment that supports interconnectivity, active travel choices, promotes healthy lifestyles and enhances road safety.*

The LDP also outlines the approach the Council will take to increase the proportion of people travelling by sustainable modes and to achieve the 50:50 modal split target. This will involve:

- enabling people to access employment, essential services and community facilities by walking and cycling through, for example, high quality, sustainable design and measures to minimise vehicle speed and give priority to pedestrians and cyclists;
- developing strategic bus and rapid transit corridor enhancements and facilitating their integration with the wider transport network;
- facilitating the transfer between transport modes by, for example, improving existing interchanges and developing new facilities such as strategically located park and ride facilities; and
- maximising provision for sustainable travel within new developments and securing infrastructure investment which can support modal shift within existing settlements.

#### **4.1.1 Replacement LDP**

The Council agreed with Welsh Government in March 2021 a timetable to prepare a Replacement LDP to cover the period 2021 to 2036. The timetable proposes a 3.5-year preparation process with adoption of the Replacement LDP due at the end of 2024.

The first stage in preparation of the Replacement LDP was consultation on the Vision, Issues and Objectives for the plan which was completed in summer 2021. Following this consultation Cabinet and Council agreed a Vision and Objectives for the plan in September 2021. The agreed Vision and Objectives includes a commitment to create healthier environments, reduce inequalities and enhance wellbeing including specifically setting out how air quality can be enhanced. This agreed Vision and Objectives will set the context for the plan as it evolves in more detail through the preparation process over the next few years.

## **Local Transport Plans and Strategies**

The Transport White Paper was launched on 15 January 2020 and lays out an ambitious 10- year plan to tackle the climate emergency, reduce congestion and

improve air quality. It includes proposals for developing the South East Wales Metro, including new Metro lines connecting new and existing communities in the city, Rapid Bus Transport, Active Travel and improvements to our streets and the future of the car, including reducing car ownership through car clubs and greening through the expansion of EV charging infrastructure. Key regional projects are identified, with significant improvements proposed for all the major routes into the city. It also outlines the intention to consider all delivery options and to work with Welsh Government to develop a comprehensive investment plan. The timescale for the White Paper was amended in line with ongoing developments in relation to the Clean Air Plan to ensure alignment. The document is available at;

<https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-policies-plans/transport-white-paper/Documents/White%20Paper%20for%20Cardiff%20Transport%202019.pdf>

## Active Travel Plans and Strategies

The Active Travel Network Map shows existing and future routes for walking and cycling that will help residents travel around the city more easily. We have done this in order to meet the requirements of the Active Travel (Wales) Act 2013.

The future routes shown on the map are proposals to be introduced over the next 15 years. The map will be used to decide which walking and cycling transport schemes will be prioritised for design and implementation.

The existing routes have been audited to show that they meet the standards required by the Welsh Government Active Travel Design Guidance. Other routes for walking and cycling are available in Cardiff but only those which meet these standards are shown on the map.

Following the 2021 public consultation, the council revised the Active Travel Network Map and it was approved by Welsh Government in December 2022.

Further details can be found at the following link

<https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-policies-plans/Active-Travel-Network-Map/Pages/default.aspx>

## Local Authorities Well-being Objectives

In 2015 Welsh Government made a new law called the Well-being of Future Generations (WFG) (Wales) Act. The new law has the sustainable development principle at its heart. This means that we need to work in a way that improves wellbeing for people today without doing anything that could make things worse for future generations. There are seven national well-being goals that form the basis of the Act and five ways of working which support the goals.

CC adopts the principles of The Well-being of Future Generations (Wales) Act 2015. The Act is a significant enabler to improve air quality as it calls for sustainable cross-sector action based on the principles of long-term, prevention-focused integration, collaboration and involvement. It intends to improve economic, social, environmental and cultural well-being in Wales to ensure the needs of the present are met without compromising the ability of future generations to meet their own needs.

Under the WFG Act the Cardiff Public Services Board (PSB) has produced its Well-Being Plan for 2018- 2023, which sets out the Cardiff PSB's priorities for action over the next 5 years, and beyond. The Plan contains Well-being Objectives, high-level priorities that the Cardiff PSB have identified as being most important. It also contains 'Commitments,' or practical steps that the city's public services, together, will deliver over the next 5 years. The Well-Being Plan has set out Well-Being Objectives as follows:

- **Objective 1** - A Capital City that Works for Wales;
- **Objective 2** - Cardiff grows in a resilient way;
- **Objective 3** -Safe, Confident and Empowered Communities
- **Objective 4** - Cardiff is a great place to grow up;
- **Objective 5** - Supporting People out of poverty;
- **Objective 6** - Cardiff is a great place to grow older; and
- **Objective 7** -Modernising and Integrating Our Public Services

Within the Well-Being Plan Objective 2 details the following; *Cardiff is one of Britain's fastest growing cities, and is by far the fastest growing local authority area in Wales. Successful cities are those in which people want to live and this growth is welcomed and a*

*sure sign of strength for the city. However, this growth will bring challenges too, putting pressure on both the city's physical infrastructures, community cohesion, its natural environment and public services. Managing the impacts of this population growth and of climate change in a resilient and sustainable fashion will be a major long term challenge for Cardiff.*

Improving levels of NO<sub>2</sub> and particulate matter (PM<sub>10, 2.5</sub>) is a City level outcome indicator that the PSB will seek to impact in order to meet this specific Objective. The Plan forecasts a future Cardiff with improved air quality and has committed to taking 'a city-wide response to air pollution through supporting the development and delivery of a Cardiff Clean Air Strategy.

## **Green Infrastructure Plans and Strategies**

Outlined in Cardiff's Local Development Plan (LDP) 2006- 2026, Policy **KP16** focuses upon Green infrastructure.

### **Policy KP16 Green Infrastructure**

The policy aims to ensure that Cardiff's green infrastructure assets are strategically planned and delivered through a green infrastructure network. Other policies in the Plan provide more detailed guidance on aspects of these assets, together with supporting SPG.

Where development is permitted, planning conditions and/or obligations will be used to protect or enhance the natural heritage network.

New developments should incorporate new and / or enhanced green infrastructure of an appropriate size, type and standard to ensure no fragmentation or loss of connectivity.

Where the benefits of development outweigh the conservation interest, mitigation and/or compensation measures will be required to offset adverse effects and appropriate planning obligations sought. The implementation of policies designed to provide and protect public open space throughout Cardiff would also serve to offset any increase in recreational pressure on the Cardiff Beech Woods SAC, thereby helping to avoid likely significant effect upon that site.

Management of Cardiff's green infrastructure network should be in place prior to development, and appropriate planning obligations sought. SPG on this topic will more fully outline the extent of Cardiff's green infrastructure and how this policy can be implemented in more detail.

As previously mentioned a new Supplementary Planning Guidance (SPG) concerning Green Infrastructure was approved in 2017 by CC to provide a detailed understanding to the elements raised in the LDP.

- This document provides planning advice on a number of areas relating to development and the environment, including protection and provision of open space, ecology and biodiversity, trees, soils, public rights of way, and river corridors.
- The new document also differs from previous SPGs by providing more in depth design advice, aimed at giving developers a clearer understanding of the approach expected when submitting designs for new developments. By having this information up-front developers are better able to provide suitable designs to the Council through the planning process.

## **Climate Change Strategies**

Cardiff Council declared a climate emergency in 2019 and has since been preparing the One Planet Strategy which sets out how we will respond and tackle this emergency and become carbon neutral Zero as a Council and a City by 2030. A draft One Planet strategy was published for consultation in October 2020 and public feedback on this, alongside a detailed analysis of the Council and city's current carbon position, have informed and shaped the final 2021 One Planet Cardiff Strategy report and action plan.

In producing the 2021 OPC Strategy the Council has completed a detailed carbon baselining and impact assessment. This key milestone has enabled an understanding of the current carbon position, both of Council operations and also of the wider City.

The OPC Strategy confirms the Council's commitment to ensuring that Cardiff will become a Carbon Neutral Council by 2030. It also confirms the Council's commitment to work in partnership with city wide stakeholders to determine a pathway to achieve a Carbon Neutral City by 2030. Full details of the final strategy are available at

<https://www.oneplanetcardiff.co.uk/>

## 5 Conclusion and Proposed Actions

### Conclusions from New Monitoring Data

Monitoring data for 2022 indicates that annual mean concentrations of nitrogen dioxide recorded at sites of relevant exposure within the already established AQMAs are compliant with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>). However, one monitoring location within Llandaff AQMA, site 212, displays an annual result of 39.3µg/m<sup>3</sup>. Therefore, further mitigation measures will need to be assessed to improve air quality concentrations at this location.

SRS will continue to monitor and review results in the Stephenson Court AQMA. It may be feasible to consider revoking the AQMA due to continued compliance with the annual mean NO<sub>2</sub> Air Quality Standard (40µg/m<sup>3</sup>).

All other monitoring sites remain compliant with the relevant objectives in 2022.

### Conclusions relating to New Local Developments

SRS on behalf of Cardiff Council will continue to monitor data gathered by the developer's air quality consultants for Velindre Construction Access 20/01110/MJR, as part of planning condition 11.

*Condition 11: Prior to commencement of the development hereby approved details of an air monitoring unit and its location shall be submitted to and approved in writing with the Local Planning Authority. The monitoring unit shall be implemented in accordance with the approved details and remain operational until cessation of the development. Data from the air monitoring unit shall be provided to the Local Planning Authority on request*

### Other Conclusions

The implementation of COVID measures in the City Centre accelerated the Council's achievement of compliance with limit values for NO<sub>2</sub> under the Ambient Air Quality Directive, on Castle Street. The Interim implementation of the Castle Street Scheme as approved by Welsh Government, was completed at the end of October 2021. The Council has ensured ongoing monitoring has been undertaken. At the time of writing this report a



Final Plan is being drafted which includes further assessments using updated traffic data, collected post Covid,. The Final Plan will detail that the Councils preferred option will be to install a permanent version of the existing interim scheme, and this will be implemented upon approval from Welsh Government.

## **Proposed Actions**

As a result of the information provided herein it is proposed to

1. Deliver and implement the proposed mitigation measures quantified within the Clean Air Plan;
2. Continue monitoring within and around the existing AQMAs and other areas of concern. The diffusion tube network appointed by SRS on behalf of Cardiff Council will be reviewed and an assessment on locations made;
3. Implementation of the updated Realtime Monitoring Network (completed).
4. Continue to drive Air Quality as a major aspect to be considered during any planning applications, most importantly Cardiff Central Development;
5. Submit an Annual Progress Report (APR) in 2024; and
6. Update the existing Clean Air Strategy and Action Plan to represent most recent actions in 2023/2024.

## References

Department for Environment, Food and Rural Affairs, 2003. Part IV of the Environment Act 1995, Environment (Northern Ireland) Order 2002 Part III Local Air Quality Management, Technical Guidance LAQM.TG(22). <https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-v1.0.pdf>

Welsh Government, Local Air Quality Management in Wales, Policy Guidance <https://www.gov.wales/sites/default/files/publications/2019-04/local-air-quality-management-in-wales.pdf>

Cardiff Council 2022 Annual Progress Report <https://www.srs.wales/Documents/Air-Quality/Cardiff/30.01.23-Cardiff-2022-APR-report-V2.pdf>

Cardiff Council Clean Air Plan 2019

<https://cardiff.moderngov.co.uk/documents/s28264/Cabinet%2021%20March%202019%20Clean%20Air%20App%201%20App%20C.pdf>

## **Appendices**

Appendix A: Monthly Diffusion Tube Monitoring Results

Appendix B: A Summary of Local Air Quality Management

Appendix C: Air Quality Monitoring Data QA/QC

Appendix D: AQMA Boundary Maps

## Appendix A: Quality Assurance / Quality Control (QA/QC) Data

Table 11 - Full Monthly Diffusion Tube Results for 2022 ( $\mu\text{g}/\text{m}^3$ )

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations ( $\mu\text{g}/\text{m}^3$ )												Simple Annual Mean ( $\mu\text{g}/\text{m}^3$ )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
16	44.8	28.0	36.8	28.0	26.2	22.9	23.9	23.8	27.1	33.3	33.4	38.0	30.5	24.1	-
258	52.5	34.8	41.4	38.3	31.4	32.3	36.0	36.6	38.5	33.6	25.8	46.6	37.3	29.5	-
58	52.8	38.2	44.8	34.8	38.0	34.0	36.7	38.4	37.2	37.9	35.9	41.7	39.2	31.0	-
81	50.6	35.1	38.0	34.8	30.2	28.0	29.6	29.3	37.2	30.2	29.4	37.8	34.2	27.0	-
86	49.6	41.9	36.0	32.5	33.0	31.8	32.3	28.7	33.3	34.7	39.8	40.1	36.1	28.6	-
96	51.7	27.2	42.0	36.2	25.3	23.8	26.3	28.3	29.8	28.3	27.8	36.6	31.9	25.2	-
98	43.7	24.7	36.7	27.9	23.7	21.2	23.0	24.0	24.6	27.2	23.8	33.0	27.8	22.0	-
99	50.5	22.2	50.9	36.8	24.3	22.9	29.0	35.7	34.9	30.6	31.1	38.9	34.0	26.8	-
259	52.5	26.6	42.7	33.6	24.1	24.1	26.6	30.5	29.2	31.9	34.1	40.2	33.0	26.1	-

Tudalen 142

Tudalen 143

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
260	44.4	27.0	29.6	23.6	19.6	18.1	22.1	17.9	22.6	27.3	25.2	35.3	26.1	20.6	-
261	26.8	13.3	17.7	14.6	10.3	10.5	13.5	12.2	12.2	11.9	7.9	23.1	14.5	11.5	-
106	46.7	30.5	33.5	27.0	24.5	25.0	27.1	21.4	26.9	32.7	39.1	37.0	31.0	24.5	-
112	44.8	22.9	37.6	30.6	22.2	20.5	26.2	27.9	28.7	25.1		32.2	29.0	22.9	-
115	52.5	33.7	36.4	31.0	29.8	28.6	34.2	29.4	30.6	33.9	39.0	38.2	34.8	27.5	-
117	53.4	32.4	61.1	46.6		33.5	44.1	47.0	41.6	40.9	28.5	40.4	42.7	33.7	-
126	43.3		36.8	30.3	30.6	25.4	31.2	27.9	29.6	29.4	32.4	35.5	32.0	25.3	-
128	46.7	34.2	37.5	31.1	27.8	26.0	33.9	27.9	27.9	37.2	42.6	40.6	34.5	27.2	-
131	51.2	32.7	35.4	32.9	29.5	26.0	30.0	29.4	29.5	29.5	32.7	36.5	32.9	26.0	-
143	44.6	30.4	37.3	31.7	31.4	28.6		28.0	31.8	32.0	26.7	35.4	32.5	25.7	-
144	43.8	34.7	32.5	35.8	37.5	31.3	32.0	31.9		35.0	37.0	37.6	35.4	27.9	-
147	50.1	21.0	42.7	30.3	22.6	21.2	24.5	31.3	28.4	27.9	32.0	36.7	30.7	24.3	-

Tudalen 144

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
148	47.4	20.1	39.2	34.0	22.7	21.8	25.6	30.4	31.8	27.6	29.0	34.5	30.3	24.0	-
149	51.1	33.8	35.0	33.9	30.3	27.5	30.9	28.2	33.1	33.1	32.2	42.1	34.3	27.1	-
156	43.1	19.7	40.9	31.3	19.3	17.4	20.5	26.2	25.9	25.7	27.3	35.8	27.8	21.9	-
157	43.2	26.7	27.9	19.7	20.1	19.6	19.8	17.4	21.4	26.0	20.5	31.1	24.5	19.3	-
158	51.2	28.0	38.5	29.3	18.2	18.0	19.8	20.4	24.1	27.4	29.4	36.3	28.4	22.4	-
159	51.4	31.0	44.7	34.6	29.3	28.5	32.4	34.8	32.9	37.6	37.9	41.1	36.4	28.7	-
166	47.8	36.7	38.1	32.0	30.9	29.8	31.3	28.0	29.5	32.4	35.4	39.4	34.3	27.1	-
168	45.9	24.6	37.7	29.2	23.9	22.3	25.1	30.8	28.9	24.7	32.0	33.0	29.8	23.6	-
174	44.8	21.3	41.1	30.0	19.3	19.5	24.2	28.2	29.5	30.1	26.4	37.5	29.3	23.2	-
179		39.5	48.8	48.6	48.6	32.2	33.8	14.0	43.4	44.5		47.5	40.1	31.7	-
183	45.8	20.7	46.5	35.3	25.4	23.7	27.9	30.7	31.0	31.0	35.4	39.7	32.8	25.9	-
184	51.6	32.2		35.6		24.1	30.3	37.2	34.0	36.1	39.5	37.0	35.8	28.3	-

Tudalen 145

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
186		33.5	46.5	37.5		31.5		35.2	37.5	39.9	47.8		38.7	31.6	-
187	57.9	37.2	48.8	38.6	37.7				39.7		50.2		44.3	31.5	-
188	55.3	29.0	46.7	34.6	32.4	28.6	32.1	34.7	32.4	35.9	35.5		36.1	28.5	-
191	51.2	33.2	37.5	27.7	27.2	24.2	26.8	23.7	30.5	34.7	30.2	39.3	32.2	25.4	-
194	41.2	19.9	33.5	26.4	19.0	18.1	20.3	25.9	22.8	20.0	26.4	33.4	25.6	20.2	-
195	45.1	26.5	39.0	30.2	26.3	25.0	27.6	26.7	26.7	32.5	35.8	39.0	31.7	25.0	-
196	43.1	23.8	36.4	28.6	21.3	20.6	23.3	27.4	27.4	29.6	29.0	32.3	28.6	22.6	-
198	54.2	38.6	37.8	35.2	34.3	30.5	30.8	32.4	33.0	33.8	35.5	33.4	35.8	28.3	-
199	43.4	25.4	29.9	24.8	20.7	18.5	21.7	19.4	21.5	23.9	28.6	27.6	25.5	20.1	-
200	55.6	31.6	40.2	37.6	28.4	26.4	27.5	34.5	33.1	30.7	33.4	40.8	35.0	27.6	-
201	51.6	27.0	45.4	32.4	25.2	24.5		34.5	33.3	33.6		34.5	34.2	27.0	-
202	43.1	25.2	42.2	32.4	28.4	26.1			30.3	34.0	33.7	37.9	33.3	26.3	-

Tudalen 146

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
203	39.3	18.6	30.0	21.3	16.6	14.2	15.9	16.6	17.8	22.1	25.1	29.3	22.2	17.6	-
204	42.7	21.4	35.9	25.6	19.1	17.4	18.7	24.8	24.8	26.5	25.7	35.6	26.5	20.9	-
207	37.7	18.8	32.1	23.6	17.7	17.2	19.1	19.7	20.0	21.4	25.9	28.8	23.5	18.6	-
208	40.6	29.3	28.9	24.4	22.3	21.0	23.3	20.0	23.8	29.1	32.1	32.0	27.2	21.5	-
209	41.4	18.1	30.5	22.6	17.0	15.7	18.0	16.1	23.5	25.2	31.5	29.9	24.1	19.1	-
210	38.6	22.0	28.0	22.0	17.5	16.2	17.3	17.9	20.0	19.6	26.0	31.4	23.0	18.2	-
211	37.5	21.7	28.3	22.7	18.3	18.2	17.6	18.2	21.2	26.1	22.5	27.3	23.3	18.4	-
212	65.4	38.4	65.3	50.2	39.4	37.2	42.3	51.9	50.1	44.4	60.6	51.4	49.7	39.3	-
214	46.3	30.5	45.5	31.3	30.2	29.2	31.5	33.1	32.5	31.8	33.7	39.1	34.6	27.3	-
218	54.4	39.7	43.0	42.3	37.0	32.8	33.9	37.8	38.7	35.0	39.1	43.4	39.8	31.4	-
254	48.1	36.6	47.4	38.9	40.2	32.2		31.8	31.9	33.9	35.0	44.2	38.2	30.2	-
220	51.4	34.0	55.8			28.9	32.7	35.9	34.6	41.4	37.0	45.1	39.7	31.3	-



Tudalen 147

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
221	57.3	43.9	46.7	40.5	37.8	36.3	39.8	39.6	41.7	38.6	45.7	45.5	42.8	33.8	-
190	47.2	27.6	30.2	24.7	21.5	19.7	23.3	20.3	24.5	27.3	27.3	27.2	26.7	21.1	-
224	38.1	19.9	31.3	24.5	18.1	16.2	19.5	22.8	21.6	21.0	15.3	32.7	23.4	18.5	-
243	60.6	39.6		31.6	38.6	35.1	32.8	32.5	36.8	44.1	39.2	42.2	39.4	31.1	-
244	38.4	23.9	23.1	21.4	19.9		19.5	19.1	21.4	21.0	23.5	29.0	23.7	18.7	-
245	32.6	20.0	22.4	16.3	15.3	13.9	14.3	14.0	19.8	20.8	19.3	25.3	19.5	15.4	-
263					16.2	15.7	17.4	17.6	21.6	17.1	21.6	27.7	19.4	14.4	-
247	29.0	12.9	21.2	14.3	10.6	9.3	11.4	17.9	12.9	13.3	17.0	22.7	16.0	12.7	-
262								18.5	19.6	26.3	27.0	26.3	23.5	15.3	-
249	37.5	20.1	27.0	19.0	15.1	13.8	13.7	14.6	15.9	17.5	21.7	29.6	20.5	16.2	-
250	46.4	29.2	44.8	33.6	31.7	27.7	25.4	18.5	30.5			44.5	33.2	26.3	-
251	33.4	14.6	29.1	19.7	14.4	12.6	15.4	14.6	16.6	17.1	22.6	26.8	19.7	15.6	-

Tudalen 148

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
255	53.7	37.7	47.9	41.0	40.8	36.4	39.4	31.7	41.5	46.9	52.6		-	-	-
256	52.4	39.2	49.9	41.4	41.8	36.4	36.9	16.2	40.3	44.0	45.9		-	-	-
257	54.3	41.2	50.8	42.3	41.1	38.0	40.0	40.4	39.6	49.1	40.0		42.1	33.3	-
192	55.8	35.4	41.9	44.2	37.5	35.1	38.7	43.4	41.8	42.6	39.8	49.9	42.2	33.3	-
TRO-001	28.2			14.2	10.6	10.2		9.3	12.2	14.9	17.6	25.9	15.9	12.6	-
TRO-002	31.0	17.2	23.6	15.3	10.3	10.9	11.4	12.2	12.8	15.6	19.7	26.7	17.2	13.6	-
TRO-003		20.0	24.4	19.9	13.6	13.1	14.4	15.6	18.1	20.3		30.9	19.0	15.0	-
TRO-004	29.5	14.7	22.6	14.6	9.3	9.1	10.0	10.9	11.8	13.1	21.5		15.2	12.0	-
TRO-005	28.4	14.7	20.1	13.0	9.7	9.2	9.8	10.1	9.9	13.6	21.9	24.4	15.4	12.2	-
TRO-006	36.9	20.0	30.5	19.6	14.2	14.9				22.3	27.8	33.3	24.4	19.3	-
TRO-007	24.2	13.1	19.4	11.2	8.2	8.2	9.4	9.5	9.4	12.2	19.9	21.8	13.9	11.0	-
TRO-008	20.7	10.7	14.9	8.8	6.3	7.0	7.4	8.3	7.5	9.8	11.9	16.6	10.8	8.6	-

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Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
TRO-0099	23.4	11.1	17.2	11.8	7.6	7.1	8.2	8.4	8.4	11.3	16.9	17.0	12.4	9.8	-
TRO-010	27.4	15.3	20.6	12.4	8.5	9.0	8.8		10.3	15.2	20.2	26.1	15.8	12.5	-
TRO-011	28.0	15.0	21.5	12.4	9.1	8.3	9.6	9.3	10.8	15.5	20.1	25.4	15.4	12.2	-
TRO-012	25.5	12.0	19.1	12.3	8.8	7.7	9.0	9.5	9.9	13.6	18.5	23.7	14.1	11.2	-
TRO-013	17.5	10.9	19.7	11.6	8.4	7.2	8.2	8.4	9.5	8.5	11.7	19.0	11.7	9.3	-
TRO-014					11.0	9.3	10.2	10.6	12.9	12.4	19.7	24.8	13.9	10.3	-
TRO-015	25.2	14.9		10.7	10.2	9.3	10.3	12.4	12.5	11.4	5.3	22.8	13.2	10.4	-
TRO-016	34.8	18.9	21.7	19.0	13.6	13.6	15.3	16.9	16.3	19.4	26.9	28.2	20.4	16.1	-
TRO-017	46.3	33.9	34.1	27.7	27.1	26.1	26.1		25.8	31.2	35.5	36.0	31.8	25.1	-
TRO-018	36.8	21.6	28.3	18.5	13.0	12.9		17.6	16.3	20.0	26.6	26.3	21.6	17.1	-
TRO-019	35.5	17.6	22.4	20.0	12.0	11.9	14.1	13.6	15.6	16.0	16.0	25.5	18.4	14.5	-
TRO-020	34.8	20.0	23.6	17.3		12.6	15.1	15.9					19.9	15.3	-

Tudalen 150

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
TRO-021	39.2	20.7	26.1	19.8	14.6	13.7	15.9	17.2	18.0	18.1	19.6	27.7	20.9	16.5	-
TRO-022		26.5	32.0	25.9		16.6	18.2						23.8	19.9	-
TRO-023	36.4	24.7	28.1	22.9	17.5	16.5		17.4		23.3		32.4	24.4	19.2	-
TRO-024		40.7	46.3	42.7	32.3	33.4		42.7	39.3	39.8		51.6	41.0	32.4	-
TRO-025	36.4	21.0	27.0	18.8	13.0	13.4	14.1	12.1	14.4	18.8	18.3	27.5	19.6	15.5	-
TRO-026	35.2	22.4	27.2	19.0	13.8	12.9	14.3	13.2	14.8	19.0	20.6	30.3	20.2	16.0	-
TRO-027	37.6	24.8	32.3	28.2	16.9	13.8	16.1	15.8	15.5	20.2	26.6	33.7	23.5	18.5	-
TRO-028	38.5	20.9	31.7	17.4	11.5	11.0	13.1	13.4	16.8		21.6	32.5	20.8	16.4	-
TRO-029	31.2	15.8	25.3	20.8	12.3	11.8	15.5	16.4	15.1	20.4			18.5	14.6	-
TRO-030	30.3	18.4	26.3	17.5	12.1	11.6	13.1	14.0	16.3	18.9	22.8	27.8	19.1	15.1	-
TRO-031	29.3	14.3	16.7	13.0	8.5	8.4		8.2	9.8	12.0	13.1	23.1	14.2	11.2	-
TRO-032	28.6	14.3	17.9	13.0	8.4	7.7	1.1		9.1	13.6	11.5	17.1	12.9	10.2	-

Tudalen 151

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
TRO-033	30.5		17.6	12.8	8.5	8.7	9.7	8.7	8.6	12.4	14.8	22.4	14.1	11.1	-
TRO-034		13.0	17.4	12.1	8.2	7.5	8.1	8.3	8.1	12.0	18.3	18.0	11.9	9.4	-
TRO-035	26.3	14.7	19.6	12.4	8.5	8.6	10.2	10.1	8.4	13.1	17.7	22.0	14.3	11.3	-
TRO-036	25.2	13.4	19.4	12.3				9.1	8.9	14.1			14.6	10.6	-
TRO-037	27.8					9.9		9.8					15.8	10.6	-
TRO-038	25.4	16.1	20.1	14.4	9.8	9.5	10.7	9.0	10.6	13.9	19.0	21.4	15.0	11.8	-
TRO-039	32.7	17.6	22.7	15.6	10.4	10.1	12.1	13.0	11.6	15.4	23.0	25.5	17.5	13.8	-
TRO-040	28.4	14.3	22.0	14.4	9.2	9.2			10.1	13.1	12.0	21.7	15.4	12.2	-
TRO-041	26.0	14.6	18.3		7.7	8.0	9.1	11.2	8.8	12.1	14.3	20.8	13.7	10.8	-
TRO-042	28.7	15.8	23.8	15.5	10.4	9.7	12.4	12.1	12.4	14.1	9.7	21.3	15.5	12.2	-
TRO-043	21.9	11.4	13.4	10.0	6.5	6.3	6.8	7.2	6.8	8.2	13.3	18.8	10.9	8.6	-
TRO-044	20.1	10.8	13.1	9.8	7.0	6.4	6.9	6.7	5.5	8.8	16.7	17.8	10.8	8.5	-

Tudalen 152

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
TRO-045	23.8	13.6	15.5	15.0	9.4	8.6	9.8	9.3	8.9	10.6	11.0	21.1	13.1	10.3	-
TRO-046									11.1		21.8	24.7	19.2	10.8	-
TRO-047									10.4	12.0	17.8	24.5	16.2	9.8	-
TRO-048									16.9	18.2	21.5	29.4	21.5	13.0	-
TRO-049									14.9	16.1	15.7	26.7	18.4	11.1	-
TRO-050										14.1	19.3	27.1	20.2	11.5	-
TRO-051									13.3	15.1	21.9	25.2	18.9	11.4	-
TRO-052									8.1		11.1		-	-	-
TRO-053									9.6			19.0	-	-	-
TRO-054									10.0			26.3	-	-	-
GW-013	42.4	25.2	28.0	23.3	18.5	18.6	18.9	20.3	23.2	25.4	31.7	36.3	26.0	20.5	-
GW-014	45.8	25.3	31.8	22.9	19.8	18.8	20.2	20.6	23.8	28.7	33.4	27.6	26.6	21.0	-

Diffusion Tube ID	NO <sub>2</sub> Mean Concentrations (µg/m <sup>3</sup> )												Simple Annual Mean (µg/m <sup>3</sup> )		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Raw Data	Bias Adjusted (0.79) and Annualised	Distance Corrected to Nearest Exposure
	GW-015	40.2	21.6	27.8	19.3	15.4	14.6	15.2	15.4	17.1	17.8	23.2			
GW-016	39.6	22.7	29.4	19.9	14.9	13.9	14.6	15.6	18.6	21.8	28.3	32.3	22.6	17.9	-
GW-017				19.5	15.1	14.8	18.7	18.8	21.6	22.3	24.3	33.0	20.9	16.5	-
GW-018				20.9	18.3	18.2	20.7	20.6	24.3	25.6	31.9	34.3	23.9	18.9	-
GW-019				20.0	17.3	15.5	18.3	16.8	20.0	21.8			18.5	17.4	-
GW-020				20.3	21.1	20.8	22.2	19.7	23.7	27.6	25.6	32.2	23.7	18.7	-

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**Notes:**

Exceedances of the NO<sub>2</sub> annual mean objective of 40µg/m<sup>3</sup> are shown in **bold**.

NO<sub>2</sub> annual means exceeding 60µg/m<sup>3</sup>, indicating a potential exceedance of the NO<sub>2</sub> 1-hour mean objective are shown in **bold and underlined**.

- (1) See Appendix C for details on bias adjustment and annualisation.
- (2) Distance corrected to the nearest relevant public exposure

## Appendix B: A Summary of Local Air Quality Management

### Purpose of an Annual Progress Report

This report fulfils the requirements of the Local Air Quality Management (LAQM) process as set out in the Environment Act 1995, as amended by the Environment Act 2021, and associated government guidance. The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas and to determine whether or not the air quality objectives are being achieved. Where exceedances occur, or are likely to occur, the local authority must then declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) within 18 months of declaration setting out the measures it intends to put in place in pursuit of the objectives. Action plans must then be reviewed and updated no later than every five years; or if a local authority considers there is a need for further or different measures to be taken in order to achieve air quality standards; or if significant changes to sources occur within your local area.

For Local Authorities in Wales, an Annual Progress Report replaces all other formal reporting requirements and have a very clear purpose of updating the general public on air quality, including what ongoing actions are being taken locally to improve it if necessary.

### Air Quality Objectives

The air quality objectives applicable to LAQM in Wales are set out in the Air Quality (Wales) Regulations 2000, No. 1940 (Wales 138), Air Quality (Amendment) (Wales) Regulations 2002, No 3182 (Wales 298), and are shown in **Error! Reference source not found.**

The table shows the objectives in units of microgrammes per cubic metre  $\mu\text{g}/\text{m}^3$  (milligrammes per cubic metre,  $\text{mg}/\text{m}^3$  for carbon monoxide) with the number of exceedances in each year that are permitted (where applicable).



**Table 12 - Air Quality Objectives Included in Regulations for the Purpose of LAQM in Wales**

<b>Pollutant</b>	<b>Air Quality Objective: Concentration</b>	<b>Air Quality Objective: Measured as</b>	<b>Date to be achieved by</b>
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>	200µg/m <sup>3</sup> not to be exceeded more than 18 times a year	1-hour mean	31.12.2005
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>	40µg/m <sup>3</sup>	Annual mean	31.12.2005
<b>Particulate Matter (PM<sub>10</sub>)</b>	50µg/m <sup>3</sup> , not to be exceeded more than 35 times a year	24-hour mean	31.12.2010
<b>Particulate Matter (PM<sub>10</sub>)</b>	40µg/m <sup>3</sup>	Annual mean	31.12.2010
<b>Sulphur dioxide (SO<sub>2</sub>)</b>	350µg/m <sup>3</sup> , not to be exceeded more than 24 times a year	1-hour mean	31.12.2004
<b>Sulphur dioxide (SO<sub>2</sub>)</b>	125µg/m <sup>3</sup> , not to be exceeded more than 3 times a year	24-hour mean	31.12.2004
<b>Sulphur dioxide (SO<sub>2</sub>)</b>	266µg/m <sup>3</sup> , not to be exceeded more than 35 times a year	15-minute mean	31.12.2005
<b>Benzene</b>	16.25µg/m <sup>3</sup>	Running annual mean	31.12.2003
<b>Benzene</b>	5µg/m <sup>3</sup>	Annual mean	31 12 2010
<b>1,3 Butadiene</b>	2.25µg/m <sup>3</sup>	Running annual mean	31.12.2003
<b>Carbon Monoxide</b>	10.0mg/m <sup>3</sup>	Maximum Daily Running 8-Hour mean	31.12.2003
<b>Lead</b>	0.25µg/m <sup>3</sup>	Annual Mean	31.12.2008

## Appendix C: Air Quality Monitoring Data QA/QC

### QA/QC of Diffusion Tube Monitoring

The diffusion tubes are supplied and analysed by Socotec UK Ltd Didcot, using the 50% triethanolamine (TEA) in water method. Socotec UK Ltd Didcot participates in the Annual Field Inter-Comparison Exercise and Workplace Analysis Scheme for Proficiency (WASP) inter-comparison scheme for nitrogen dioxide diffusion tube analysis. From April 2014 the WASP Scheme was combined with the STACKS scheme to form the new AIR scheme, which Socotec UK Ltd Didcot participates in. The AIR scheme is an independent analytical proficiency testing scheme operated by LGC Standards and supported by the Health and Safety Laboratory (HSL).

The laboratory Socotec UK Ltd Didcot is regarded ranked as the highest rank of satisfactory in relation to the WASP intercomparison scheme for spiked nitrogen dioxide diffusion tubes. Information regarding tube precision can be obtained via <http://laqm.defra.gov.uk/diffusion-tubes/precision.html> Information regarding WASP results can be obtained via <http://laqm.defra.gov.uk/diffusion-tubes/qa-qc-framework.html>

### Diffusion Tube Annualisation

16 diffusion tube site required annualisation in 2022. Details for these sites are provided in Table 14. Annualisation is required for any site with data capture less than 75% but greater than 25%.

### Diffusion Tube Bias Adjustment Factors

SRS on behalf of BCBC have applied a local bias adjustment factor of 0.79 to the 2022 monitoring data. A summary of bias adjustment factors used over the past five years is presented in Table 13.

Obtaining a local bias adjustment factor was performed by carrying out a co-location study at Castle Street continuous automatic monitor. Triplicate diffusion tubes were sited next to the NOX inlet of the monitoring station. The diffusion tube results are then compared to those measured by the continuous monitor. Once all ratified annual data is obtained, a data check is carried out to check the precision of data. Precision is calculated based on the diffusion tube data only. Tube precision is categorised as good or poor. Good precision applies where the coefficient of variation (CV) of triplicate diffusion tubes for eight or more

periods during the year is less than 20%, and the average CV of all monitoring periods is less than 10%. Poor precision applies where the CV of four or more periods is greater than 20% and/or the average CV is greater than 10%. Details for this co-location study are presented in Table 15.

**Table 13 - Bias Adjustment Factor**

Year	Local or National	If National, Version of National Spreadsheet	Adjustment Factor
2022	Local	-	0.79
2021	National	03/22	0.78
2020	National	06/21	0.76
2019	National	09/20	0.75

### **NO<sub>2</sub> Fall-off with Distance from the Road**

No diffusion tube NO<sub>2</sub> monitoring locations within Cardiff required distance correction during 2022

### **QA/QC of Automatic Monitoring**

Local Site Operator duties are performed by officers within the Shared Regulatory Services Environment Team. Cardiff Newport Road and Cardiff Centre Automatic Urban Rural Network (AURN) sites are owned by DEFRA and managed by Bureau Veritas. SRS officers are contracted to visit these sites at fortnightly and monthly intervals to carry out calibrations. The AURN is the UK's largest automatic monitoring network and is the main network used for compliance reporting against the Ambient Air Quality Directives.

The Cardiff Castle Street automatic monitor is owned and managed by Cardiff Council. This monitor is calibrated fortnightly by an officer from the Shared Regulatory Services Environment Team.

Automatic monitoring data presented in this APR from the above monitors is ratified by Ricardo. Live and historical data is available at <https://airquality.gov.wales/>.

In addition to the network monitors, four indicative monitors were also used in Cardiff in 2022. These monitors do not form part of the regulated Welsh automated monitoring network, but as specified they are an indicative form of monitoring and a useful tool to look at datasets on a high-resolution basis. The monitors are co-located annually to check accuracy. However, these are not compliant with the standard reference method and should only be used for indicative assessment purposes.

### **PM<sub>10</sub> and PM<sub>2.5</sub> Monitoring Adjustment**

The type of PM<sub>10</sub>/PM<sub>2.5</sub> monitors utilised within Cardiff do not require the application of a correction factor.

### **Automatic Monitoring Annualisation**

All regulated automatic monitoring locations within Cardiff recorded data capture of greater than 75% therefore it was not required to annualise any monitoring data. In addition, any sites with a data capture below 25% do not require annualisation.

### **NO<sub>2</sub> Fall-off with Distance from the Road**

No automatic NO<sub>2</sub> monitoring locations within Cardiff required distance correction during 2022.

Table 14 - Annualisation Summary (concentrations presented in  $\mu\text{g}/\text{m}^3$ )

Diffusion Tube ID	Annualisation Factor Cardiff Centre	Annualisation Factor St Julians Newport	Annualisation Factor Bristol St Pauls	Annualisation Factor Site 4 Name	Average Annualisation Factor	Raw Data Simple Annual Mean ( $\mu\text{g}/\text{m}^3$ )	Annualised Data Simple Annual Mean ( $\mu\text{g}/\text{m}^3$ )
186	0.9633		1.1040		1.0337	38.7	40.0
187	0.8491		0.9526		0.9009	44.3	39.9
263	0.9539	0.7692	1.1000		0.9410	19.4	18.2
262	0.8314	0.6777	0.9584		0.8225	23.5	19.4
TRO-014	0.9539	0.7692	1.1000		0.9410	13.9	13.0
TRO-020	0.9098		1.0352		0.9725	19.9	19.4
TRO-022	0.9866		1.1277		1.0572	23.8	25.2
TRO-036	0.8602		0.9735		0.9168	14.6	13.4
TRO-037	0.8971	0.6411	1.0011		0.8465	15.8	13.4
TRO-046	0.7235	0.5917	0.8244		0.7132	19.2	13.7
TRO-047	0.7770	0.6407	0.8856		0.7678	16.2	12.4
TRO-048	0.7770	0.6407	0.8856		0.7678	21.5	16.5
TRO-049	0.7770	0.6407	0.8856		0.7678	18.4	14.1
TRO-050	0.7312	0.6127	0.8308		0.7249	20.2	14.6
TRO-051	0.7770	0.6407	0.8856		0.7678	18.9	14.5

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<b>Diffusion Tube ID</b>	<b>Annualisation Factor Cardiff Centre</b>	<b>Annualisation Factor St Julians Newport</b>	<b>Annualisation Factor Bristol St Pauls</b>	<b>Annualisation Factor Site 4 Name</b>	<b>Average Annualisation Factor</b>	<b>Raw Data Simple Annual Mean (<math>\mu\text{g}/\text{m}^3</math>)</b>	<b>Annualised Data Simple Annual Mean (<math>\mu\text{g}/\text{m}^3</math>)</b>
GW-019	1.1004		1.2712		1.1858	18.5	22.0

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**Table 15 - Local Bias Adjustment Calculations**

	<b>STEP 3a Local Bias Adjustment Input 1</b>
<b>Periods used to calculate bias</b>	11
<b>Bias Adjustment Factor A</b>	0.79 (0.74 - 0.85)
<b>Diffusion Tube Bias B</b>	27% (18% - 35%)
<b>Diffusion Tube Mean (<math>\mu\text{g}/\text{m}^3</math>)</b>	42.7
<b>Mean CV (Precision)</b>	5.2%
<b>Automatic Mean (<math>\mu\text{g}/\text{m}^3</math>)</b>	33.7
<b>Data Capture</b>	100%
<b>Adjusted Tube Mean (<math>\mu\text{g}/\text{m}^3</math>)</b>	34 (32 - 36)
<b>Overall Diffusion Tube Precision</b>	<b>Good Overall Precision</b>
<b>Overall Continuous Monitor Data Capture</b>	<b>Good Overall Data Capture</b>
<b>Local Bias Adjustment Factor</b>	<b>0.79</b>

**Notes:**

A single local bias adjustment factor has been used to bias adjust the 2022 diffusion tube results.

## Appendix D: AQMA Boundary Maps

Figure 14 - Cardiff City Centre AQMA



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Figure 15 - Stephenson Court AQMA



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Figure 16 - Ely Bridge AQMA



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Figure 17 - Llandaff AQMA



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## Glossary of Terms

Abbreviation	Description
AQAP	Air Quality Action Plan - A detailed description of measures, outcomes, achievement dates and implementation methods, showing how the LA intends to achieve air quality limit values'
AQMA	Air Quality Management Area – An area where air pollutant concentrations exceed / are likely to exceed the relevant air quality objectives. AQMAs are declared for specific pollutants and objectives
APR	Air quality Annual Progress Report
AURN	Automatic Urban and Rural Network (UK air quality monitoring network)
Defra	Department for Environment, Food and Rural Affairs
DMRB	Design Manual for Roads and Bridges – Air quality screening tool produced by Highways England
FDMS	Filter Dynamics Measurement System
LAQM	Local Air Quality Management
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
PM <sub>10</sub>	Airborne particulate matter with an aerodynamic diameter of 10µm (micrometres or microns) or less
PM <sub>2.5</sub>	Airborne particulate matter with an aerodynamic diameter of 2.5µm or less
QA/QC	Quality Assurance and Quality Control
SO <sub>2</sub>	Sulphur Dioxide

**COUNTER-FRAUD, BRIBERY AND CORRUPTION STRATEGY &  
OPERATIONAL DOCUMENTS – UPDATE****FINANCE, MODERNISATION & PERFORMANCE (COUNCILLOR  
CHRIS WEAVER)****AGENDA ITEM: 3**

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**Reason for this Report**

1. To seek approval from Cabinet for the Counter-Fraud, Bribery and Corruption Strategy and operational documents update.

**Background**

2. The Council has a responsibility to protect the public purse through proper administration and control of the public funds and assets to which it has been entrusted. Fraud costs the public sector an estimated £50.2 billion annually, and of this total, £8.8bn is specifically in local government (Annual Fraud Indicator 2023 - researched and published by Crowe, Peters & Peters and University of Portsmouth).
3. A Counter-Fraud and Corruption Strategy was introduced and approved by Cabinet in July 2019 to co-ordinate the counter-fraud policy framework and outline the strategic approach to tackling fraud across the organisation. The existing Strategy has introduced:
  - Mandatory fraud awareness training across the organisation, delivered through a combination of face-to-face and eLearning sessions to approaching seven thousand people (officers, headteachers and school governors).
  - Annual participation in International Fraud Awareness Week, to develop and maintain the alertness and maturity of all staff in key areas of risk by providing practical information, advice, supporting resources and relevant contact details for further assistance. Topics have included personal interests & secondary employment, managing conflicts of interest, procurement fraud, mandate fraud and staying vigilant to attempts to defraud the Council with reference to social engineering.
4. The Counter-Fraud and Corruption Strategy has been reviewed, renamed to add the word 'bribery' to the title, and refreshed, to support the Council

to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action is and will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses. Alongside the review and refresh of the Strategy, a suite of operational counter-fraud documents have been reviewed to which incremental updates have also been made.

5. The Governance and Audit Committee considered the updated Strategy and operational documents in its meeting of 28 November 2023. All proposed updates have also been discussed and considered with the Council's Trade Unions in November 2023, and all documents have been supported by Single Impact Assessments (appended to this report) with the engagement of the Council's Equalities Team and Bilingual Cardiff. Any commentary and guidance received through these processes has been taken into account in the draft documents appended to this report.

## Issues

### Strategy and Operational Document Reviews

6. The Strategy incorporates best practice guidance and intelligence from the Chartered Institute of Public Finance and Accountancy (CIPFA), notably the 'Fighting Fraud and Corruption Locally Strategy', and the 'Fraud and Corruption Tracker Survey'. It has also accounted for the Government's functional standards, which set out the basics that public bodies should have in place to find and fight fraud.
7. The Strategy is also based on best practice information and intelligence on the nature and management of fraud risks gained through lead counter-fraud officers participating in ongoing networking. This involves participation in peer local authority networks such as the Core UK Cities, Welsh Chief Auditor and Welsh Investigator groups, and attending the Wales Fraud Forum.
8. The draft revised Strategy (Appendix A) has been updated to incorporate the incremental updates to best practice models, information and guidance as referred to above. The principal updates from the draft updates to the Strategy are:
  - **Enhanced Oversight** - Through the introduction of a Counter-Fraud Oversight Board, to provide strategic management direction, oversight and review of the Council's counter-fraud arrangements, approach, and governance.
  - **Assurance Reviews** – Whereby the Counter-Fraud Oversight Board will commission relevant reviews where considered required on the Directorate assurance and risk assessment in respect of the prevention and detection of fraud.



- **Communication** - Continued fraud awareness week participation and relevant wider information campaigns.
  - **Training** - Refreshed mandatory fraud awareness training for 2024/25 to support all staff.
9. The Counter-Fraud, Bribery and Corruption Strategy template for schools has also been updated and arrangements will be made to engage with school Headteachers and Chairs of Governors to outline the updates, provide relevant guidance and to commend the adoption of the Strategy by respective Governing Bodies.
10. In addition to updating the Counter-Fraud, Bribery and Corruption Strategy, the following operational documents have been subject to review and incremental update in line with best practices and are provided for Cabinet consideration and comment:
- **Counter-Fraud Bribery and Corruption Policy** (*formerly titled the Fraud, Bribery and Corruption Policy*) - The Policy underpins the objectives of the Strategy and sets out accountabilities, and the processes to be followed in respect of the prevention, detection, reporting and investigation of suspected fraud, bribery and corruption.
  - **Fraud Response Plan** - This Plan defines how the Council will respond to allegations and provides guidance on the steps that should be followed, in the event of a suspicion of fraud, bribery, corruption or financial impropriety, either actual or attempted, within or against the Council.
  - **Sanction Procedure** (*formerly titled the Prosecution Policy*) - This Procedure sets out how the Council will pursue and punish fraudsters by using civil sanctions, recovering losses, and supporting the law enforcement response.
  - **Publicity Procedure** (*formerly titled the Fraud Publicity Policy*) - The Procedure sets out how the Council will communicate its counter-fraud strategy, policies, and positive action effectively, for assurance to the public that it is taking a firm line on counter-fraud issues and that it has robust and effective procedures in place to tackle fraudulent activity. It is often the alertness of staff and the public to indicators of fraud that enables detection to occur and the Procedure will be used to encourage this support and to promote mechanisms for reporting suspicions of fraud.

### **Reason for Recommendation**

11. To formally consider and approve proposed updates to the Counter-Fraud, Bribery and Corruption Strategy and operational documents update.

## Legal Implications

12. The Counter-Fraud, Bribery and Corruption Strategy and Policy and associated documents (Appendices A-E to the report) set out the Council's arrangements for safeguarding the public funds and resources entrusted to it, discharging its legal responsibilities (under various relevant legislation, as set out in the body of each document) and adhering to best practice guidance. The updates seek to ensure that each document reflects current legislation and best practice and remains up to date and fit for purpose.
13. In considering this matter, the Council must have regard to:
  - (a) Its 'well-being duty', under the Well-Being of Future Generations (Wales) Act 2015 ('the WCFG Act'), aimed at achieving seven national well-being goals for Wales – a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible. When exercising its functions, the Council is required to take all reasonable steps to meet the well-being objectives it has set in order to maximise its contribution to achieving the national well-being goals, which are set out in Cardiff's Corporate Plan 2023-26: Cardiff Council Corporate Plan 2023-26.
  - (b) Its public sector equality duties, under the Equality Act 2010, which require that the Council must, in making decisions, have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics (specifically, (a) Age, (b) Gender reassignment, (c) Sex, (d) Race – including ethnic or national origin, colour or nationality, (e) Disability, (f) Pregnancy and maternity, (g) Marriage and civil partnership, (h) Sexual orientation (i) Religion or belief – including lack of religion or belief.) The Council also has a statutory duty, when taking strategic decisions, to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). An equalities impact assessment should be carried out to consider the equalities implications of any proposed changes to a Council strategy, policy or practice, and the Council must involve those sharing protected characteristics and with an interest in the matter when assessing equality impacts.
  - (c) Its obligations under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.
14. The Single Impact Assessment, **Appendix F** to the report, assists the decision maker to consider the impacts of its decision, having regard to the duties above.



## **Financial Implications**

15. A Counter Fraud, Bribery and Corruption Strategy is an important aspect of promoting effective financial stewardship and helping to safeguard the Council's financial resources. The covering report highlights that the training will be council-wide and needs to be delivered in ways suitable for the various groups of Council staff ranging from eLearning to face to face engagement sessions. The communication and engagement will be undertaken by Council resources and is anticipated to be within existing budget allocations. However, in the event of any additional cost being identified then the funding will need to be considered before proceeding.

## **HR Implications**

16. It will be important that there is an effective communications programme to ensure that managers and employees are aware of the updated elements of the strategy. The requirements of the mandatory eLearning will need to be continued to be communicated effectively in order to ensure compliance is achieved. The briefing of the Trade Unions will be an important step in this process.

## **Property Implications**

17. There are no further specific property implications in respect of the Counter-Fraud, Bribery and Corruption Strategy & Operational Documents – update report. Where there are any relevant property management matters, acquisitions or valuations being undertaken by the Council, they should adhere to the principles of the Strategy and relevant legislation as necessary and be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas. All Estates Department staff will be required to carry out any mandatory eLearning training and to be aware of these principles and as required through the Strategy.

## **RECOMMENDATION**

Cabinet is recommended to approve the updated Counter-Fraud Bribery and Corruption Strategy, and the operational counter-fraud documents appended to this report.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Chris Lee</b> Corporate Director Resources
	8 December 2023

*The following appendices are attached:*

**Appendix A:** Draft Counter-Fraud, Bribery and Corruption Strategy

**Appendix B:** Draft Counter-Fraud, Bribery and Corruption Policy  
**Appendix C:** Draft Fraud Response Plan  
**Appendix D:** Draft Sanction Procedure  
**Appendix E:** Draft Publicity Procedure  
**Appendix F:** Single Impact Assessment

*The following background papers have been taken into account:*

[Fighting Fraud Corruption Locally Strategy 2020 | Cifas](#)  
[Government Functional Standard - GovS 013: Counter Fraud](#)  
[\(publishing.service.gov.uk\)](#)  
[CIPFA's Fraud and Corruption Tracker Survey](#)  
[Annual Fraud Indicator | Crowe UK](#)

# Counter-Fraud, Bribery & Corruption Strategy



STRONGER  
FAIRER  
Tudalen 173



## Document Control

<b>Organisation</b>	Cardiff Council
<b>Title</b>	Counter-Fraud Bribery & Corruption Strategy
<b>Author</b>	Audit Manager
<b>Owner</b>	Corporate Director Resources, Section 151 Officer
<b>Review date</b>	Biennially

## Revision History

<b>Revision Date</b>	<b>Revision</b>	<b>Previous Version</b>	<b>Description of Revision</b>
2019	1.0		Initial document, titled 'Counter-Fraud & Corruption Strategy'
December 2023	1.1	1.0	Incorporated content from the latest Fighting Fraud and Corruption Locally Strategy

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## Foreword

Ensuring that we protect the public purse is a priority for the Council, and the Counter-Fraud, Bribery and Corruption Strategy is an important element of this.

With criminals increasingly seeking to exploit any weakness across the public sector, we need to be vigilant to fraud risks. This strategy will help ensure that we take all appropriate measures to safeguard public finances, which is more important than ever at a time of declining budgets.

Fraud affects our reputation and our ability to deliver services. All of us, therefore, have a responsibility to do all that we can to prevent fraud and proactively report any suspicions or concerns. This strategy sets out our responsibilities and the expectations of Council, and provides a framework for tackling fraud, bribery and corruption.

Council officers will be fully supported to deliver this strategy, through eLearning, training and awareness campaigns. Their active support will be essential in continuing to develop a culture in which fraud, bribery and corruption are understood across the organisation to be unacceptable, and for which firm action will be taken.

Fraud and any acts of bribery and corruption will not be tolerated.

**Councillor Huw Thomas, Leader of the Council, and Paul Orders, Chief Executive.**

# 1. Objectives

This Strategy is designed to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action is and will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses.

## Our Principles

The strategy will support all working for the Council to better understand fraud risk, and to prevent and detect fraud more effectively. The strategic response to fighting fraud in Cardiff Council includes the following principles through which we:

- **‘Govern’** with robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the Council.
- **‘Acknowledge’** and understand fraud risks and take steps to tackle fraud through a robust anti-fraud response.
- **‘Prevent’** and strengthen the detection of fraud, by making good use of technology, maintaining, and enhancing fraud controls and processes and delivering an anti-fraud culture.
- **‘Pursue’** through punishing fraudsters and the use of civil sanctions and recovery of losses and support to the law enforcement response.



It is advised that those tasked with administering the Strategy have also received adequate Equality/Unconscious Bias training to ensure fairness throughout the process.

## Our Targets

The Strategy is designed to support a fraud reporting culture, strong fraud awareness, assurance, and ownership within Directorates and teams.

1. **Reporting Culture** - Everyone working for / representing the Council (staff, agency workers, temporary staff, Members etc.) needs a good awareness of fraud risk and accountability for reporting, through training, communication activities and policy reviews. Members of the public must know how and when to raise concerns.
2. **Strong Assurance** - The Council's internal control systems need to provide indications of any unusual patterns of activity or events that may point to potential fraudulent activity. Fraud risks must be understood, monitored, and managed, to deliver strong council-wide assurance on fraud risk management.
3. **Ownership** - Everyone working for the Council needs to understand their personal responsibility for supporting counter-fraud risk management. Managers should consider this in Personal Review objective setting.

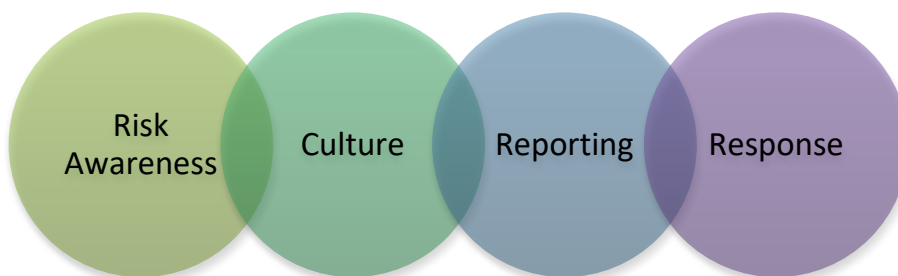
## Why is this important?

Fraud is a significant risk to the UK public sector and has far-reaching financial and reputational consequences.

**“According to the Annual Fraud Indicator 2023 published by Crowe, Peters & Peters and the University of Portsmouth. Public sector fraud losses are estimated to be £50.2bn annually, with £8.8bn of this total being lost in local government.”**

## Our Approach

The Council's approach for meeting the objectives of the strategy involves four core elements:



**Risk Awareness** - Ongoing senior management oversight and engagement in counter-fraud and corruption assessment and response. Delivery of a range of fraud awareness training and taking active steps to understand the nature and level of fraud risks. Providing managers with support in designing, operating, and reviewing internal controls and sharing knowledge of vulnerabilities and lessons learned through strong communication channels.



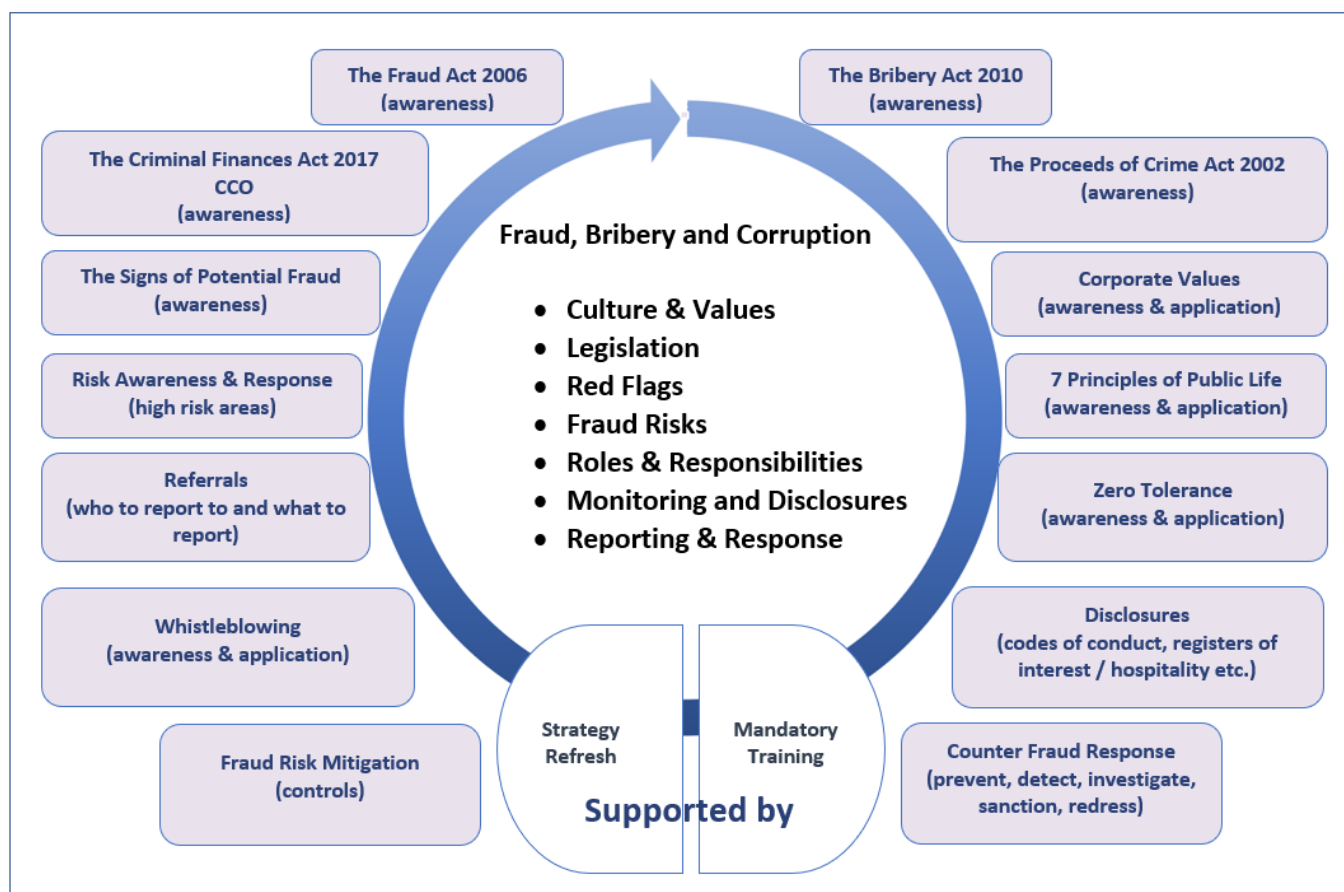
**Culture** - Supporting individuals in their responsibilities to prevent and detect fraud, through training and guidance to reinforce expectations. Communicating our attitude to fraud by raising awareness of the counter-fraud policy framework, which supports the application of clear ethical standards.

**Reporting** - Corporate measurement and reporting of fraud. Providing, effectively communicating, and promoting, a robust process for reporting suspicions of fraud.

**Fraud response** - Responding to fraud effectively through a comprehensive fraud response plan, developing capability and capacity to investigate fraudsters and delivering a collaborative and supportive response.

## How we will deliver the strategy

Awareness, support, and training for ALL officers to understand and apply a strong counter-fraud culture. The Counter-Fraud, Bribery and Corruption Action Plan, which sets out the calendar of key activities planned for each financial year, is included in Appendix A.



## 2. Legal Background

There are a number of pieces of legislation in place that we need to be aware of and ensure we adhere to, which are summarised below:

### Welsh Language Standards

Local authorities in Wales have a statutory duty to comply with the Welsh Language Standards that explain how they as organisations should use the Welsh language in different situations.

The 'Welsh Language Standards' ensure that the Welsh language is treated no less favourably than the English language in all Council services.

Members of the public have a legal right to receive services from the Council in English or Welsh according to their choice. Staff also have the right to receive certain information from their employer in Welsh.

Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.

### Fraud

**The Fraud Act 2006** focusses on dishonest behaviour, with the intent to make a gain either for yourself or another; to cause a loss to another; or expose another to a risk of a loss. A person does not have to actually benefit from the fraud to be guilty of the offence.

The offence of fraud can be committed in three ways, which are summarised below:

- ⊘ **Fraud by false representation** - lying or misleading someone in order to make a gain or cause a loss.  
*E.g. falsifying information in a job application form.*
- ⊘ **Fraud by failing to disclose information** - not stating something you have a legal duty to disclose.  
*E.g. failing to declare a conviction, disqualification, or commercial interest.*
- ⊘ **Fraud by abuse of a position** - abusing a position where there is an expectation to safeguard the financial interests of another person or organisation.  
*E.g. abusing access to monies or using commercially confidential information to make a personal gain or cause a loss.*

**Fraud** - Offences under the Fraud Act 2006 occur where the act or omission is committed dishonestly and with intent to cause gain or loss. The gain or loss does not have to succeed.

Successful prosecutions under the Fraud Act 2006 may result in an unlimited fine and/or a potential custodial sentence of up to 10 years.

## **Bribery and Corruption**

Bribery and Corruption is covered by specific pieces of legislation:

**The Bribery Act 2010** has made it a criminal offence to:

- Ø **Offer, promise, or give a financial or other advantage to another person, and/or**
- Ø **Request, agree to receive, or accept a financial or other advantage, as an inducement or reward for the improper performance of duties.**

The Act contains further offences for commercial bribery; an offence relating to bribery of a foreign public official in order to obtain or retain business or an advantage in the conduct of business; and a form of corporate liability for failing to prevent bribery on behalf of a commercial organisation.

**Bribery** is generally defined as: an inducement or reward offered, promised, or provided to someone to perform their functions or activities improperly in order to gain a personal, commercial, regulatory and/or contractual advantage. Under the Bribery Act 2010, bribery is a series of specific offences.

A conviction under the Bribery Act 2010 may ultimately result in an unlimited fine and/or a custodial sentence of up to 10 years imprisonment.

**Corruption** is generally considered as an “umbrella” term covering various activities such as bribery, corrupt preferential treatment, kickbacks, cronyism, theft, or embezzlement.

A bribe does not have to be in cash; it may be the awarding of a contract, the provision of gifts, hospitality, sponsorship, the promise of work or some other benefit. The persons making and receiving the bribe may be acting on behalf of others – under the Bribery Act 2010, all parties involved may be prosecuted for a bribery offence.

### **Proceeds of Crime Act 2002:**

The Act can be used for recovering criminal assets. Criminal confiscation is the most commonly used power, and this occurs after a conviction has taken place. The Act was introduced to deny criminals the use of their assets, to recover the proceeds of crime and to ‘disrupt and deter’ criminality.

### **Misconduct in Public Office:**

A common law offence for which the elements are:

- a) A public officer acting as such;
- b) Wilfully neglects to perform his duty and/or wilfully misconducts himself;
- c) To such a degree as to amount to an abuse of the public's trust in the office holder; and
- d) Without reasonable excuse or justification.

This offence carries a maximum sentence of life imprisonment and should be reserved for cases of serious misconduct or deliberate failure to perform a duty, likely to injure the public interest. Dishonesty or corrupt behaviour are not essential elements of the offence.

### **Criminal Finances Act 2017:**

The Act introduces a responsibility to have policies and procedures to prevent a UK tax evasion facilitation offence.

The offence created under the Act is called the **Corporate Criminal Offence ("CCO")** and is not the committing of tax evasion itself, but a "failure to prevent". The Council has a responsibility to put in place procedures to prevent tax evasion being facilitated by its staff, elected members, suppliers, and agents.

This strategy has been written to include, so far as is reasonable, preventative procedures in relation to the Corporate Criminal Offence, pursuant to section 45(2) of the Criminal Finances Act 2017.

### **Economic Crime and Corporate Transparency Bill:**

The Bill is currently progressing through the House of Lords and follows on from recommendations made by the Law Commission's 2022 review of corporate criminal liability and includes an amendment to introduce a failure to prevent fraud offence.

If fraud is committed by an employee of an organisation, the organisation must be able to demonstrate it had reasonable measures in place to deter the offending or risk receiving an unlimited fine.

### **Other relevant legislation**

#### **Serious Crime Act 2015:**

The Serious Crime Act gives effect to a number of legislative proposals in relation to serious and organised crime. In doing so, it builds on current law to ensure that the relevant bodies have the powers they need to effectively and relentlessly pursue, disrupt, and bring to justice serious and organised criminals.

#### **The Public Contracts Regulations 2015:**

Where a contracting authority has knowledge that a company or its representatives have been convicted of a corruption offence, they should be treated as ineligible (debarred) to participate in the tendering process.

Companies cannot be permanently debarred, but instead will face a term of debarment, dependent on the case, that can be no longer than five years from the date of the conviction.

### 3. Values

#### General Integrity and Ethical Values

The Council has a strong commitment to integrity, ethical values, and the law, through the Council's Corporate Values, Constitution, and supporting policies and procedures:

- **Corporate Values** - guide the workforce and communicate expectations to our stakeholders on conduct and behaviour.
- **Induction and Training Processes** - are in place for all Officers and Members to ensure awareness and understanding on a range of policies, procedures, and regulations.
- **Statutory Roles** - which include the Section 151 Officer, who has overall responsibility for the financial administration of the Council and the Monitoring Officer, who has overall responsibility for the lawfulness of Council decision making and supporting the work of the Standards & Ethics Committee in relation to standards of conduct.
- **The Standards and Ethics Committee** - responsible for promoting and maintaining high standards of conduct within the Council and monitors and scrutinises the ethical standards of the Authority, its Members, staff and any associated providers of the Authority's services.
- **A Whistleblowing Policy** - encourages staff and contractors to speak out on misconduct or illegal behaviour within the organisation, which affects the public or other people (making a disclosure in the public interest).
- **Zero Tolerance attitude to fraud, bribery, and corruption** - requires Officers and Members to act honestly and with integrity at all times, and to promptly report concerns.

#### Zero Tolerance to Fraud

The Council requires Officers, Members, and those we engage with, to act honestly and with integrity at all times. Zero tolerance is given to those committing or attempting fraudulent or corrupt acts (including bribery) inside and/or outside of the Council, through:

- Acting robustly and decisively when fraud, bribery and corruption are suspected and proven e.g. the termination of contracts, dismissal, prosecution etc;
- Taking action to recover any losses through fraud, bribery, and corruption e.g. through agreement, Court action, penalties, insurance etc;
- Having sound internal control systems, which allow for innovation, whilst limiting opportunities for fraud, bribery, and corruption; and
- Optimising the publicity opportunities associated with anti-fraud and corruption activity within the Council and where appropriate, publishing the results of any action taken, including prosecutions, in the media.

## 4. Assessing Fraud Risk

Cardiff Council relies upon proactive and reactive work across the Council in order to effectively prevent and detect fraud.

The first line of defence is the internal control environment within each directorate, in which there needs to be a culture of accountability, a zero tolerance to fraud, supported by a robust application of controls, to prevent fraud and a reporting culture for any concerns.

Awareness and training are essential to ensure a council-wide response to counter-fraud. A corporate approach to awareness and training is programmed in the Counter-Fraud, Bribery and Corruption Action Plan (see Appendix A).

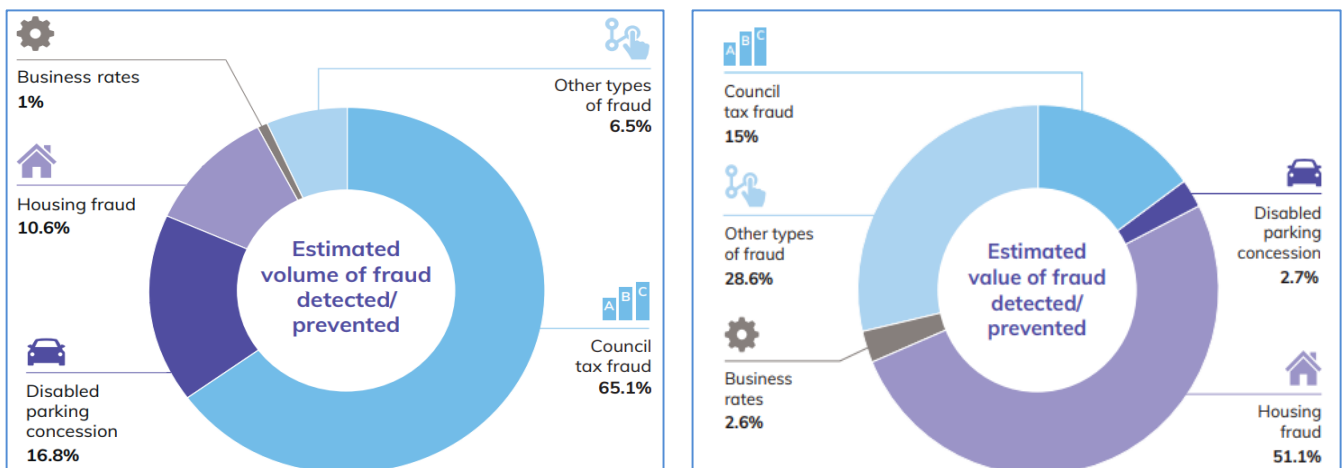
Central resources are targeted to the highest risk fraud areas, and the starting point for the risk assessment is national intelligence and data on fraud levels across local authorities. The annual CIPFA fraud and corruption tracker provides insight on the levels of fraud identified in UK local authorities and wider public services.

The most recent data on the relative proportions of detected local authority fraud by volume is shown below. The associated fraud risk descriptions are included in the glossary in Appendix B.

The following pages explain the process that is followed to develop the fraud risk assessment, starting with national data and intelligence, and then integrating Council intelligence. This strategy and the associated activities included in the Counter-Fraud, Bribery and Corruption Action Plan, are focussing greater attention to an organisation-wide fraud risk awareness, and the reporting of suspicions and concerns from all levels of the organisation.

### National Trends & Intelligence CIPFA Fraud and Corruption Tracker National Report 2020

#### I. Estimated fraud in UK Local Authorities – volume and value



• £122.4m Housing fraud	• £35.9m Council tax fraud	• £6.2m Business rates
• £68.5m Other types of fraud	• £6.4m Disabled parking	

The 'other' types of fraud (6.5% of estimated volume) comprised the following, shown in order of frequency across UK local authorities, ordered from most frequent to least.

## II. Notable 'other' types of fraud in UK Local Authorities in 2019/20

Notable 'other' types of fraud	Estimated value 'overall'	Estimated value 'per fraud'
Adult Social Care	£8.2m	£17.8k
Children's Social Care	£0.4m	£9.9k
Debt	£0.3m	£27.5k
Economic and voluntary sector support & debt fraud	£0.1m	£25k
Grant	£36.6	£227k
Insurance fraud	£3.9m	£11.3k
Mandate fraud	£9.4m	£27.2k
No recourse to public funds / welfare assistance fraud	£2.4m	£11.1k / £0.7k
Payroll, recruitment, expenses, and pension fraud	£0.8m	Payroll - £2.6k Recruitment - £4.8k Expenses - £1.7k Pensions - £13.3k
Procurement fraud	£1.5m	£16.7k
School fraud (excl. transport)	£0.2m	£1.1k
School transport	£0.2m	£32.7k

CIPFA, Fraud and corruption tracker 2020

The Council uses its awareness of national fraud risk trends in local authorities and wider public services, to understand the growing areas of fraud and to consider the conditions in which fraud could take place. This knowledge is used to inform management activities, Internal Audit testing, and the focus of the Corporate Fraud Investigation Team.

The value of actual fraud identified in Cardiff Council through fraud investigations, is monitored, recorded, reflected on and reported to each of the five Governance and Audit Committee meetings held each year.

### Council Intelligence

The Council uses a number of sources of intelligence to identify its fraud risk, which build upon the national intelligence data that we receive. The Corporate Fraud Investigation Team uses the following primary means to identify its fraud risk assessment of the Council.





Building on national intelligence sources, four principal areas are used to further refine the understanding of, and response to fraud risk, as follows:

### **1. Internal Control Environment (*Management and Internal Audit Assurance*)**

Managers at all levels are responsible for ensuring that systems and processes in place minimise fraud risk and are operating as they should. Managers are responsible for installing and monitoring strong physical and system controls to prevent fraud risks, and for effective mechanisms to detect and respond to potential fraud. Management monitor the controls in place to manage fraud risk, allegations of fraud, and other intelligence or red flags for fraud. This intelligence should inform their management risk assessments quarterly and assurance statements twice a year in respect of the prevention and detection of fraud.

Internal Audit provides independent assurance on the operation of internal controls. The Internal Audit plan is responsive to fraud risk, with national data and intelligence used to inform an inherent risk assessment, which is further refined by additional sources of assurance. High fraud risk areas (e.g. Council Tax, Business Rates and Housing) are subject to regular systematic audits, as are the areas of 'other' fraud (as categorised above). Audit test programmes assess the risk of fraud and the effectiveness of key controls to mitigate fraud. The work of audit provides a secondary assessment of the fraud risk.

The full Senior Management Team participate in a coordinated assessment and response to the CIPFA Fraud and Corruption Tracker annually (or as frequently as the scheme is run). This and wider reviews, as arranged informs updates to risk registers and relevant management actions as appropriate.

### **2. Data Matching and Analysis**

There are a number of activities in place to identify fraud risk through data analysis and data matching. Core financial systems use a range of methods to identify the risk of fraud, with mechanisms in place for assurance in key areas of high value transactions such as procurement and payroll.

The Council works with Audit Wales and the Cabinet Office to undertake data matching exercises in order to identify potential frauds and irregularities, and works with other local authorities to share intelligence and best practice. The data matching and analysis intelligence further informs the fraud risk assessment, whilst also leading to proactive fraud detection activities.

### **3. Whistleblowing**

The Council's [Whistleblowing Policy](#) is a means through which those working for, or with us, can make a disclosure in the public interest, and this may relate to an allegation of fraud or financial impropriety. Staff are often the first to realise that there may be something significantly wrong within the Council. The Council is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment, we expect staff, and others that we deal with, who have serious concerns about any aspect of the Council's work to come forward and voice those concerns, with the assurance that they may do so without any fear of reprisal.



#### 4. Strategy, Policies, Training and Awareness

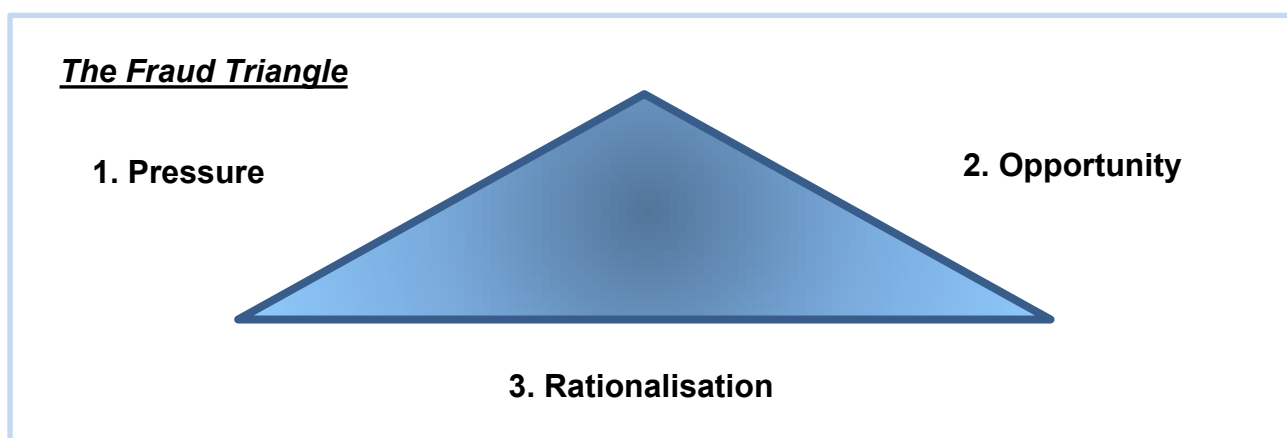
The Council's counter-fraud, bribery and corruption strategy, associated policies and training and awareness campaigns are designed to support the Council to meet a range of counter-fraud and corruption compliance responsibilities. Awareness and engagement campaigns across the organisation target general and focussed areas of counter-fraud compliance and control to support a risk aware and responsive culture.

In recent years, training has been developed and delivered on risk awareness across the organisation and procedures have been developed and updated. These include Corporate Criminal Offence and Anti-Money Laundering responsibilities, for which key points of emphasis are included below:

- Anti-Money Laundering - In line with the Council's Anti-Money Laundering Policy, before establishing a client relationship or accepting an engagement, the Council will put controls in place to address relevant risks. It is important that the Council is aware of whom it is transacting with, including the structure of relevant entities, so all beneficiaries are appropriately disclosed/identified. A 'Due Diligence and Know Your Customer Procedure' sets out the process that must be followed, and the circumstances in which 'Customer Due Diligence Forms' must be completed, and disclosures are to be made. An eLearning Module has been developed to support compliance and control.
- Corporate Criminal Offence - CCO is an offence for the failure to prevent the facilitation of tax evasion in HMRC-administered taxes. Often there is no dividing line between the measures in tax-compliance policies and in policies to counter tax fraud. However, the Council's tax-compliance policies have the effect of countering potential tax fraud and implementing CCO compliance.

#### **The Right Conditions for Fraud**

A concept known as the fraud triangle refers to a 'perfect storm' where the following three elements, leading to fraud, coincide. At the same time as upholding our own corporate values, we need to be alert to the presence of these conditions in others, and to work on reducing the elements which are in our control as colleagues and managers.



Concept developed in 1950s by Criminologist Dr Donald Cressey.

1. **Pressure or motivation** to commit fraud can come from a range of sources e.g. a detrimental change to an individual's personal financial situation.
2. **Opportunity** to commit fraud generally results from poor controls in place within directorates i.e. failing to put in place measures to prevent attempted fraudulent acts. It is the responsibility of managers in the first instance to install and monitor effective controls, with all staff expected to report any concerns they have.
3. **Rationalisation** is the justification that a person has to commit fraud. If the right culture and values are upheld, then regardless of the above two elements, people will not commit fraud.

## **Red Flags for Fraud**

There are a number of behavioural characteristics, which may alert us to a greater risk of fraud. These are known as 'Red Flags', and we are all responsible for keeping alert to the presence of these behavioural characteristics in those that we work with, and reporting concerns to our line manager, where appropriate, and to the Audit Manager.

The Association of Certified Fraud Examiners in its 12<sup>th</sup> edition of the largest global study on occupational fraud, Occupational Fraud 2022: [A Report to the Nations](#) identified behavioural red flags that many fraud perpetrators exhibit as follows:

- Ø Living beyond one's means
- Ø Financial difficulties
- Ø An unusually close association with a vendor or customer
- Ø Control issues, unwillingness to share duties
- Ø Irritability, suspiciousness, or defensiveness
- Ø Bullying or intimidation
- Ø Divorce/family problems
- Ø Wheeler-dealer attitude
- Ø Excessive pressure from within organization
- Ø Addiction problems
- Ø Complained about inadequate pay
- Ø Refusal to take holidays
- Ø Social isolation
- Ø Past legal problems
- Ø Complained about their lack of authority
- Ø Other employment-related problems
- Ø Excessive family/peer pressure for success
- Ø Excessive tardiness or absenteeism
- Ø Instability in life circumstances
- Ø Excessive internet browsing

A fraudster living beyond their means is the most common red flag by a sizable margin. This has ranked as the number 1 red flag in every study since 2008.

## System / Data 'Red Flags'

Inventory shrinkage	Missing documents	Multiple payments
Spikes in invoice volume	Frequent complaints	Excessive number of adjusting entries

## 5. Roles and Responsibilities

Cardiff Council recognises the threat of fraud and corruption, and the harm they can cause to our organisation, our aims and objectives, and our service users.

It is important that all staff recognise personal accountability for managing the risk of fraud, bribery, and corruption. To be able to 'acknowledge', 'prevent' and 'pursue' potential instances of fraud all staff need to work together, and each understand the active role they must play. The primary responsibilities for supporting a counter-fraud culture are included below.

To maintain and enhance the Council's counter-fraud arrangements, a Counter-Fraud Oversight Board is being established with representation from key members of the Senior Management Team, and lead Council officers.

The Board's overall responsibility will be to provide strategic direction, oversight and review of the Council's counter-fraud arrangements, approach, and governance. An appropriate work programme will be developed accordingly.

Roles	Primary Responsibilities
All Staff	<ul style="list-style-type: none"> <li>Complete all mandatory training;</li> <li>Uphold strong standards of conduct and compliance;</li> <li>Maintain physical and system controls to prevent and detect fraud;</li> <li>Keep aware of fraud risks and report suspicions.</li> </ul>
Members	<ul style="list-style-type: none"> <li>Complete all mandatory training;</li> <li>Uphold strong standards of conduct and compliance;</li> <li>Support a reporting culture and take appropriate action;</li> <li>Reinforce a culture of accountability and 'zero tolerance' to fraud.</li> </ul>
Managers	<ul style="list-style-type: none"> <li>Complete all mandatory training;</li> <li>Uphold strong standards of conduct and compliance;</li> <li>Maintain physical and system controls to prevent and detect fraud;</li> <li>Regularly assess, monitor, and manage fraud risks;</li> <li>Support a reporting culture and take appropriate action;</li> <li>Reinforce a culture of accountability and 'zero tolerance' to fraud.</li> </ul>
Section 151 Officer	<ul style="list-style-type: none"> <li>Oversee Counter-Fraud activities across the Council;</li> <li>Make arrangements for the proper administration of financial affairs;</li> <li>Authorise the investigation of potential financial irregularities.</li> </ul>
Monitoring Officer	<ul style="list-style-type: none"> <li>To ensure the lawfulness of Council decision making and support the work of the Standards &amp; Ethics Committee in promoting and maintaining high standards of conduct within the Council.</li> </ul>

Audit Manager	<ul style="list-style-type: none"> <li>• Counter-Fraud Lead / Champion for corporate communication and risk assessment exercises, initiatives and reporting;</li> <li>• Promote awareness of fraud, bribery, and corruption within the Council, inform process improvements and drive cultural change.</li> </ul>
Internal Audit Team	<ul style="list-style-type: none"> <li>• Develop and deliver a risk-based audit plan to provide assurance on effective financial management and sound systems of internal control;</li> <li>• Evaluate the risk of fraud, and the systems and controls in place to prevent and detect fraud.</li> </ul>
Internal Audit – Corporate Fraud Investigation Team	<ul style="list-style-type: none"> <li>• Provide advice and support to the Section 151 Officer and assurance that suspicions of fraud, bribery and corruption are dealt with in an effective, efficient, and consistent manner;</li> <li>• Work closely with Directorates where fraud or financial impropriety is suspected;</li> <li>• Provide professional advice and support to Investigating Officers;</li> <li>• To lead investigations as appropriate;</li> <li>• Develop and deliver the Counter-Fraud Action Plan.</li> </ul>
Counter-Fraud Oversight Board	<ul style="list-style-type: none"> <li>• To provide strategic direction, oversight and review of the Council's counter-fraud arrangements, approach, and governance.</li> </ul>
Governance and Audit Committee	<ul style="list-style-type: none"> <li>• To monitor the Counter-Fraud, Bribery and Corruption Strategy, actions and resources;</li> <li>• To review the assessment of fraud risks and potential harm to the council from fraud and corruption.</li> </ul>
<i>Dedicated Investigation roles</i>	<i>NB – this Strategy outlines the roles and responsibilities to support a council-wide approach to Counter-Fraud. The specific roles in respect of investigations are included in associated policies.</i>

## Reporting Culture

The core message to staff is that through your day-to-day work, you are in the best position to recognise specific risks within your areas of responsibility, or those working closely with you. Where you believe the opportunity for fraud, corruption or bribery exists, whether because of poor procedures or oversight, you should report in accordance with the following simple steps.

If you believe you have identified potential fraud:

1. Report the matter to your line manager as
2. soon as possible. Line managers should attempt to establish as many details as possible (through discussion with the notifying officer only).

OR

3. If the concern relates to your line manager, report the matter direct to the Audit Manager (Chris Pyke) or the Section 151 Officer (Christopher Lee).
4. Following any notification of fraud, financial impropriety or irregularity, Management should in the first instance, send an email to the Corporate-Fraud Investigation Team [fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk) summarising the allegation(s), including as much detail as possible.

NB. Key Contact information is included in Appendix C, and the investigation process is included in the Council's Counter-Fraud, Bribery, and Corruption Policy.

## Further Reporting Mechanisms:

[Whistleblowing Policy](#) [Tenancy fraud](#) [Benefit Fraud](#) [Scams online](#) [Fraud online](#)

- Audit Wales Whistle blowers' Hotline 029 20 320 522 [whistleblowing@audit.wales](mailto:whistleblowing@audit.wales)
- Public Services Ombudsman for Wales 0300 790 0203 [ask@ombudsman.wales](mailto:ask@ombudsman.wales)
- Protect (previously Public Concern at Work) 020 3117 2520

## 6. Monitoring and Disclosures

The Council requires a number of disclosures to be made for transparency and accountability, and to reinforce its counter-fraud culture. The primary policies in which disclosures are required for Officers and Members relate to:

- Codes of Conduct
- Registers of Interest
- Register of Gifts and Hospitality

In upholding strong standards of conduct and compliance, it is vital that we work in accordance with the full requirements of these policies and codes. All relevant personal interests, and gifts and hospitality received, need to be fully disclosed in accordance with the respective policies with associated monitoring, and review processes in place.

## 7. Fraud Response Plan

The Council's approach to counter-fraud includes a number of proactive and responsive elements.

### Proactive

- Developing a counter-fraud culture to increase resilience to fraud;
- Preventing fraud through the implementation of appropriate and robust internal controls and security measures;
- Using techniques such as data matching to validate data and identifying anomalies;
- Deterring fraud attempts by publicising the organisation's anti-fraud and corruption stance and the actions it takes against fraudsters; and
- Ensuring suppliers adhere to the Council's Suppliers' Code of Conduct.

### Responsive

- Detecting fraud through data and intelligence analysis;
- Implementing effective whistleblowing arrangements;
- Reporting tax non-compliance and fraud to HMRC;
- Investigating fraud referrals;
- Reporting suspected criminal activity to the Police

- Applying sanctions, including internal disciplinary, regulatory, and criminal; and
- Seeking redress, including the recovery of assets and money, where possible.

The Council has a Counter-Fraud Plan in place as part of its Counter-Fraud Policy Framework as summarised below.

### Counter-Fraud Strategy, Policy, and Document Framework



Each of the above documents supports the Council to achieve one or more of its Counter-Fraud objectives as follows:

- **‘Govern’** with embedded anti-fraud, bribery, and corruption measures;
- **‘Acknowledge’** and understand fraud risks;
- **‘Prevent’** and strengthen the detection of fraud; and
- **‘Pursue’** and punish fraudsters.

These core documents need to be robustly applied and adhered to by all working for the Council.

Included in Appendix C is a desktop guide for wide publicity and use across the Council.

## 8. Counter-Fraud Action Plan

The Audit Manager will produce a Counter-Fraud Action Plan on an annual basis to summarise the key Counter-Fraud work and initiatives scheduled for the financial year.

The Counter-Fraud Oversight Board and the Governance and Audit Committee will oversee the delivery of Counter-Fraud activities.

## The Counter-Fraud, Bribery and Corruption Action Plan

Ref.	Action Required	Target Timescale	Comments (where applicable)
<b>Oversight arrangements</b>			
1.	<b>Counter-Fraud Oversight Board</b> The Board's overall responsibility will be to provide strategic direction, oversight and review of the Council's counter-fraud arrangements, approach, and governance. To meet quarterly		To provide strategic direction, oversight and review of the Council's counter-fraud arrangements, approach, and governance
<b>Anti-fraud and Corruption Policies Updates (<i>Primary Policies</i>)</b>			
2.	<b>Counter-Fraud, Bribery and Corruption Strategy</b> Strategic priorities, approach, responsibilities, and actions	Review every two years	Counter-Fraud, Bribery and Corruption Strategy, Policies and Procedures shall be kept under review by the Audit Manager who shall have authority, in consultation with the Corporate Director Resources and Portfolio Cabinet Member, to make any minor amendments to ensure they remain effective and up to date.  Material and strategic updates are to be approved by Cabinet after consideration by the Governance and Audit Committee
3.	<b>Counter-Fraud, Bribery and Corruption Policy</b> Review and update the policy that guides the approach to preventing fraud, bribery, and corruption, managing CCO responsibilities, and managing suspected cases	Review every two years	
4.	<b>Fraud Response Plan</b> Review and update the approach followed in the event of suspicions of fraud, bribery, and corruption, and CCO responsibilities	Review every two years	
5.	<b>Anti-Money Laundering Policy and Procedure</b> Review and update the policy that provides guidance, obligations, and reporting arrangements	Review every two years	
6.	<b>Whistleblowing Policy</b> Review and update to ensure it meets best practice	Regular review (directed by Monitoring Officer.)	
7.	<b>Sanction Procedure</b> Review and update the procedure that provides guidance on a decision to prosecute an individual in respect of a criminal investigation case	Review every two years	

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Ref.	Action Required	Target Timescale	
<b>Participation in Networks and Information Reviews</b>			
8.	<b>Fraud Network</b> Attend meetings and correspond with Chief Auditors, Investigators, and other like-minded professionals/relevant groups	Ongoing	To ensure we are up to date with national and regional attempted and committed frauds, and trends and intelligence
9.	<b>Counter-Fraud and Corruption Review</b> All Directorate Management Teams to participate in a coordinated assessment and response to an annual exercise, and to update risk registers and actions as appropriate.	Annually	The tracker is based on an annual survey created by CIPFA and has been designed to provide a council-wide view of the risk of fraud and corruption across the organisation, for management information and assurance. It complements the senior management assurance statement and risk register processes.
10.	<b>Senior Management Assurance Statements - Review</b> The Counter-Fraud Oversight Board will commission relevant reviews where considered required on the Directorate assurance statements in respect of the prevention and detection of fraud.	When directed by the Counter-Fraud Oversight Board	Senior Management Assurance Statements (SMAS) are used to assess governance maturity in application of the 'Delivering Good Governance in Local Government' framework. Each Director responds to 28 good governance statements using a 5-point maturity scale for their areas of responsibility.



Ref.	Action Required	Target Timescale	
11.	<p><b>Directorate Risk Register – Review</b></p> <p>The Counter-Fraud Oversight Board will commission relevant reviews where considered required on the Directorate risks relating to fraud, bribery, and corruption.</p>	When directed by the Counter-Fraud Oversight Board	The corporate risk register is formally reviewed and updated on a quarterly basis. Senior Managers are supported to identify and report risks at the right level in a timely manner. Through the process of risk escalation, Directors communicate significant risks to SMT to raise collective awareness and support. The Audit Manager attends SMT to present on Counter-Fraud, Bribery, and Corruption matters.
<b>Training and Awareness Raising</b>			
12.	<p><b>Fraud Awareness Training</b></p> <p>Promote and maintain mandatory eLearning training module across the council and deliver face to face training for non-PC users.</p>	Ongoing	eLearning modules are available for all PC users. Training will be provided to line managers of non PC users to enable face to face training to be cascaded.
13.	<p><b>Training/communication sessions</b></p> <p>Participate in International Fraud Awareness Week in November each year, working with the Council's Communications Team.</p>	Ongoing	To promote an anti-fraud culture and awareness raising at a local level.
<b>Data Analytics &amp; Proactive Fraud Reviews</b>			
14.	<p><b>National Fraud Initiative</b></p> <p>Participate in the data matching exercise on an ongoing basis to assist in the prevention and detection of fraud.</p>	Ongoing	The National Fraud Initiative (NFI) is an exercise that matches electronic data within and between public and private sector bodies to prevent and detect fraud.
15.	<p><b>Internal Audit Plan and Review</b></p> <p>The Internal Audit Plan is informed by CIPFA intelligence of local authority fraud risks, and wider organisation risks and information. The team actively reviews the effectiveness of controls in place to prevent and detect fraud, as part of their ongoing programme of work.</p>	Ongoing	

## Glossary – Fraud Types

Based on the CIPFA Fraud and Corruption Tracker 2020

<p><b>1. Adult social care fraud</b></p> <p>Adult social care fraud can happen in a number of ways but the increase in personal budgets gives a greater opportunity for misuse. Investigations may cover cases where:</p> <ul style="list-style-type: none"> <li>• direct payments were not being used to pay for the care of the vulnerable adult.</li> <li>• care workers were claiming money for time they had not worked or were spending the allocated budget inappropriately.</li> </ul>
<p><b>2. Blue Badge fraud</b></p> <p>The Blue Badge is a Europe-wide scheme entitling holders of the permit to parking concessions. This scheme is locally administered, and badges issued to those with disabilities so they can park nearer to their destination. At present, a badge issued to a deceased person is classified as fraudulent, even if it is not being used for fraudulent purposes.</p>
<p><b>3. Business rates fraud</b></p> <p>Business rates fraud is not a transparent landscape for the fraud investigator, with legislation making it difficult to separate evasion and avoidance. Business rate fraud may include the fraudulent applications for exemptions and reliefs and unlisted properties, and fraud staff may be used to visit properties in question.</p>
<p><b>4. Cautions</b></p> <p>Cautions relate to a verbal warning given in circumstances where there is enough evidence to prosecute, but it is felt that it is not in the public interest to do so in that instance.</p>
<p><b>5. Council tax fraud</b></p> <p>Council tax fraud is split into three sections:</p> <ul style="list-style-type: none"> <li>• <b>Council tax single person discount</b> – where the liable party claims to be the only adult resident and receives a 25% discount, when in fact other adults reside in the property.</li> <li>• <b>Council tax reduction support</b> – where the recipient fails to correctly declare their circumstances.</li> <li>• <b>Other types of council tax fraud</b> – e.g., claims for exemptions or discounts to which the council tax payer has no entitlement.</li> </ul>
<p><b>6. Debt fraud</b></p> <p>Debt fraud includes fraudulently avoiding a payment of debt to an organisation, excluding council tax discount.</p>
<p><b>7. Disciplinary outcomes</b></p> <p>Disciplinary outcomes relate to the number of instances where, as a result of an investigation by a fraud team, disciplinary action is undertaken, or where, a subject resigns during the disciplinary process.</p>
<p><b>8. Economic and voluntary sector (grant fraud)</b></p> <p>This type of fraud relates to the false application or payment of grants or financial support to any person and any type of agency or organisation.</p>
<p><b>9. Housing fraud</b></p> <p>Fraud within housing takes a number of forms, including sub-letting for profit, providing false information to gain a tenancy, wrongful tenancy assignment and succession, failing to use the property as the principal home, abandonment, and right to buy.</p>
<p><b>10. Insurance fraud</b></p> <p>Insurance fraud includes any insurance claim that is proved to be false, made against the organisation or the organisation's insurers.</p>

<p><b>11. Mandate fraud</b></p> <p>Action Fraud define mandate fraud as “when someone gets you to change a direct debit, standing order or bank transfer mandate, by purporting to be an organisation you make regular payments to, for example a subscription or membership organisation or your business supplier”.</p>
<p><b>12. Manipulation of data fraud</b></p> <p>The majority of manipulation of data frauds relate to staff changing data in order to indicate better performance than actually occurred and staff removing data from the organisation. It also includes individuals using their position to change and manipulate data fraudulently or in assisting or providing access to a family member or friend.</p>
<p><b>13. No recourse to public funds fraud</b></p> <p>No recourse to public funds prevents any person with that restriction from accessing certain public funds. A person who claims public funds despite such a condition is committing a criminal offence.</p>
<p><b>14. Organised crime</b></p> <p>The widely used definition of organised crime is one planned, co-ordinated, and conducted by people working together on a continuing basis. Their motivation is often, but not always, financial gain.</p>
<p><b>15. Payroll fraud</b></p> <p>Payroll fraud covers a wide range of areas such as ghost employees on the payroll, diversion of payments into fraudulent accounts, employees set up to receive higher salaries than they are entitled to by either grade or hours worked and false overtime claims.</p>
<p><b>16. Procurement fraud</b></p> <p>This includes any fraud associated with the false procurement of goods and services for an organisation by an internal or external person(s) or organisations in the ‘purchase to pay’ or post contract procedure, including contract monitoring.</p>
<p><b>17. Recruitment fraud</b></p> <p>Recruitment fraud includes applicants providing false CVs, job histories, qualifications, references, immigration status (ie the right to work in the UK) or the use of a false identity to hide criminal convictions or immigration status.</p>
<p><b>18. Right to buy</b></p> <p>Right to buy is the scheme that allows tenants who have lived in their properties for a qualifying period the right to purchase the property at a discount.</p>
<p><b>19. Tax</b></p> <p>Tax fraud is a deliberate attempt not to pay the tax that is due. This type of fraud is typically against the payment of corporation tax, income tax, VAT, and landfill tax, but includes all taxes and duties administered by HM Customs and Excise.</p>
<p><b>20. Welfare assistance</b></p> <p>Organisations have a limited amount of money available for welfare assistance claims so the criteria for applications are becoming increasingly stringent. Awards are discretionary and may come as either a crisis payment or some form of support payment.</p>
<p><b>21. Whistleblowing</b></p> <p>Effective whistleblowing allows staff to raise concerns about a crime, criminal offence, miscarriage of justice or dangers to health and safety in a structured and defined way. It can enable teams to uncover significant frauds that may otherwise have gone undiscovered. Organisations should therefore ensure that whistleblowing processes are reviewed regularly.</p>



## A Desktop Guide to Reporting Cardiff Council Fraud, Bribery and Corruption

**FRAUD** is the dishonest intent to obtain a financial gain from, or cause a financial loss to, a person or party through false representation, failing to disclose information or abuse of position.

**CORRUPTION/BRIBERY** is the offering, promise, giving, requesting, agreeing to receive, or accepting a payment or other advantage to induce or reward a person to improperly carry out their duties.

### DO

- **Note your concerns**

Record details such as your concerns, names, descriptions, dates, times, details of conversations and possible witnesses. Time, date and sign your notes.

- **Retain or secure evidence**

Retain any evidence that may be destroyed, but do not alter or write on it in any way.

- **Report your suspicion promptly**

Confidentiality will be respected – delays may lead to further financial loss.

- **Be discreet**

Don't discuss your concerns with anyone who doesn't need to know.

### DO NOT

- **Confront the suspect or convey concerns to anyone other than those authorised**

Never attempt to question a suspect yourself; this could alert a fraudster and place you at harm and jeopardise an investigation/put evidence at risk.

- **Try to investigate the concern yourself**

Never attempt to gather evidence yourself unless it is about to be destroyed; speak with the Council's Counter-Fraud Specialist as soon as possible for advice and guidance.

- **Be afraid of raising your concerns**

The Public Interest Disclosure Act 1998 protects employees who have reasonable concerns. You will not suffer discrimination or victimisation by following the correct procedures.

### If you suspect that fraud against the Council has taken place, you must report it immediately:

- To your line manager in the first instance, where appropriate or direct to the Audit Manager (Chris Pyke) or the Section 151 Officer (Christopher Lee).

Management must report details to the Corporate-Fraud Investigation Team [fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk)

#### Contact details:

#### **Audit Manager**

**Internal Audit, County Hall, Cardiff. CF10 4UW**

**Telephone: 2087 3455**

- Audit Manager (Chris Pyke) [cpyke@caerdydd.gov.uk](mailto:cpyke@caerdydd.gov.uk)
- Section 151 Officer (Christopher Lee) [christopher.lee@cardiff.gov.uk](mailto:christopher.lee@cardiff.gov.uk)

All referrals will be treated in confidence and investigated by professionally trained personnel.

## Protecting your Council from Fraud, Bribery and Corruption

Your nominated **Counter-Fraud Specialist is David Hexter**, who can be contacted via email on [fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk)  
If you would like further information about Cardiff Council Fraud Activities, please visit our [SharePoint site](#).

# Counter-Fraud, Bribery & Corruption Policy



STRONGER  
FAIRER  
GREENER  
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## Document Control

<b>Organisation</b>	Cardiff Council
<b>Title</b>	Counter-Fraud, Bribery & Corruption Policy
<b>Author</b>	Audit Manager
<b>Owner</b>	Corporate Director Resources, Section 151 Officer
<b>Review date</b>	Biennially

## Revision History

<b>Revision Date</b>	<b>Revision</b>	<b>Previous Version</b>	<b>Description of Revision</b>
2018	1.0		Initial document
December 2023	1.1	1.0	Incorporated content from the latest Fighting Fraud and Corruption Locally Strategy

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## 1. Objectives

- 1.1 The Council's reputation is underpinned by ethical behaviour, financial probity, and honesty. Fraud, bribery, corruption, or other dishonesty adversely affects the Council's reputation and puts its ability to achieve its policies and objectives at risk by diverting the Council's limited resources from the provision of services to the people of Cardiff.
- 1.2 This policy supports the core objective of the Counter-Fraud, Bribery and Corruption Strategy (**ADD LINK**), to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action is and will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses.
- 1.3 The Council is one of the largest employers in Wales, delivering services to approximately 364,000 people, with assets, interests and annual transactions running into billions of pounds.
- 1.4 In carrying out its functions and responsibilities, the Council seeks to promote a culture of openness and fairness and expects all those who work for and within the Council to adopt the highest standards of propriety and accountability.
- 1.5 Members and employees of the Council must comply with statutory codes of conduct – The Members' Code of Conduct and the Employees Code of Conduct, both documents forming part of the [Constitution](#) of the Council.
- 1.6 The Council fully recognises its responsibility for good financial management so that public money is safeguarded at all times and used appropriately, efficiently, and effectively. The prevention, and if necessary, the investigation, of fraud, bribery and corruption is therefore seen as an important aspect of its duties, which it is committed to undertake. The procedures and the culture of the Council are recognised as important in ensuring high standards in public life.
- 1.7 As part of the Council's commitment to its counter-fraud, bribery, and corruption responsibilities, arrangements have been developed to safeguard against the Corporate Criminal Offences of failure to prevent the criminal facilitation of tax evasion (under Part 3 of the Criminal Finances Act 2017), to prevent the use of our services for money laundering and to prevent terrorist financing.
- 1.8 This policy has been written to include, so far as is reasonable, preventative procedures in relation to the Corporate Criminal Offences (failure to prevent the criminal facilitation of tax evasion), pursuant to section 45(2) of the Criminal Finances Act 2017.
- 1.9 The Council acknowledges that the vast majority of employees and those that work with it act with honesty and integrity at all times to safeguard the public resources they are responsible for. However, there are people who will not act in this way.



## 2. Legislation, Definitions, Application & Scope

Key legislation includes the following:

- 2.1 The Fraud Act 2006 - an Act to make provision for, and in connection with, criminal liability for fraud and obtaining services dishonestly, the most applicable offences to the Council and this policy are:
  - Fraud by false representation
  - Fraud by failing to disclose information
  - Fraud by abuse of position
- 2.2 The Bribery Act 2010 - an Act to make provision about offences relating to bribery; and for connected purposes, the most applicable offences to the Council and this policy are:
  - Bribing another person
  - Being bribed
- 2.3 Criminal Finances Act 2017, Part 3 – this Act creates the ‘Corporate Criminal Offences’ which make a corporate body criminally liable if it fails to prevent an ‘associated person’ (which includes employees, agents and anyone providing services for or on its behalf) from criminally facilitating the evasion of a tax (whether it is owed in the UK or in a foreign country).

### **Definitions – for the purposes of this policy**

- 2.4 **Fraud** is an unlawful act undertaken in order to make a gain for oneself or another, cause a loss or expose another to a risk of loss; often through false representation, failure to disclose information, or abuse of a position.
- 2.5 **Bribery** is generally defined as: an inducement or reward offered, promised, or provided to someone to perform their functions or activities improperly in order to gain a personal, commercial, regulatory and/or contractual advantage.
- 2.6 **Corruption** is generally considered as an “umbrella” term covering such various activities as bribery, corrupt preferential treatment, kickbacks, cronyism, theft, or embezzlement.
- 2.7 **Members** include, Elected, Independent and Co-opted Members.

### **Who this policy applies to**

- 2.8 This policy applies to everyone associated with the Council (employees, agency workers, temporary staff, Members, service users, contractors, partners, and voluntary bodies). The expectation is that all will remain alert to the risk of fraud, bribery and corruption and raise any concerns. They can do this in the knowledge that such concerns will be properly investigated, without fear of victimisation, subsequent discrimination, or disadvantage.

2.9 Members of the public may also have concerns, but not know how and when to raise them. The reporting section below, explains the process to follow.

### **Aims and scope of this policy**

2.10 This policy makes clear that the Council will not tolerate fraud, bribery or corruption and will take all necessary steps to investigate concerns, recover losses and sanction offenders.

2.11 The Council is committed to an effective Policy designed to:

- Raise awareness
- Encourage prevention
- Promote detection
- Facilitate reporting
- Identify a clear pathway for investigation
- Act as a deterrent against future fraud, bribery, or corruption

2.12 It is advised that those tasked with administering the Policy have also received adequate Equality/Unconscious Bias training to ensure fairness throughout the process.

## **3. Recruitment, Training and Awareness**

3.1 It is important that appointments are made fully in compliance with recruitment policies and procedures, to include reasonable measures to verify professional qualifications, honesty, propriety, and integrity. For instance, right to work checks and written references must be obtained before employment offers are confirmed, and where appropriate, Disclosure and Barring Service checks will also be required.

3.2 Training is provided, as appropriate, to employees, in order to improve awareness of, and skills to combat, fraud, bribery and corruption. Additional documentation and guidance is available on the Internal Audit, Corporate Fraud Investigation Team's public SharePoint [site](#).

3.3 Mandatory Fraud Awareness training is available via the Council's Academy website and an Anti-Money Laundering online training Module is also available. At a minimum, all staff who receive cash, monitor cash receipts or who manage staff in these areas, and all solicitors must complete eLearning on anti-money laundering. This includes Operational Managers in these areas, who are responsible for verifying customer due diligence evidence and making disclosures to the Money Laundering Reporting Officer.

## 4. Prevention

- 4.1 The Council uses a number of methods to deter potential fraudsters from committing or attempting fraudulent or corrupt acts (including bribery) whether they are inside and/or outside of the Council, including:
- Having a zero tolerance approach to fraud, bribery, and corruption.
  - Publicising the Council's determination to prevent and detect fraud, bribery, and corruption e.g. clauses in contracts, publications etc.
  - Risk awareness driven through Internal communication campaigns, raising awareness, training and the provision of guidance and support.
  - Acting robustly and decisively when fraud, bribery and corruption are suspected and proven e.g. the termination of contracts, dismissal, prosecution etc.
  - Taking action to recover losses e.g. through agreement, court action, penalties, insurance etc.
  - Having sound internal control systems, which allow for innovation, whilst limiting opportunities for fraud, bribery, and corruption.
  - Optimising the publicity opportunities associated with anti-fraud and corruption activity within the Council and where appropriate, publishing the results of any action taken, including prosecutions, in the media.
- 4.2 There are a wide range of procedures in place to minimise the risk of fraud that constitute a major part of the Council's system of internal control, designed to ensure the Council conducts its business properly and effectively and completes its transactions fully, accurately, and correctly.
- 4.3 The Council aims to have in place efficient and effective systems of control that as far as possible prevent potential fraudsters from exploiting weaknesses. The prime responsibility lies with senior management who are expected to design and operate systems and procedures that will minimise losses due to fraud, bribery, corruption. The Council's Internal Audit Team supports senior management through an independent appraisal of the integrity of all internal control systems. Key documents in the prevention of fraud, bribery and corruption are the Council's [Financial Procedure Rules](#) and [Contract Standing Order & Procurement Rules](#), which must be adhered to at all times.
- 4.4 Employees are expected to abide by their professional codes of conduct and the [Employee Code of Conduct](#).
- 4.5 Members are bound by the ethical code and should consider the Cardiff Undertaking for Councillors in conjunction with the [Members' Code of Conduct](#).
- 4.6 As part of the pre-qualification questionnaire process for tendering / self-declaration and in compliance with relevant regulations, the Council sets out grounds on which a bidding organisation must be deemed ineligible to tender for, or be awarded, a public contract. These grounds include conviction for fraud, bribery, and corruption.

- 4.7 There is a requirement on Council officers and elected Members to disclose any pecuniary interests in contracts relating to the Council and not to offer, or accept, any fee or reward in connection with their Council duties, other than their proper remuneration. Other Council policies and guidance must also be complied with, such as: Guidance - Hospitality, Gifts and other Benefits - Officers, Guidance - Hospitality, Gifts and other Benefits - Members and Officers Personal Interests and Secondary Employment Policy. Senior Managers have a responsibility to consider, on an ongoing basis, the adequacy of controls to prevent and promptly detect fraud, bribery and corruption within their Directorate and enter and manage risks, as appropriate through their risk register.

## 5. Detection

- 5.1 It is important that there are ways of detecting fraud when it happens. Most systems will have controls to measure the throughput of transactions and provide management reports for monitoring as a means of identifying suspected fraud.
- 5.2 The work of both Internal and External Audit is primarily to ensure controls are embedded into systems as a prevention measure. Management should also have inbuilt mechanisms to support early detection of anything untoward.
- 5.3 It is the responsibility of all managers, Members, and employees to prevent and help detect fraud, bribery, and corruption.
- 5.4 The Council participates in the National Fraud Initiative, an exercise that matches electronic data within and between public and private sector bodies to prevent and detect fraud. The Council will also exchange information and intelligence with other public bodies or agencies, when appropriate and lawful, to help combat fraud, bribery, and corruption.
- 5.5 The Council has a [Whistleblowing Policy](#) which supports staff to report any serious concerns about malpractice within the Council and sets out a procedure for this. However, concerns relating to fraud, bribery, and corruption will be investigated in accordance with this Counter-Fraud, Bribery and Corruption Policy. The Internal Audit, Corporate Fraud Investigation Team will liaise with the Director of Governance and Legal Services and Monitoring Officer in any cases where it appears that the Whistleblowing Policy applies.
- 5.6 Suspicions of fraud, bribery and corruption are often raised by employees and/or members of the public and a reporting culture is encouraged. **Any person who suspects fraud or financial impropriety has a responsibility to report this, and if in doubt, should contact Internal Audit for advice.**

## 6. Reporting

- 6.1 Suspected fraud, bribery and corruption can be notified in a number of ways, but in all cases, it is important that employees and/or the public feel confident to report their concerns and are clear of the means by which they are able to do so.
- 6.2 It is a legal right to receive services from the Council in English or Welsh according to choice. Correspondence will be received, and investigations will be conducted in accordance with the Welsh Language Standards.
- 6.3 Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.
- 6.4 If you believe you have identified potential fraud:

- Report the matter to your line manager as soon as possible. Line managers should attempt to establish as many details as possible (through discussion with the notifying officer only).

OR

- If the concern relates to your line manager, report the matter direct to the Audit Manager (Chris Pyke) or the Section 151 Officer (Christopher Lee).
  - Following any notification of fraud, financial impropriety or irregularity, Management should in the first instance, send an email to the Corporate-Fraud Investigation Team, email: [fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk) summarising the allegation(s), including as much detail as possible.
- 6.5 The [Financial Procedure Rules \(Section 4\)](#) place a responsibility on Directors to immediately notify the Audit Manager whenever any matter arises which involves, or is thought to involve, a breach of security, theft, or irregularities concerning cash, stores or other property of the Council (including data), or any suspected irregularity in the exercise of the functions of the Council.
- 6.6 Members of the public wishing to report suspicions of a breach of security, theft, or irregularities concerning cash, stores or other property of the Council, or any suspected irregularity in the exercise of the functions of the Council, should if possible refer to information available on the Council's Fraud web page: ([Your Council/Council Finance/Managing the Council's Finances/Fraud](#)), or alternatively contact the Corporate Fraud Investigation Team by:

**Email:** [fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk)

**Post:** Audit Manager, Internal Audit Section, County Hall, Cardiff. CF10 4UW.

- 6.7 For further information in respect of identifying fraud, bribery, and corruption, refer to the Counter-Fraud, Bribery and Corruption Strategy ([LINK](#)).

## 7. Investigation

- 7.1 The [Fraud Response Plan](#) sets out how suspicions of fraud will be considered and investigated.
- 7.2 The overall responsibility for investigating cases of suspected fraud, bribery, corruption, or financial impropriety committed by employees, rests with management of the employing Directorate; however, the Section 151 Officer has responsibility for financial stewardship throughout the Council and as such will seek assurance, through the Audit Manager, that a proper investigation is undertaken.

### **Collaboration with other Agencies and Bodies**

- 7.3 Given the potential risk to the Council, the nature and scope of fraud, bribery and corruption and the ease with which fraudsters can utilise technology to commit fraud across boundaries, the Council will share information and intelligence with others, including (but not limited to):
- Action Fraud
  - Cabinet Office / Audit Wales
  - CIFAS
  - HMRC
  - Home Office
  - Local Police / National Fraud Intelligence Bureau
  - National Anti-Fraud Network
  - Other Local Authorities
  - UK Border Agency
  - Department for Work and Pensions

## 8. Accountability

- 8.1 The Corporate Director Resources is responsible for the proper administration of the Council's financial affairs and overseeing the Council's corporate approach to counter-fraud governance, risk management, and assurance.
- 8.2 Through its terms of reference, the Governance and Audit Committee has a responsibility to review the assessment of fraud risks and potential harm to the Council from fraud and corruption, and to monitor the counter-fraud strategy, actions, and resources.
- 8.3 To maintain and enhance the Council's counter-fraud arrangements, a counter-fraud oversight board will provide strategic direction, oversight and review of the Council's counter-fraud arrangements, approach, and governance.
- 8.4 A record of referrals and their outcomes will be maintained by the Internal Audit Corporate Fraud Investigation Team and reported at least annually to the Governance and Audit Committee and Section 151 Officer.

- 8.5 Action may be taken against employees in the event of them failing to comply with this Policy, or making an untrue allegation frivolously, maliciously or for personal gain, in accordance with the Council's Disciplinary Policy.
- 8.6 This Policy shall be kept under review by the Audit Manager who shall have authority, in consultation with the Corporate Director Resources and Portfolio Cabinet Member, to make any minor amendments to ensure it remains effective and up to date. Material and strategic updates are to be approved by Cabinet after consideration by the Governance and Audit Committee.

## **9. Confidentiality and Data Protection**

- 9.1 The Council will treat all information received confidentially, where appropriate, and disclose it only on a 'need to know' basis or as required by law. Any processing of personal data will comply with data protection laws and principles.

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# Fraud Response Plan

Counter-Fraud, Bribery and Corruption



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## Document Control

<b>Organisation</b>	Cardiff Council
<b>Title</b>	Fraud Response Plan
<b>Author</b>	Audit Manager
<b>Owner</b>	Corporate Director Resources, Section 151 Officer
<b>Review date</b>	Biennially

## Revision History

<b>Revision Date</b>	<b>Revision</b>	<b>Previous Version</b>	<b>Description of Revision</b>
2018	1.0		Initial document
December 2023	1.1	1.0	Reflecting Counter-Fraud, Bribery and Corruption Strategy updates

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## 1. Introduction

### 1.1 This Fraud Response Plan:

- Defines how the Council will respond to allegations, and provides guidance on the steps that should be followed, in the event of a suspicion of fraud, bribery, corruption or financial impropriety, either actual or attempted, within or against the Council. This plan should be read alongside the Counter-Fraud, Bribery and Corruption Strategy and Counter-Fraud, Bribery and Corruption Policy, the Whistleblowing Policy, and Disciplinary Policy.
- Is aligned to delivering the objectives of the Counter-Fraud, Bribery and Corruption Strategy, through which a Zero Tolerance approach to fraud, bribery and corruption is communicated, and Officers and Members are required to act honestly and with integrity at all times, and to promptly report concerns.
- Has been written to include, so far as is reasonable, preventative procedures in relation to Corporate Criminal Offence, pursuant to section 45(2) of the Criminal Finances Act 2017.

### 1.2 The Council will govern with robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the Council.

### 1.3 It is important that all staff recognise their personal accountability for managing the risk of fraud, bribery, and corruption. To be able to acknowledge, prevent and pursue potential instances of fraud all staff need to work together, and understand the active roles they must play.

### 1.4 The Council will take action to recover any losses through fraud, bribery, and corruption for example, through agreement, court action, penalties, insurance etc.

## 2. Scope

### 1.1 This Fraud Response Plan sets out the approach dealing with suspicions or allegations of fraud, financial impropriety, bribery, and corruption. It is concerned with any act or activity that puts the Council's resources at risk.

This plan applies to all Council officers and is commended to all Schools for consideration and adoption by their respective Governing Bodies.

### 1.2 There are a number of ways in which concerns may arise, for example:

- Discoveries by managers or other employees
- Referral from a concerned member of the public
- Proactive exercises (data matching / data analytics)
- Intelligence from external partners
- Routine systems audit checks or specific audit checks on high-risk areas

- 1.3 Example areas of concern include: theft / misappropriation of assets, facilitation of tax evasion (Corporate Criminal Offence), business rates, council tax liability, council tax reduction, economic support, employee misconduct, grants, housing and tenancy, mandate, procurement, and housing benefit (housing benefit fraud is investigated by the Department for Work and Pensions).
- 1.4 This plan must be invoked immediately where there are suspicions or allegations of fraud, bribery, corruption, or financial impropriety.
- 1.5 If in doubt, seek advice from the Internal Audit, Corporate Fraud Investigation Team.
- 1.6 It is advised that those tasked with administering the Plan have also received adequate Equality/Unconscious Bias training to ensure fairness throughout the process.

### 3. Action to be taken

- 1.1 The Section 151 Officer has overall responsibility for financial stewardship across the Council and as such seeks assurance, through the Audit Manager, that a proper investigation is undertaken.
- 1.2 There is a requirement that all suspicions or concerns in respect of fraud, financial irregularities, theft / loss of property or assets are reported to the Audit Manager, via the Corporate Fraud Investigation Team, without delay.
- 1.3 The action to be taken is detailed below, in respect of **a.** 'Employees and those working on behalf of the council', and **b.** 'Concerns relating to persons external to the Council as follows:
  - a. Concerns relating to conduct of employees or those working on behalf of the Council**
- 1.4 **Internal Fraud** - for example, theft of property / assets, exaggerated claims. Investigations will be conducted in accordance with the Council's Counter-Fraud Bribery, and Corruption and Disciplinary Policies.
- 1.5 If you have suspicions or concerns, you should:
  - **Note your concerns**  
Record details such as names, descriptions, dates, times, details of conversations and possible witnesses. Time, date and sign your notes.
  - **Preserve evidence**  
It is imperative that all available evidence is preserved / secured lawfully and held securely, without alerting individuals who are thought to be involved. Do not recycle, delete, destroy, edit, annotate, or mark electronic or physical evidence.
  - **Report your concerns promptly**  
Discuss your concerns with your line manager, or report the matter direct to the Audit Manager or the Section 151 Officer / Corporate Director Resources.

- **Maintain confidentiality**  
Do not tell anyone else about your suspicions;  
Do not approach any of the named individuals;  
Do not carry out an investigation yourself, as this may damage any subsequent investigation and potentially put you at risk.

#### **b. Concerns relating to persons external to the Council**

- 1.6 **External Fraud** - for example, Council Tax Liability, Council Tax Reduction, Housing and Tenancy frauds (not housing benefit fraud\*).
- 1.7 If you have suspicions or concerns, you should:
- **Report your concerns promptly**  
Referrals should be submitted to the Corporate Fraud Investigation Team either via existing approved routes, the Council's [Website](#), or by emailing: [fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk). Please provide as much information as possible, to include where known, the name and address of the subject(s) of concern, what it is that they are thought to be doing wrong, how long it has been going on, who else is involved, descriptions of individuals and any other relevant information.
- 1.8 Whenever possible the Investigating Officer will provide relevant feedback to the referrer (subject to DPA / GDPR considerations).

## **4. Fraud response**

- 1.9 The Council has a dedicated Corporate Fraud Investigation Team, consisting of professionally trained investigators who focus on financial probity and security and carry out investigations for the prevention and detection of crime.
- 1.10 It is a legal right to receive services from the Council in English or Welsh according to choice. Correspondence will be received, and investigations will be conducted in accordance with the Welsh Language Standards. Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.
- 1.11 Investigations will be undertaken with consideration for the relevant legislation, regulations, policies, and procedures.
- 1.12 On completion of the investigation the investigating officer will prepare a full written report setting out the background, findings of the investigation, and recommendations to reduce further exposure if fraud is proven.
- 1.13 Should a criminal investigation identify that the perpetrator is an employee, normally, at the conclusion of the investigation, Human Resources will be contacted and if appropriate, contact will be made with the employing Directorate. Dependant on the employee's role, there may be a requirement (e.g., Safeguarding) to contact the employing Directorate prior to the conclusion of the criminal investigation.

1.14 In all cases of fraud, the Council will vigorously pursue the recovery of property and overpaid monies and will use all means available, including civil sanctions. As appropriate fraudsters will be subject to criminal action which could include prosecution.

## Members of the public

1.15 The council encourages members of the public to report suspicions of a breach of security, theft, irregularities concerning cash, stores or other property of the Council, or any suspected irregularity in the exercise of the functions of the Council. If possible, refer to information available on the Council's Fraud web page:

[Your Council/Council Finance/Managing the Council's Finances/Fraud](#)

Alternatively contact the Council's Internal Audit, Corporate Fraud Investigation Team:

Email: [fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk)

Post: Audit Manager  
Internal Audit Section  
Cardiff Council  
County Hall  
Cardiff  
CF10 4UW

## 5. Training and Guidance

1.16 The Corporate Fraud Investigation Team will provide face to face and eLearning fraud awareness training, and guidance to employees.

1.17 Requests for training, and questions in relation to this plan, should be directed to the Corporate Fraud Investigation Team ([fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk)).

## 6. Review

1.18 Internal Audit will conduct a review of this Fraud Response Plan biennially or more frequently if required, to ensure that it reflects changes which may be necessary to strengthen future responses by the Council to fraud, bribery, and corruption, and to ensure that the procedures reflect current best practice.

1.19 Reviews will be overseen by the Audit Manager who shall have authority, in consultation with the Corporate Director Resources and Portfolio Cabinet Member, to make any minor amendments to ensure the Plan remains effective. Material and strategic updates to be approved by Cabinet after consideration by the Governance and Audit Committee.

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# Sanction Procedure

Counter-Fraud, Bribery and Corruption



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## Document Control

<b>Organisation</b>	Cardiff Council
<b>Title</b>	Sanction Procedure
<b>Author</b>	Audit Manager
<b>Owner</b>	Corporate Director Resources, Section 151 Officer
<b>Review date</b>	Biennially

## Revision History

<b>Revision Date</b>	<b>Revision</b>	<b>Previous Version</b>	<b>Description of Revision</b>
2017	1.0		Initial document
December 2023	1.1	1.0	Reflecting Counter-Fraud, Bribery and Corruption Strategy updates

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# 1. Introduction

- 1.1 This procedure is aligned to the Council's Counter-Fraud, Bribery and Corruption Strategy ([LINK](#)), which communicates a zero-tolerance approach, and encourages and promotes fraud prevention and detection.
- 1.2 The Strategy has a core objective to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses.
- 1.3 As part of the strategic response to fighting fraud, the Council has communicated how it will pursue and punish fraudsters by using civil sanctions, recovering losses, and supporting the law enforcement response.
- 1.4 It is a legal right to receive services from the Council in English or Welsh according to choice. Correspondence will be received, and investigations will be conducted in accordance with the Welsh Language Standards. Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.
- 1.5 This procedure has been written to include, so far as is reasonable, preventative procedures in relation to Corporate Criminal Offence, pursuant to section 45(2) of the Criminal Finances Act 2017.
- 1.6 Examples of how fraud and corruption will be prevented and pursued as part of the Council's robust counter-fraud response are as follows:

Prevent	Pursue
<ul style="list-style-type: none"><li>• Making best use of information and technology</li><li>• Enhancing fraud controls and processes</li></ul>	<ul style="list-style-type: none"><li>• Developing our capability and capacity to punish offenders</li><li>• Use of criminal and civil sanctions prioritising fraud recovery</li></ul>
<ul style="list-style-type: none"><li>• Developing and maintaining an effective anti-fraud culture</li></ul>	<ul style="list-style-type: none"><li>• Collaboration across geographical and sectoral boundaries</li></ul>
<ul style="list-style-type: none"><li>• Communicating activity and success</li></ul>	<ul style="list-style-type: none"><li>• Learning lessons and closing the gaps</li></ul>

- 1.7 The decision to sanction an individual is a serious step and may have lasting implications for the offender. This procedure is designed to ensure that all officers involved in any such decisions understand and appreciate the principles that will be taken into account.
- 1.8 There is a requirement for all frauds\* committed against or from within the Council to be reported to the Audit Manager, via the Internal Audit, Corporate Fraud Investigation Team, based within Finance, Resources. ([fraud@cardiff.gov.uk](mailto:fraud@cardiff.gov.uk))

*\*except housing benefit fraud which will be reported to the Department for Work and Pensions.*

- 1.9 Corporate Fraud Investigation Team Investigators are professionally trained and highly experienced. Investigations are undertaken to the criminal standard outlined in paragraph 2.3, utilising best practice.

## 2. General Principles

- 1.1 In recognition of the Council's strategic aims and its status as a responsible steward of public funds, this procedure aims to ensure that persons who commit fraud are dealt with fairly and consistently. Its specific objectives are to:
- ensure that those who commit fraud are punished;
  - assist officers in the selection of the most appropriate sanction;
  - ensure that sanctions are successfully applied;
  - maximise the deterrent effect of successful sanctions;
  - maintain and generate public confidence in and respect for the Council, by helping to ensure that justice is seen as being done.
- 1.2 Each case must be considered on its own merits. When deciding whether to commence a sanction, officers must be fair, independent, and objective. They shall not be affected by improper or undue pressure from any source.
- 1.3 Investigations will be conducted in accordance with the Police and Criminal Evidence Act 1984 and its Codes of Practice, as applicable, and all other relevant legislative and common-law rules.
- 1.4 In accordance with the Corporate Fraud Investigation Team's Publicity Procedure, the Team will work with the Communications and Media Team to seek to generate additional positive publicity for successful counter-fraud activity, to maximise the deterrent effect, and to encourage fraud referrals.
- 1.5 It is advised that those tasked with administering the Procedure have also received adequate Equality/Unconscious Bias training to ensure fairness throughout the process.

## 3. Scope and Definition

- 1.6 This procedure applies to criminal investigations undertaken by the Corporate Fraud Investigation Team and for example, may relate to Council Tax Liability, Council Tax Reduction, Housing, and Procurement investigations.
- 1.7 Due to the size of the organisation and the proactive work undertaken by the Investigation Team, occasionally Council employees may be identified as potential fraudsters. In the first instance the criminal investigation will take precedence, however, advice will be sought from Human Resources and Legal Services as appropriate.

## 4. Sanctions

1.8 There are a number of Criminal / Civil sanctions available to the Council:

- **Prosecution** - criminal proceedings may be brought against offenders and the case heard in Court when there appears to be sufficient evidence of a criminal offence and it is in the public interest to prosecute.
- **Simple Caution** - a “simple” caution is a formal warning that may be given to persons aged 18 or over who admit to committing an offence. This is designed to provide a means of dealing with low-level, mainly first-time, offending without a prosecution. In addition, a simple caution may only be given if there appears to be sufficient evidence to provide a realistic prospect of conviction if the offender were to be prosecuted.

Simple cautions form part of an offender’s criminal record and may be referred to in future legal proceedings and, in certain circumstances, may be revealed as part of a criminal record check.

- **Unlawful profit order** - (Prevention of Social Housing Fraud Act 2013) – the offender is required to pay the landlord an amount representing profit made.
- **Financial penalties** - the Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (Wales) Regulations 2013, provides the Council with the ability to impose financial penalties.
- **Overpayment recovery & civil court action** - in all cases of fraud the Council will vigorously pursue the recovery of property and overpaid monies and will use all means available, including civil sanctions.

## 5. Criteria

1.9 Each case is unique and must be considered on its own facts and merits. However, there are general principles that apply to the way in which sanctions are determined and the following will be taken into account:

- the full code test (for which further details are provided below);
- the seriousness of the fraud;
- the extent to which the offending was premeditated and/or planned;
- the extent to which the suspect has benefitted from criminal conduct;
- the loss to the Council;
- whether the suspect has previous criminal convictions and/or out-of-court disposals;
- the age and health of the suspect;
- aggravating / mitigating factors;
- admittance of the offence at interview.

- 1.10 The [Code for Crown Prosecutors](#) gives guidance to prosecutors on the general principles to be applied when making decisions about prosecutions.
- 1.11 All cases must meet the full code test before an Investigator can recommend a prosecution. The full code test has two stages, being the evidential test followed by the public interest test.
- 1.12 In order to pass the evidential test, prosecutors must be satisfied that there is sufficient evidence to provide a realistic prospect of conviction. They must consider what the defence case may be, and how it is likely to affect the prospects of conviction. A case which does not pass the evidential stage must not proceed to a criminal sanction, no matter how serious or sensitive it may be.
- 1.13 In every case where there is sufficient evidence to justify a prosecution or to offer an out-of-court disposal, prosecutors must go on to consider whether a prosecution is required in the public interest. Consideration will be given to:
- how serious is the offence committed;
  - what is the level of culpability of the suspect;
  - what are the circumstances of and the harm caused to the victim;
  - what was the suspect's age and maturity at the time of the offence;
  - what is the impact on the community;
  - is prosecution a proportionate response;
  - do sources of information require protecting.
- 1.14 The decision to prosecute is a serious step that affects suspects, victims, witnesses and the public at large and must be undertaken with the utmost care. It is recognised that prosecuting an offender may send a strong message, reinforcing the Council's stance in respect of protecting the public purse, however, this must be weighed against the burden on the court system and cost to the Council bringing less serious cases before the court.
- 1.15 A strict requirement to repay monies fraudulently obtained is in itself another major deterrent to fraud and will not influence the decision to sanction.

## 6. Responsibilities

- 1.16 Legal Services will normally undertake the role of prosecutor / administer out of court disposals, however, there may be occasions such as collaborating with other external partners when the Crown Prosecution Service or other Local Authority Solicitors fulfil the role.
- 1.17 The Investigating officer will bring to the attention of the Group Auditor (Investigations) all cases that may attract adverse publicity or that require alternative methods of disposal, so that senior management may be notified as appropriate.
- 1.18 Cases that fall within parameters as defined within this procedure will require the Investigating Officer to produce a sanction file in accordance with standard procedures.

- 1.19 The Group Auditor (Investigations) will review the case and consider the appropriateness of a sanction in accordance with this procedure, prior to the referral of the case to Governance and Legal Services.
- 1.20 Governance and Legal Services will review each sanction file received from the Internal Audit Corporate Investigation Team to ensure that there are sufficient grounds to instigate proceedings, taking into account the evidential and public interest test. The delegation to prosecute rests with Governance and Legal Services.

## 7. Review

- 1.21 This procedure will be reviewed every two years, unless legislation or further developments require it to be reviewed before this date. This will ensure the procedure meets its objectives and takes account of good practice developments.
- 1.22 Reviews will be overseen by the Audit Manager who shall have authority, in consultation with the Corporate Director Resources and Portfolio Cabinet Member, to make any minor amendments to ensure the procedure remains effective. Material and strategic updates to be approved by Cabinet after consideration by the Governance and Audit Committee.



# Publicity Procedure

Counter-Fraud, Bribery and Corruption



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## Document Control

<b>Organisation</b>	Cardiff Council
<b>Title</b>	Publicity Procedure
<b>Author</b>	Audit Manager
<b>Owner</b>	Corporate Director Resources, Section 151 Officer
<b>Review date</b>	Biennially

## Revision History

<b>Revision Date</b>	<b>Revision</b>	<b>Previous Version</b>	<b>Description of Revision</b>
2003	1.0		Initial document
December 2023	1.1	1.0	Reflecting Counter-Fraud, Bribery and Corruption Strategy updates

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## 1. Introduction

- 1.1 This procedure is aligned to the Council's Counter-Fraud, Bribery and Corruption Strategy, which is designed to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action is and will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses.
- 1.2 The Council wishes to communicate its counter-fraud strategy, policies, and positive action effectively, for assurance to the public that it is taking a firm line on counter-fraud issues and that it has robust and effective procedures in place to tackle fraudulent activity. Tackling fraud is everybody's business. It is often the alertness of staff and the public to indicators of fraud that enables detection to occur, and the Council wishes to encourage this support and to promote mechanisms for reporting suspicions of fraud.
- 1.3 This Policy shall be kept under review by the Audit Manager who shall have authority, in consultation with the Corporate Director Resources and Portfolio Cabinet Member, to make any minor amendments to ensure it remains effective. Material and strategic updates to be approved by Cabinet after consideration by the Governance and Audit Committee

## 2. Prevent

- 1.4 One of the key pillars of activity of counter-fraud effort is 'Prevent', the Council recognises that a key prevention and deterrent measure in the fight against fraud is a programme to communicate counter-fraud activity and successes.

## 3. Implementation

- 1.5 Fraud prevention and investigation is led by the Council's Corporate Fraud Investigation Team, based in the Internal Audit Section. The Team will work with the Council's Communications & Media Team to ensure that a regular programme of publicity is maintained throughout the year, this will include, but not be limited to, an annual Fraud Awareness Week communication campaign. Additionally, a tool kit of promotional material, including leaflets and posters will be available.
- 1.6 On an ongoing basis, advice will be sought from Bilingual Cardiff as appropriate to ensure compliance with the Welsh Language Standards, specifically in relation to translations and language queries.
- 1.7 Fraud awareness staff training will be maintained and delivered through the most appropriate medium across the organisation.

- 1.8 The Corporate Fraud Investigation Team will seek to generate additional, positive bilingual publicity for its successful counter-fraud activity using the press and other advertising media, when appropriate.
- 1.9 Counter-fraud activity will regularly be reported to the Governance and Audit Committee.
- 1.10 It is advised that those tasked with administering the Procedure have also received adequate Equality/Unconscious Bias training to ensure fairness throughout the process.

## 4. Publicity

- 4.1 The Council seeks to promote its policies, performance, and reporting mechanisms to its staff via all available physical and digital means, including notice boards, the intranet, and Share Point. The external website will report on the activities of the Corporate Fraud Investigation Team and encourage referrals from members of the public.
- 4.2 Regular dissemination of information by the Internal Audit Section on policy, performance, and best practice is facilitated through the delivery of fraud awareness training, communication campaigns, newsletters, and the staging of workshops.
- 4.3 The Corporate Fraud Investigation Team will work with the Communications & Media Team to publicise successful sanction activity, fraud drives, and other counter fraud initiatives using the local press and other publicity vehicles.
- 4.4 Advice will be sought from Bilingual Cardiff and the Equalities Team to ensure that publicity materials and messages are targeted appropriately to take into account language and format requirements.
- 4.5 The Council will maximise opportunities to advertise reporting mechanisms, particularly on statutory notifications and mail shots that are likely to be retained by the recipient.

## 5. Collaboration

- 1.11 All opportunities to collaborate with officers across the Council and partner agencies to share data and intelligence to prevent and detect fraud will be explored.
- 1.12 As appropriate, the Council will seek to publicise successful counter-fraud activity arising from joint working initiatives.

Mae'r dudalen hon yn wag yn fwriadol

# Single Impact Assessment

Cardiff Council



## 1. Details of the Proposal

What is the proposal?

Title:	Counter-Fraud, Bribery and Corruption Policy
--------	--

Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?

New

Authorisation	
Completed By:	David Hexter
Job Title:	Group Auditor (Investigations)
Date:	6 July 2023
Approved By:	Chris Pyke
Job Title:	Audit Manager

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023



## 2. Overview of the Proposal

### What action is the Council considering and why?

The Counter-Fraud, Bribery and Corruption Policy supports the core objective of the Counter Fraud, Bribery and Corruption Strategy, to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action is and will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses.

In carrying out its functions and responsibilities, the Council seeks to promote a culture of openness and fairness and expects all those who work for and within the Council to adopt the highest standards of propriety and accountability.

The Council fully recognises its responsibility for good financial management so that public money is safeguarded at all times and used appropriately, efficiently and effectively. The prevention, and if necessary, the investigation, of fraud, bribery and corruption is therefore seen as an important aspect of its duties, which it is committed to undertake.

'Fraud costs the public sector at least £50.2bn annually, and of this total, £8.8bn is specifically in local government.' The CIPFA Fraud and Corruption Tracker 2020 states that 65.1% of detected/prevented fraud in UK Local Authorities by volume, relates to council tax fraud – individuals inappropriately receiving a discount, exemption, or discount.

The Investigation Team receives referrals from various sources, including members of staff and the public.

Fraud from the public sector deprives vulnerable citizens of the help and support that they need.

### What are the costs and/or savings?

Cost neutral

## Impact Assessments

### Which impact assessments do you need to complete to support your proposal?

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

Put **Yes** or **No** next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	Yes
B. Child Rights Impact Assessment	No
C. Welsh Language Impact Assessment	Yes
D. Habitats Regulations Assessment	No
E. Strategic Environmental Assessment	No
F. Data Protection Impact Assessment	No
G. Health Impact Assessment	No

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact** [positive/negative] on different age groups?

	Yes	No	N/A
Up to 18 years			
18 - 65 years			
Over 65 years			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on younger/older people. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the policy will be beneficial to all, including people of all ages.

### Disability

Will this proposal have a **differential impact** [positive/negative] on disabled people?

	Yes	No	N/A
Hearing Impairment			
Learning Disability			
Long-Standing Illness or Health Condition			
Mental Health			
Neurodiversity			
Physical Impairment			
Substance Misuse			
Visual Impairment			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on disabled people. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the policy will be beneficial to all, including disabled people.

### Gender Reassignment

Will this proposal have a **differential impact** [positive/negative] on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on transgender people. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the policy will be beneficial to all, including Transgender people.

### Marriage and Civil Partnership

Will this proposal have a **differential impact** [positive/negative] on marriage and civil partnership?

	Yes	No	N/A
Marriage			
Civil Partnership			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on marriage and civil partnership. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the policy will be beneficial to all, including people who are married or in a civil partnership.

## Pregnancy and Maternity

Will this proposal have a **differential impact** [positive/negative] on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			
Maternity			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on pregnancy and maternity. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Counter Fraud, Bribery and Corruption Strategy, the policy will be beneficial to all, including people who are pregnant or in their maternity period.

## Race

Will this proposal have a **differential impact** [positive/negative] on the following groups?

	Yes	No	N/A
White			
Mixed / Multiple Ethnic Groups			
Asian / Asian British			
Black / African / Caribbean / Black British			
Other Ethnic Groups			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact in respect of race. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the policy will be beneficial to all, including people from all ethnicities and backgrounds.

### Religion, Belief or Non-Belief

Will this proposal have a **differential impact** [positive/negative] on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			
Christian			
Hindu			
Humanist			
Jewish			
Muslim			
Sikh			
Other belief			
No belief			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on people with different religions, beliefs or non-beliefs. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud and Corruption Strategy, the policy will be beneficial to all, including people of all faiths and beliefs.

### Sex

Will this proposal have a **differential impact** [positive/negative] on male, female or non-binary persons?

	Yes	No	N/A
Male persons			
Female persons			
Non-binary persons			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact on men and/or women. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the policy will be beneficial to all, regardless of sex.

### Sexual Orientation

Will this proposal have a **differential impact** [positive/negative] on people with different sexual orientations?

	Yes	No	N/A
Bi			
Gay			
Lesbian			
Heterosexual			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact in respect of sexual orientation. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the policy will be beneficial to all, regardless of sexual orientation.

### Socio-economic Duty

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the policy will have a differential impact in respect of Socio-economic Duty. The policy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the policy will be beneficial to all, regardless of Socio-economic status.

## Welsh Language

Will this proposal have a **differential impact** [positive/negative] on the Welsh language?

	Yes	No	N/A
Welsh language			

### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The Counter-Fraud, Bribery and Corruption Policy will have a potentially positive impact on the Welsh language as it provides the ability of both the public and staff members to understand and report on matters of fraud in their chosen language.

### What action(s) can you take to address the differential impact?

Through engagement with Bilingual Cardiff, mitigating actions have been incorporated, this includes recognising the importance of the Welsh Language Standards, processes in place to seek advice from Bilingual Cardiff, specifically in relation to translations and language queries. Having existing arrangements to ensure the ability to communicate with individuals and progress fraud issues and concerns in other languages as required.

## Consultation and Engagement

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

A copy of the Counter Fraud, Bribery and Corruption Strategy and the Counter Fraud, Bribery and Corruption Policy have been shared with the Equality Team and Bilingual Cardiff. Discussions ensued and working with Bilingual Cardiff, mitigating factors were developed jointly.

A process of consultation and engagement will take place, with Trade Union consultation taking place prior to Cabinet consideration in October 2023.

## Summary of Actions (Listed in the sections above)

	Actions
Age	Not applicable
Disability	Not applicable
Gender Reassignment	Not applicable
Marriage & Civil Partnership	Not applicable
Pregnancy & Maternity	Not applicable
Race	Not applicable
Religion/Belief	Not applicable
Sex	Not applicable
Sexual Orientation	Not applicable
Socio-economic Impact	Not applicable
Welsh Language	Not applicable



Generic/ Over-Archiving (applicable to all the above groups)	Not applicable
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## Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

# C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## Welsh Language Standards 88-97

### Standard 88

Will this proposal have a **differential impact** [positive/negative] on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?			
Treating the Welsh language no less favourably than the English language?			

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

The core objectives of the Counter Fraud, Bribery and Corruption Policy will be beneficial to all, engagement has been undertaken with Bilingual Cardiff and the Policy has been reviewed to ensure that the Welsh language is not treated less favourably than the English language.

Working with Bilingual Cardiff mitigating factors were considered and developed jointly.

The Counter Fraud, Bribery and Corruption Policy recognises that local authorities in Wales have a statutory duty to comply with the Welsh language standards. A process is in place to ensure that advice is sought at the appropriate time in order to obtain translations and resolve language queries.

Members of the public have a legal right to receive services from the Council in English or Welsh according to their choice. Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.

### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

See above

**Treating the Welsh language no less favourably than the English language?**

See above

### Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 91

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 92

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 93

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 94

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council's Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 95

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Standard 96

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

[Correspondence](#) - receiving and replying (emails, letters, online communication).

[Telephone](#) – receiving and answering calls.

[Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.

[Public Messages – electronic – video](#)

[Signs, Notices & Display Material](#)

[Publicity & Advertising](#)

[Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.

[Producing Forms](#)

[Reception Services](#)

[Websites, Apps and Online Services](#)

[Social Media](#)

[Self Service Machines](#)

[Education Training Courses](#)

[Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>
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Yes
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### Cardiff Council's Welsh Language Skills Strategy

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

[Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)

[Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>
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Yes
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### Next Steps

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

# Single Impact Assessment

Cardiff Council



## 1. Details of the Proposal

What is the proposal?

Title: Counter-Fraud, Bribery and Corruption Strategy

Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?

New

Authorisation	
Completed By:	David Hexter
Job Title:	Group Auditor (Investigations)
Date:	6 July 2023
Approved By:	Chris Pyke
Job Title:	Audit Manager

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023



## 2. Overview of the Proposal

### What action is the Council considering and why?

The Counter-Fraud, Bribery and Corruption Strategy is designed to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action is and will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses.

Reporting Culture - raising awareness of fraud risk and accountability for reporting, through training, communication activities and policy reviews. Members of the public must also know how and when to raise concerns.

Strong Assurance - fraud risks must be understood, monitored and managed, to deliver strong Council-wide assurance on fraud risk management.

Ownership - Everyone working for the Council needs to understand their personal responsibility for supporting counter-fraud risk management. Managers should consider this in Personal Review objective setting.

'Fraud costs the public sector £50.2bn annually, and of this total, £8.8bn is specifically in local government.' The CIPFA Fraud and Corruption Tracker 2020 states that 65.1% of detected/prevented fraud in UK Local Authorities by volume, relates to council tax fraud – individuals inappropriately receiving a discount, exemption, or discount.

The Investigation Team receives referrals from various sources, including members of staff and the public.

### What are the costs and/or savings?

Cost neutral

## Impact Assessments

**Which impact assessments do you need to complete to support your proposal?**

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

**Put Yes or No next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.**

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	Yes
B. Child Rights Impact Assessment	No
C. Welsh Language Impact Assessment	Yes
D. Habitats Regulations Assessment	No
E. Strategic Environmental Assessment	No
F. Data Protection Impact Assessment	No
G. Health Impact Assessment	No

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact** [positive/negative] on different age groups?

	Yes	No	N/A
Up to 18 years			
18 - 65 years			
Over 65 years			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the strategy will have a differential impact on younger/older people. The strategy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. The core objectives of the strategy will be beneficial to all, including people of all ages.

### Disability

Will this proposal have a **differential impact** [positive/negative] on disabled people?

	Yes	No	N/A
Hearing Impairment			
Learning Disability			
Long-Standing Illness or Health Condition			
Mental Health			
Neurodiversity			
Physical Impairment			
Substance Misuse			
Visual Impairment			
Other			

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
It is not anticipated that the strategy will have a differential impact on disabled people. The strategy supports the Council in its duty to protect public resources.
<b>What action(s) can you take to address the differential impact?</b>
No action identified. The core objectives of the strategy will be beneficial to all, including disabled people.

**Gender Reassignment**

Will this proposal have a **differential impact** [positive/negative] on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)			

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
It is not anticipated that the strategy will have a differential impact on transgender people. The strategy supports the Council in its duty to protect public resources.
<b>What action(s) can you take to address the differential impact?</b>
No action identified. The core objectives of the strategy will be beneficial to all, including Transgender people.

**Marriage and Civil Partnership**

Will this proposal have a **differential impact** [positive/negative] on marriage and civil partnership?

	Yes	No	N/A
Marriage			
Civil Partnership			

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
It is not anticipated that the strategy will have a differential impact on marriage and civil partnership. The strategy supports the Council in its duty to protect public resources.
<b>What action(s) can you take to address the differential impact?</b>
No action identified. The core objectives of the strategy will be beneficial to all, including people who are married or in a civil partnership.

## Pregnancy and Maternity

Will this proposal have a **differential impact** [positive/negative] on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			
Maternity			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the strategy will have a differential impact on pregnancy and maternity. The strategy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. The core objectives of the strategy will be beneficial to all, including people who are pregnant or in their maternity period.

## Race

Will this proposal have a **differential impact** [positive/negative] on the following groups?

	Yes	No	N/A
White			
Mixed / Multiple Ethnic Groups			
Asian / Asian British			
Black / African / Caribbean / Black British			
Other Ethnic Groups			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the strategy will have a differential impact in respect of race. The strategy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. The core objectives of the strategy will be beneficial to all, including people from all ethnicities and backgrounds.

### Religion, Belief or Non-Belief

Will this proposal have a **differential impact** [positive/negative] on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			
Christian			
Hindu			
Humanist			
Jewish			
Muslim			
Sikh			
Other belief			
No belief			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the strategy will have a differential impact on people with different religions, beliefs or non-beliefs. The strategy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. The core objectives of the strategy will be beneficial to all, including people of all faiths and beliefs.

### Sex

Will this proposal have a **differential impact** [positive/negative] on male, female or non-binary persons?

	Yes	No	N/A
Male persons			
Female persons			
Non-binary persons			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the strategy will have a differential impact on men and/or women. The strategy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. The core objectives of the strategy will be beneficial to all, regardless of sex.

### Sexual Orientation

Will this proposal have a **differential impact** [positive/negative] on people with different sexual orientations?

	Yes	No	N/A
Bi			
Gay			
Lesbian			
Heterosexual			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the strategy will have a differential impact in respect of sexual orientation. The strategy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. The core objectives of the strategy will be beneficial to all, regardless of sexual orientation.

### Socio-economic Duty

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the strategy will have a differential impact in respect of Socio-economic Duty. The strategy supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. The core objectives of the strategy will be beneficial to all, regardless of Socio-economic status.

## Welsh Language

Will this proposal have a **differential impact** [positive/negative] on the Welsh language?

	Yes	No	N/A
Welsh language			

### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The Counter-Fraud, Bribery and Corruption Strategy will have a potentially positive impact on the Welsh language as it provides the ability of both the public and staff members to understand and report on matters of fraud in their chosen language.

### What action(s) can you take to address the differential impact?

Through engagement with Bilingual Cardiff, mitigating actions have been incorporated, this includes recognising the importance of the Welsh Language Standards, processes in place to seek advice from Bilingual Cardiff, specifically in relation to translations and language queries. Having existing arrangements to ensure the ability to communicate with individuals and progress fraud issues and concerns in other languages as required.

## Consultation and Engagement

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

A copy of the Counter-Fraud, Bribery and Corruption Strategy has been shared with the Equality Team and Bilingual Cardiff. Discussions ensued and working with Bilingual Cardiff, mitigating factors were developed jointly.

A process of consultation and engagement will take place, with Trade Union consultation taking place prior to Cabinet consideration in October 2023.

## Summary of Actions (Listed in the sections above)

	Actions
Age	Not applicable
Disability	Not applicable
Gender Reassignment	Not applicable
Marriage & Civil Partnership	Not applicable
Pregnancy & Maternity	Not applicable
Race	Not applicable
Religion/Belief	Not applicable
Sex	Not applicable
Sexual Orientation	Not applicable
Socio-economic Impact	Not applicable
Welsh Language	Not applicable



Generic/ Over-Archiving (applicable to all the above groups)	Not applicable
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### Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

# C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## Welsh Language Standards 88-97

### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?			
Treating the Welsh language no less favourably than the English language?			

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

The core objectives of the Counter-Fraud, Bribery and Corruption Strategy will be beneficial to all, engagement has been undertaken with Bilingual Cardiff and the Strategy has been reviewed to ensure that the Welsh language is not treated less favourably than the English language.

Working with Bilingual Cardiff mitigating factors were considered and developed jointly.

The Counter-Fraud, Bribery and Corruption Strategy recognises that local authorities in Wales have a statutory duty to comply with the Welsh language standards. A process is in place to ensure that advice is sought at the appropriate time in order to obtain translations and resolve language queries.

Members of the public have a legal right to receive services from the Council in English or Welsh according to their choice. Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.

### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

See above

**Treating the Welsh language no less favourably than the English language?**

See above

## Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Standard 91

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Standard 92

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 93

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 94

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council's Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 95

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Standard 96

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

[Correspondence](#) - receiving and replying (emails, letters, online communication).

[Telephone](#) – receiving and answering calls.

[Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.

[Public Messages – electronic – video](#)

[Signs, Notices & Display Material](#)

[Publicity & Advertising](#)

[Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.

[Producing Forms](#)

[Reception Services](#)

[Websites, Apps and Online Services](#)

[Social Media](#)

[Self Service Machines](#)

[Education Training Courses](#)

[Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>
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Yes
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### Cardiff Council's Welsh Language Skills Strategy

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

[Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)

[Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>
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Yes
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### Next Steps

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

# Single Impact Assessment

Cardiff Council



## 1. Details of the Proposal

What is the proposal?

Title:	Fraud Response Plan
--------	---------------------

Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?

New

Authorisation	
Completed By:	David Hexter
Job Title:	Group Auditor (Investigations)
Date:	6 July 2023
Approved By:	Chris Pyke
Job Title:	Audit Manager

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023



## 2. Overview of the Proposal

### What action is the Council considering and why?

The Fraud Response Plan defines how the council will respond to allegations, and provides guidance on the steps that should be followed, in the event of a suspicion of fraud, bribery, corruption or financial impropriety, either actual or attempted, within or against the Council.

It is important that we all recognise our personal accountability for managing the risk of fraud, bribery and corruption. To be able to 'acknowledge', 'prevent' and 'pursue' potential instances of fraud we need to work together and each understand the active role we must play.

The plan sets out the approach dealing with suspicions or allegations of fraud, financial impropriety, bribery, and corruption. It is concerned with any act or activity that puts the Council's resources at risk.

The Council fully recognises its responsibility for good financial management so that public money is safeguarded at all times and used appropriately, efficiently and effectively. The prevention, and if necessary, the investigation, of fraud, bribery and corruption is therefore seen as an important aspect of its duties, which it is committed to undertake.

'Fraud costs the public sector at least £50.2bn annually, and of this total, £8.8bn is specifically in local government.' The CIPFA Fraud and Corruption Tracker 2020 states that 65.1% of detected/prevented fraud in UK Local Authorities by volume, relates to council tax fraud – individuals inappropriately receiving a discount, exemption, or discount.

The Investigation Team receives referrals from various sources, including members of staff and the public.  
Fraud from the public sector deprives vulnerable citizens of the help and support that they need.

### What are the costs and/or savings?

Cost neutral

## Impact Assessments

**Which impact assessments do you need to complete to support your proposal?**

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

**Put Yes or No next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.**

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	Yes
B. Child Rights Impact Assessment	No
C. Welsh Language Impact Assessment	Yes
D. Habitats Regulations Assessment	No
E. Strategic Environmental Assessment	No
F. Data Protection Impact Assessment	No
G. Health Impact Assessment	No

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact** [positive/negative] on different age groups?

	Yes	No	N/A
Up to 18 years			
18 - 65 years			
Over 65 years			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact on younger/older people. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, including people of all ages.

### Disability

Will this proposal have a **differential impact** [positive/negative] on disabled people?

	Yes	No	N/A
Hearing Impairment			
Learning Disability			
Long-Standing Illness or Health Condition			
Mental Health			
Neurodiversity			
Physical Impairment			
Substance Misuse			
Visual Impairment			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact on disabled people. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, including disabled people.

### Gender Reassignment

Will this proposal have a **differential impact** [positive/negative] on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact on transgender people. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, including Transgender people.

### Marriage and Civil Partnership

Will this proposal have a **differential impact** [positive/negative] on marriage and civil partnership?

	Yes	No	N/A
Marriage			
Civil Partnership			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact on marriage and civil partnership. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, including people who are married or in a civil partnership.

## Pregnancy and Maternity

Will this proposal have a **differential impact** [positive/negative] on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			
Maternity			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact on pregnancy and maternity. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, including people who are pregnant or in their maternity period.

## Race

Will this proposal have a **differential impact** [positive/negative] on the following groups?

	Yes	No	N/A
White			
Mixed / Multiple Ethnic Groups			
Asian / Asian British			
Black / African / Caribbean / Black British			
Other Ethnic Groups			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact in respect of race. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, including people from all ethnicities and backgrounds.

### Religion, Belief or Non-Belief

Will this proposal have a **differential impact** [positive/negative] on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			
Christian			
Hindu			
Humanist			
Jewish			
Muslim			
Sikh			
Other belief			
No belief			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact on people with different religions, beliefs or non-beliefs. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, including people of all faiths and beliefs.

### Sex

Will this proposal have a **differential impact** [positive/negative] on male, female or non-binary persons?

	Yes	No	N/A
Male persons			
Female persons			
Non-binary persons			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact on men and/or women. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, regardless of sex.

### Sexual Orientation

Will this proposal have a **differential impact** [positive/negative] on people with different sexual orientations?

	Yes	No	N/A
Bi			
Gay			
Lesbian			
Heterosexual			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact in respect of sexual orientation. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, regardless of sexual orientation.

### Socio-economic Duty

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the plan will have a differential impact in respect of Socio-economic Duty. The plan supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the plan will be beneficial to all, regardless of Socio-economic status.

## Welsh Language

Will this proposal have a **differential impact** [positive/negative] on the Welsh language?

	Yes	No	N/A
Welsh language			

### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The fraud response plan will have a potentially positive impact on the Welsh language as it provides the ability of both the public and staff members to understand and report on matters of fraud in their chosen language.

### What action(s) can you take to address the differential impact?

Through engagement with Bilingual Cardiff, mitigating actions have been incorporated, this includes recognising the importance of the Welsh Language Standards, processes in place to seek advice from Bilingual Cardiff, specifically in relation to translations and language queries. Having existing arrangements to ensure the ability to communicate with individuals and progress fraud issues and concerns in other languages as required.

## Consultation and Engagement

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

A copy of the Counter-Fraud, Bribery and Corruption Strategy and this Fraud Response Plan have been shared with the Equality Team and Bilingual Cardiff. Discussions ensued and working with Bilingual Cardiff, mitigating factors were developed jointly. A process of consultation and engagement will take place, with Trade Union consultation taking place prior to Cabinet consideration in October 2023.

## Summary of Actions (Listed in the sections above)

	Actions
Age	Not applicable
Disability	Not applicable
Gender Reassignment	Not applicable
Marriage & Civil Partnership	Not applicable
Pregnancy & Maternity	Not applicable
Race	Not applicable
Religion/Belief	Not applicable
Sex	Not applicable
Sexual Orientation	Not applicable
Socio-economic Impact	Not applicable
Welsh Language	Not applicable



Generic/ Over-Archiving (applicable to all the above groups)	Not applicable
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## Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

# C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## Welsh Language Standards 88-97

### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?			
Treating the Welsh language no less favourably than the English language?			

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

The core objectives of the Counter-Fraud, Bribery and Corruption Strategy and Fraud Response Plan will be beneficial to all, engagement has been undertaken with Bilingual Cardiff and the Fraud Response Plan has been reviewed to ensure that the Welsh language is not treated less favourably than the English language.

Working with Bilingual Cardiff mitigating factors were considered and developed jointly.

The Counter-Fraud, Bribery and Corruption Strategy and Fraud Response Plan recognise that local authorities in Wales have a statutory duty to comply with the Welsh language standards. A process is in place to ensure that advice is sought at the appropriate time in order to obtain translations and resolve language queries.

Members of the public have a legal right to receive services from the Council in English or Welsh according to their choice. Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.

### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

See above

**Treating the Welsh language no less favourably than the English language?**

See above

### Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 91

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 92

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

### Standard 93

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

### Standard 94

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council's Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

### Standard 95

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

## Standard 96

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

[Correspondence](#) - receiving and replying (emails, letters, online communication).

[Telephone](#) – receiving and answering calls.

[Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.

[Public Messages – electronic – video](#)

[Signs, Notices & Display Material](#)

[Publicity & Advertising](#)

[Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.

[Producing Forms](#)

- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)
- [Education Training Courses](#)
- [Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>
---

Yes
-----

### Cardiff Council's Welsh Language Skills Strategy

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>
---

Yes
-----

### Next Steps

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

# Single Impact Assessment

Cardiff Council



## 1. Details of the Proposal

What is the proposal?

Title:	Publicity Procedure
--------	---------------------

Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?

New

Authorisation	
Completed By:	David Hexter
Job Title:	Group Auditor (Investigations)
Date:	6 July 2023
Approved By:	Chris Pyke
Job Title:	Audit Manager

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023



## 2. Overview of the Proposal

### What action is the Council considering and why?

The Counter-Fraud, Bribery and Corruption Publicity Procedure supports the core objective of the Council's Counter-Fraud, Bribery and Corruption Strategy, to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action is and will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses. Everyone working for / representing the Council (employees, agency workers, temporary staff, Members etc.) needs a good awareness of fraud risk and accountability for reporting, through training, communication activities and policy reviews.

The Council wishes to communicate its counter-fraud strategy, policies, and positive action effectively, to provide reassurance to the public that it is taking a firm line on counter-fraud issues and that it has robust and effective procedures in place to tackle fraudulent activity. Tackling fraud is everybody's business.

The Council fully recognises its responsibility for good financial management so that public money is safeguarded at all times and used appropriately, efficiently and effectively. The prevention, and if necessary, the investigation, of fraud, bribery and corruption is therefore seen as an important aspect of its duties, which it is committed to undertake.

'Fraud costs the public sector at least £50.2bn annually, and of this total, £8.8bn is specifically in local government.' The CIPFA Fraud and Corruption Tracker 2020 states that 65.1% of detected/prevented fraud in UK Local Authorities by volume, relates to council tax fraud – individuals inappropriately receiving a discount, exemption, or discount.

### What are the costs and/or savings?

Cost neutral

## Impact Assessments

Which impact assessments do you need to complete to support your proposal?

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

Put **Yes** or **No** next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	Yes
B. Child Rights Impact Assessment	No
C. Welsh Language Impact Assessment	Yes
D. Habitats Regulations Assessment	No
E. Strategic Environmental Assessment	No
F. Data Protection Impact Assessment	No
G. Health Impact Assessment	No

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact** [positive/negative] on different age groups?

	Yes	No	N/A
Up to 18 years			
18 - 65 years			
Over 65 years			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on younger/older people. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people of all ages.

### Disability

Will this proposal have a **differential impact** [positive/negative] on disabled people?

	Yes	No	N/A
Hearing Impairment			
Learning Disability			
Long-Standing Illness or Health Condition			
Mental Health			
Neurodiversity			
Physical Impairment			
Substance Misuse			
Visual Impairment			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on disabled people. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including disabled people.

### Gender Reassignment

Will this proposal have a **differential impact** [positive/negative] on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on transgender people. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including Transgender people.

### Marriage and Civil Partnership

Will this proposal have a **differential impact** [positive/negative] on marriage and civil partnership?

	Yes	No	N/A
Marriage			
Civil Partnership			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on marriage and civil partnership. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people who are married or in a civil partnership.

**Pregnancy and Maternity**

Will this proposal have a **differential impact** [positive/negative] on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			
Maternity			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on pregnancy and maternity. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people who are pregnant or in their maternity period.

**Race**

Will this proposal have a **differential impact** [positive/negative] on the following groups?

	Yes	No	N/A
White			
Mixed / Multiple Ethnic Groups			
Asian / Asian British			
Black / African / Caribbean / Black British			
Other Ethnic Groups			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact in respect of race. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people from all ethnicities and backgrounds.

### Religion, Belief or Non-Belief

Will this proposal have a **differential impact** [positive/negative] on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			
Christian			
Hindu			
Humanist			
Jewish			
Muslim			
Sikh			
Other belief			
No belief			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on people with different religions, beliefs or non-beliefs. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people of all faiths and beliefs.

### Sex

Will this proposal have a **differential impact** [positive/negative] on male, female or non-binary persons?

	Yes	No	N/A
Male persons			
Female persons			
Non-binary persons			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on men and/or women. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, regardless of sex.

### Sexual Orientation

Will this proposal have a **differential impact** [positive/negative] on people with different sexual orientations?

	Yes	No	N/A
Bi			
Gay			
Lesbian			
Heterosexual			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact in respect of sexual orientation. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, regardless of sexual orientation.

### Socio-economic Duty

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact in respect of Socio-economic Duty. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, regardless of Socio-economic status.

## Welsh Language

Will this proposal have a **differential impact** [positive/negative] on the Welsh language?

	Yes	No	N/A
Welsh language			

### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The Publicity Procedure will have a potentially positive impact on the Welsh language as it provides the ability of both the public and staff members to understand and report on matters of fraud in their chosen language. The Publicity Procedure will also help inform the public about this duty and any successful prosecutions in both Welsh and English.

### What action(s) can you take to address the differential impact?

Through engagement with Bilingual Cardiff, mitigating actions have been incorporated, this includes recognising the importance of the Welsh Language Standards, processes in place to seek advice from Bilingual Cardiff, specifically in relation to translations and language queries. Having existing arrangements to ensure the ability to communicate with individuals and progress fraud issues and concerns in other languages as required.

## Consultation and Engagement

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

A copy of the Counter Fraud, Bribery and Corruption Strategy and the Publicity Procedure have been shared with the Equality Team and Bilingual Cardiff. Discussions ensued and working with Bilingual Cardiff, mitigating factors were developed jointly. A process of consultation and engagement will take place, with Trade Union consultation taking place prior to Cabinet consideration in October 2023.

## Summary of Actions (Listed in the sections above)

	Actions
Age	Not applicable
Disability	Not applicable
Gender Reassignment	Not applicable
Marriage & Civil Partnership	Not applicable
Pregnancy & Maternity	Not applicable
Race	Not applicable
Religion/Belief	Not applicable
Sex	Not applicable
Sexual Orientation	Not applicable
Socio-economic Impact	Not applicable
Welsh Language	Not applicable



Generic/ Over-Archiving (applicable to all the above groups)	Not applicable
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### Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

# C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## Welsh Language Standards 88-97

### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?			
Treating the Welsh language no less favourably than the English language?			

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

The core objectives of the Counter-Fraud, Bribery and Corruption Strategy and Publicity Procedure will be beneficial to all, engagement has been undertaken with Bilingual Cardiff and the Publicity Procedure has been reviewed to ensure that the Welsh language is not treated less favourably than the English language.

Working with Bilingual Cardiff mitigating factors were considered and developed jointly.

The Counter-Fraud, Bribery and Corruption Strategy and Publicity Procedure recognise that local authorities in Wales have a statutory duty to comply with the Welsh language standards. A process is in place to ensure that advice is sought at the appropriate time in order to obtain translations and resolve language queries.

Members of the public have a legal right to receive services from the Council in English or Welsh according to their choice. Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.

### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

### Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

### Standard 91

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

### Standard 92

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
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See above
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### Standard 93

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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See above
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<b>Treating the Welsh language no less favourably than the English language?</b>
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See above
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### Standard 94

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council's Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

<b>The opportunities for persons to use the Welsh language?</b>
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See above
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<b>Treating the Welsh language no less favourably than the English language?</b>
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See above
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### Standard 95

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

<b>The opportunities for persons to use the Welsh language?</b>
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See above
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<b>Treating the Welsh language no less favourably than the English language?</b>
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See above
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## Standard 96

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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See above
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<b>Treating the Welsh language no less favourably than the English language?</b>
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See above
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## Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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See above
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<b>Treating the Welsh language no less favourably than the English language?</b>
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See above
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## Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

[Correspondence](#) - receiving and replying (emails, letters, online communication).

[Telephone](#) – receiving and answering calls.

[Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.

[Public Messages – electronic – video](#)

[Signs, Notices & Display Material](#)

[Publicity & Advertising](#)

[Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.

[Producing Forms](#)

- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)
- [Education Training Courses](#)
- [Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>
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Yes
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### Cardiff Council's Welsh Language Skills Strategy

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>
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Yes
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### Next Steps

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

# Single Impact Assessment

Cardiff Council



## 1. Details of the Proposal

What is the proposal?

Title:	Sanction Procedure
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Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?

New

Completed By:	David Hexter
Job Title:	Group Auditor (Investigations)
Date:	6 July 2023
Approved By:	Chris Pyke
Job Title:	Audit Manager

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023



## 2. Overview of the Proposal

### What action is the Council considering and why?

The Counter-Fraud and Corruption Sanction Procedure is aligned to the Council's Counter Fraud, Bribery and Corruption Strategy, which communicates a zero-tolerance approach, and encourages and promotes fraud prevention and detection.

The strategy has a core objective to develop and maintain a culture in which fraud, bribery and corruption are understood across the organisation as unacceptable, for which firm action is and will be taken to prevent and detect fraud loss, bring fraudsters to account quickly and efficiently, and to recover any losses.

As part of the strategic response to fighting fraud, the Council has communicated how it will pursue and punish fraudsters by using civil sanctions, recovering losses, and supporting the law enforcement response. In carrying out its functions and responsibilities, the Council seeks to promote a culture of openness and fairness and expects all those who work for and within the Council to adopt the highest standards of propriety and accountability.

The Council fully recognises its responsibility for good financial management so that public money is safeguarded at all times and used appropriately, efficiently and effectively. The prevention, and if necessary, the investigation, of fraud, bribery and corruption is therefore seen as an important aspect of its duties, which it is committed to undertake.

'Fraud costs the public sector at least £50.2bn annually, and of this total, £8.8bn is specifically in local government.' The CIPFA Fraud and Corruption Tracker 2020 states that 65.1% of detected/prevented fraud in UK Local Authorities by volume, relates to council tax fraud – individuals inappropriately receiving a discount, exemption, or discount.

### What are the costs and/or savings?

Cost neutral

## Impact Assessments

Which impact assessments do you need to complete to support your proposal?

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

Put Yes or No next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	Yes
B. Child Rights Impact Assessment	No
C. Welsh Language Impact Assessment	Yes
D. Habitats Regulations Assessment	No
E. Strategic Environmental Assessment	No
F. Data Protection Impact Assessment	No
G. Health Impact Assessment	No

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact** [positive/negative] on different age groups?

	Yes	No	N/A
Up to 18 years			
18 - 65 years			
Over 65 years			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on younger/older people. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people of all ages.

### Disability

Will this proposal have a **differential impact** [positive/negative] on disabled people?

	Yes	No	N/A
Hearing Impairment			
Learning Disability			
Long-Standing Illness or Health Condition			
Mental Health			
Neurodiversity			
Physical Impairment			
Substance Misuse			
Visual Impairment			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on disabled people. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including disabled people.

**Gender Reassignment**

Will this proposal have a **differential impact** [positive/negative] on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on transgender people. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including Transgender people.

**Marriage and Civil Partnership**

Will this proposal have a **differential impact** [positive/negative] on marriage and civil partnership?

	Yes	No	N/A
Marriage			
Civil Partnership			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on marriage and civil partnership. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people who are married or in a civil partnership.

**Pregnancy and Maternity**

Will this proposal have a **differential impact** [positive/negative] on pregnancy and maternity?

	Yes	No	N/A
Pregnancy			
Maternity			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on pregnancy and maternity. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people who are pregnant or in their maternity period.

**Race**

Will this proposal have a **differential impact** [positive/negative] on the following groups?

	Yes	No	N/A
White			
Mixed / Multiple Ethnic Groups			
Asian / Asian British			
Black / African / Caribbean / Black British			
Other Ethnic Groups			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact in respect of race. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council’s Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people from all ethnicities and backgrounds.

### Religion, Belief or Non-Belief

Will this proposal have a **differential impact** [positive/negative] on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist			
Christian			
Hindu			
Humanist			
Jewish			
Muslim			
Sikh			
Other belief			
No belief			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on people with different religions, beliefs or non-beliefs. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, including people of all faiths and beliefs.

### Sex

Will this proposal have a **differential impact** [positive/negative] on male, female or non-binary persons?

	Yes	No	N/A
Male persons			
Female persons			
Non-binary persons			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact on men and/or women. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, regardless of sex.

### Sexual Orientation

Will this proposal have a **differential impact** [positive/negative] on people with different sexual orientations?

	Yes	No	N/A
Bi			
Gay			
Lesbian			
Heterosexual			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact in respect of sexual orientation. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, regardless of sexual orientation.

### Socio-economic Duty

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not anticipated that the procedure will have a differential impact in respect of Socio-economic Duty. The procedure supports the Council in its duty to protect public resources.

**What action(s) can you take to address the differential impact?**

No action identified. By supporting the core objectives of the Council's Counter Fraud, Bribery and Corruption Strategy, the procedure will be beneficial to all, regardless of Socio-economic status.

## Welsh Language

Will this proposal have a **differential impact** [positive/negative] on the Welsh language?

	Yes	No	N/A
Welsh language			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The Sanction Procedure will have a potentially positive impact on the Welsh language as it provides the ability of both the public and staff members to understand and report on matters of fraud in their chosen language.

**What action(s) can you take to address the differential impact?**

Through engagement with Bilingual Cardiff, mitigating actions have been incorporated, this includes recognising the importance of the Welsh Language Standards, processes in place to seek advice from Bilingual Cardiff, specifically in relation to translations and language queries. Having existing arrangements to ensure the ability to communicate with individuals and progress fraud issues and concerns in other languages as required.

## Consultation and Engagement

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

A copy of the Counter-Fraud, Bribery and Corruption Strategy and this Sanction Procedure have been shared with the Equality Team and Bilingual Cardiff. Discussions ensued and working with Bilingual Cardiff, mitigating factors were developed jointly. A process of consultation and engagement will take place, with Trade Union consultation taking place prior to Cabinet consideration in October 2023.

## Summary of Actions (Listed in the sections above)

	Actions
Age	Not applicable
Disability	Not applicable
Gender Reassignment	Not applicable
Marriage & Civil Partnership	Not applicable
Pregnancy & Maternity	Not applicable
Race	Not applicable
Religion/Belief	Not applicable
Sex	Not applicable
Sexual Orientation	Not applicable
Socio-economic Impact	Not applicable
Welsh Language	Not applicable



Generic/ Over-Archiving (applicable to all the above groups)	Not applicable
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## Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

# C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## Welsh Language Standards 88-97

### Standard 88

Will this proposal have a **differential impact** [positive/negative] on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?			
Treating the Welsh language no less favourably than the English language?			

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

The core objectives of the Counter-Fraud Strategy and Sanction Procedure will be beneficial to all, engagement has been undertaken with Bilingual Cardiff and the Sanction Procedure has been reviewed to ensure that the Welsh language is not treated less favourably than the English language.

Working with Bilingual Cardiff mitigating factors were considered and developed jointly.

The Counter-Fraud Strategy and Sanction Procedure recognise that local authorities in Wales have a statutory duty to comply with the Welsh language standards. A process is in place to ensure that advice is sought at the appropriate time in order to obtain translations and resolve language queries.

Members of the public have a legal right to receive services from the Council in English or Welsh according to their choice. Arrangements are in place to communicate with individuals and progress fraud issues and concerns in other languages as required.

### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

### Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

### Standard 91

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

### Standard 92

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

**Standard 93**

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

**Standard 94**

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council's Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

**Standard 95**

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

<b>The opportunities for persons to use the Welsh language?</b>
See above

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

## Standard 96

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

The opportunities for persons to use the Welsh language?
See above

Treating the Welsh language no less favourably than the English language?
See above

## Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

[Correspondence](#) - receiving and replying (emails, letters, online communication).

[Telephone](#) – receiving and answering calls.

[Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.

[Public Messages – electronic – video](#)

[Signs, Notices & Display Material](#)

[Publicity & Advertising](#)

[Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.

- [Producing Forms](#)
- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)
- [Education Training Courses](#)
- [Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>
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Yes
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### Cardiff Council's Welsh Language Skills Strategy

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>
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Yes
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### Next Steps

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

**MID-YEAR ASSESSMENT OF PERFORMANCE 2023/24****FINANCE, MODERNISATION & PERFORMANCE  
(COUNCILLOR CHRIS WEAVER)****AGENDA ITEM: 4**

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**Reason for this Report**

1. The report enables the Cabinet to consider the Council's mid-year assessment of performance in 2023/24.

**Background**

2. The Well-being of Future Generations (Wales) Act 2015 requires the Council to set and publish Well-being Objectives and take all reasonable steps to meet those objectives. These duties are fulfilled through the Council's annual Corporate Planning process, with the Corporate Plan being approved by Council in late February or early March. The Well-being of Future Generations Act also requires the Council to publish an annual report of progress made in meeting its Well-being Objectives in each financial year.
3. The Local Government and Elections (Wales) Act 2021 established a new legislative framework for local government performance management, with an emphasis on self-improvement through a system based on self-assessment and a panel performance assessment. The purpose of the Act, in relation to performance, is *"to provide a framework which supports councils, through an ongoing process of review, to think about their performance and effectiveness now and for the future; to encourage more inquisitive organisations willing to challenge themselves to do more, to be more innovative and more ambitious in what they do"*.
4. As part of the Council's strengthened performance management arrangements, a mid-year self-assessment of performance is published annually. This ensures that performance is kept under regular review; there is collective understanding of progress, as well as areas of challenge, and corrective action can be identified and agreed if necessary.

## Issues

### Overview of Corporate Performance: Mid-Year Assessment

5. The mid-year assessment of performance in 2023/24 is attached as **Appendix A** to this report. The assessment provides a performance update for each of the Council's seven Well-Being Objectives, as set out in the Corporate Plan 2023-26. The assessment draws on a number of sources of performance information to assess progress against the Well-being Objectives, including:
  - Progress against the Steps and Key Performance Indicators under each Well-being Objective (**Appendix A**) (accessible via the [Corporate Plan Dashboard](#))
  - Regulatory assessment;
  - Surveys and citizen feedback;
  - Complaints – these are also considered separately as part of an annual report to Cabinet;
  - Financial monitoring – the Council's Month 6 monitoring report 2023/24 serves to inform the Council's financial position;
  - Feedback from Scrutiny Committees and the Governance & Audit Committee – the Council responds to the issues raised and recommendations made by Scrutiny Committees, which help to inform performance improvement;
  - Risk – the Council's corporate and directorate risks are considered fully;
  - The Annual Governance Statement, supported by the Senior Management Assurance Statement.
  
6. Reviewing this range of performance information assists the Council in developing a balanced picture of the Council's improvement journey over the year and enables the Council to identify areas of improvement and performance challenge, which may require further attention.
  
7. The Council also has in place a performance and accountability regime, which involves the wider political governance of the Council. In developing the self-assessment of performance, the following steps have been undertaken to provide opportunities for challenge and to ensure a full and balanced assessment:
  - Directorate self-evaluation of service performance, governance & financial challenges and priorities;
  - Performance and budget challenge sessions with each Director that are convened by the Chief Executive and Section 151 Officer to consider the findings of the directorate self-assessment;
  - A progress and performance session with the Cabinet and the Council's Senior Management Team; and
  - Consideration by the Council's Policy Review and Performance (PRAP) Scrutiny Committee.



8. The Scrutiny Performance Panel considered the mid-year assessment of performance 2023/24 on 28 November 2023. The Council received feedback from the Performance Panel on the 4<sup>th</sup> December 2023 (Appendix B), which made 11 recommendations. In response, cabinet have accepted 10 recommendations and partially accepted 1 (Appendix C), ensuring that the Mid-Year Assessment provides a balanced judgement and reflects the assessment of the Council's Scrutiny Committee Chairs. The PRAP Scrutiny Committee is also due to consider the mid-year assessment on 13 December 2023.

### **Areas of Progress and Improvement**

9. The Council continues to evidence improvement across a range of council services, with clear progress being made in the delivery of Corporate Plan 2023-26 commitments to date in 2023/24 as set out below:
  - Cardiff became the first British city to be awarded Child Friendly City status by UNICEF with formal recognition received in September 2023, followed by the signing of a formal agreement with UNICEF in October 2023.
  - The Council has made good progress in delivering the Striving for Excellence in Children's Services Strategy 2023-26. Though there is more to be done, progress can be evidenced by a demonstrable shift within the balance of care where, at Quarter 2 of 2023/24, there has been a reduction in the proportion of children placed in external residential placements and an increase in the number of children fostered by local authority foster carers, as well as an increase in the number of children returned home from care.
  - In response to the cost-of-living crisis, the Council's support offer continues to be delivered effectively. Between April and September 2023, almost 3,300 people were helped with Universal Credit financial support. This figure has already exceeded the number of people anticipated to need help during 2023/24. During the same period, the Money Advice Team has also identified additional weekly benefit of over £10m for its clients.
  - The Council remains on track to deliver 1,000 new homes by December 2023, with 890 homes having been completed at Quarter 2 of 2023/24. Progress is set to continue with nine active development sites projected to deliver over 400 further homes. Work is also due to commence on 245 new homes across six new sites in the city before March 2024.
  - A greater level of integration has been achieved with the NHS, which is getting people safely out of hospital quicker.
  - The Council has continued to play a leading role in supporting refugees and asylum seekers, particularly those arriving from Ukraine and Afghanistan. In addition to responding to the immediate needs of those arriving in Cardiff, the Council is focussed on transitioning individuals and families into sustainable long-term

provision where possible. To date, Cardiff has welcomed over 1,200 Ukrainian nationals into the city for long-term settlement, all of which are due to be matched and settled into long-term accommodation by January 2024. The Council has also supported 800 people from Afghanistan into local temporary bridging accommodation as part of a national process where they are matched into long-term homes across the UK.

- The Council has made good progress in improving public and green spaces in Cardiff. Two more parks in the city, Parc Tredelech and Western Cemetery, were awarded Green Flag status in 2023, bringing the total number of Green Flag parks in Cardiff to 18.
- The Council's Housing Energy Efficiency Retrofit programme is progressing well and the number of energy efficiency measures installed in Council-owned domestic properties is currently above target at Quarter 2 of 2023/24 at 416. The success of this scheme is demonstrated by the energy performance of Cardiff's council homes being better than the average for any tenure. Additionally, work undertaken within private rented sector properties to improve energy efficiency has led to an estimated carbon dioxide improvement of 72.4 tonnes.
- Universal Primary Free School Meals have been rolled-out to Reception, as well as Years 1-3, in Cardiff schools and the Council is on track to deliver the rollout for pupils in Years 4-6, in line with Welsh Government expectations.
- The Council continues to see increases in the numbers of citizens interacting with the Council digitally, with over 82,500 citizens registered to use the Cardiff App, a 12% increase over Quarter 1 and Quarter 2 of 2023/24.
- During the first half of the 2023/24 financial year, the Council has established the Ardal procurement service, which delivers a collaborative procurement partnership with Monmouthshire, Torfaen and Vale of Glamorgan Councils.

### **Areas of Strategic Challenge and Corporate Improvement Priorities**

10. The mid-year assessment highlights a number of performance challenges that will be the subject of corporate focus in Quarters 3 and 4 of 2023/24:
11. Sustained increase in the scale and complexity of demand across Council services: As identified in the end of year Self-Assessment report, the fundamental changes to the scale and complexity of service demand post-Covid are proving to be long lasting. This can be attributed to the lasting impacts of the pandemic, as well as the cost of-living crisis, which has placed pressure on households across the city – particularly vulnerable individuals and families – with increasing numbers of individuals relying on council services. These include:

- Demand challenges remain evident in services for children and young people, with children's services continuing to face a significant rise in both the number of cases. For example, referrals into the MASH are now 50% above pre-pandemic levels. In addition to rising numbers, cases are also becoming more complex, with a greater number of children needing a higher level of support. This demand pressures are being experienced at a time where there remain recruitment and retention challenges for children's social workers (despite the impact of the Council's interventions in this area) and a lack of available accommodation for placements. Shifting the balance of care towards preventative and lower cost interventions will continue to be the Council's focus over the year ahead.
  - In Education, school attendance has not yet returned to pre-pandemic levels and persistent non-attendance remain a significant concern in many parts of the city. There has also been a rise in exclusions, particularly in secondary schools, whilst a deterioration in pupil behaviour and an increase in the number of children entering school falling behind on their development milestones presents challenges for a number of schools. These, and other pressures associated with ALN and child mental health and wellbeing, are being met at a time when schools are facing significant budgetary challenges.
  - The adult social care sector continues to face ongoing pressures through rising demand and increasingly complex service requirements at a time when the market for care presents a range of challenges. Whilst the supply of care in Cardiff has improved, the fragility of the care market remains a concern due to an ongoing. New arrangements for the commissioning of care home placements for older people are being developed in response.
  - The Council continues to face unprecedented demand pressures in the housing system. Waiting lists for Temporary Accommodation are at historically high levels, having increased by 150% over the last two years with limited housing options available. A set of major proposals to respond to the Housing crisis is being brought forward as a corporate priority.
12. Ensuring continued financial resilience: The Council continues to face significant financial challenges as a result of increasing demand and pressures on services and inflationary pressures. A predicted budget gap in excess of £40m for the 2024/25 financial year represented a deterioration of the position reported in the end of year report with a total gap of £119.2m needing to be closed across the period of the Medium-Term Financial Plan. The overall position is set out in detail within the Month 6 Budget Monitoring Report and areas of significant pressures include:

- Education Services, due primarily to home-to-school transport, out-of-county placements, and catering. The Council is also still awaiting Welsh Government's decision on price-setting for the new Universal Free School Meal offer.
- Children's Services continue to experience an increase in placements costs for the Council's children looked after cohort. This, along with sustained demand pressures and price increases have resulted in costs exceeding budget.
- The planned closure of City Hall continues to impact the Council's capacity to generate income, from both functions and catering. The closure of St. David's Hall, due to the presence of Reinforced Autoclaved Aerated Concrete (RAAC) has also had an impact on income for the Council.
- Energy, food, and fuel inflation, and the staff pay award, combined with an increasing demand for services from the 'long tail' impact of the pandemic and the cost-of-living crisis, have significantly increased the levels of risk. The Council continues to face unprecedented challenges in terms of financial resilience which will require close monitoring and management during this year and into the medium term.
- With high interest rates, inflation and energy costs, market conditions remain challenging, placing sustained pressure on revenue and the capital programme, whilst income recovery remains a challenge in some services.

13. Workforce pressures continue to impact all council services: The pressures relating to the recruitment and retention of staff continue to impact all directorates. Workforce issues, recognised nationally in areas such as children's social services and adult social care, are no longer restricted to those sectors. The shortage within the professional services sector is impacting the delivery of projects with the Council facing competition from other sectors, making it difficult to fill key positions. The recruitment and retention challenges remain in the education sector. The Council's Workforce Strategy 2023-27 sets out an enhanced approach to proactive workforce planning, which includes the further development of a supportive work environment, fostering employee engagement and continuing to develop new, tailored approaches to recruitment and retention in areas where the Council has skills and capacity gaps.

14. Responding to new risks and issues: New risks and issues have continued to emerge, which have required the Council to put in place rapid responses, working across directorates and with public service partners. Issues such as RAAC concrete, industrial action, community disorder in Ely and pressures in the asylum system could not have been planned for when setting the Corporate Plan. The Council anticipates further major unanticipated risks will emerge in Q3 and Q4 which will require concerted Council and city-wide action.

## **Reason for Recommendations**

13. To provide Cabinet with a mid-year assessment of the Council's performance in 2023/24.

## **Financial Implications**

14. This report sets out the Council's mid-year assessment of performance. The covering report sets out the challenging environment within which the Council currently operates, which is likely to continue for the medium term. The Month 6 Financial Monitoring performance report was considered by Cabinet on 23 November 2023 with a further monitoring report for Month 9 to be considered in late February/early March 2023.

## **Legal Implications**

15. The Local Government and Elections (Wales) Act 2021 ('the 2021 Act'), Part 6, Chapter 1 sets the new performance and governance framework for local authorities, which came into force in May 2021. Under these provisions, the Council is required to keep under review the extent to which it is fulfilling the 'performance requirements', that is, the extent to which:

- (i) it is exercising its functions effectively;
- (ii) it is using its resources economically, efficiently and effectively; and
- (iii) its governance is effective for securing the above.

The information set out in this report enables the Council to discharge this duty.

16. The Council is required to consult at least once in each financial year about the extent to which it is meeting the performance requirements. The statutory consultees are:

- a) local people;
- b) other persons carrying on a business in the council's area;
- c) the staff of the council; and
- d) every recognised trade union.

17. A self-assessment report must be prepared in respect of each financial year, setting out conclusions on the extent to which the Council has met the performance requirements during that financial year, and any actions it intends to take, or has already taken, to increase the extent to which it is meeting the performance requirements.

18. The performance and governance provisions of the 2021 Act are framed within the context of the well-being duty set by the Well-being of Future Generations (Wales) Act 2015. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how its decisions and actions will contribute towards meeting the well-being objectives set out in the Corporate Plan and to keep the well-being objectives under review.

The Council must publish a report of the progress made in meeting its well-being objectives in each financial year, which may be included in the self-assessment report prepared under the 2021 Act (referred to in paragraph 15 above). Members must also be satisfied that the Council is complying with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.

19. When considering its performance and governance duties under the 2021 Act, the Council must have regard to the statutory guidance issued by the Welsh Ministers:

[https://gov.wales/sites/default/files/publications/2021-03/performance\[1\]governance-of-principal-councils.pdf](https://gov.wales/sites/default/files/publications/2021-03/performance[1]governance-of-principal-councils.pdf)

### **HR Implications**

20. There are no HR implications that are directly related to this report.

### **Property Implications**

21. There are no further specific property implications in respect of the Mid-Year Assessment of Performance 2023/24 report. Where there are any relevant property management matters, property transactions or valuations being undertaken by the Council to deliver any proposals, they should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## **RECOMMENDATIONS**

Cabinet is recommended to

1. note the mid-year assessment of the Council's performance as set out in this report and Appendix A, including the delivery of key commitments and priorities at the end of Quarter 2 of 2023/24, and the actions being taken to ensure the effective delivery of the Corporate Plan 2023-26.
2. Consider and agree the response to any recommendations made by the Policy Review and Performance Scrutiny Committee (PRAP) (Appendix C) in relation to the draft Mid-Year Assessment.
3. Delegate authority to the Chief Executive, in consultation with the Leader of the Council and Cabinet Member for Finance, Modernisation & Performance to make any consequential amendments to the draft Mid-Year Assessment required to reflect the response to PRAP Scrutiny Committee recommendations (agreed under recommendation 2).

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Paul Orders</b> Chief Executive
	8 December 2023

*The following appendices are attached:*

- Appendix A: Mid-Year Assessment of Performance 2023/24
- Appendix B: Performance Panel Letter
- Appendix C: Cabinet Response to Performance Panel

Mae'r dudalen hon yn wag yn fwriadol



# Mid-Year Assessment of Performance 2023/24

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## About This Report

### What is the Mid-Year Self-Assessment?

As part of its performance management arrangements, Cardiff Council produces a Mid-Year and End-of-Year Self-Assessment of performance in delivering its Wellbeing Objectives.

These Wellbeing Objectives, including the steps the Council will take to achieve them and how performance will be measured, are set out in the [Council's Corporate Plan 2023-26](#).

These are:

1. Cardiff is a great place to grow up
2. Cardiff is a great place to grow older
3. Supporting people out of poverty
4. Safe, confident and empowered communities
5. A capital city that works for Wales
6. One Planet Cardiff
7. Modernising and integrating our public services

For each Wellbeing Objective, the areas of progress and performance and risk are summarised with next steps identified.

In undertaking the mid-year and end-of-year assessments, the Council fulfils its statutory duties in relation to both the Well-being of Future Generations (Wales) Act 2015 and the Local Government and Elections (Wales) Act 2021, and the publication of the reports ensures that Cabinet receive an update on the delivery of their policy agenda and performance of statutory services.

### How is the Mid-Year Assessment Report developed?

The assessment of performance contained within the Mid-Year Assessment is developed through a thorough process of self-assessment involving the political and managerial leadership of the Council, drawing from a wide range of sources of performance information.

#### Sources of Performance Information

Sources of performance information which contribute towards the performance assessment include:

- **Performance against the Council's Key Performance Indicators** – The Council's Corporate Plan contains a suite of performance indicators which measure progress made in delivering the Wellbeing Objectives. Where applicable, targets are set against these performance indicators to demonstrate the desired level of achievement. Performance indicators are assigned a RAG status: **Green** where the indicator is on or above target, **Amber** where the result is within 10% of the target and **Red** where the result is more than 10% from the target.

- **Progress against the steps in each Wellbeing Objective** – Each Wellbeing Objective within the Corporate Plan also contains a set of ‘steps’ or actions. Monitoring progress against these steps provides an understanding of what has been achieved and where further work is required.
- **Consultation and Engagement** – The Council has a number of established consultation and engagement mechanisms such as the Annual Ask Cardiff Citizen Survey, the Budget Consultation, the Child Friendly City Survey as well as other surveys and consultation exercises which take place over the course of the year that provide residents, businesses and other city stakeholders an opportunity to share their views on a wide range of Council services and initiatives. In addition, the Council’s [Annual Compliments and Complaints Report 2022/23](#) provides valuable insight into where Cardiff’s citizens feel the Council needs to improve. The Corporate Plan contains a number of ‘qualitative’ Key Performance Indicators that relate to citizen satisfaction with services, and the findings of the consultation and engagement work forms an important part of the Council’s self-assessment process, policy development and budget setting process.
- **Finance Monitoring** – The Council’s Month 6 Budget Monitoring Report (link when published) serves to inform of the Council’s financial position in respect of the year ending 31 March 2024 and its findings contribute to the assessment contained within the Mid-Year Assessment Report.
- **Governance** – The Council’s Governance Framework comprises the systems, processes, culture and values by which the Council is directed, controlled, and the means through which it accounts to, engages with, and leads the community. The Council’s [Annual Governance Statement](#) sets out an assessment of the Council’s framework of governance, risk management and internal control.
- **Risk** – Delivering objectives requires frequent management of a wide range of risks at both operational and strategic levels, particularly in the dynamic external environment in which the Council is currently operating. The Council’s Year End [Risk Report](#), and its Corporate and Directorate Risk Registers, provides an overview of the current risks and the actions in place to mitigate them.
- **Scrutiny Committees and Governance & Audit Committee** – The Council responds to the issues raised and recommendations made by the Committees, which help inform policy development and performance improvement.
- **Inspection Reports** – The Council is subject to a number of inspections from regulatory bodies including Audit Wales, Estyn (Education) and the Care Inspectorate Wales (CIW). Their findings help the Council to assess areas of strong performance, as well as identifying areas that require improvement.

## Wellbeing Objective 1: Cardiff is a great place to grow up

The Corporate Plan sets out the following priorities for ensuring Cardiff is a great place to grow up 2023/24:

- Becoming a Child Friendly City
- Supporting education recovery post-pandemic
- Continuing to deliver the Cardiff 2030 vision for education and learning
- Shifting the balance of care: place
- Shifting the balance of care: people
- Shifting the balance of care: practice
- Protecting the wellbeing of vulnerable children, young people and families

### Overview of Performance at Quarter 2

#### Key Performance Indicators



#### Steps



A detailed assessment of performance against each Key Performance Indicator and step is accessible via the [Corporate Performance Dashboard](#).

## A Child Friendly City

Cardiff became the first British city to be awarded Child Friendly City status by UNICEF with formal recognition received in September 2023 followed by a formal agreement in October. A sustainability plan has been agreed with UNICEF outlining a programme of work for the coming three years.

## Deliver the Cardiff 2030 Vision for education and learning

The Council continues to demonstrate a sustained improvement in the quality and effectiveness of education in Cardiff. Attainment outcomes for pupils have been above or well above the Welsh average for GCSE and A-Level results in Summer 2023 for A\* to A and A\* to C results. School inspection outcomes have been good, especially in the primary sector. Of the 41 Estyn school inspections since March 2022, only two have been placed in a statutory category.

Cardiff Commitment engagement continues to improve, with 300 work experience placements secured through the What's Next project and additional partners onboarded including Cardiff and Vale Health Board, BBC Studios, construction providers and several Council departments.

Schools are, however, experiencing a number of pressures and challenges impacting children and young people post-COVID. These include:

- **School Attendance:** The fall in attendance levels post-pandemic remains an area of concern, having yet to return to pre-pandemic levels. In primary schools, attendance in 2022/23 was 91.7%, compared with 88.87% in 2021/22 and around 95% prior to the pandemic. In secondary schools, attendance was 88.20% in 2022/23, compared with 86.03% in 2022/21 and around 94% prior to the pandemic. The percentage of persistent absence (below 50% threshold) in secondary schools is also below target at Quarter 2. In response, the engagement programme with pupils, parents and schools is positively impacting the position, with the figures for academic year 2022/23 showing improvement.
- **Fixed-term exclusions:** Exclusions in both primary and secondary schools have risen in the 2022/23 academic year. These rates remain higher in secondary schools than in primary schools, with secondary schools reporting an increase of around 35% in 2022/23. The Education directorate continues to work closely with schools to support those with high rates of exclusions and supporting schools on pupil behaviour.
- **Additional Learning Needs:** The Council has made good progress on meeting the requirements of the new ALN reforms, with all specified year groups transferred to the ALN system in accordance with Welsh Government timescales. At Quarter 2, 131 new ALN places were created against a target of 141, though the supply of places is not keeping up with the rising demand. In July 2023, Cabinet approved plans to progress with projects to increase the total number of ALN places, covering a range of ages and complex needs, to 1,755.

- Pupil Development and Early Years – there has been a reduction in pupil development at reception into Primary School, with, for example, expected language ability well below pre-pandemic levels.
- Emotional Health and Wellbeing: The increase in the number of children with emotional health and wellbeing needs remains an ongoing challenge.
- Electively Home Educated: There has been a significant increase in the number of children who are Electively Home Educated (EHE) following the pandemic. The cohort in Cardiff has doubled in size between 2019 (219 children) and 2023 (443 children), though similar increases have been seen across Wales. The Council has a statutory responsibility to meet with a child who is being educated at home at least once a year to ensure the suitability of education is maintained and that the child is making suitable progress; during the pandemic this annual visit became a phone call. Concerns remain in relation to the attainment of EHE pupils and potentially safeguarding risks that will need to be actively managed.

Schools are also facing significant budgetary challenges, driven by a combination of record levels of inflation (which has devalued spending power despite the Council providing funding to schools above the Welsh Government settlement level), increasing and increasingly complex demand (see above) and an increase in vacant places across the city's school system (see below).

As of the Month 6 Budget Monitoring position, the Education directorate is projecting a £1.775m annual overspend with home-to-school transport, catering, and out-of-county placements sources of cost pressure. Further to this, meeting the cost of Universal School Meals represents an area of risk as the Council awaits confirmation that the funding levels received will be sufficient to meet the cost of provision.

Over the medium term the fall in birth rates projected across the city is projected to result in an increase in the number of vacant places across schools in Cardiff. These demographic trends will bring additional financial pressures to several schools in the short term and, over the medium term, is projected to impact the financial sustainability of the wider school system.

For 2023/24, the Council has committed circa £66m to the Schools Asset Programme to invest in the school estate to increase capacity where needed and improve the condition of school buildings. A Strategic Framework for Schools Organisational Planning is being progressed which will deliver additional secondary places at five secondary schools, including additional Welsh-medium places, and a new Early Years Unit. However, inflationary pressures are impacting on the Council's investment programme, both on maintaining the quality of existing schools and on the delivery of the School Organisation Programme.

## Shifting the balance of care and protecting vulnerable children and young people

Though significant pressures on the service remain, the Council has made good progress in delivering the Striving for Excellence in Children's Services Strategy 2023-26. This progress can be evidenced by a demonstrable shift within the balance of care where, at Quarter 2, there has been a reduction in the proportion of children placed in external residential placements and an increase in the number of children fostered by local authority foster carers, as well as an increase in the number of children returned home from care.

The Council is also progressing the delivery of its Accommodation Strategy to address the rising demand and increasing costs of placements for children looked after. The Strategy aims to increase in-house residential provision for children looked after by securing additional properties within Cardiff, reducing the Council's reliance on external providers. This is critical given that the Month 6 Budget Monitoring position projects an overspend of £3.185m in Children's Services, primarily due to sustained demand and higher prices for accommodation for children looked after. This does represent a significant reduction from the £6.6m overspend at year-end in 2022/23 and points to the impact of the Accommodation Strategy.

Despite this work, finding suitable accommodation for children and young people, particularly those with complex needs, has been challenging. The percentage of children looked after in regulated placements in Cardiff is 56.9% against a target of 60%, and the percentage of children looked after in regulated placements either in Cardiff or a neighbouring local authority is 76.7% against a target of 80%. Equally, and despite the progress made in delivering the Accommodation Strategy, the percentage of children placed in regulated placements (excluding kinship) and in in-house residential placements is short of the target set at Quarter 2.

To accelerate the shift in the balance of care, operational process improvements have continued to be delivered within the Council's Fostering Team to promote in-house fostering. In Quarter 2, 135 children were placed with in-house foster carers, exceeding the target of 130. Progress in this area is key in reducing the Council's reliance on private independent fostering agencies and bringing down placement costs.

The sector continues to face a national workforce crisis, but the strategic interventions identified to respond to this locally are having an impact. Vacancy rates in Children's Services have improved throughout the year, reducing from 27% in March 2023 to 16% in September 2023.

In addition to local demand pressures, national policy decisions are causing additional pressures on the Children's Services system. The aspiration to eliminate profit from the care sector is exacerbating the lack of availability of accommodation for children and young people. The widening of the National Autism Strategy to include all neurodiversity is leading to additional demand on already stretched services.

Children's Services is one of a number of important services that support vulnerable children and young people. With demand rising and budgets constrained across public



services, partners are reducing their services, leaving Children's Services increasingly as the service of last resort. The introduction of the Right Care Right Person framework by South Wales Police over the coming period will, in particular, place new pressures on Children's (and Adult) Services.

The implementation of the new Youth Justice 'Building Safer Futures Together' Strategy continues to be delivered effectively with first-time entrants and re-offending rates well below targets. Whilst there has been a reduction in entrants to the Youth Justice System, the impact of diverting children from youth justice has placed significant pressure on other services for young people within Cardiff.

## Wellbeing Objective 2: Cardiff is a great place to grow older

The Corporate Plan sets out the following priorities for making Cardiff a great place to grow older in 2023/24:

- Supporting older people to stay active and connected in an Age-Friendly City
- Supporting older people to live independently at home through strengths-based preventative services
- Working in partnership to deliver high-quality sustainable care and support
- Supporting unpaid carers and valuing their role
- Ensuring our services meet the needs of those living with dementia

### Overview of Performance at Quarter 2

#### Key Performance Indicators



#### Steps



A detailed assessment of performance against each Key Performance Indicator and step is accessible via the [Corporate Performance Dashboard](#).

## **Supporting older people to stay active and connected in an age-friendly city and ensuring our services meet the needs of those living with dementia**

The Annual Age-Friendly Cardiff Highlight Report, due to be published in November 2023, will set out the good progress being made in relation to the Council's priorities. Corporate awareness of Dementia is increasing with the percentage of staff completing the Dementia Friendly training module up to 58%, though this is short of the 85% target.

Areas of notable progress involves supporting older people into work, with the appointment of employment mentors. At Quarter 2, there were approximately 150 individuals, aged 50 or over, being supported into either employment or training by the mentors. Older people are also supported to improve their digital skills, with training offers available across the city to help build confidence and improve familiarity with common digital products, such as Microsoft Office.

## **Supporting older people to live independently at home through strengths-based preventative services**

Care provision is generally good following a period of real concern about the resilience of the service. Access to domiciliary care is very good with all cases allocated to care provider by the end of each day whilst the availability of residential care is generally good, with some issues in accessing more specialist care home placements.

Despite excellent work to stabilize the provision of care, challenges remain. The recruitment and retention of qualified social workers and occupational therapists is a national challenge that remains clearly evident in Cardiff. As of Quarter 2, the percentage of adult social work vacancies stood at 21.98%, which is above target. There are also assessment delays in the community demanding that all cases are carefully prioritized. An Adult Services Workforce Strategy has been developed in response and a series of interventions are being progressed, including the launch of a "Social Work Cardiff" brand to promote recruitment to the service, the development of a Trusted Assessor approach to empower staff and reduce duplication, the recruitment of Resource Assistants to reduce administration for qualified staff and the introduction of a new streamlined Assessment and Care Planning process.

Excellent progress has been made to support the preventative agenda, with a programme of support offered across the city. Citizen feedback suggests the interventions are successful with 98% of people reporting that they feel able to live independently at home following support from the Independent Living Service. Further to this, 90% of people who contacted the First Point of Contact team have not contacted the team again for at least 6 months and Occupational Therapists now review all cases at the front door to identify alternative solutions to care. Service development is ongoing to further develop technology enabled care, aids and adaptations, which will support more people to remain independent. The Community Resource Team (CRT) homecare service modernisation programme is leading to improved continuity of care. At mid-year, 100% of service users were satisfied with the service which is now offering a rapid bridging service from its emergency unit to prevent admissions.

Despite good progress against key corporate plan steps, financial pressures continue and an overspend is projected at Month 6. This is offset by underspends and other budget planning arrangements, so a balanced position is currently shown with full detail available in the Budget Monitoring report considered by Cabinet in November. The spend on Disabled Facilities Grants (DFG) to deliver disabled adaptations is over budget, necessitating a pause in the allocation of facilities to support independent living if no additional funding found. Not only does this represent budgetary challenge, but also impacts prevention. Further budgetary challenges are likely to arise with an anticipated reduction to the Regional Integration Fund next year.

### **Working in partnership to deliver high-quality sustainable care and support**

The Council continues to work closely with Health colleagues to ensure a smooth, safe, and timely transition from hospital to help free up beds. Significant improvements to hospital discharge arrangements have been secured with the Integrated Discharge Hub and new hospital discharge pathways working well. Work is ongoing to develop a suite of new performance indicators to clearly demonstrate these improvements and the impact of the Council's interventions. In the meantime, the service is recording and reporting interim measures at Directorate level. On average, 43 discharges with care are being achieved each week, contributing to improved patient flow and increased bed capacity across all University Health Board (UHB) sites. In Quarter 2, 73% of referrals to the Integrated Discharge Hub were triaged within one working day against a target of 85%. The deep dive review of hospital social work has also improved flow, with hospital social work cases down from 160 in April to 107 and minimal unallocated social work cases at present.

The availability of specialist care homes for those with dementia and nursing, however, remains an issue, often resulting in the need to pay above the cost of care. The current commissioning arrangements also require reform as they do not allow effective market management or certainty for providers, leading to a risk that care providers may withdraw services. This is being mitigated as far as possible by ongoing communication with the sector. A cost of care exercise is under way for care homes. A long-term plan for Adult Services is currently being developed based on prevention, alternative models of care and cost-effective commissioning, to ensure the Service is sustainable into the future.

Changes to the legal environment present additional risks following a Supreme Court ruling that local authorities must provide and pay for "after care services" for out of county placements following re-admission to hospital under section 117 of the Mental Health Act. Given the size and scale of Cardiff this is likely to disproportionately impact the Council with potentially significant cost and delivery implications.

### **Supporting unpaid carers and valuing their role**

The support for carers continues to be improved through the effective delivery of key Corporate Plan steps. The Hubs for All approach has been successfully developed allowing people with care and support needs to access sessions within their community and a package of support measures has been made available to support unpaid carers. Within

Care Hubs (Day Centers), over 3,600 service user sessions have been delivered so far this year, providing person centered activities, social activity and invaluable unpaid carer respite.

### **Older persons housing**

The Council is committed to delivering modern, fit-for-purpose older persons housing that supports independent living and has an ambitious delivery plan for developing new schemes. Following the success of two supporting living schemes for individuals with mental health and learning disabilities – Blue Dragon and Llys Maelfryn – further schemes are due to open in December which will further allow for the step down from residential care. A Pipeline of schemes for the next 3 years has also been developed.

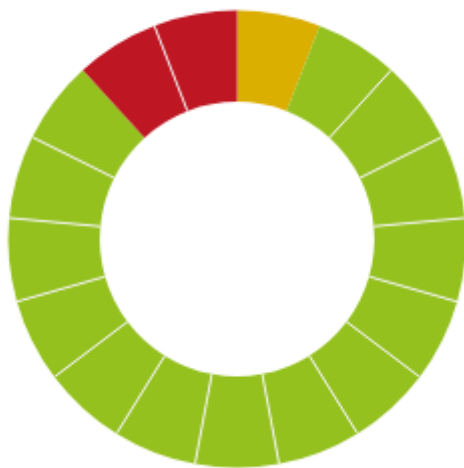
### Wellbeing Objective 3: Supporting people out of poverty

The Corporate Plan sets out the following priorities for supporting people out of poverty in 2023/24:

- Supporting those most impacted by the cost-of-living crisis
- Continuing our Living Wage City ambition
- Tackling homelessness and ending rough sleeping

#### Overview of Performance at Quarter 2

Key Performance Indicators



Steps



A detailed assessment of performance against each Key Performance Indicator and step is accessible via the [Corporate Performance Dashboard](#).

## **Cost-of-Living Crisis**

In response to the cost-of-living crisis the Council's support offer continues to be delivered effectively. Between April and September 2023 almost 3,300 people were helped with Universal Credit financial support; this figure has already exceeded the number of people anticipated to need help during 2023/24. During the same period the Money Advice Team has identified additional weekly benefit of over £10m for its clients. The Council has also reviewed its cost-of-living support to ensure that it is relevant and meets prevailing needs with key interventions, such as warm spaces at Community Hubs, planned from the end of October 2023. The Council's early intervention policy also ensures that Council contract holders (tenants) are contacted at an early stage to prevent rent arrears from escalating.

The alignment of Council support services, such as the Welfare Liaison team and Money Advice Team, has ensured additional capacity that has unlocked support for longer hours, including late nights and Saturdays. Services are now provided from eight Community Hubs on a drop-in basis including Ely & Caerau, St. Mellons and Grangetown, increasing the reach of the team.

The impact of inflation and rising costs on households means that, despite the Council's programme of support, the crisis is having an impact on the lives of many people which in turn is leading to service pressures across the Council. Housing costs, for instance, are becoming unaffordable due to the rising costs of mortgages, rent, food and energy. This has led to an increase in social service referrals for vulnerable people and greater demand for Council support services.

There is also uncertainty about Welsh Government funding for support schemes going forward, and the Department for Work and Pensions has reduced the total amount of Discretionary Housing Payment allocated to the Council. In response the Council is seeking to identify additional external funding and reviewing available budgets to meet demand.

## **Supporting those most impacted by the economic crisis into work, education or training**

Good progress has been made on supporting the progression of local people into work, education or training. Of those who received support from the Employment Gateway, 620 have secured work during the first six months of this financial year and 1,600 Council posts have been filled through placements from Cardiff Works during the same period. The Council has also created 35 new apprenticeship and trainee placements during this time, bringing the total number of apprentices and trainees working in the Council to 120.

A new city-wide engagement plan has been developed to reach priority groups, such as those with Additional Learning Needs, people who are economically inactive, carers, those at risk of homelessness, and people living in the southern arc of the city. Provision has also been enhanced to support individuals with learning difficulties and young people within the Youth Justice Service. The Into Work Advice Service has created bespoke packages for different employment sectors and the Teaching Assistant Recruitment Scheme has been expanded. Since April 2023, the scheme has enrolled 72 candidates and of those, 17 have entered employment and seven have completed work placements in local education

settings.

The Into Work Advice Service continues to work with the Economic Development directorate and the Commissioning & Procurement team to assess and influence contractors' social value commitments for all developments related to Atlantic Wharf. A new action plan will be developed during Quarter 3 to capitalise on the employment and skills opportunities afforded by major developments in Cardiff, with a focus on supporting citizens living in the nearby communities.

The Into Work Advice Service have three employment mentors supporting individuals in employment to up-skill or to secure higher paid or sustainable employment. There has been an increase in the number of individuals in employment accessing the services including the Cardiff Cares Academy, Teaching Assistant Academy and Onsite Construction Academy. Between April and September 2023, 558 individuals in employment have been supported with mentoring provision, 151 individuals have gained a different job following support and 144 individuals have successfully achieved a qualification.

### **Continuing our Living Wage City ambition**

Cardiff is now recognised as a leading UK Living Wage City with the partnership continuing to meet all its delivery targets. In 2017, 20.7% of the workforce in Cardiff – around 42,000 people – were not earning the real Living Wage; the latest Office for National Statistics survey results show that this has now decreased to 7.9%, or 18,000 people. Cardiff has also achieved one of the highest uplifts in the number of employees being paid the Real Living Wage, with over 13,200 workers in the city now benefitting. Cardiff University estimate the value of this to be £68m for the Cardiff economy since 2012. There are now 210 accredited employers in Cardiff with Admiral, the only Welsh FTSE listed company, amongst the most recent organisations to be accredited.

### **Embedding our new approach to tackling homelessness and ending rough sleeping**

The unprecedented demand for housing is placing significant pressure on Council services. Waiting lists for temporary accommodation are high across all Gateways. Waiting lists for temporary accommodation are at historically high levels, having increased by 150% over the last two years. At Quarter 2, all temporary accommodation units in Cardiff were full with extensive use of hotels for families.

The number of people recorded as sleeping rough in the city has also increased substantially. On average 39 individuals are now sleeping on the city's streets every night, compared with 11 at the same time last year. Many of the individuals have either no local connection or no recourse to public funds. The Outreach and Multi-Disciplinary Teams continue to engage with clients, either by supporting them into appropriate accommodation or in the case of those with no local connection, to encourage them to seek support in their local area.

The Council has delivered a number of interventions to help manage demand, with all support services continuing to operate effectively in the face of exceptionally challenging



circumstances. However there remains a significant lack of available and affordable properties to support people moving on from temporary accommodation. A report will be considered by Cabinet in December 2023 to set out the extent to which the situation in Cardiff now qualifies as a 'housing emergency' and to outline a comprehensive, system-wide response.

## Wellbeing Objective 4: Safe, confident and empowered communities

The Corporate Plan sets out the following priorities for delivering safe, confident and empowered communities in 2023/24:

- Building new Council homes and investing in community facilities
- Ensuring children and adults are protected from risk of harm and abuse
- Creating safe and inclusive communities
- Promoting the Welsh language
- Working together to support a healthier and more active population

### Overview of Performance at Quarter 2

#### Key Performance Indicators



#### Steps



A detailed assessment of performance against each Key Performance Indicator and step is accessible via the [Corporate Performance Dashboard](#).

## Building new homes and making more homes available

The Council continues to do everything in its power to increase the amount of affordable, energy-efficient and low-carbon housing in the city:

- The Council remains on track to deliver 1,000 new homes by December 2023 with 890 homes completed at Quarter 2. Progress is set to continue with nine active development sites projected to deliver over 400 further homes and work is due to commence on 245 new homes across six new sites before March 2024.
- The Council continues to make progress in the delivery of the Local Development Plan (LDP), with a total of 3,295 new homes being completed across five strategic housing sites in Cardiff. Over the last five years of the plan, an average of 1,242 homes have been completed per annum. Despite this success, the plan faces site assembly, legal, and logistical challenges, meaning delivery is still slower than initially anticipated.
- Empty homes continue to be brought back into use, enhancing the available housing stock and as at Quarter 2 the Council is on track to meet its target, with 46 empty properties brought back into occupation to date.

Good progress has been made in driving up housing standards in the private rented sector with the Rent Smart Wales scheme tackling rogue agents and landlords. The Council has also continued to intervene where enforcement action is needed against landlords or where safety hazards in homes need to be addressed. Regarding Council housing stock, over 25,000 repairs were carried out in the first six months of this year, with just over 1,000 new jobs and around 2,400 follow-up jobs outstanding at the end of September. Between 93% and 96% of emergency repairs were completed on time. A new online repairs system is due to be launched before March 2024, making it easier for tenants to report and monitor repairs they need carried out in their properties.

The Council retain a focus on addressing critical repairs such as damp and mould in its housing stock, with regular monitoring in place. To further improve the Council's ability to respond, a new dedicated team is being established to provide a rapid response to issues raised. A strengthened approach will also be introduced to ensure that maintenance persons have ready access to a range of intervention to address damp and mould issues.

However, the pressure on the housing market, especially the rising cost and lack of availability of homes in the private rented sector, remains a strategic challenge for the Council, causing significant demand and cost pressures in housing and homelessness services and across numerous Council services, including social services, advice services and refugee and asylum seeker support (see Wellbeing Objective 3). As noted above, a report will be considered by Cabinet in December 2023 to set out the extent to which the situation in Cardiff now qualifies as a 'housing emergency' and to outline the response. This will include both immediate, short, medium and longer-term interventions and detail innovative proposals to substantially increase the number of new-build temporary accommodation units across the city.

## **Investing in communities**

Performance monitoring at Quarter 2 indicates that the target of securing £1m in external funding is set to be achieved for investment in local communities. Good progress is also being made with the ongoing development of Community Hubs with notable progress in the delivery of the Wellbeing Hubs at Ely and Caerau Parkview, Lisvane and Plasdwr, the Michaelston Hub and the City Centre Youth Hub.

A range of performance indicators demonstrate that the existing network of libraries and hubs are highly valued community assets, being both well attended – with over 1 million visitors recorded so far this year – and achieving high customer satisfaction ratings. Though visits to the Council’s volunteer portal are higher at Quarter 2 than they were at the same point in the previous year, this has not translated to an increase in the number of volunteering hours committed within Housing & Communities. This is due to recruitment challenges in the Into Work Service, though these posts have now been filled and volunteer hours are expected to improve.

Work to ensure that the Council’s high-rise housing blocks meet stringent fire safety standards and that tenants receive regular updates and reassurance is progressing well. In Quarter 2, recladding work is proceeding at the Lydstep high-rise blocks with tender documents being prepared for the recladding of Loudan & Nelson House. Sprinkler installation has been completed at Lydstep and Loudan & Nelson House, with sprinkler designs planned for Beech & Sycamore House. Further to this, good progress is also being made in relation to Shared Regulatory Service commitments included within the Corporate Plan, with the delivery of relevant steps all marked as green.

## **Ensuring children and adults are protected from risk of harm and abuse**

The wellbeing of vulnerable children and adults remains the Council’s highest priority, working closely with partners across the region to coordinate safeguarding activity. The governance arrangements supporting the Regional Safeguarding Board have been strengthened with an increased focus on data-driven decision-making and the implementation of the Safeguarding Adolescents From Exploitation (SAFE) Model continues to be implemented effectively. As part of this implementation, the Council has focussed on raising awareness of the various forms of exploitation, strengthening partnership working, embedding contextual safeguarding approaches, and ensuring clear guidance, procedures, pathways, and services are in place to respond to exploitation.

Corporate awareness of safeguarding is high, following a concerted programme of management action, and the percentage of staff who have completed Safeguarding Awareness Training is now well above the target of 85%.

The number of adult protection enquiries recorded has increased significantly in 2023/24 with 1,280 enquiries received at Quarter 2, compared to only 654 at Quarter 2 in 2022/23. This increase is primarily due to recording changes made in January 2023, where more accurate recording practices were implemented in the social care case management system to better reflect the full workload of the safeguarding team. While the data displayed does

not provide an accurate comparison with the previous year's data because of this, the service has still observed a moderate increase in demand over this period. Despite an increase in demand, the Council has still maintained its performance standards in completing 99% of enquires within seven days through Quarter 2.

The Council continues to employ a strengths-based approach to support vulnerable people, ensuring that they retain a choice in how their care is provided. Several strength-based mentors have been nominated across Adults' Services to promote and embed this approach and existing provision has been enhanced, with particular emphasis on overcoming language and cultural barriers to care.

The pressures on mental health services have continued during the year, in line with the ongoing pressures on health and social care services generally. The Council is working with the Cardiff and Vale University Health Board to identify a suitable venue for the new Sanctuary service for those facing a mental health crisis. However, at Quarter 2 this project has been delayed as no suitable venue has been found. Work continues between the Council and the Health Board to find a way forward for this project.

### **Creating safe and inclusive communities**

The Council is working with partners to expand its multi-agency problem-solving approach to localised, complex anti-social behaviour (ASB) hotspots. In the city centre, the Council has utilised the UK Government Safer Streets Fund to commission murals in three pedestrian underpasses which were inspired by Cardiff's history<sup>1</sup>, along with installing CCTV in targeted areas in the city centre and Cathays. Using an evidence-based approach, the Council has successfully secured further funding for the fifth round of the Safer Streets Fund, which will help to deliver interventions in Adamsdown and Riverside, including CCTV, youth intervention and education initiatives on bike safety, violence, and park security. Further work is also planned for Ely, Butetown and Splott.

On 22<sup>nd</sup> May 2023 the community of Ely saw serious disorder following the tragic death of two young boys in a road traffic collision. In response, an in-depth community engagement exercise is being led by Action for Ely and Caerau and an Ely and Caerau Community Reference Group to understand the community's priorities for the future. These will form the basis of a Community Plan which will be presented to the Cardiff Public Services Board in Spring 2024.

Engagement work to date has identified community safety, preventing ASB and criminal exploitation of young people as community priorities. Joint work is planned for Quarter 3 to explore these and co-produce new responses between the community and the city's public services.

The Council remains committed to tackling all forms of violence against women and girls. In May 2023 the Council's Cabinet agreed a new Violence Against Women, Domestic Abuse and Sexual Violence Strategy for 2023-28 and the associated Implementation Plan.

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<sup>1</sup> [New murals inspired by Cardiff's history and musical heritage \(cardiffnewsroom.co.uk\)](https://www.cardiffnewsroom.co.uk)

Corporate awareness is also demonstrably high, with 82% of staff having completed the Violence Against Women, Domestic Abuse and Sexual Violence training.

The Council has continued to play a leading role in supporting refugees and asylum seekers, particularly those arriving from Ukraine and Afghanistan. In addition to responding to the immediate needs of those arriving in Cardiff, the Council is focussed on transitioning individuals and families into sustainable long-term provision where possible. To date, Cardiff has welcomed over 1,200 Ukrainian nationals into the city for long-term settlement, all of which are due to be matched and settled into long-term accommodation by January 2024. The Council has also supported 800 people from Afghanistan into local temporary bridging accommodation as part of a national process where they are matched into long-term homes across the UK. These processes, however, can place strain on other parts of the housing system. For example, those granted asylum may present immediately as homeless, seeking assistance from the Council to support them into accommodation. This impact is placing significant pressure on homelessness and wider housing services. It is anticipated that the recent decision by the Home Office to significantly accelerate the approval decision-making process will create further demand pressures in Quarter 3 and Quarter 4 2023/24.

### **Promoting the Welsh language**

The 2021 Census showed that the number of people who could speak, read and write in Welsh has increased by 23%, or over 6,500 people, since 2011, the largest numerical and percentage increase across all Welsh local authorities. The growth of high-quality Welsh Language Education and the promotion of opportunities to speak Welsh across the city, delivered through the Welsh in Education Strategic Plan (WESP) and the Bilingual Cardiff Strategy 2022-27 respectively, have helped to support this growth.

### **Working together to support a healthier and more active population**

The Council continues to promote and facilitate physical activity through the delivery of its Physical Activity & Sport Strategy 2022-27<sup>2</sup>. A report on Sport Wales's Regional Sports Partnerships is planned for Cabinet in Quarter 3 which will determine the future of any regionalisation proposals.

The Council has also made good progress in improving public and green spaces in Cardiff. Two more green spaces, Parc Tredelerch and Western Cemetery, have been awarded Green Flag status, bringing the total number of Green Flag parks in Cardiff to 18. Work to increase Cardiff's tree canopy, deliver the Allotment Strategy, and support volunteer work has also been taken forward effectively. Work on the development of a National Park City for Cardiff, however, has been paused in 2023/24 subject to establishing appropriate governance and delivery arrangements.

The Council continues to closely monitor its contract for leisure services with the provider GLL. A report proposing investment in Pentwyn Leisure Centre was approved by Cabinet in

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<sup>2</sup> [Physical Activity and Sport Strategy](#)

June 2023 however the sustained high cost of energy remains a major challenge for both GLL and Parkwood, the operators of the International Swimming Pool.

The Llanishen Reservoir has also been opened, delivering 5km of circular paths around the reservoir and opportunities for a range of water sports, welcoming around 75,000 visitors between July and August 2023.

## Wellbeing Objective 5: A capital city that works for Wales

The Corporate Plan sets out the following priorities for ensuring that the Capital City works for Wales in 2023/24:

- Leading the economic recovery in Wales
- Leading a recovery programme in Cardiff
- Supporting the recovery of the cultural sector and major events programme

### Overview of Performance at Quarter 2

#### Key Performance Indicators\*



#### Steps



*\*Many Key Performance Indicators in this chapter are reported on an annual basis which is why there are few RAG ratings to report at Quarter 2.*

A detailed assessment of performance against each Key Performance Indicator and step is accessible via the [Corporate Performance Dashboard](#).



## **Leading the economic recovery in Wales**

Last year, Cardiff was allocated £42m over two and a half years from the Shared Prosperity Fund (SPF), the UK Government's new regional development funding programme. Working with the Cardiff Capital Region (CCR), a robust governance structure has since been developed to deliver the programme – including the creation of a Regional Investment Plan – which is funding a range of local business support, transport, skills and community safety initiatives. In July 2023, an open call for proposals was launched, to allow eligible organisations to propose projects or schemes that will deliver the SPF outputs and outcomes. The proposals are currently being assessed, ensuring that they fill a gap in terms of need, and are aligned with the city's priorities, as identified in Stronger, Fairer, Greener and Cardiff's Local Well-being Plan.

In addition, the Council, in partnership with Transport for Wales, has secured £50m from the Levelling Up Fund to improve public transport in the city, which will be match funded by a £50m Welsh Government grant. The funding will be utilised to implement Cardiff Crossrail Phase 1, improving connectivity to and from the Cardiff Bay area; the full business case is currently in development.

## **Leading a recovery programme in Cardiff**

A range of projects are being progressed as part of Cardiff's recovery programme, supporting investment in visitor infrastructure. This includes a successful submission to Welsh Government for funding for the restoration of Cardiff Market, establishing new city centre warden arrangements and utilising the Transforming Towns facility to encourage the take-up and refurbishment of space for hospitality purposes in the city centre.

Economic challenges – including inflation in the construction sector and higher interest rates – are impeding the development of new commercial premises in the city. Nonetheless, it is imagined that when pressures begin to ease, because of underlying demand trends, there is likely to be a resumption of new commercial property development. Work on Central Quay has continued, with the first phase of residential development well underway (delivering 700 units) and work on the new multi-storey car park set to begin in Quarter 3.

As part of the Industrial Strategy for the East of the city, a significant amount of work was undertaken to prepare statements to support the Cardiff Parkway proposal through Welsh Government's planning application 'call in' process in Quarters 1 and 2. A decision is anticipated by Welsh Ministers in Quarter 3.

The Council has continued to progress projects related to the regeneration of Cardiff Bay. The Council is on target to complete the Red Dragon Centre business case by the end of the year; work continues to conclude the agreement to lease the Graving Docks; a disposal strategy was agreed by Cabinet in July 2023 for the International Sports Village and the option agreement has since been concluded and entered with the developer.

Work is ongoing to refine the funding strategy for the Indoor Arena following the changed economic environment and cost inflation. In Quarter 1, Cabinet agreed to the extension to

the pre-construction services agreement to enable the completion of a funding strategy to be considered at Cabinet in November 2023. If agreed, the project will move towards financial close in May 2024 with project delivery set to begin in mid-2024.

### **Supporting the recovery of the cultural sector and major events programme**

Visitor economy recovery has been impacted by the cost-of-living and energy crises, nonetheless, the Council continues to work with event promoters and cultural venues to support the capital city's event and cultural sector. Attendance at the Council's cultural venues was 14.87% above target at Quarter 2, with over 310,000 visits recorded. The development of the new Events Strategy is progressing in tandem with the development of a new Tourism Strategy, as well as a new Cultural Strategy. The Council has secured funding from Welsh Government's Events Wales to deliver an International Music Festival in Autumn 2024 and Cardiff has been confirmed as a host city for the 2028 UEFA European Championships.

Following changes to Health and Safety Executive (HSE) advice in the Summer of 2023 on Reinforced Autoclaved Aerated Concrete (RAAC) in public buildings, intrusive surveys were undertaken on the roof of St. David's Hall, with appointed engineers categorising the building as a RED risk, resulting in the building's closure until the roof is replaced and the building refurbished. The building was in the process of being leased to the Academy Music Group (AGM), however, considering recent developments, it has been agreed that the lease will be conditional for a period to enable them to work towards identifying a viable solution for the required works.

While visitor numbers across Council venues are improving, income generation has not quite returned to pre-COVID levels and remains short of budgeted income targets. The closure of buildings – including St. David's Hall and City Hall – are also impacting on budgets in year.

## Wellbeing Objective 6: One Planet Cardiff

The Corporate Plan sets out the following priorities for delivering a One Planet Cardiff in 2023/24:

- Decarbonising the city and leading a green recovery
- Transforming Cardiff's public transport and active travel systems
- Putting sustainability and wellbeing at the heart of the city's growth
- Enhancing Cardiff's flood defences
- Building resilience into our highway network
- Making Cardiff a world-leading recycling city
- Working as one team to keep our streets clean

### Overview of Performance at Quarter 2

#### Key Performance Indicators



#### Steps



A detailed assessment of performance against each Key Performance Indicator and step is accessible via the [Corporate Performance Dashboard](#).

## Decarbonising the city and leading a green recovery

Significant progress has been made by the Council and its partners in developing a robust governance structure to deliver change, as well as making major carbon reduction improvements. This includes developing detailed studies and work programmes for major decarbonisation work areas, such as estates retrofit, fleet decarbonisation, low carbon procurement policy and supporting One Planet action planning within schools. However, constraints and challenges relating to cost and timescales for implementation are now being encountered, which look likely to affect the 2030 net-zero ambitions set out in the One Planet Cardiff Strategy. These constraints and challenges are being experienced by public sector partners across Wales, with regional and national-level discussions underway to consider holistic, partnership-led solutions.

Project updates include:

- Heat Network: Works to install the heat network are progressing well, with the Energy Centre nearing completion and internal works complete in two major customer buildings. However, issues regarding the interface of the scheme with proposed Council developments remain unresolved and under detailed discussion.
- Large-scale Renewable Energy Generation: Initial findings from an ecology survey of the Wentloog solar farm proposal site have given confidence to move to the next stage of ecological investigation. A recent change to Welsh Government policy on development in areas with ecological protection status has, however, placed the viability of the scheme in doubt. Discussions are ongoing with Welsh Government and Welsh Government Energy Services to establish whether there are any routes through. Moving forward, a clear picture of Council land that may be available for additional renewable schemes, subject to favourable business case analysis, will be established. The Lamby Way Solar Farm continues to perform above the expectations set in its business plan, and a series of improvement actions at the Radyr Weir Hydrogeneration Plant have delivered upgraded performance.
- Housing Energy Efficiency Retrofit: The programme is progressing well, following successful recruitment into some key vacancies in the team. The number of energy efficiency measures installed in Council-owned domestic properties is currently above target at Quarter 2, at 416. The success of this scheme is demonstrated by the energy performance of Cardiff's council homes being better than the average for any tenure<sup>3</sup>. Additionally, work undertaken within private rented sector properties – to improve energy efficiency - has led to an estimated carbon dioxide improvement of 72.4 tonnes.
- Electric Vehicles: A decision has been taken not to proceed with the Fleet Replacement Strategy, with delays also experienced in terms of the implementation of Fleet Replacement programme. The number of Council vehicles which are electric is above target at Quarter 2, however, at 85. Furthermore, the first part of the Electric Vehicle

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<sup>3</sup> The requirement for Welsh Housing Quality Standard (WHQS) is a SAP (Standard Assessment Procedure) rating of 65. Average SAP ratings for Cardiff Council stock: 72; Cardiff Council New Build: 85; Owner-occupied: 62; Rental (private): 63; and Rental (social): 71.

Infrastructure Road Map has been completed, examining levels of demand, current technology and delivery options.

- Healthy, Local and Low-Carbon Food: A £2m Cardiff Capital Region funded innovation programme is in progress, sponsoring new and innovative ways to grow, distribute and decarbonise the local food sector.

An annual update on the One Planet Cardiff programme is expected in January, which will present Council and city-wide emissions for 2022/23, although it is recognised that further work is needed to understand more precisely the required reductions in emissions due to changing methodologies related to Welsh Government's reporting framework.

### **Transforming Cardiff's public transport and active travel systems**

Whilst good progress has been made to deliver the Council's programme of investment in public transport and active travel, several projects have been subject to delays, as well as difficulties in securing funding:

- Cardiff and Regional Metro: Whilst the Metro network continues to be progressed, issues have arisen in terms of securing commitment for the delivery of network improvements, including frequency improvements to Coryton and Radyr and new stations in Cardiff. Work is ongoing with partners to secure the funding needed to deliver the improvements.
- Bus Services: A Bus Priority Infrastructure Plan has been developed and is expected to be presented to Cabinet in January 2024, whilst the feasibility and optioneering work for several bus corridors is continuing. Further reductions in funding for bus services have, however, been announced by Welsh Government, with the Bus Transition Fund – which replaced the Bus Emergency Scheme - ending in March 2024. This is a significant risk for the Council and one which, unless mitigated, will result in a gap in bus service provision across the city.
- Wales 20mph Default Speed Limit: Work is ongoing to manage the transition to a default 20mph city; the implementation of Phase 1 of the 20mph default has been installed, including all necessary signage and carriageway amendments. Phase 2 of the programme has now been commenced.
- Active Travel: Work continues to develop a segregated cycle network across the city, with design work progressed for the majority of schemes. However, work on Blackweir has been placed on hold due to a lack of funding. Work to develop a data-led approach to prioritise Active Travel Network Map routes is ongoing, as well as work with schools to support the implementation of Active Travel Plans.
- Road User Charging Options: To develop a new source of long-term infrastructure funding the Council resolved, in April 2023, to consider a range of road payment schemes. Consultation with stakeholders has taken place in the autumn with further

stakeholder engagement and detailed business case work expected to take place throughout 2024.

- Intelligent Transport System (ITS): Preparation of the ITS strategy is on hold. The opportunity to comprehensively progress the strategy – and define the scope of what can be achieved – is dependent on reliable sources of funding, which may not be determined until 2025 subject to a robust business case and alignment with the potential road payment scheme.

## **Air Quality**

Poor air quality is now considered the largest environmental risk to public health in the UK with clear scientific evidence that air pollution exposure reduces life expectancy. Substantial progress has been made with regards to implementing clean air improvement projects in the city centre; City Centre East Phase 1 is nearing completion whilst Welsh Government have agreed, in principle, to fund the full Castle Street scheme, subject to approval of the updated business case which has now been submitted to Welsh Gov. A final decision on funding is expected by Welsh Government in Quarter 4. Furthermore, design work has progressed to a final concept stage for the Boulevard De Nantes scheme, although a decision is needed from Welsh Government as to the source of funding.

An annual update on air quality monitoring will be presented to Cabinet in December 2023. The report sets out that, in 2022, all Air Quality Management Areas (AQMAs) within Cardiff were compliant with the relevant objectives for NO<sub>2</sub>. However, one non-automatic monitoring site located within the Llandaff AQMA was close to the annual air quality objective limit of 40µg/m<sup>3</sup> with a result of 39.3µg/m<sup>3</sup>. The Clean Air Strategy & Action Plan will therefore be subject to a full review in 2024/25 and a specific focus will be afforded to improving the NO<sub>2</sub> concentrations in the Llandaff AQMA.

## **Putting sustainability and wellbeing at the heart of the city's growth**

Work continues on a full review of the Local Development Plan (LDP), with consultation completed on the Replacement LDP Preferred Strategy, which received over 1000 responses. Resourcing challenges, however, threaten to compromise the delivery of the next stage of the Replacement LDP within agreed timescales. Similar difficulties have led to a delay in the preparation of the Green Infrastructure Plan and Biodiversity and Resilience of Ecosystems Duty (BRED) Forward Plan, a requirement under Section 6 of the environment (Wales) Act 2016. This work is now not expected to commence until Quarter 4.

There has been a continued drop in the percentage of householder planning applications determined within agreed time periods; the Quarter 2 position was 72.9% against a target of 85%. A number of contributing factors account for the drop in performance, including staff vacancies and unprecedented workload demands. New technology is being deployed which will assist Officers with the timely completion of applications.

## **Enhancing Cardiff's flood defences**

Some work related to enhancing Cardiff's flood defences have been subject to delay. For instance, pressures – related to staff recruitment and a recognised shortage of skills in the field - have resulted in delays in completing the Sustainable Water, Flood and Drainage Strategy for Cardiff, as required by the Flood and Water Management Act (2010) and Flood Risk Regulations (2009) within Welsh Government proposed timescales. Although considerable development work has been undertaken, the March 2024 publication deadline will not be achieved, and discussions are therefore taking place with Welsh Government regarding a revised deadline.

In terms of coastal defence improvements in Cardiff East, the construction contract has been formally awarded. A delay in the legal process for granting the contract led to the commencement of the enabling works being pushed back to October 2023. However, progress has been made in the development of outline and full business cases, with 100% Welsh Government funding, for flood alleviation schemes at key flood risk locations within the city. The Council is also working to mitigate flood risk relating to Roath Park Dam, considering the design of schemes and preparing a planning application for the proposed works which can be delivered in line with heritage requirements and budget allocation.

## **Building resilience into our highway network**

Good progress has been made to deliver improvements to Cardiff's roads and footways, with localised road and footway surfacing taking place across the city. Looking ahead, a risk-based approach will be utilised to identify further work programmes, governed by asset deterioration and related conditions. In addition, the programme to place all 24,000 residential lighting to low-energy LED lighting is now approximately 95% complete, with 22,000 new LED units installed. Substantial completion is on track for Quarter 3 of 2023/24.

In terms of civil parking enforcement, deployment maps have been created to cover all areas within the city that have parking restrictions, building in patrol frequency and efficiency of service delivery. The 'Report a Parking Problem' section of the Cardiff Gov App has also been amended to capture further details of the problems being reported. This will enable Civil Enforcement Officers to prioritise problems and tackle specific areas of concern whilst undertaking their patrols.

## **Recycling and Street Cleanliness**

Following the publication of its new Recycling Strategy (2022-25), the Council has begun to implement a major programme of reform to waste and collection services to improve efficiency and resilience. This includes a move towards segregated recycling across the city, with a timetable for implementation now in place, as well as an expansion of kerbside collection services. Recycling performance continues to fluctuate throughout the year, as the tonnage of waste collected varies monthly. In addition, waste collection services have also been impacted by recent industrial action. Further work is therefore needed to meet the 70% target by the end of the 2024/25 financial year. In Quarter 1, recycling performance was slightly below the current 64% target, at 63.59%, whilst in Quarter 2 recycling

performance was 61.11%. The Council remains in regular dialogue with the Welsh Government and the Waste and Resources Action Programme (WRAP) as it works towards achieving the 70% recycling target in 2024/25.

The percentage of highways inspected found to be of a high or an acceptable standard of cleanliness is above target, however it is recognised that areas of the city require improvement and levels of investigation and enforcement are below target at Quarter 2. In response, a programme of service reform has been developed to transition street cleansing from a 'reactionary' service which responds to cleansing issues as they emerge, to a proactive service area with good digital infrastructure which responds to data and intelligence. Despite a period of disruption, the service has established effective interim arrangements to maintain a baseline service.



## Wellbeing Objective 7: Modernising and Integrating Our Public Services

The Corporate Plan sets out the following priorities for Modernising and Integrating Our Public Services in 2023/24:

- Delivering leaner and greener Council buildings, and protecting the Council’s historic buildings
- Improving the Council’s digital offer and enhancing the use of data
- Supporting a highly-skilled and productive workforce with the wellbeing of staff at its core
- Using the power of the public purse to support the city’s recovery
- Ensuring the Council represents and responds to the diversity of Cardiff’s communities

### Overview of Performance at Quarter 2

#### Key Performance Indicators



#### Steps



A detailed assessment of performance against each Key Performance Indicator and step is accessible via the [Corporate Performance Dashboard](#).

## Financial Resilience

The Council continues to face unprecedented challenges following year-on-year reductions to its budget in the face of increasing demand and pressures on services. A predicted budget gap of in excess of £40m for the 2024/25 financial year and a total of £119.2m across the period of the Medium-Term Financial Plan present significant immediate and medium-term budgetary challenges that will test the Council's financial resilience.

The overall monitoring position at Month 6 reflects a total projected net annual Council overspend of £5.388m. Areas of significant budgetary pressures include:

- Education Services, due primarily to home-to-school transport, out-of-county placements, and catering. The Council is also still awaiting Welsh Government's decision on price-setting for the new Universal Free School Meal offer.
- Children's Services continue to experience an increase in placements costs for the Council's children looked after cohort. This, along with sustained demand pressures and price increases have resulted in costs exceeding budget.
- The planned closure of City Hall continues to impact the Council's capacity to generate income, from both functions and catering. The closure of St. David's Hall, due to the presence of Reinforced Autoclaved Aerated Concrete (RAAC) has also had an impact on income for the Council.
- Energy, food, and fuel inflation, and the staff pay award, combined with an increasing demand for services from the 'long tail' impact of the pandemic and the cost-of-living crisis, have significantly increased the levels of risk. The Council continues to face unprecedented challenges in terms of financial resilience which will require close monitoring and management during this year and into the medium term.

## Delivering leaner and greener Council buildings

The Council's land and property estate is considerable, with property running costs (approximately £38m) representing the second largest call on the Council's budget after staff costs. Managing, operating, and maintaining the estate presents its own challenges, due to the age and condition of many properties. The Council has worked to reduce the size of its estate to manage the rise in operational costs and to mitigate the growing maintenance backlog. The Council's ability to maintain and renew its existing assets, constrained by the lack of availability of capital funding for maintenance, is also emerging as a key risk in this area.

The delivery of capital receipts also remains a critical objective of both the Council's Property Strategy and the 2023-24 Annual Property Plan. A target of £3m was set to be achieved from the sale of property and, at the end of Quarter 2, £183,000 had been achieved. This programme will be closely monitored to ensure the target can be achieved.

In efforts to reduce running costs and assist with carbon reduction targets the Council has taken the decision to close two wings of County Hall, reflecting the reduced numbers of staff working from County Hall on a regular basis. Alongside this, it has also been agreed to

relinquish Willcox House and consequently the ARC (Alarm Receiving Centre) and Telecare Services have been moved to County Hall.

The hybrid working model has been further developed over the last two Quarters and an engagement programme will be undertaken with staff and services areas in the second half of the year. This will inform the detailed requirements of the new Core Office working environment to be included in the full business case.

### **Improving the Council's digital offer and enhancing use of data**

Good progress continues to be made by the Council as it expands its digital offer and explores technology opportunities to enable citizens to interact with the Council through multiple platforms, as well as enabling services to be delivered more efficiently.

The Council continues to see increases in the numbers of citizens interacting with the Council digitally, with over 82,500 citizens registered to use the Cardiff App, a 12% increase over Quarter 1 and Quarter 2, 2023/24. Further updates to the App include the ability for residents to report faults with Street Lighting. This reporting functionality was also made available on the Council's website. In the first three months 284 of the 360 reports (78.8%) were received digitally.

Work will continue to expand the services available on online platforms to shift demand to lower-cost channels and an emphasis will be placed on ensuring the customer is supported effectively to enable digital interactions. Customer feedback channels are being reviewed to give better insight to the citizen experience when using digital services and work has been undertaken on the Chatbot to improve its capabilities.

The Council has focussed on moving high-volume processes, including the updating of Council Tax details, away from the Council's customer service team towards lower-cost digital channels. This digital shift has helped the Council more effectively manage demand on services, with the number of telephone calls for Council Tax falling from 1,612 per Quarter to only 35. This has also helped to reduce call waiting times for more complex enquiries while maintaining a high level of customer satisfaction. Similarly, successful initiatives have been delivered for waste enquiries, where approximately 95% of requests are now dealt with digitally.

### **Supporting a highly-skilled and productive workforce with the wellbeing of staff at its core**

The Council continues to face a number of workforce challenges, including ensuring sufficient capacity, appropriate skills and in recruiting and retaining staff, particularly given the level of competition for some professions. In response, an enhanced approach to workforce planning at a corporate level has been put in place with detailed plans developed supporting the seven strategic themes from the 2023-27 Workforce Strategy. Where the challenge is particularly acute, for example in Adult and Children's Services, tailored approaches to recruitment and retention have been implemented.

Managing sickness absence continues to be a significant challenge to the Council, at the mid-year position results show a forecasted year end position of 11 working days/shift per full-time equivalent (FTE) lost to sickness absence, against a target of 9.5 days lost per FTE. This is an improved position when compared to the same period in 2022/23, which predicted an outturn result of 12.3 days lost per FTE. A targeted approach continues to be applied to areas with high sickness absence, such as Adult Services, Parks & Sports and Neighbourhood Services, particularly through the provision of support to managers on dealing with complex long-term absence cases. Non-work-related stress and Musculo-skeletal remain the two highest categories for sickness, and measures are in place to manage these types of absences through initiatives such as counselling services, referral to occupational health, employee network support groups and wellbeing sessions.

Following the agreement of the nationally negotiated pay award the Unite Trade Union continued their dispute against the national pay settlement, pursuing discontinuous strike action from September. The Council were informed at the start of this dispute that the mandate for strike action in Cardiff was the national pay settlement with the Council making clear its commitment to the collective pay bargaining process. The Council has worked to ensure the continuation of Council services during this period and recognises the effort of all staff who have continued to provide services during this challenging time when demand has never been greater across all services. The Council continues to have in place well-established trade union partnership meetings which provide an opportunity for Trade Unions to raise issues of concern, make representations for changes that are not part of the national collective agreement and discuss areas of policy development collectively.

### **Using the power of the public purse to support the city's recovery**

The Council spends over £600m a year procuring a diverse range of goods, services and works from over 8,000 suppliers and contractors. As well as achieving good value for public money spent on these, the Council is committed to ensuring it has robust procurement systems in place. Whilst the amount of social value secured within contracts is below target at Quarter 2, the Council Wide Framework for ensuring this is achieved has only recently been established and several potentially significant contracts are also currently being progressed. The Council's Senior Management Team continue to receive regular updates on procurement spend and compliance, including issues such as off-contract spend.

During the first half of the year the Council has established the Ardal procurement services, which delivers a collaborative procurement partnership with Monmouthshire, Torfaen and the Vale of Glamorgan Councils. The partnership will tackle inequality, help protect the environment and support the adaptation to climate change by working in partnership with suppliers to deliver social good. This will involve working with suppliers to adopt fair work, equity and safeguarding practices whilst also supporting small local businesses and the third sector to access the Council's procurement opportunities.

### **Ensuring the Council represents and responds to the diversity of Cardiff's communities**

The Council is currently in the process of developing a new Public Participation Strategy, with a focus on engaging and involving seldom-heard groups in decision-making.

Stakeholder engagement has been undertaken as well as a policy development session of the Policy Review and Performance Scrutiny Committee and engagement sessions with members. The draft Participation Strategy was approved by Cabinet in July 2023 for a period of public consultation and the final draft of the strategy, including a response to the consultation feedback, will be considered by Cabinet in January 2024.

In June 2023, the Council launched a new pilot Cohesion Fund to support community groups seeking to create more inclusive communities and to build bridges between the city's diverse communities. The fund received a very large number of high-quality applications, and the Council is currently considering options for future rounds over the year ahead. This year the Cohesion team launched a new small grants scheme. The initiative enables grassroots community organisations to apply for microgrants for activities which support community cohesion objectives and received over 140 expressions of interest. Of those applying for funding, 11 applicants were successful and all are projected to be complete by the end of the financial year.

Work is ongoing to ensure the Council's workforce is representative and inclusive of the communities it services. Governance and Oversight arrangements have been developed and embedded for the Cardiff Race Equality Task Force with a half-year progress update completed for all 31 recommendations across the five thematic areas. Demonstrable progress was made against the Task Force recommendations, with notable progress made in relation to:

- Workforce development with the Council becoming a signatory to the Cardiff Community Jobs Compact and a pilot Leadership and Development Programme being launched for groups under-represented at senior management level.
- Improving ethnic minority representation in the local labour market through the development of a city-wide network for employees to encourage good practice and collaboration on employment action.
- Increasing the participation of minority ethnic groups in the Into Work Advice service. At Quarter 1, 53% of those who engaged with Into Work Advice service were from a minority ethnic background.
- Improving access to, and visibility of, Cardiff Works for minority ethnic groups. Data from April to August 2023 shows minority ethnic background represented over 55% of applicants.

The Cardiff Race Equality Taskforce will reconvene in May 2024 and will be provided with a year-end position as at 2023/24. The Council's Equality, Diversity and Inclusion training is also being reviewed to ensure it is fit for purpose and that it addresses identified skills gaps, and the development of a diverse recruitment panel process.

Mae'r dudalen hon yn wag yn fwriadol

Date: 04 December 2023

Councillor Huw Thomas, Leader  
 Councillor Chris Weaver,  
 Cabinet Member, Finance, Modernisation & Performance,  
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Dear Huw & Chris,

**Scrutiny Performance Panel 28 November 2023: Mid-Year 2023/24**

Please find attached a record of the observations and comments made by all five Scrutiny Chairs at our recent informal meeting to consider the Mid-Year Performance Assessment Report 2023/24.

Thank you for attending in person, this was a most useful discussion. We offer our feedback to inform your final draft report, and I look forward to pre-decision scrutiny of the final report at the December meeting of PRAP.

Yours sincerely,

**COUNCILLOR JOEL WILLIAMS  
 CHAIR, POLICY REVIEW AND PERFORMANCE SCRUTINY COMMITTEE**

cc Councillor Lee Bridgeman, Chair, CYP Scrutiny Committee  
 Councillor Owen Jones, Chair, Environment Scrutiny Committee  
 Councillor Rhys Taylor, Chair, CASSC Scrutiny Committee  
 Councillor Peter Wong, Chair, Economy & Culture Scrutiny Committee  
 Paul Orders, Chief Executive  
 Chris Lee, Corporate Director, Resources  
 Sarah McGill, Corporate Director, People & Communities  
 Mel Godfrey, Director of Education and Lifelong Learning  
 Gareth Newell, Head of Performance & Partnerships  
 Dylan Owen, Operational Manager Policy & Improvement  
 Suzanne Scarlett, Partnerships & Performance Manager  
 Mr Gavin McArthur, Chair, Governance & Audit Committee.  
 Chris Pyke, OM Governance & Audit

**Mid-Year Performance Assessment Report 2023/24**  
**Scrutiny comments and observations for further consideration**

REF/PAGE	Comment / Observation
<b>WBO1</b>	<i>Cardiff is a great place to grow up</i>
MY report – page 6 K1.08 & K1.09	<p><b>School Attendance:</b></p> <p>Chairs noted that attendance isn't yet back to pre-pandemic levels, with Primary currently 91.7% and secondary at 88.2%. Acknowledge that it is moving in the right direction, but perhaps not quick enough.</p> <p>Chairs noted that, to aid acceleration, significant support is being provided to schools, including an attendance campaign including the use of multimedia assets. E&amp;LL is also providing direct support where attendance is a particularly stubborn issue.</p> <p>Members recognised that attendance is wider than a school issue – it is a societal issue, so there is a need for more support for community focussed provisions. Some areas have community focus managers to link with families and align with other services if needed.</p> <p>Chairs acknowledged and supported the need to refresh and refocus services – not just physical attendance at school but a focus on ensuring teaching and learning. Flexi-school learning, hybrid learning and using technology more are a range of options E&amp;LL are working through.</p>
MY report – page 7	<p><b>Electively Home Educated (EHE):</b></p> <p>Chairs noted the reasons why some children and young people are EHE, which were not as a consequence of the pandemic. Anxiety; lifestyle choice; and those who are not happy with school provision and “drop out” until they can find an appropriate place.</p> <p>Chairs heard that guidance on the process is low level, which states that one inspection is required per year for an individual young person but doing this for over 400 children and young people is a challenge. To combat this, an officer (with child protection expertise) is undertaking “risk based” inspection approach, with the inspection including testing that the young person is getting the right attainment and is safeguarded. If not, appropriate notices are served or discussions with the local school to try and get a return. Good headway is being made in this area and links with Children’s Services are in place as well.</p> <p>Chairs noted the Leader’s <b>suggestion</b> that some analysis be undertaken to better understand this area, including levels of attainment and the underlying reasons for EHE.</p>



<p>K1.14</p>	<p><b>ALN Funding:</b></p> <p>Chairs asked about ALN funding and support and difficulties with this, particularly in the primary sector. What is the response and how is it being addressed?</p> <p>Chairs heard that Primary heads are seeing this as a funding freeze, but this is not the case – it’s a change in mechanism. A formulaic process has been used to give them the funding up front, which links closely with the ALN reforms for schools to provide the support themselves.</p> <p>In terms of support, Chairs heard that there will be strengthened governance arrangements around an ALN Strategy Group. This means that the funding side of ALN and planning side will be brought together to tackle expectation of paperwork, manage workload and streamlining it to ensure support is on the ground and not spent filling in paperwork.</p> <p>ALN Strategy Group - three strands:</p> <ul style="list-style-type: none"> <li>• Funds are allocated in the right places</li> <li>• Strategic overview of ALN across the City</li> <li>• Ensuring that the right processes and tracking are in place</li> </ul> <p>Chairs sought assurances that the funding formula is easy to understand and flexible. Members heard that, for the current year, it doesn't address schools where there has been a large increase in ALN numbers as it is predicated on the previous year. What will be done is make sure there is a formula waiting to address this over time. The reason for this is to limit destabilising schools during a time when stability is critical.</p> <p>Chairs <b>recommend</b> that the ALN funding model review include the relevant scrutiny committee and form a priority area of work for the service area.</p>
<p>MY report – page 8 K1.20 &amp; K1.21</p>	<p><b>Children’s Services – Accommodation for CLA</b></p> <p>Chairs noted that improvements are being made in this area in shifting the balance of care towards the lowest level of intervention possible. Significant improvements in areas that have had to be used. Now down to 3 unregistered placements and these are currently in assessment with CIW. In-house opportunities have increased – quadrupling supply, but still a long way to go. Some delays due to building works.</p> <p>The Leader restated that unregistered does not mean unregulated, and there are examples and evidence where outcomes for individuals in this area have been very positive. The Chairs <b>suggested</b> that better communication on this could assure Members. Members noted that there had been a need to reshape provision in this area.</p>

<p>MY Report – pages 8 &amp; 9</p>	<p><b>Children’s Services - Working with Others:</b> Members heard that this is an area that has caused some concern. Discussions are ongoing with SWP colleagues, and it is important that we know exactly what this means, particularly around the types of response they won't be providing. There is a concern about what this means for the council and health.</p> <p>There are a series of workshops being arranged by SWP (with council colleagues nominated to attend), but currently, the Council is still not clear about what this will mean. Assurances were given that as things develop, CYPSC will be kept informed. Chairs <b>request</b> that CASSC also be kept informed of the implications of changes by SWP.</p>
<p>MY Report - Page 7</p>	<p><b>Decrease in Pupil numbers:</b> Chairs sought assurances that the Council is constantly reviewing fluctuations and changes in pupil numbers and changing SOP proposals accordingly. Members were told that everything in this area is evidence based and has to be more flexible. This will be reflected in the SOP Strategy that is currently being updated, which will include flexible accommodation.</p> <p>Members also asked how much head teachers are told about changes in pupil numbers. It was responded that head teachers are very aware (the Director gave the example of a meeting with all Heads the previous week where they were informed of population and migration statistics), and it is a frequent and ongoing discussion around budgets and managing of school places.</p>
<p><b>WBO2</b></p>	<p><i>Cardiff is a great place to grow older</i></p>
<p>MY report - Page 11</p>	<p><b>Adult Services Budget:</b> Chairs noted the draft Mid-Year Performance report details that ‘<i>an overspend of approximately £2m on care is projected, though this is offset by underspends and other budget planning arrangements, so a balanced position is currently shown.</i>’</p> <p>Chairs noted the verbal assurance provided at the meeting regarding overall cost pressures management in Adult Services – however <b>recommend</b> the narrative in the report be expanded to include this assurance / insight.</p>
<p>MY report - Page 12</p>	<p><b>Community Resource Team/ Hospital Discharge:</b> Chairs noted the draft Report does provide an assessment of the issue of hospital discharge. Although the assessment provided does recognise issues remain, Chairs noted it makes no specific reference to the continued pressures on the Community Resource Team; or the initiatives CASSC Members are aware of to address ongoing pressures such as -</p> <ul style="list-style-type: none"> <li>• Embedding a new call monitoring system for the carers</li> </ul>

	<ul style="list-style-type: none"> <li>• Returning the teams focus to only supporting individuals who require reablement (e.g., not double handed care)</li> <li>• Boost staff morale by providing the team with more regular updates / opportunities to contribute to the service areas vision for the future.</li> </ul> <p>The Chair of CASSC also raised that in recent performance monitoring work undertaken by the committee, it was noted by CASSC Members that quarterly targets on the CRT KPI's had been removed.</p> <p>Chairs noted the explanation given on the target's removal (i.e., the need to better reflect the quality of service).</p> <p>Chairs noted the update that a national set of indicators (together with health) is being worked on regarding hospital discharge, and there is also internal discussion on preparing a new package of data as part of the process for developing the forthcoming Corporate Plan.</p> <p>Chairs agree the CRT KPIs (numbers of hours / people accessed services) may not best reflect the quality of service, however, <b>recommend</b>, given the substantive work ongoing in the CRT to address the ongoing pressures within the team, this is captured in the report.</p> <p>At the end of the meeting, Chairs asked how well this service was prepared for dealing with Winter Pressures. Chairs noted the service is well-prepared, with the joined-up discharge process working well; however, Chairs noted there are pressures elsewhere on the pathway and that the new national set of indicators should provide the metrics to enable nuanced conversations to resolve these issues.</p> <p>Chairs <b>recommend</b> that, in the absence of the new metrics discussed at the meeting, that the Q2 performance against the CRT targets are included in the report, to illustrate the pressures on the service.</p>
Corporate Plan – page 19	<p><b>Older People Employment:</b></p> <p>Chairs noted the draft Mid-Year Performance report does not contain an update on this Corporate Plan step. Chairs noted officers' response that there is a comprehensive update in the dashboard narrative, with good progress.</p> <p>Chairs therefore <b>recommend</b> a paragraph setting out progress in delivering the Older People Employment step is included in the Mid-Year Performance report.</p>

<b>WBO3</b>	<i>Supporting people out of poverty</i>
	<p><b>Council House Repairs:</b></p> <p>Although Chairs recognise Council House Repairs does not have a specific step in the Corporate Plan, through CASSC’s performance monitoring work Chairs are aware of the ongoing performance issue in the Responsive Repairs Units regarding the continued and notable number of outstanding repair jobs and significant pressures around damp and mould maintenance.</p> <p>Given the importance of this ongoing performance issue, and the importance of providing greater visibility, and the likelihood of high levels of public interest, Chairs <b>recommend</b> insight into the performance pressures within the Responsive Repairs Unit is provided in the final Mid-Year Performance report, including the extent of work undertaken by the team (e.g. the average number of repairs they complete and how long it has taken to respond to) against the number of outstanding repair jobs and the ongoing work to address this issue such as: the launch of a ‘Repairs Online’ service (in the summer of 2023), which allows contract-holders to report and monitor progress of their repair requests online; introduction of a dedicated damp and mould team; and commissioning of new resource within the in-house repairs team and through external contractors.</p> <p>Further, Chairs also <b>recommend</b>, in the forthcoming Corporate Plan development process, due consideration is given to this being a specific Step, with relevant KPIs, drawing on the KPIs provided in the service area’s Directorate Delivery Plan.</p>
	<p><b>Enforcement Powers on Landlords:</b></p> <p>Chairs noted the enforcement powers available to the local authority against poor landlords and therefore stressed the need for the authority to ‘lead from the front’ in terms of quality of council homes.</p> <p>Within the discussion, Chairs noted and welcomed the assurance that the Executive holds high significance in resolving repair issues for council contract holders.</p> <p>Chairs further noted that CASSC have recently been briefed that in some instances, particularly in the private rented sector, contract holders may refuse entry for repair services. If this is an issue also apparent for the council’s Response Repairs Service, where contract holders do not allow entry, this may be worthwhile including in the forthcoming Step or KPI (recommended above).</p>
MY report – Pages 14-15	<p><b>Into Work Services:</b></p> <p>Chairs noted the draft Mid-Year Performance report and KPIs associated with Into Work Services highlight the high numbers of people supported,</p>

	<p>with the cumulative total up to the end of Q2 nearly equalling the whole year target and asked whether there is sufficient resource available to assist all those who require Into Work services.</p> <p>Chairs note the Leader’s response that the Council has worked to attract different funding streams, such as Shared Prosperity Funding and DWP monies, to support this work and so there is currently sufficient resource; however, the concern is whether funding will continue post -2025.</p>
Corporate Plan – page 26	<p><b>In Work Support:</b></p> <p>Chairs highlighted that they had previously recommended an In-Work support step be included in the Corporate Plan and were pleased that this had been accepted; however, the draft Mid-Year Performance report does not include an update on this work and Chairs sought assurance on progress.</p> <p>Chairs therefore <b>recommend</b> a paragraph setting out progress in delivering the In Work Support step is included in the Mid-Year Performance report.</p>
<b>WBO4</b>	<i>Safe, confident and empowered communities</i>
MY report – Page 18	<p><b>Adult Protection Enquiries:</b></p> <p>The Report notes the number of adult protection enquiries recorded has increased significantly in 2023/24 with 1,280 enquiries received at Quarter 2, compared to only 654 at Quarter 2 in 2022/23.</p> <p>Though it is noted the increase in numbers is due to more effective ways of reporting enquiries, Chairs <b>request</b> further insight into what these enquiries are related to.</p> <p>Chairs noted this will be investigated and so <b>recommend</b> due consideration be given to whether this increase in number is primarily due to more effective reporting arrangements or if this increase in data, and the nature of the enquires, are signposting a particular issue in Adult Services that may need addressing. If so, this assessment / insight must be included in the final report.</p>
MY report – Page 17-18 K4.17	<p><b>Libraries &amp; Hubs:</b></p> <p>Chairs noted the positive story shown by the number of Green indicators associated with this step, coupled with the recent Welsh Public Library Standards report that shows good service provision. However, Chairs highlighted the performance indicator for number of volunteer hours, K4.17, is Red and asked whether this is causing an issue with achieving the budget saving that was predicated on use of volunteers in libraries and hubs.</p> <p>Chairs noted the response that performance has improved to date in Q3, largely because volunteer mentors are now in place. Chairs note the Leader’s point that this illustrates the limitations of relying on volunteers to</p>

	deliver services, even where there is a good record of volunteering and where this is coupled with other aims, such as assisting people into work.
Corporate Plan – page 37	<b>Shared Regulatory Services (SRS):</b> Chairs noted the draft Mid-Year Performance report does not contain an update on this Corporate Plan step. Chairs noted the Chief Executive’s response that Cabinet are due to receive the SRS Annual Report shortly and therefore Chairs <b>recommend</b> a paragraph setting out progress in delivering the Shared Regulatory Services step is included in the Mid-Year Performance report.
MY Report – page 20	<b>Fields in Trust:</b> Chairs noted the draft Mid-Year Performance report does not contain an update on this Corporate Plan step. Chairs noted the Leader’s response that there has been dialogue with Fields in Trust, with a shortlist of potential sites due in Q3 and a report on progress to be included in the End-Year Performance report.
MY report - page	<b>Healthy, Active Population:</b> Chairs noted that achieving the overall aim of a healthy, active population relies on partnership working, with Public Health leading, and a whole system approach that encourages and supports people to move more and eat well. Chairs noted pilot interventions are underway in Riverside and Llanrumney focusing on supporting and motivating people regarding moving more and eating well.
<b>WBO5</b>	<i>A capital city that works for Wales</i>
MY report – pages 17 & 22	<b>Recovery and Regeneration - 15-minute cities:</b> Chairs noted the draft Mid-Year Performance report details successes and the current economic challenges but sought views on progress with steps on recovery and regeneration, including the 15-minute city approach and toolkit.  Chairs noted the response that the report captures the notable wins to date and recognises delays that are beyond the Council’s control, such as delays related to Cardiff Parkway, and that, overall, there is significant confidence in the economic renewal direction.
K5.02	<b>Jobs Created/ Safeguarded:</b> Chairs noted indicator K5.02 is red but that it is anticipated the target will be achieved by year end, due to forthcoming announcements about jobs being created in Cardiff.
MY report – page 23	<b>Venues and Income:</b> Chairs noted the draft Mid-Year Performance report details good performance in terms of attendees at Council venues but note that this does not translate to meeting income targets for council venues and sought views on this and measures being taken to address this.

	<p>Chairs noted there are several reasons for this, including: during covid, free access to Cardiff Castle was introduced and this is still in place and this, coupled with the events programme at the Castle, has led to an increase in the numbers using this space, but this has not translated to visitors paying to enter the rooms of the Castle, which is reducing the Castle income; and the closure of St. David’s Hall.</p> <p>Chairs noted the covid recovery reserve has been used to mitigate the loss of income. Chairs noted the Leader’s comments that there needs to be discussion about how future budgets utilise income generation and whether there needs to be consideration of externalising certain assets, which would lead to surety of income generation, for example the Cardiff White-Water Rafting Centre could become part of the wider ISV package operated by a private company.</p> <p>Chairs noted the Council’s approach to income generation is set out in the Medium-Term Financial Plan and this is important for the Budget Strategy going forward, with challenge and review of the robustness of fees and charges.</p> <p>Chairs highlighted the need to ensure inclusive discussions about significant service changes happen as early as possible and in public, to enable interested backbench members and members of the public to be aware of issues and to work collaboratively to assist in identifying possible resolution of issues; this would also help ensure transparency. Chairs noted the Leader’s response that the administration aim to achieve this where possible, with decisions taken outside the budget process where possible, but that sometimes time pressures do not enable this.</p>
<b>WBO6</b>	<i>One Planet Cardiff</i>
MY report – page 28	<p><b>Recycling:</b></p> <p>Chairs note that while there are many reasons why Cardiff are not currently meeting our recycling targets and that there is a significant gap to where we need to be in a relatively short space of time, how patient/ tolerant will Welsh Government be?</p> <p>The Leader commented that the expectation from Welsh Government is that we need to roll out separated recycling across the city and that it is anticipated that this will deliver the desired outcomes, although it was acknowledged that this has been delayed.</p>
MY report – page 26	<p><b>Transport:</b></p> <p>Chairs noted that while many of the exciting projects happening in Cardiff are out of our control, many are, for example cycleways, and these have completion dates that continually slip. Does the delay and then the</p>

	<p>increased costs impact the deliverability of these projects that are within out control?</p> <p>It is <b>recommended</b> that when the new Corporate Plan is written, if projects are no longer included, that a clear and full explanation/rationale is provided. The Leader noted that where projects are within our control, we have more confidence they will be delivered. It was also noted that much of the monies spent in relation to the South Wales Metro are currently being spend outside Cardiff.</p>
Corporate Plan – page 50	<p><b>Llanrumney Bridge:</b> Chairs noted the draft Mid-Year Performance report does not provide an update on this step and sought a progress update.</p> <p>Chairs <b>note and accept</b> the Leader’s offer to provide a written update on this step to the Economy &amp; Culture Scrutiny Committee, as the committee that has previously scrutinised this issue, and to all Scrutiny Chairs.</p>
<b>WBO7</b>	<i>Modernising and integrating our public services</i>
K7.04	<p><b>Capital Receipts:</b> Chairs noted that delivery of capital receipts at Q2 is below target, with K7.04 marked Red, and asked for views on this. Chairs noted the response that the Council takes a long-term view and seeks to achieve the best possible capital receipt, which can mean in-year targets are missed, but that, overall, there is confidence that the target will be met.</p>
	<p><b>Customers:</b> Chairs highlighted that whilst the draft Mid-Year Performance report includes a KPI for customer satisfaction, there is a need to ensure a more systematic approach to capturing citizen voice. The Chairs <b>request</b> that the Ask Cardiff survey results, which include customer satisfaction, be made available to the Scrutiny Committees when published in January 2024.</p>
MY report – page 32 & 33  K7.11	<p><b>Workforce:</b> Chairs sought views on the challenges facing the Council regarding workforce issues. Chairs noted that local government pay has dropped in value since 2010, leading to recruitment issues in some areas, which the Council addresses via market supplements if required. Chairs noted that, in relation to strike action, the Council is keen to make reasonable adjustments to resolve disputes and reduce disruption to residents, working across all unions to enable this. Chairs noted that, in relation to grievance complaints, the Council has a process for dealing with these that looks at the specificity of complaints, investigating and testing these independently whilst also ensuring that the Council’s duty of care to all staff is maintained.</p>



GENERAL	<i>Cross Cutting Issues</i>
	<p><b>Workforce:</b></p> <p>Chairs noted their awareness that vacancies and sickness rates in Adult Services has gone up and welcomed the recognition in the draft Mid-Year Report on the services area’s Workforce Development Plan to mitigate pressures.</p> <p>During the discussion Chairs sought insight and assurance on the use of agency social workers in Adult Services including the cost pressures this measure may present. Chairs wish to thank officers for their initial insight and advise the CASSC Committee have confirmed they wish to explore this issue of the use of agency workers in Adult Services in detail and have scheduled it as an agenda item in a forthcoming committee meeting.</p> <p>On general workforce matters, Chairs stressed the importance of remaining mindful to deliverability and capacity when managing workforce pressures (across the authority) and were informed there is an awareness within the executive on the possibility of moving resource around the authority as a way of managing workforce pressures.</p> <p>Chairs also sought assurance the work force pressures apparent in the Council’s Community Resource Team will be effectively managed and addressed; particularly in light of forthcoming winter months.</p> <p>Chairs note the progress being made in the wider hospital discharge pathways and were informed key issues in delay can be more aligned to issues within the ward part of the process.</p> <p>Chairs also wish to confirm ongoing conversation are being had between CASSC Members and the service area on which data metrics could be reported to the committee in their Quarterly Performance Reports to provide CASSC Members with a full insight into the hospital discharge process (alongside the national KPI’s being drawn).</p>

Mae'r dudalen hon yn wag yn fwriadol



## SWYDDFA'R ARWEINYDD LEADER'S OFFICE

Fy Nghyf / My Ref: [CE:0045146]

Dyddiad / Date: 7 December 2023

Councillor Joel Williams  
Chair, Policy Review & Performance Scrutiny Committee  
County Hall  
Cardiff

Annwy/ Dear Joel

Thank you for convening the Performance Panel on 28 November, and my thanks to all the Scrutiny Committee chairs for attending. This is now an important part of our planning and monitoring arrangements and once again the Panel offered an opportunity for constructive discussion and the strengthening of the mid-year assessment.

The Panel made 11 recommendations – 10 were accepted and 1 were partially accepted. Where the Panel made requests, we have provided a response which I trust the Scrutiny Committees will find helpful and useful in supporting Committee work programmes moving forward.

Yn gywir / Yours sincerely

**CYNGHORYDD / COUNCILLOR HUW THOMAS  
ARWEINYDD / LEADER  
CYNGOR CAERDYDD / CARDIFF COUNCIL**

**CC:** Councillor Lee Bridgeman, Chair, CYP Scrutiny Committee  
Councillor Owen Jones, Chair, Environment Scrutiny Committee  
Councillor Rhys Taylor, Chair, CASSC Scrutiny Committee  
Councillor Peter Wong, Chair, Economy & Culture Scrutiny Committee  
Paul Orders, Chief Executive  
Chris Lee, Corporate Director, Resources  
Sarah McGill, Corporate Director, People & Communities  
Mel Godfrey, Director of Education and Lifelong Learning  
Gareth Newell, Head of Performance & Partnerships  
Dylan Owen, Operational Manager Policy & Improvement  
Suzanne Scarlett, Partnerships & Performance Manager  
Mr Gavin McArthur, Chair, Governance & Audit Committee  
Chris Pyke, OM Governance & Audit

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### GWEITHIO DROS GAERDYDD, GWEITHIO DROSOCH CHI

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu'n ddwyieithog. Byddwn yn cyfathrebu â chi yn ôl eich dewis, dim ond i chi roi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

### WORKING FOR CARDIFF, WORKING FOR YOU

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Tudalen 373



### Mid-Year Assessment of Performance 2023/24

The recommendations, requests and observations of the Performance Panel on 28 November 2023 have been welcomed. The responses have been grouped into five categories (below), depending on the nature of the Panel’s comments, with a response or explanatory note included as necessary.

- Recommendation Accepted
- Recommendation Partially Accepted
- Request Accepted
- Observation Noted
- Action

REF/PAGE	Comment / Observation	Cabinet Response
<p><b>WBO1</b> Cardiff is a great place to grow up</p> <p>MY report – page 6 K1.08 &amp; K1.09</p>	<p><b>School Attendance:</b> Chairs noted that attendance isn’t yet back to pre-pandemic levels, with Primary currently 91.7% and secondary at 88.2%. Acknowledged that it is moving in the right direction, but perhaps not quick enough.</p> <p>Chairs noted that, to aid acceleration, significant support is being provided to schools, including an attendance campaign including the use of multimedia assets. E&amp;LL is also providing direct support where attendance is a particularly stubborn issue.</p> <p>Members recognised that attendance is wider than a school issue – it is a societal issue, so there is a need for more support for community focussed provisions. Some areas have community focus managers to link with families and align with other services if needed.</p>	<p><b>Observation Noted</b></p>

	<p>Chairs acknowledged and supported the need to refresh and refocus services – not just physical attendance at school but a focus on ensuring teaching and learning. Flexi-school learning, hybrid learning and using technology more are a range of options E&amp;LL are working through.</p>	
<p>MY report – page 7</p>	<p><b>Electively Home Educated (EHE):</b>  Chairs noted the reasons for why some children and young people are EHE, which were not as a consequence of the pandemic. Anxiety; lifestyle choice; and those who are not happy with school provision and “drop out” until they can find an appropriate place.</p> <p>Chairs heard that guidance on the process is low level, which states that one inspection is required per year for an individual young person but doing this for over 400 children and young people is a challenge. To combat this, an officer (with child protection expertise) is undertaking “risk based” inspection approach, with the inspection including testing that the young person is getting the right attainment and is safeguarded. If not, appropriate notices are served or discussions with the local school to try and get a return. Good headway is being made in this area and links with Children’s Services are in place as well.</p> <p>Chairs noted the Leader’s <b>suggestion</b> that some analysis be undertaken to better understand this area, including levels of attainment and the underlying reasons for EHE.</p>	<p><b>Action:</b>  An analysis of EHE trends has been undertaken. Further work is currently underway.</p> <p>The findings of this analysis and the Council’s response could be considered as part of the Children and Young People Scrutiny Committee work programme.</p>
<p>K1.14</p>	<p><b>ALN Funding:</b>  Chairs asked about ALN funding and support and difficulties with this, particularly in the primary sector. What is the response and how is it being addressed?</p>	<p><b>Recommendation Accepted:</b>  ALN funding review could form part of the Children and Young People Scrutiny Committee Work Programme.</p>

	<p>Chairs heard that Primary heads are seeing this as a funding freeze, but this is not the case – it's a change in mechanism. A formulaic process has been used to give them the funding up front, which links closely with the ALN reforms for schools to provide the support themselves.</p> <p>In terms of support, Chairs heard that there will be strengthened governance arrangements around an ALN Strategy Group. This means that the funding side of ALN and planning side will be brought together to tackle expectation of paperwork, manage workload and streamlining it to ensure support is on the ground and not spent filling in paperwork.</p> <p>ALN Strategy Group - three strands:</p> <ul style="list-style-type: none"> <li>• Funds are allocated in the right places</li> <li>• Strategic overview of ALN across the City</li> <li>• Ensuring that the right processes and tracking are in place</li> </ul> <p>Chairs sought assurances that the funding formula is easy to understand and flexible. Members heard that, for the current year, it doesn't address schools where there has been a large increase in ALN numbers as it is predicated on the previous year. What will be done is make sure there is a formula waiting to address this over time. The reason for this is to limit destabilising schools during a time when stability is critical.</p> <p>Chairs <b>recommend</b> that the ALN funding model review include the relevant scrutiny committee and form a priority area of work for the service area.</p>	
<p>MY report – page 8 K1.20 &amp; K1.21</p>	<p><b>Children's Services – Accommodation for CLA</b> Chairs noted that improvements are being made in this area in shifting the balance of care towards the lowest level of intervention possible. Significant improvements in areas that have had to be used. Now down to 3 unregistered</p>	<p><b>Observation Noted</b></p>

	<p>placements and these are currently in assessment with CIM. In-house opportunities have increased – quadrupling supply, but still a long way to go. Some delays due to building works.</p> <p>The Leader restated that unregistered does not mean unregulated, and there are examples and evidence where outcomes for individuals in this area have been very positive. The Chairs suggested that better communication on this could assure Members. Members noted that there had been a need to reshape provision in this area.</p>	
<p>MY Report – pages 8 &amp; 9</p>	<p><b>Children’s Services - Working with Others:</b></p> <p>Members heard that this is an area that has caused some concern. Discussions are ongoing with SWP colleagues, and it is important that we know exactly what this means, particularly around the types of response they won't be providing. There is a concern about what this means for the council and health.</p> <p>There are a series of workshops being arranged by SWP (with council colleagues nominated to attend), but currently, the Council is still not clear about what this will mean. Assurances were given that as things develop, CYPSC will be kept informed. Chairs <b>request</b> that CASSC also be kept informed of the implications of changes by SWP.</p>	<p><b>Request Accepted:</b></p> <p>Children and Young People Scrutiny Committee and CASSC to receive update on the roll-out of the Right Place Right Time model and its implication for Council and partner services.</p>
<p>MY Report - Page 7</p>	<p><b>Decrease in Pupil numbers:</b></p> <p>Chairs sought assurances that the Council is constantly reviewing fluctuations and changes in pupil numbers and changing SOP proposals accordingly. Members were told that everything in this area is evidence based and has to be more flexible. This will be reflected in the SOP Strategy that is currently being updated, which will include flexible accommodation.</p>	<p><b>Observation Noted</b></p>

	<p>Members also asked how much head teachers are told about changes in pupil numbers. It was responded that head teachers are very aware (the Director gave the example of a meeting with all Heads the previous week where they were informed of population and migration statistics), and it is a frequent and ongoing discussion around budgets and managing of school places.</p>	
<p><b>WBO2 Cardiff is a great place to grow older</b> MY report - Page 11</p>	<p><b>Adult Services Budget:</b> Chairs noted the draft Mid-Year Performance report details that <i>'an overspend of approximately £2m on care is projected, though this is offset by underspends and other budget planning arrangements, so a balanced position is currently shown.'</i></p> <p>Chairs noted the verbal assurance provided at the meeting regarding overall cost pressures management in Adult Services – however <b>recommend</b> the narrative in the report be expanded to include this assurance / insight.</p> <p><b>Community Resource Team/ Hospital Discharge:</b> Chairs noted the draft Report does provide an assessment of the issue of hospital discharge. Although the assessment provided does recognise issues remain, Chairs noted it makes no specific reference to the continued pressures on the Community Resource Team; or the initiatives CASSC Members are aware of to address ongoing pressures such as -</p> <ul style="list-style-type: none"> <li>• Embedding a new call monitoring system for the carers</li> <li>• Returning the teams focus to only supporting individuals who require reablement (e.g., not double handed care)</li> <li>• Boost staff morale by providing the team with more regular updates / opportunities to contribute to the service areas vision for the future.</li> </ul> <p>The Chair of CASSC also raised that in recent performance monitoring work undertaken by the committee, it was noted by CASSC Members that quarterly targets on the CRT KPI's had been removed.</p>	<p><b>Recommendation Accepted:</b> Narrative amended on page 12, setting out that the detail can be reviewed in full in the <u>Month 6 Budget Monitoring Report</u> on 23<sup>rd</sup> November.</p>
<p>MY report - Page 12</p>		



	<p>Chairs noted the explanation given on the target's removal (i.e., the need to better reflect the quality of service).</p> <p>Chairs noted the update that a national set of indicators (together with health) is being worked on regarding hospital discharge, and there is also internal discussion on preparing a new package of data as part of the process for developing the forthcoming Corporate Plan.</p> <p>Chairs agree the CRT KPIs (numbers of hours / people accessed services) may not best reflect the quality of service, however, <b>recommend</b>, given the substantive work ongoing in the CRT to address the ongoing pressures within the team, this is captured in the report.</p> <p>At the end of the meeting, Chairs asked how well this service was prepared for dealing with Winter Pressures. Chairs noted the service is well-prepared, with the joined-up discharge process working well; however, Chairs noted there are pressures elsewhere on the pathway and that the new national set of indicators should provide the metrics to enable nuanced conversations to resolve these issues.</p> <p>Chairs <b>recommend</b> that, in the absence of the new metrics discussed at the meeting, that the Q2 performance against the CRT targets are included in the report, to illustrate the pressures on the service.</p>	<p><b>Recommendation Accepted:</b> Page 12 of the report has been amended to reflect the development of a national set of indicators regarding hospital discharge, as well as the local work being progressed to establish a new package of performance metrics for consideration in the next Corporate Plan.</p> <p><b>Recommendation Partially Accepted:</b> The CRT indicators were removed from the current Corporate Plan as they were not considered appropriate. This was the subject of discussion with the Performance Panel during the target-setting session in February. The CRT data</p>
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Corporate Plan – page 19		continues to be monitored at service area level, however as noted in the Corporate Plan, new indicators are being developed which will be the subject of future discussion with the Panel as part of the process of developing the new Corporate Plan.
Corporate Plan – page 19	<p><b>Older People Employment:</b> Chairs noted the draft Mid-Year Performance report does not contain an update on this Corporate Plan step. Chairs noted officers’ response that there is a comprehensive update in the dashboard narrative, with good progress.</p> <p>Chairs therefore <b>recommend</b> a paragraph setting out progress in delivering the Older People Employment step is included in the Mid-Year Performance report.</p>	<p><b>Recommendation Accepted:</b> A paragraph setting out the performance against this step (S2.02) has been included in the report on page 11. A full update on progress is included in the Corporate Performance Dashboard.</p>
<p><b>WBO3 Supporting people out of poverty</b></p> <p><b>Council House Repairs:</b> Although Chairs recognise Council House Repairs does not have a specific step in the Corporate Plan, through CASSC’s performance monitoring work Chairs are aware of the ongoing performance issue in the Responsive Repairs Units regarding the continued and notable number of outstanding repair jobs and significant pressures around damp and mould maintenance.</p> <p>Given the importance of this ongoing performance issue, and the importance of providing greater visibility, and the likelihood of high levels of public interest, Chairs <b>recommend</b> insight into the performance pressures within the Responsive Repairs Unit is provided in the final Mid-Year Performance report, including the extent of work undertaken by the team (e.g. the average number of repairs they complete and how long it has taken to respond to) against the number of</p>		<p><b>Recommendation Accepted:</b> A summary of performance and delivery pressures for the Council’s Responsive Repairs Unit has been included on page 18.</p>

	<p>outstanding repair jobs and the ongoing work to address this issue such as: the launch of a 'Repairs Online' service (in the summer of 2023), which allows contract-holders to report and monitor progress of their repair requests online; introduction of a dedicated damp and mould team; and commissioning of new resource within the in-house repairs team and through external contractors.</p> <p>Further, Chairs also <b>recommend</b>, in the forthcoming Corporate Plan development process, due consideration is given to this being a specific Step, with relevant KPIs, drawing on the KPIs provided in the service area's Directorate Delivery Plan.</p>	<p><b>Recommendation Accepted:</b> The inclusion of appropriate performance metrics will be considered as part of the development of the Corporate Plan refresh.</p>
	<p><b>Enforcement Powers on Landlords:</b></p> <p>Chairs noted the enforcement powers available to the local authority against poor landlords and therefore stressed the need for the authority to 'lead from the front' in terms of quality of council homes.</p> <p>Within the discussion, Chairs noted, and welcomed the assurance that the Executive holds high significance in resolving repair issues for council contract holders.</p> <p>Chairs further noted that CASSC have recently been briefed that in some instances, particularly in the private rented sector, contract holders may refuse entry for repair services. If this is an issue also apparent for the council's Response Repairs Service, where contract holders do not allow entry, this may be worthwhile including in the forthcoming Step or KPI (recommended above).</p>	<p><b>Observation Noted</b></p>
<p>MY report – Pages 14-15</p>	<p><b>Into Work Services:</b></p>	<p><b>Observation Noted</b></p>

	<p>Chairs noted the draft Mid-Year Performance report and KPIs associated with Into Work Services highlight the high numbers of people supported, with the cumulative total up to the end of Q2 nearly equalling the whole year target and asked whether there is sufficient resource available to assist all those who require Into Work services.</p> <p>Chairs note the Leader's response that the Council has worked to attract different funding streams, such as Shared Prosperity Funding and DWP monies, to support this work and so there is currently sufficient resource; however, the concern is whether funding will continue post -2025.</p>	
<p>Corporate Plan – page 26</p>	<p><b>In Work Support:</b> Chairs highlighted that they had previously recommended an In-Work support step be included in the Corporate Plan and were pleased that this had been accepted; however, the draft Mid-Year Performance report does not include an update on this work and Chairs sought assurance on progress.</p> <p>Chairs therefore <b>recommend</b> a paragraph setting out progress in delivering the In Work Support step is included in the Mid-Year Performance report.</p>	<p><b>Recommendation Accepted:</b> Progress in delivering the In Work Support step (S3.03) has been included in the Mid-Year Performance report on page 16.</p>
<p><b>WBO4 Safe, confident and empowered communities</b></p>		
<p>MY report – Page 18</p>	<p><b>Adult Protection Enquiries:</b> The Report notes the number of adult protection enquiries recorded has increased significantly in 2023/24 with 1,280 enquiries received at Quarter 2, compared to only 654 at Quarter 2 in 2022/23.</p> <p>Though it is noted the increase in numbers is due to more effective ways of reporting enquiries, Chairs requested further insight into what these enquiries are related to.</p>	<p><b>Recommendation Accepted:</b> Although there has been an increased demand for services since 2022/23, the change to the recording methodology is the primary reason for the increase.</p> <p>The way that referrals are recorded in Carefirst was changed in January</p>

	<p>Chairs noted this will be investigated and so <b>recommend</b>, due consideration be given to if this increase in number is primarily due to more effective reporting arrangements, or if this increase in data, and the nature of the enquires are signposting a particular issue in Adult Services that may need addressing. If so, this assessment / insight must be included in the final report.</p>	<p>2023 to reflect the full workload of the Adult Safeguarding team in regard to statutory duties. Previously referrals received that did not meet the statutory Adult at Risk definition (S126 Social Services and Well-being (Wales) Act 2014) were not recorded. Since January, all referrals are recorded. For this reason, previous years' data is not comparable with 2023/24 and the Corporate Performance Dashboard will be amended to reflect this.</p> <p>Adult protection enquiries can be split into the following categories: Physical; Sexual; Emotional/psychological; Financial; Neglect. A detailed breakdown is available on request.</p>
<p>MY report – Page 17-18 K4.17</p>	<p><b>Libraries &amp; Hubs:</b> Chairs noted the positive story shown by the number of Green indicators associated with this step, coupled with the recent Welsh Public Library Standards report that shows good service provision. However, Chairs highlighted the performance indicator for number of volunteer hours, K4.17, is Red and asked whether this is causing an issue with achieving the budget saving that was predicated on use of volunteers in libraries and hubs.</p>	<p><b>Observation Noted</b></p>

	<p>Chairs noted the response that performance has improved to date in Q3, largely because volunteer mentors are now in place. Chairs note the Leader's point that this illustrates the limitations of relying on volunteers to deliver services, even where there is a good record of volunteering and where this is coupled with other aims, such as assisting people into work.</p>	
<p>Corporate Plan – page 37</p>	<p><b>Shared Regulatory Services (SRS):</b>  Chairs noted the draft Mid-Year Performance report does not contain an update on this Corporate Plan step. Chairs noted the Chief Executive's response that Cabinet are due to receive the SRS Annual Report shortly and therefore Chairs <b>recommend</b> a paragraph setting out progress in delivering the Shared Regulatory Services step is included in the Mid-Year Performance report.</p>	<p><b>Recommendation Accepted:</b>  Updates on performance against all steps which cover work delivered by SRS are included in the Corporate Performance Dashboard – the steps are S3.04, S4.03, S4.04, S4.09, S4.17 and S6.05.</p> <p>All steps relating to SRS are Green and this progress is reflected in the report.</p> <p>Established governance arrangements are in place for SRS. Managerial leadership is provided by the Officer Management Board, which the Director of Economic Development sits on. Oversight by Elected Members is provided by the SRS Joint Committee – Cardiff is represented by the Cabinet Member for Transport and Strategic Planning, and the Chair of the Licensing and Public Protection Committees.</p>

<p>MY Report – page 20</p>	<p><b>Fields in Trust:</b></p> <p>Chairs noted the draft Mid-Year Performance report does not contain an update on this Corporate Plan step. Chairs noted the Leader’s response that there has been dialogue with Fields in Trust, with a shortlist of potential sites due in Q3 and a report on progress to be included in the End-Year Performance report.</p>	<p><b>Observation Noted</b></p>
<p>MY report - page</p>	<p><b>Healthy, Active Population:</b></p> <p>Chairs noted that achieving the overall aim of a healthy, active population relies on partnership working, with Public Health leading, and a whole system approach that encourages and supports people to move more and eat well. Chairs noted pilot interventions are underway in Riverside and Llanrumney focusing on supporting and motivating people regarding moving more and eating well.</p>	<p><b>Observation Noted</b></p>
<p><b>WBO5 A capital city that works for Wales</b></p>		
<p>MY report – pages 17 &amp; 22</p>	<p><b>Recovery and Regeneration - 15-minute cities:</b></p> <p>Chairs noted the draft Mid-Year Performance report details successes and the current economic challenges but sought views on progress with steps on recovery and regeneration, including the 15-minute city approach and toolkit.</p> <p>Chairs noted the response that the report captures the notable wins to date and recognises delays that are beyond the Council’s control, such as delays related to Cardiff Parkway, and that, overall, there is significant confidence in the economic renewal direction.</p>	<p><b>Observation Noted</b></p>
<p>K5.02</p>	<p><b>Jobs Created/ Safeguarded:</b></p>	<p><b>Observation Noted</b></p>

	<p>Chairs noted indicator K5.02 is red but that it is anticipated the target will be achieved by year end, due to forthcoming announcements about jobs being created in Cardiff.</p>	
<p>MY report – page 23</p>	<p><b>Venues and Income:</b>  Chairs noted the draft Mid-Year Performance report details good performance in terms of attendees at Council venues but note that this does not translate to meeting income targets for council venues and sought views on this and measures being taken to address this.</p> <p>Chairs noted there are several reasons for this, including: during covid, free access to Cardiff Castle was introduced and this is still in place and this, coupled with the events programme at the Castle, has led to an increase in the numbers using this space, but this has not translated to visitors paying to enter the rooms of the Castle , which is reducing the Castle income and the closure of St. David's Hall.</p> <p>Chairs noted the covid recovery reserve has been used to mitigate the loss of income. Chairs noted the Leader's comments that there needs to be discussion about how future budgets utilise income generation and whether there needs to be consideration of externalising certain assets, which would lead to surety of income generation, for example the Cardiff White-Water Rafting Centre could become part of the wider ISV package operated by a private company.</p> <p>Chairs noted the Council's approach to income generation is set out in the Medium-Term Financial Plan and this is important for the Budget Strategy going forward, with challenge and review of the robustness of fees and charges.</p> <p>Chairs highlighted the need to ensure inclusive discussions about significant service changes happen as early as possible and in public, to enable interested backbench members and members of the public to be aware of issues and to</p>	<p><b>Observation Noted</b></p>



	<p>work collaboratively to assist in identifying possible resolution of issues; this would also help ensure transparency. Chairs noted the Leader's response that the administration aim to achieve this where possible, with decisions taken outside the budget process where possible, but that sometimes time pressures do not enable this.</p>	
<b>WBO6 One Planet Cardiff</b>		
<p>MY report – page 28</p>	<p><b>Recycling:</b> Chairs note that while there are many reasons why Cardiff are not currently meeting our recycling targets and that there is a significant gap to where we need to be in a relatively short space of time, how patient/ tolerant will Welsh Government be?</p> <p>The Leader commented that the expectation from Welsh Government is that we need to roll out separated recycling across the city and that it is anticipated that this will deliver the desired outcomes, although it was acknowledged that this has been delayed.</p>	<p><b>Observation Noted</b></p>
<p>MY report – page 26</p>	<p><b>Transport:</b> Chairs noted that while many of the exciting projects happening in Cardiff are out of our control, many are, for example the cycleways, and these have completion dates that continually slip. Does the delay and then the increased costs impact the deliverability of these projects that are within our control?</p>	<p><b>Recommendation Accepted:</b> Moving forward, the Council's policy framework will establish a more explicit relationship between transport projects committed to within the Corporate Plan and the</p>

	<p>It is <b>recommended</b> that when the new Corporate Plan is written if projects are no longer included, that a clear and full explanation/rationale is provided. The Leader noted that where projects are within our control, we have more confidence they will be delivered. It was also noted that much of the monies spent in relation to the South Wales Metro are currently being spend outside Cardiff.</p>	<p>performance updates provided against them.</p> <p>For any projects removed from the Corporate Plan 2024-27, a clear and full rationale will be provided to Committee.</p> <p>A review of the delivery of transport projects could form part of the future work programme of the Environmental Scrutiny Committee.</p>
<p>Corporate Plan – page 50</p>	<p><b>Llanrumney Bridge:</b> Chairs noted the draft Mid-Year Performance report does not provide an update on this step and sought a progress update.</p> <p>Chairs <b>note and accept</b> the Leader’s offer to provide a written update on this step to the Economy &amp; Culture Scrutiny Committee, as the committee that has previously scrutinised this issue, and to all Scrutiny Chairs.</p>	<p><b>Action:</b> A written update to be provided to Scrutiny Committees by the Directorates on the delivery of Llanrumney Bridge.</p>
<p><b>WBO7 Modernising and integrating our public services</b></p>		
<p>K7.04</p>	<p><b>Capital Receipts:</b> Chairs noted that delivery of capital receipts at Q2 is below target, with K7.04 marked Red, and asked for views on this. Chairs noted the response that the Council takes a long-term view and seeks to achieve the best possible capital receipt, which can mean in-year targets are missed, but that, overall, there is confidence that the target will be met.</p>	<p><b>Observation Noted</b></p>

	<p><b>Customers:</b> Chairs highlighted that whilst the draft Mid-Year Performance includes a KPI for customer satisfaction, there is a need to ensure a more systematic approach to capturing citizen voice. The Chairs requested that the Ask Cardiff survey results, which includes customer satisfaction, will be made available to the Scrutiny Committees when published in January 2024.</p>	<p><b>Action:</b> All Scrutiny Committees to receive a copy of the Ask Cardiff Report as soon as it is published.</p>
<p>MY report – page 32 &amp; 33 K7.11</p>	<p><b>Workforce:</b> Chairs sought views on the challenges facing the Council regarding workforce issues. Chairs noted that local government pay has dropped in value since 2010, leading to recruitment issues in some areas, which the Council addresses via market supplements if required. Chairs noted that, in relation to strike action, the Council is keen to make reasonable adjustments to resolve disputes and reduce disruption to residents, working across all unions to enable this. Chairs noted that, in relation to grievance complaints, the Council has a process for dealing with these that looks at the specificity of complaints, investigating and testing these independently whilst also ensuring that the Council’s duty of care to all staff is maintained.</p>	<p><b>Observation Noted</b></p>
<p><b>GENERAL Cross Cutting Issues</b></p>		
	<p><b>Workforce</b> Chairs noted their awareness that vacancies and sickness rates in Adult Services has gone up and welcomed the recognition in the draft Mid-Year Report on the services area’s Workforce Development Plan to mitigate pressures.  During the discussion Chairs sought insight and assurance on the use of agency social workers in Adult Services including the cost pressures this measure may present. Chairs wish to thank officers for their initial insight and advise the CASSC Committee have confirmed they wish to explore this issue of the use of agency</p>	<p><b>Observation Noted</b></p>

workers in Adult Services in detail and have scheduled it as an agenda item in a forthcoming committee meeting.

On general workforce matters, Chairs stressed the importance of remaining mindful to deliverability and capacity when managing workforce pressures (across the authority) and were informed there is an awareness within the executive on the possibility of moving resource around the authority as a way of managing workforce pressures.

Chairs also sought assurance the work force pressures apparent in the Council's Community Resource Team will be effectively managed and addressed; particularly in light of forthcoming winter months.

Chairs note the progress being made in the wider hospital discharge pathways and were informed key issues in delay can be more aligned to issues within the ward part of the process.

Chairs also wish to confirm ongoing conversation are being had between CASSC Members and the service area on which data metrics could be reported to the committee in their Quarterly Performance Reports to provide CASSC Members with a full insight into the hospital discharge process (alongside the national KPI's being drawn).



Mae'r dudalen hon yn wag yn fwriadol

**CARDIFF COUNCIL  
CYNGOR CAERDYDD****CABINET MEETING: 14 DECEMBER 2023****CORPORATE RISK MANAGEMENT – QUARTER 2 2023/24****FINANCE, MODERNISATION AND PERFORMANCE (COUNCILLOR  
CHRIS WEAVER)****AGENDA ITEM: 5****Reason for this Report**

1. To update Cabinet on the risk management position at quarter two 2023/24 and to highlight any changes from the quarter four 2022/23 report.

**Background**

2. Cabinet receives a risk management update on a biannual basis with the opportunity to make comments.
3. Each Directorate holds a Directorate Risk Register (DRR) and the Senior Management Team (SMT) collectively own a Corporate Risk Register (CRR). The CRR records the main risks to the delivery of corporate objectives and priorities, whilst the DRRs record the key risks to the delivery of Directorate functions and priorities.
4. A risk escalation process is in place, whereby each Director is required to take ownership of all residual (current) risks rated as 'red/amber' and above on their DRR and, at a minimum, to escalate all 'red' residual risks to SMT for collective ownership and review.
5. This reporting process allows SMT to determine if any changes are required to the CRR each quarter. The remaining escalated risks continue to be held on DRRs and are reviewed by SMT each quarter until it is agreed that mitigation is sufficient for risk ownership to transfer back to the Directorate.

**Issues**

6. Each Director has worked with their Risk Champion(s) to undertake their quarter one risk management review. The Risk Management Team has also provided advice and guidance on the measurement and reporting of risks. The quarter one risk assessments are presented on the Corporate Risk Register Summary Snapshot (Appendix A) and the Detailed Corporate Risk Register (Appendix B).

7. The Risk Management Review process has two tiers (Directorate and Corporate) and the actions at each for quarter four are detailed as follows.
8. Governance & Audit Committee receives a risk management update each financial quarter with the opportunity to make comments. The last Governance & Audit Committee review was on the 28th of November 2023, at which time the risk management position at quarter two 2023/24 was presented.

### **Directorate Risks**

9. At the quarter two position, 241 risks were reported from DRRs. All escalated risks and requests for de-escalation were discussed and approved in SMT on the 9<sup>th</sup> of November 2023.
10. It was agreed that nineteen Directorate risks would be carried forward as SMT escalated risks at quarter two.

<b>Directorate</b>	<b>Directorate Risks</b>	<b>Risks at SMT Escalation Point</b>
Economic Development (inc Waste)	32	3
Education	22	0
Housing & Communities	25	4
Performance & Partnerships	14	1
Social Services	14	9 (1 shared)
Planning, Transport & Environment	19	1
Resources	96	1
Governance & Legal Services	19	1 (1 shared)
<b>Total</b>	<b>241</b>	<b>19*</b>

\* Includes 1 shared

### **Corporate Risks**

11. SMT collectively reviewed the escalated directorate risks and corporate risk updates at the end of quarter two.
12. In October's Governance & Audit Committee an update was provided on the position of RAAC and associated risks. In August 2023, revised guidance from the Health & Safety Executive (HSE) was issued following the collapse of a school roof in Kent which contained RAAC planks in the roof structure. The HSE advised that the use of RAAC planks was at the end of their useful life and that they could collapse without warning. For the quarter two position, the Health & Safety corporate risk includes risk mitigation measures that have been



implemented and further controls that are being actioned to manage the risk of RAAC.

13. As part of the risk escalation process, consideration has been given to the Directorate risk in respect to ensuring an effective response to the increasing rise in homelessness. It is proposed that as from Q3 that this risk will be added to the Corporate Risk Register in order to ensure corporate oversight on this potential risk. This risk Homelessness Crisis was considered at the 20 November 2023 Community & Adult Services Scrutiny Committee and a link to the report can be found under backing papers section of this report.
14. A Core Cities risk management working group has recently been set up, and our risk management team are participating in this group. The first piece of work to be undertaken is a comparison of each City's Corporate Risks and once completed this will be shared at a future meeting.

### **Reason for Recommendation**

15. To enable the Cabinet to monitor risk management activity and consider the Risk Management Review – quarter two 2022/23.

### **Legal Implications**

16. There are no direct legal implications arising from this report. However, one of the benefits of identifying risk is that mitigation measures may be taken, if appropriate, and consequently successful claims against the Council may be avoided altogether or reduced.

### **Financial Implications**

17. There are no direct financial implications arising from this report. The Corporate Risk register will be used to guide the Internal Audit Plan and the Council's resource planning processes and forms an important part of the governance arrangements for the Council.

### **HR Implications**

18. There are no HR implications for this report.

### **Property Implications**

19. There are no specific property implications arising from this report. The Estates Department continues to work closely with relevant service areas in monitoring property related risks through the Corporate Risk register, including identifying any appropriate mitigation measures.

## RECOMMENDATION

Cabinet is recommended to note the content of the Corporate Risk Register.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Chris Lee</b> Corporate Director Resources
	8 December 2023

*The following appendices are attached:*

**Appendix A** - Corporate Risk Register Summary Snapshot – Q2 2023/24

**Appendix B** - Detailed Corporate Risk Register – Q2 2023/24

*The following background papers have been considered:*

Directorate Risk Registers Q2 2023/24

[Homelessness Crisis - Report - CASSC 20 November 2023](#)

# Corporate Risk Register Summary Snapshot Quarter 2 2023/24

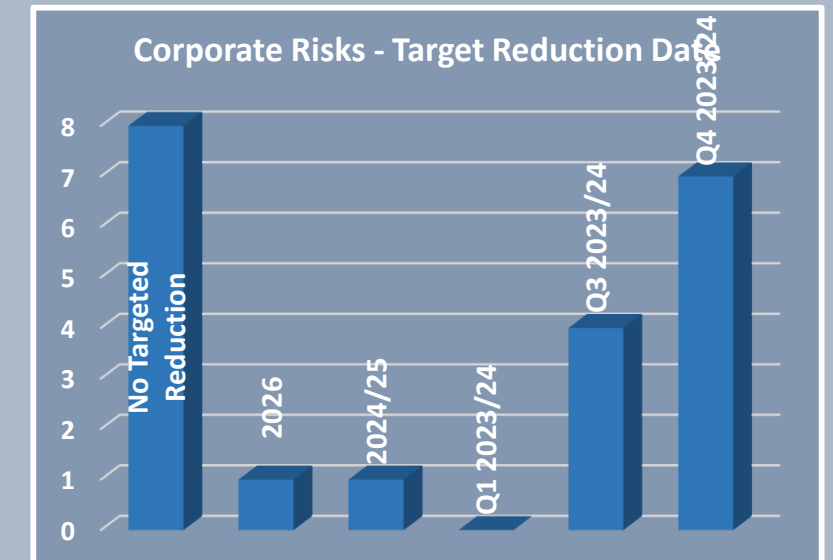
Appendix A

Likelihood	Impact			
	1	2	3	4
A	A1: 11	A2: 0	A3	A4
B	B1: 6	B2: 4	B3	B4
C	C1	C2	C3	C4
D	D1	D2	D3	D4
E	E1	E2	E3	E4

Likelihood	Impact			
	1	2	3	4
A	A1	A2: 2	A3	A4
B	B1: 1	B2: 4	B3: 1	B4
C	C1: 2	C2: 5	C3	C4
D	D1: 3	D2: 2	D3: 1	D4
E	E1	E2	E3	E4

Likelihood	Impact			
	1	2	3	4
A	A1	A2	A3	A4
B	B1: 1	B2: 1	B3: 1	B4
C	C1	C2: 4	C3: 2	C4
D	D1: 4	D2: 4	D3: 3	D4
E	E1	E2	E3: 1	E4

Inherent Risk Rating	Corporate Risk Title	Residual Risk		Target Risk	
		Rating	Movement from Q1	Rating	Movement from Q1
A1	Climate Change (Aggregate)	B2	↔	C2	↔
	City Security	B1	↔	B1	↔
	Air Quality & Clean Air Strategy	B2	↔	C3	↔
	Cyber Security	C1	↔	D1	↔
	Budget Monitoring (Control)	C2	↔	D2	↔
	Financial Resilience	C2	↔	C2	↔
	Schools Organisation Programme (Band B)	B2	↔	E3	↔
	Health and Safety	D3	↔	D3	↔
	Statutory Compliance Management in Council Buildings	C2	↔	D3	↔
	Information Governance	D1	↔	D2	↔
B1	Ensuring Access	A2	↔	B3	↔
	Coastal Erosion	B2	↔	C2	↔
	Recycling Performance	C2	↔	D3	↔
	Increase in Demand (Children's Services)	C1	↔	D1	↔
	Education – Schools Delegated Budgets	A2	↔	B2	↔
B2	Business Continuity	D1	↔	D1	↔
	Safeguarding Children & Adults at Risk	D1	↔	D1	↔
	Education Consortium & Attainment	B3	↔	C3	↔
	Legal Compliance	C2	↔	C2	↔
	Performance Management	D2	↔	D2	↔
	Fraud, Bribery and Corruption	D2	↔	D2	↔



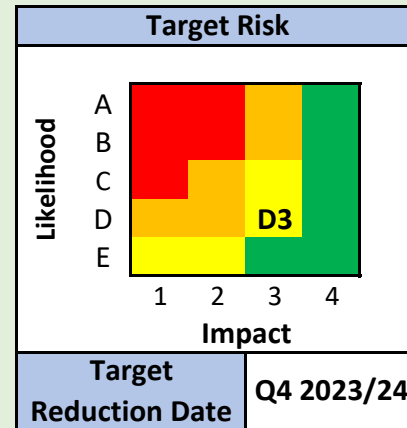
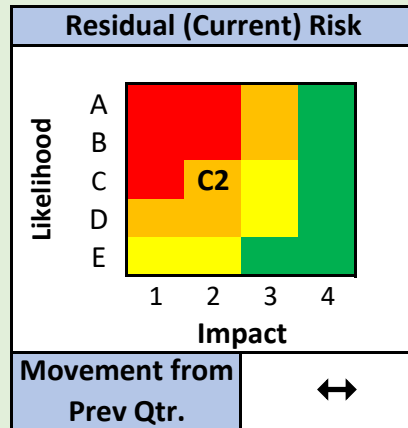
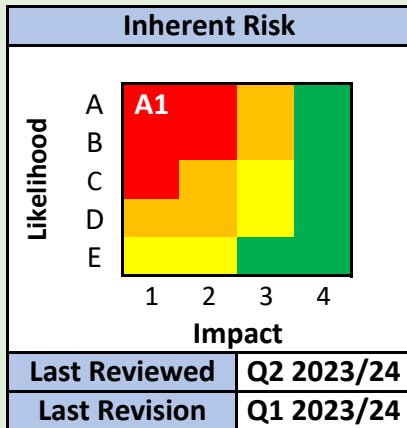
High (Red)	Medium (Red-Amber)
Medium (Amber-Green)	Low (Green)
↓ Decrease from previous quarter	
↔ No change from previous quarter	
↑ Increase from previous quarter	

Mae'r dudalen hon yn wag yn fwiadol

# Statutory Compliance Management in Council Buildings

**Description**

Non completion of cyclical statutory inspections or the remedial works arising out of the inspections, required to maintain the premises and related installations in a safe and legally compliant condition.



**Risk Owner(s)**

Neil Hanratty (Donna Jones)	Councillor Russell Goodway Investment & Development
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**What we've done/are currently doing to achieve the Residual Risk Rating**

**Contractor**

- Consequential remedial work identified on test certificates.
- Statutory maintenance contracting arrangements in place as specification for statutory obligations testing and new risk based specification for legionella management supported by RAMIS.
- Internal resource reviews review all test certificates, remedial work captured and communicated to client as necessary/applicable
- Statutory Obligations Team continues to provide monitoring and supervision of statutory obligations contractor including contractor training arrangements on Council system. Incorporating latest advice from bodies such as HSE.

**RAMIS IT Software**

- Bi-monthly reporting on statistics to SMT for all to consider any issues / mitigations.
- Continue to ensure the number of Building Managers with training remains appropriate in terms of number and coverage.
- Compliance ratings target set at 80% minimum
- Condition surveys have been completed to maintain our understanding /knowledge of all the Council's land and property holdings.

**What we plan to do to meet target**

**Statutory Compliance**

- Continue to commission investigations / work to complete required compliance testing (and works required) in respect of 'gaps' in compliance identified by reports from RAMIS.  
Q2, 2023/24 update - Gaps in compliance identified and in process of being actioned. **ONGOING**
- Completed a review of arrangements and appointed new Framework contractor for statutory inspections/maintenance for non-domestic Council premises. Under new Framework, tighter controls established within the new contract to ensure good performance. Enhanced governance with Building Managers to ensure essential works are progressed to ensure compliance. Stat Maintenance Team have now moved to SED - moved to SED restructure complete. (now moved to Q4, 2023/24 to align with restructuring critical teams). **Q4 23/24**
- Risk reduction is on target to be reduced as planned for Q4, 2023/24. Work is currently focussed on resolving residual tasks from previous contractor, and delivering on the planned inspection and works programme for 2023/24 - which is on target. **Q4 23/24**

**Potential Impact(s)**

Potential consequences of non-compliance with statutory maintenance:

- Fatalities or serious injuries
- Closure of part or whole of facilities with major disruption to service delivery
- HSE interventions and consequential actions including fines and prosecution;
- Significant additional expenditure requiring realignment of Corporate budgets;
- Temporary relocation of staff
- Temporary loss of operational service
- Invalidation of insurance policy
- Serious adverse impact on reputation
- Damage to fabric of building or other equipment

**Type(s) of Impact**

• Service Delivery	• Health & Safety
• Reputational	• Partnership
• Legal	• Community & Environment
• Financial	• Stakeholder

**Linked Risks**

Health & Safety

**Key Indicators / Measures used to monitor the risk**

Compliance stats from the Corporate Health & Safety Team.

# Health & Safety

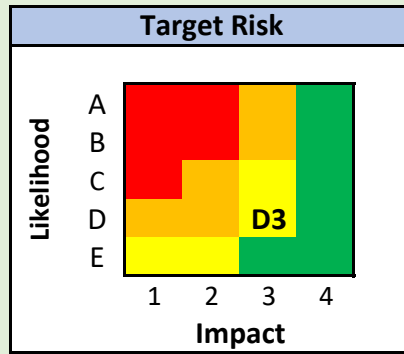
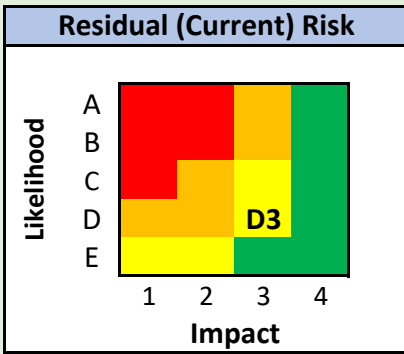
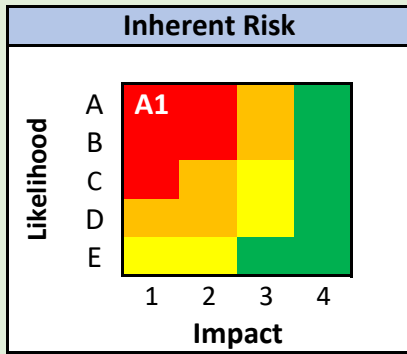
**Description**  
 Non Compliance with corporate Health and Safety arrangements to control key risks across the Council in line with statutory requirements.

**Potential Impact(s)**

- Fatalities
- Serious injuries
- Prosecution – fines for corporate body and/or fines/imprisonment for individual
- Civil Claims
- Negative Publicity

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial



Last Reviewed Q2 2023/24  
 Last Revision Q2 2023/24

Movement from Prev Qtr. ↔

Target Reduction Date N/A

**Risk Owner(s)**

Neil Hanratty (Donna Jones)

Councillor Chris Weaver  
 Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

- RAMIS -Reports submitted to Corporate Health & Safety Forum and Senior Management Team. Based on Current HSE National Advice
- Condition Surveys School Buildings - Shared with Schools .
- Insurance fire safety improvements actioned. Including safe operation of the fire suppression system in Lamby Way MRF and Fire Risk Assessment updated.
- Continue Asbestos Training - Online and face to face taking place. Briefing sessions for technical departments and Building Managers to ensure they understand their responsibilities under the Corporate Asbestos Management (CAM) Plan.
- RAAC Inspections - Schools inspections are complete, with no RAAC identified in the schools. RAAC inspections are now being progressed for the remaining Council premise portfolio.

**What we plan to do to meet target**

- Continue to monitor embedding of current controls to reduce the overall risk **ONGOING**
- RAAC Inspection - Work continues to inspect the Council premise portfolio, (non schools), it is anticipated this will be completed by the end of October - **Q3 2023/24**

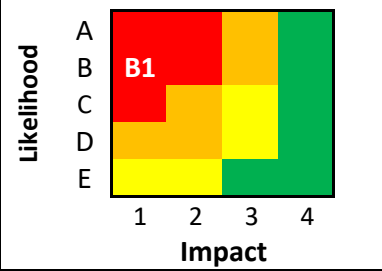
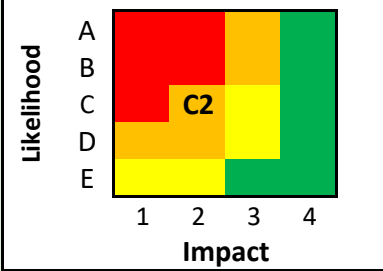
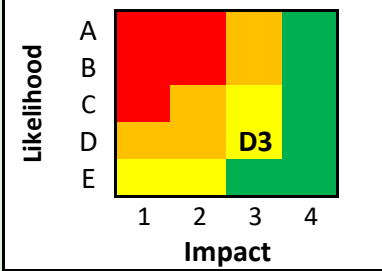
**Linked Risks**

Non-completion of Statutory Building Equipment Maintenance

**Key Indicators / Measures used to monitor the risk**

RAMIS is used to monitor statutory risk in relation to premises safety, bi-monthly reporting to SMT, quarterly reporting to Health and Safety Forum.  
 Compliance against annual Corporate H&S Objectives, used to monitor improvement secured in Service Areas, reported to Health and Safety Forum.

# Recycling Performance

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)								
<p>Failure to meet statutory recycling performance targets within the Waste (Wales) Measure 2010</p> <p>Failure to meet target may lead to Welsh Government imposing fiscal penalty</p>				<p style="text-align: center;"><b>Neil Hanratty</b> (Matt Wakelam)</p> <p style="text-align: center;"><b>Councillor Caro Wild</b> Climate Change</p>								
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Movement from Prev Qtr.	↔											
Target Reduction Date	2024/25											

Potential Impact(s)
<p><b>Financial</b></p> <ul style="list-style-type: none"> <li>Penalties</li> <li>Financial costs to improve recycling performance</li> </ul> <p><b>Strategic/ Reputational</b></p> <ul style="list-style-type: none"> <li>Reputational consequence with citizens and key stakeholders</li> </ul>

What we've done/are currently doing to achieve the Residual Risk Rating
<p>Cardiff's Recycling Strategy 2022-2025 Cleaner and Greener</p> <ul style="list-style-type: none"> <li>Recycling Strategy for Cardiff sets out the Council's long-term objectives over the next 3 years and considers economic, social and environmental aspirations, to ensure Cardiff is one of the leading cities in the world for recycling. Strategy was approved at September 22nd 2022 Cabinet meeting; Agreement in principle be given to the programme of change set out in the Recycling Strategy 2022-25: 'Greener and Cleaner' and this report and delegate authority to the Director of Economic Development in consultation with the Cabinet Member for Climate Change to roll-out the phased implementation of the programme including: Agreement in principle be given to the programme of change set out in the Recycling Strategy 2022-25: 'Greener and Cleaner' and this report and delegate authority to the Director of Economic Development in consultation with the Cabinet Member for Climate Change to roll-out the phased implementation of the programme including: <ul style="list-style-type: none"> <li>The phased roll-out of segregated recycling as set out in this report across household properties in Cardiff.</li> <li>The review of residual waste provision to support introduction of measures to increase participation in food waste recycling</li> <li>Undertake further pilot work in relation to Houses of Multiple Occupancy and Flats to improve recycling performance including the testing of communal segregated recycling bins.</li> <li>Review the expansion of kerbside collection services to cover items currently not collected at the kerbside.</li> <li>Enhance and strengthen education and enforcement to deliver improved recycling compliance across household properties in Cardiff.</li> <li>Develop the business case to move from a Material Recovery Facility to a Material Handling Facility required to manage segregated recycling</li> </ul> </li> <li>Improvements to the trade / business waste model to improve recycling and meet new legislative requirements.</li> <li>Identification of wider Council / service area change to value resources and minimise the Council's impact on climate change.</li> </ul> <ul style="list-style-type: none"> <li>the plans to enhance the cleansing service, including the move balanced resourcing and 'same day cleanse' following collections for inner wards be noted.</li> <li>the development of a business case for a future repair and re-use 'superstore' be noted. A further report will be brought regarding the business case.</li> <li>Pilot for segregated recycling commenced 24th Jan 2022 - participation 10,000 properties and is now complete.</li> </ul> <p>Wider Governance &amp; Compliance</p> <ul style="list-style-type: none"> <li>Working in partnership with WG, WRAP &amp; WLGA to deliver the actions within the new Recycling Strategy, Implementation Plan &amp; individual business cases <ul style="list-style-type: none"> <li>segregated recycling modelling and business case</li> <li>material recovery facility to material handling facility, outline design and business case.</li> <li>development of blueprint model for flats, working in partnership with Swansea council</li> <li>trade business waste recycling review in preparation of new legislation</li> </ul> </li> <li>A project team of Cardiff Council, WRAP and Welsh Government meet monthly to discuss business cases and implementation programme</li> <li>Update provided to Welsh Government Officers on current position in terms of recycling performance and programme for improvements as part of the delivery of the Recycling Strategy 2022-25 - complete</li> <li>Response to Minister re 2020/21 recycling performance - Met Minister on February 27th 2023 to discuss below target recycling performance (58.19% against target 64%) - Minister has responded to state no fiscal penalty will be issued for 2020/21. However, Minister recognises underachievement of target and therefore wants to see evidenced improvement going forward.</li> </ul>

What we plan to do to meet target
<p>Cardiff's Recycling Strategy 2022-2025 Cleaner and Greener</p> <ul style="list-style-type: none"> <li>Phase 1 segregated recycling rolled out to 40,000 36,000 properties on 20th February 2024</li> <li>Phase 2 segregated recycling rolled put to further 80,000 properties in June-Aug 2024</li> <li>Outline business case to be developed for a future repair and re-use 'superstore' - officers currently gathering information from similar initiatives in the UK - Q3/Q4 2023/24.</li> <li>Recycling Performance Targets set within the Strategy are: <ul style="list-style-type: none"> <li>2021/22 = 64% - final validated performance for year is 58.19%</li> <li>2022/23 = 64% - final validated performance for year is 61.57%</li> <li>2023/24 = 64% - current performance at Q1 is 63.42%</li> <li>2024/25 = 70%</li> </ul> </li> </ul> <p>Wider Governance &amp; Compliance</p> <ul style="list-style-type: none"> <li>Quarterly meetings with Julie James MS, Minister for Climate Change, and WG to monitor actions to improve recycling performance ONGOING</li> <li>The April 2024 target will not be achieved for implementation and therefore further correspondence will be required with Welsh Government officers following decision by Cabinet supporting the extension of frequency to residual collections</li> </ul>

Type(s) of Impact
<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal &amp; Regulatory</li> <li>Financial</li> </ul>

Linked Risks
<p>Directorate Risk Register risks:</p> <p>RNS 11 - Financial Pressures</p>

Key Indicators / Measures used to monitor the risk
<ul style="list-style-type: none"> <li>Quarterly monitoring recycling % from waste data flow - 23/24: <ul style="list-style-type: none"> <li>Q1= 63.80%</li> <li>Total final validated 22/23= 61.57%</li> <li>Total final validated 21/22= 58.19%</li> </ul> </li> <li>Monthly tonnage monitoring</li> <li>Monthly financial monitoring in each area of waste</li> </ul>

## Schools Organisation Programme (Band B)

Description		Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>Failure to deliver on aspects of the School Organisation Programme, which is significant in value and complex. The programme consists of Band B (£284m) 21st Century Schools, asset management improvement work, ICT and sufficiency projects. The programme of work spans across a number of directorates, requires significant capacity and has significant capital spend.</p>					<p><b>Mel Godfrey</b> (Richard Portas)</p>	<p><b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills</p>								
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="background-color: #d9e1f2;">Last Reviewed</td><td>Q2 2023/24</td></tr> <tr><td style="background-color: #d9e1f2;">Last Revision</td><td>Q1 2023/24</td></tr> </table>	Last Reviewed	Q2 2023/24	Last Revision	Q1 2023/24	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="background-color: #d9e1f2;">Movement from Prev Qtr.</td><td style="text-align: center;">↔</td></tr> </table>	Movement from Prev Qtr.	↔	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="background-color: #d9e1f2;">Target Reduction Date</td><td>Q4 2023/24</td></tr> </table>	Target Reduction Date	Q4 2023/24		
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Potential Impact(s)		What we've done/are currently doing to achieve the Residual Risk Rating			What we plan to do to meet target									
<ul style="list-style-type: none"> <li>Opportunities to enhance the school estate, and transform education will be missed</li> <li>Insufficient secondary places in some central and north east areas of the city</li> <li>Insufficient places in ALN settings across the city, leading to costly placement in out of county &amp; private settings</li> <li>School buildings that are not suitable for teaching and learning</li> <li>Further degeneration of school buildings &amp; rise in asset management backlog</li> <li>Project cost and time overruns</li> <li>Risk that school ICT infrastructure fails in the short to medium term and does not support the new curriculum</li> <li>Risk that in the current situation, learners do not have access to ICT equipment to support distance learning</li> </ul>		<ul style="list-style-type: none"> <li>21st Century Schools Band B funding bid was submitted to Welsh Government in July 2017 and the Strategic Outline Case for £284m was approved in November 2017n for investment in new building. Fitzalan build is complete SOP reports for Fitzalan, Doyle Avenue, Cathays and St Mary the Virgin have been considered by Cabinet under Band B. Progression of these schemes was delayed as a result of COVID-19 but are now under way. A review of Band B has been completed and identified the priority projects to progress. Further work is required to establish priorities of investment for next wave (Band C - rolling programme) A draft strategic plan for ALN provision has been submitted to Cabinet in October 2021.</li> <li>The delivery and transition for Fitzalan High School is complete and has been handed over. The demolition of Ty Glas is currently in progress. work on the Fairwater campus has commenced with temporary school in situ.</li> <li>A Cabinet paper has been approved for the temporary and permanent accommodation plans for Emotional Health and Wellbeing Specialist Resource Bases (SRB), the extended Pupil Referral Unit (PRU) and to consult on the Greenhill Secondary Special School expansion. 131 additional ALN places have been implemented for September 2023, 20 further places are planned for 2023/24 following completion of adaptation works.</li> <li>Work is ongoing to make sure that all learners have access to digital devices, network and infrastructure to support mobile and distance learning.</li> <li>Robust governance model, in line with Corporate Landlord approach is in place and is supporting consistent decision making.</li> <li>The resource for the asset renewal programme is not sufficient to fund the needs of the estate to meet the short term sufficiency need, LDP capital requirements, condition and suitability requirements. Data available through the OFD has allowed the asset commissioning group to be more structured to understand resource shortfalls at points in the project lifecycle and across the longer term asset programme generally.</li> <li>Delivering committed projects only and applying for in years WG grants.</li> <li>Cost control has improved through the introduction of strong multi-disciplinary teams, MACE cost consultancy and improved commercial decision making through the Programme Director and Board governance. Also, appointment of Commercial Manager to assess the commercial viability of cost plans and tenders.</li> </ul>			<ul style="list-style-type: none"> <li>Conclude SOP Strategy Discussions <b>Q3 2023/24</b></li> <li>Open a new purpose-built Pupil Referral Unit and Carnegie Centre. <b>Q3 2023/24</b></li> <li>A review of internal resource is underway to address when additional resource is required and restructure is underway <b>Q4 2023/24</b></li> <li>Develop a workforce plan to ensure that programme resource is up to date and capable of delivering asset programme of this scale. <b>Q4 2023/24</b></li> </ul>									
Type(s) of Impact		Linked Risks			Key Indicators / Measures used to monitor the risk									
<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> <li>Social</li> </ul>		<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Stakeholder</li> <li>Health and Wellbeing</li> <li>Sustainability</li> </ul>			<ul style="list-style-type: none"> <li>Spend against the asset programme in financial year, in accordance with the responsibilities of schools and corporate landlord (Corporate Plan)..</li> <li>Timelines to deliver projects within the SOP programme.</li> <li>New key performance measures which are being developed as part of the overarching SOP Strategy.</li> </ul>									



## Education - Schools' Delegated Budgets

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>The number of schools with deficit budgets and/or the overall value of deficit budgets increases, or that those schools (particularly in the Secondary sector) with existing deficit budgets do not deliver agreed deficit recovery plans.</p>	<p><b>Inherent Risk</b></p>	<p><b>Residual (Current) Risk</b></p>	<p><b>Target Risk</b></p>	<p>Mel Godfrey</p>	<p><b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills</p>								
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Target Reduction Date	Q4 2023/24												
	<p><b>What we've done/are currently doing to achieve the Residual Risk Rating</b></p> <ul style="list-style-type: none"> <li>For the 2023/24 financial year, 42 schools applied to set deficit budgets. 15 have been agreed and a number require more work with the LA. Aggregate deficit applications - £4.8m. Good progress in year 1 – greater challenge year 2 onwards.</li> <li>The Education Directorate receives regular detailed budget monitoring reports from the LA Financial Services team and manages its budgets within the parameters set by the LA.</li> <li>There is good engagement with schools on financial issues through the well-established School Budget Forum arrangements with all papers and meeting agenda and minutes made available on the Council's website.</li> <li>Officers from Education and Financial Services work with individual schools through Headteachers and Governing Bodies to formulate Medium Term Financial Plans (MTFP) to seek to either balance individual school deficits within four financial years or to ensure that the accumulated deficits were frozen or slowed as much as possible.</li> <li>Officers continue to monitor and challenge those schools in deficit before allowing any additional financial commitments, both staffing and other expenditure.</li> </ul>			<p><b>What we plan to do to meet target</b></p> <ul style="list-style-type: none"> <li>Continue to work with schools in deficit <b>Ongoing</b></li> <li>Collate individual school budget impact assessments <b>Ongoing</b></li> <li>Following latest School Outturn position, due in early November, conduct a review of current school spending plans to identify Schools facing financial pressures for 2024/25, with a view of identifying mitigating actions in partnership with Schools. <b>Q3 2023/24</b></li> <li>Work with all schools and cluster working and establish an Efficiency Board to have oversight of efficiency gains to school system <b>Ongoing</b></li> <li>SOP Strategy - methodology worked to provide range of options <b>Ongoing</b></li> </ul>									
<p><b>Potential Impact(s)</b></p> <ul style="list-style-type: none"> <li>An overall deficit arising from schools budgets would count against the funding available for the Council</li> <li>Schools with deficit budgets may struggle to adequately fund the resources required to achieve the desired levels of educational attainment</li> <li>Schools with deficit budgets may struggle to adequately fund maintenance of school buildings creating an issue for other budgets, e.g. Capital/SOP Band B</li> <li>Schools that continually fail to address deficit budgets may ultimately require LA intervention, with a corresponding increase required in centralised resources</li> </ul>													
<p><b>Type(s) of Impact</b></p> <ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<p><b>Linked Risks</b></p>			<p><b>Key Indicators / Measures used to monitor the risk</b></p> <ul style="list-style-type: none"> <li>School budget monitoring position</li> <li>Number of schools setting deficit budgets</li> <li>Final budget balances</li> </ul>									

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## Education - School Improvement & Attainment

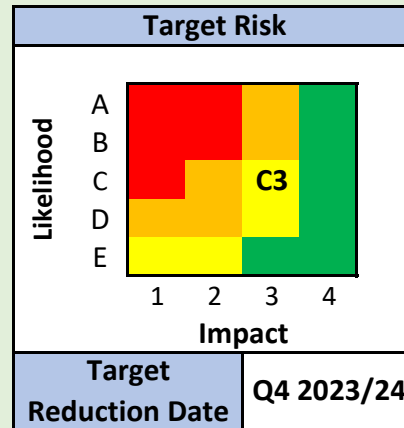
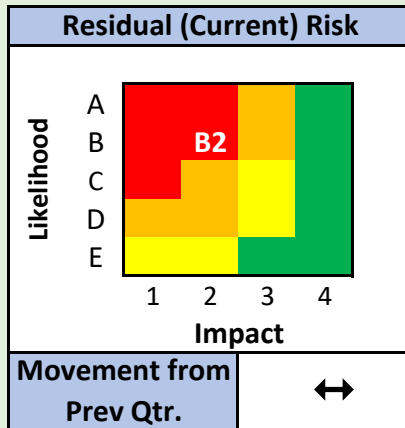
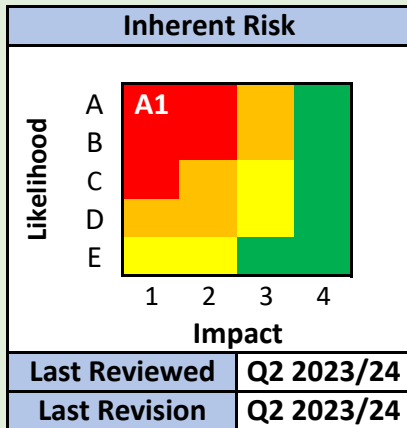
Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)									
<p>The risk that school improvement is not delivered as planned, in light of changing accountability and assessment arrangements and National Reforms (Curriculum and Additional Learning Needs).</p>	<p><b>B2</b></p>	<p><b>B3</b></p>	<p><b>C3</b></p>	<p><b>Mel Godfrey</b></p>	<p><b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills</p>								
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	<b>What we've done/are currently doing to achieve the Residual Risk Rating</b>			<b>What we plan to do to meet target</b>									
	<ul style="list-style-type: none"> <li>The number of schools inspected by Estyn in the academic year 2022/2023 was 25. Of these 25 inspected schools, 5 are under Estyn Review, 4 are awaiting official reports, and 2 in category from the previous year. The LA and CSC are supporting these schools and monitoring progress against recommendations. Schools continue to be monitored via the Schools Causing Concern and All Schools Risk processes.</li> <li>The LA and CSC are continuing to support schools in the roll out Curriculum for Wales 2022.</li> <li>Estyn concluded in their full inspection of Cardiff Education Services in February 2022 that there has been a sustained and incremental improvement in Cardiff Education in recent years. Inspection outcomes are strong, especially in the primary sector. Outcomes for outcomes for pupils across key stage 4 have been above or well above expectations in the majority of schools in the three years up to the pandemic. Outcomes for pupils that are eligible for free-school meals (efsm) has generally been above that of the same group nationally.</li> <li>Estyn noted that the LA has established strong working relationships with the regional consortium and there are robust processes for the support and challenge to schools causing concern.</li> </ul>			<ul style="list-style-type: none"> <li>Following the November '21 Inspection, Estyn recommended that the LA ensures that the work of the regional consortium (CSC) is focused appropriately on Cardiff's strategic priorities. Actions to align the work of the LA and CSC more closely will be carried forward into the new Directorate Delivery Plan. <b>Q4 2023/24</b></li> <li>Closely monitor school exclusions and school attendance, paying particular attention to investigating alternatives to exclusions on a case-by-case basis; also by providing further support to families as well as making sure they are more involved in the process.</li> </ul> <p><b>ONGOING</b></p> <ul style="list-style-type: none"> <li>Work with CSC to provide support to schools to develop teaching and learning approaches in line with Curriculum for Wales 2022 and prepare for new assessment arrangements. <b>ONGOING</b></li> <li>Effective systems for quality assuring IDPs and IDP reviews in place and continuing to support schools with ALN Reform. <b>Q4 2023/24</b></li> <li>Enhance processes for All Schools Risk monitoring and Schools Causing Concern. Enhanced governance of ASR and SCC processes reporting each half term to Cabinet Member and CEX. <b>Q4 2023/24</b></li> <li>The Team Around the School approach has been developed and is being piloted in the East and West of the city, to ensure that integrated support is offered to schools where there are specific concerns. COMPLETE Next step is to design audit for schools' accessibility to 'services around the school'. <b>Q3 2023/24</b></li> <li>Two key school improvement posts are currently out to advert – Head of Achievement and Assistant Director. <b>Q4 2023/24</b></li> </ul>									
	<b>Potential Impact(s)</b>	<b>Type(s) of Impact</b>			<b>Linked Risks</b>								
	<ul style="list-style-type: none"> <li>Learners do not reach their full potential</li> <li>Schools are not supported to improve</li> <li>Schools are not able to deliver the new curriculum</li> <li>Impact on Estyn judgements</li> <li>Value for money - CSC</li> </ul>	<ul style="list-style-type: none"> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>			<p>KS4 2018/19 School Performance, Outcomes from Estyn Inspections up to 2020.</p>								

## Ensuring Access

Ensuring Access					
<p style="text-align: center;"><b>Description</b></p> <p>Failure to meet our statutory requirements to provide education to all learners of statutory school age, in particular those with Additional Learning Needs associated with Emotional Health and Wellbeing. Associated safeguarding risks due to vulnerable children not being at school, financial risks due to escalating costs of placements and reputational risk to the Council, evidenced by increasing volume of complaints.</p>		<p><b>Inherent Risk</b></p>	<p><b>Residual (Current) Risk</b></p>	<p><b>Target Risk</b></p>	<p style="text-align: center;"><b>Risk Owner</b></p> <p style="text-align: center;"><b>Mel Godfrey</b></p> <p style="text-align: center;"><b>Councillor Sarah Merry</b> Deputy Leader &amp; Education, Employment &amp; Skills</p>
		<p><b>Last Reviewed</b> Q2 2023/24</p> <p><b>Last Revision</b> Q2 2023/24</p>	<p><b>Movement from</b> ↔</p> <p><b>Prev Qtr.</b></p>	<p><b>Target</b> Q3 2023/24</p> <p><b>Reduction Date</b></p>	
		<p><b>What we've done/are currently doing to achieve the Residual Risk Rating</b></p> <ul style="list-style-type: none"> <li>Emergency plan (Phase 1) for increasing capacity in the short term developed and implemented. Initially spot purchasing of places with Horizon to provide enhanced tuition. Review of in-house tuition offer to ensure stronger programme for children not in placement providing greater value for money. Identified primary schools with scope to provide places at Baden Powell and Pen Y Bryn. Extended number of places in our Specialist Resource Bases (SRBs) in schools for September 2023 as well as developing extra places in Special schools including Woodlands, Ty Gwyn, Hollies and Riverbank. Extended Pupil Referral Provision (PRU) has been developed, staff appointed, building works commenced with opening proposed for January 2024. Permanent site for extended PRU identified case for investment being developed. Secured additional classes at ACT provision. Monitoring of progress and impact against short term to long term solutions are monitored monthly to the senior education team. Proposal to develop additional ALN across the city to increase places agreed by Cabinet.</li> <li>Maintaining continuous review of pupils who are not in provision to identify specialist provision to accommodate their needs.</li> </ul>			<p><b>What we plan to do to meet target</b></p> <p>Phase 2:</p> <ol style="list-style-type: none"> <li>Work with External Providers                             <ul style="list-style-type: none"> <li>Work with Procurement to specify how to correctly progress with utilising external providers. (ID providers)</li> <li>Establish a 'Best Approach' by testing the market, scope the current provision. Ongoing</li> <li>Establish a list of possible sites, buildings and areas that will meet appropriate need, to lease for the next 5 years at least.</li> </ul> </li> <li>Building our own capacity - Prioritisation of ALN provision and places                             <ul style="list-style-type: none"> <li>Long term vision - establish budget parameters for operational capacity and establish long term Management Board for extended PRU Open a new purpose-built Pupil Referral Unit and Carnegie Centre.</li> <li>Develop proposition of Greenhill provision aligned to stresses on the system and gaps in provision, also highlighting long term cost implications. Ongoing</li> </ul> </li> </ol>
<p style="text-align: center;"><b>Potential Impact(s)</b></p> <p>Increase in OOC spend. Children not in education pending identification of suitable ALN provision. Children and young people who are not in an environment where they can be safeguarded could be at risk of significant harm. Outcomes for young people who requiring provision for their ALN related to EHW do not improve and face difficulties in making a positive transition Post 16. Young people with complex mental health needs do not receive psychological support. Children not in education whilst parents attempt to secure places of choice. Financial impact of providing temporary accommodation. Reputational risk due to public interest groups protesting about available places.</p>					
<p style="text-align: center;"><b>Type(s) of Impact</b></p> <p>Safeguarding Legal Financial Social Reputational</p>		<p><b>Linked Risks</b></p> <p>Risk to relocation of vulnerable children to Cardiff as part of Children's Service</p>		<p><b>Key Indicators / Measures used to monitor the risk</b></p> <p>Numbers of Children Not In Education Provision Out of County Placement Spend</p>	

# Air Quality & Clean Air Strategy

**Description**  
 Air quality in Cardiff does not meet statutory requirements set by legislation and continues to have a detrimental impact on health for residents and visitors to Cardiff.



**Risk Owner(s)**

<b>Andrew Gregory</b> (Jason Bale)	<b>Councillor Caro Wild</b> Climate Change
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**What we've done/are currently doing to achieve the Residual Risk Rating**

RESIDUAL RISK RATING AFTER CURRENT CONTROLS BELOW - B2 = LIKELY/ SIGNIFICANT

Monitoring

- Non-automatic nitrogen dioxide (NO<sub>2</sub>) monitoring sites at 136 locations.
- Data includes monitoring at schools as part of the TRO pilot projects at schools
- There are three live 24/7 monitoring stations:
  - Cardiff Frederick Street: measuring levels of NO<sub>2</sub>, PM<sub>10</sub> & PM<sub>2.5</sub>, SO<sub>2</sub>, CO and O<sub>3</sub>
  - Richard's Terrace, Newport Road: measuring levels of NO<sub>2</sub> & PM<sub>10</sub>
  - Castle Street measuring levels of NO<sub>2</sub> PM<sub>10</sub> and PM<sub>2.5</sub>
- 7 near real time indicative automatic analysers located predominantly in Cardiff's City Centre (5), one in Llandaff within the established AQMA and one in Canton on Lansdowne Road. These sites measure on a 24/7 basis, continuously monitoring for Nitric Oxide, Nitrogen Dioxide, Ozone, PM<sub>10</sub> & PM<sub>2.5</sub>, and does so every 15 minutes
- Additional 47 real time monitors installed across Cardiff, with support of One Planet Funding. This will be a 2 year pilot to assist the Council in improving collection of data including PM<sub>2.5</sub> and PM<sub>10</sub>. Data will be used to assess any additional areas of concern and trends in pollutant levels in existing AQMAs, to help identify and target further interventions.

Air Quality Management Areas (AQMA's)

- Cardiff has 4 existing declared Air Quality Management Areas (AQMA's) all as a result of elevated NO<sub>2</sub> concentrations from road traffic emissions.

Clean Air Plan

- Annual average for Castle Street = 33.8 µg/m<sup>3</sup> for NO<sub>2</sub> for 2022.
- Interim Castle Street Option still being implemented
- Mitigation measures to be detailed to WG if annualised results exceed agreed two threshold values of 35 µg/m<sup>3</sup> and 38 µg/m<sup>3</sup>.
- Construction of Ph1 City Centre West scheme (Wood St & Central Square) – substantially completed with snagging been undertaken. .
- Completion of Bus Retrofitting Programme of 49 buses – buses have been fitted with exhaust technology which reduces NO<sub>x</sub> emissions from the buses by 90%
- WG have approved updated Initial Plan and supported implementation of Option 1. The Minister has confirmed that in principle funding for the scheme will be provided by WG, subject to submission and approval of Final Plan. It is proposed to provide the updated plan within Q3.
- Following WG funding award, progression of EV Infrastructure has commenced on the council EV infrastructure road map, with the baseline assessment having been completed in Q2 2023/24.

Taxi Scheme:

Lease scheme launched January 2022 (note 5 vehicles only at this stage). Licensing Committee have now approved the proposal to remove the Hackney Carriage Limit for new plates to be issued. However this is restricted that any new hackney carriage licences should only be issued to fully electric vehicles, or wheelchair accessible vehicles that are under 5 years old and meet the Euro 6 emission standard. Further revisions or update of scheme will need to be considered, including potential funding options to support upgrades to cleaner vehicles.

- Clean Air Strategy and Action Plan - A wider Clean Air Strategy and Action Plan has been developed to satisfy the requirements of LAQM. The strategy includes measures that will likely provide further AQ improvements incl AQMAs

**What we plan to do to meet target**

TARGET RISK RATING AFTER ACTIONS BELOW - C3 = POSSIBLE/ MODERATE

**Implement Clean Air Plan**

- Package of measures as detailed in Final Plan:
- Further assessment on Castle Street completed in February/ March and report was presented to Cabinet in April. Results show that Option 1 for all traffic still achieved compliance and owing to wider network impacts will be recommended as preferred option for Cabinet to approve. In Q2 WG provided approval of the updated Initial Plan and in a letter from the Minister, she detailed that funding for the scheme is agreed in principle.
- Subject to final decision being made on funding and approval of final plan the revised programme is anticipated;
  - Q3 2023/24 Commence tender process
  - Q4 2023/24/ Q1 2024/25 Complete tender process an New Cabinet Paper to award tender
  - Q2/3 2024/25 On site (with the road closed - this will be achieving compliance)
  - Q1 2025/26 Completion

**Clean Air Strategy and Action Plan**

- Roll out of measures (subject to grant bids/ funding)
  - Pilot project Non Idling Zones – Work with WG and Active travel team on potential, targeted around schools - Due to resource issues this project has not been fulfilled and will be potentially picked up in 23/24 subject to resources Q4 2023/24
  - Living Walls and other Green Infrastructure – this project has been completed and will be reported in the 2023 APR
  - Progression of EV Infrastructure - the completed road map is expected in Q4 2023/24
  - Review and where necessary update Air Quality Planning Guidance
  - Schools Active Travel - Continued support on TRO projects and expansion of monitoring associated with the project will be further supported as an when more schools come on line. Projects worked on to date in 22/23, will be reported in the 2023 APR
  - Behavioural Change Promotion, Consolidation of a dedicated Behavioural Change Programme linked to the Behavioural Change Strategy to be developed for One Planet Cardiff.

Review of Clean Air Strategy and Action Plan in 2023/2024 Q4 2023/24

**Potential Impact(s)**

**Health & Safety**

- No improvement to health
- Increased burden on health care
- Further deterioration of related health conditions

**Legal & Regulatory / Financial**

- Breach of legal / statutory requirements
- Potential significant financial penalty

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Health</li> <li>• Regulatory</li> <li>• Financial</li> <li>• Strategic</li> </ul>	<ul style="list-style-type: none"> <li>• Reputational</li> </ul>
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**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

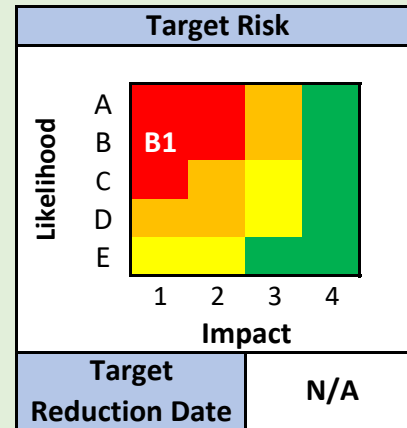
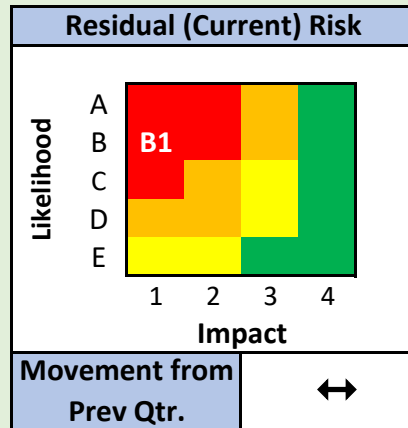
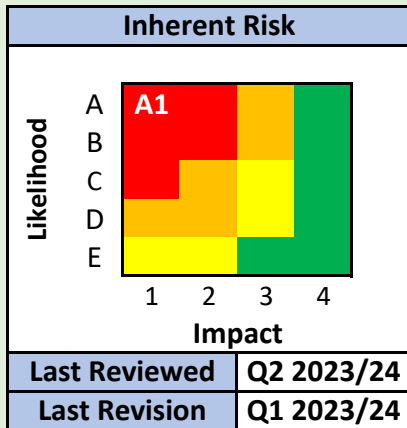
- Implementation Plan for measures (funding dependent)
- Monitoring and Evaluation Plan for Clean Air Plan
- Ongoing monitoring and reporting under LAQM

Judalen 406

# City Security

**Description**

Major security-related incident in 'crowded places' as a result of international or domestic terrorism.



**Risk Owner(s)**

Chris Lee  
(Gavin Macho)

Andrew Gregory

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- All existing identified high-risk, crowded places have been formally assessed
- Some crowded places have an extremely limited and in some cases 'third party managed' access control process to operate them; providing little/no challenge
- CONTEST Protect/Prepare Task & Finish Group maintains the City Gateways Public Realm Enhancement Scheme, with agreed options for suitable PAS 68/69 mitigation for appropriate boundary locations; referred to as 'gateways'
- The work done in the city to address security concerns has been predominantly focused on the provision of physical assets to mitigate against the threat of hostile vehicles
- Areas protected against the threat of hostile vehicles include the Principality Stadium, St Mary Street, Queen Street, St David's Dewi Sant and Cardiff Bay.
- The Cardiff City Centre Access Control Protocol is currently operating at the heightened response level, reflecting the UK National Threat Level; permitting vehicles onto the pedestrianised areas within Cardiff City Centre using strict parameters
- The Government National Terror Risk Rating set by the National Counter Terrorism Office remains at Substantial or an attack is likely.
- Martyn's Law has now passed into the Parliamentary Scrutiny process. The committee's initial opinions were critical of the current draft and questioned both its viability and cost effectiveness. We await with interest the Government's response.
- Cardiff Council Counter Terror Policing Wales and Partners are moving the agenda forward since it is unthinkable, we wait for the legislative process to catch up.
- Our revised position will be that we will move away from geographical responses and instead focus more on Sectors (Retail/Hoteliers/Business/Education) This would allow us to maximise our interaction with existing partnerships.
- The programme will be signed off at the PSPG before being launched in October.
- The continuing weekly/daily liaison between us and our Event Organisers Sporting venues, City Centre etc through City Centre Management, ELP, SAG, licencing etc keep all the issues in play.

**What we plan to do to meet target**

- The PSPG Chair has commissioned a Director led review across all relevant Service areas to assess current operational and tactical arrangements for City Security to see if they are effective. All opportunities for improvement to captured and costed. **ONGOING**
- The PSPG is broadening its remit by taking on a more comprehensive portfolio of security issues inclusive of Cyber Security, Insider threat and personal security. Training and development being planned, projects managed at director level. **ONGOING**
- Consideration to be given to incorporating structured and strategic conversations about security and counter terrorism into pre application stage of major developments. **ONGOING**
- The PSPG will try to engage with Government to find funding to improve and develop Cardiff's security arrangement. Shovel ready projects ready to go. **ONGOING**
- The Chair of Contest has requested that the PSPG develop a SMART work programme that takes ownership of all its targets. This has been agreed and will be presented to the PSPG in October. Contest will then take on a Scrutiny Role and ensure we deliver on our Targets. **Q3 23/24**

**Potential Impact(s)**

**Immediate / Short-Term**

- Large numbers of fatalities, injuries to public
- Extensive structural damage and/or collapse of buildings
- Closure of roads having impact on transport network and access to businesses and properties.
- Damage/disruption to utilities (gas, electricity, water etc.)
- Immediate impact to core business, retail and sporting district in the centre of Cardiff

**Ongoing / Longer Term**

- Reputational risk due to a public perception Cardiff is an unsafe place
- Area viewed as a risk for potential future business investment.
- Inability to attract major future national and international events (political, sporting etc.)
- Increase in demand for Council services/support for all affected.
- Current economic climate to reduce the effectiveness of any recovery/regeneration of the area.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Partnership</li> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>
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**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

- National Threat Level and period at level
- No of 'Crowded Places' not protected to PAS 68/69 level



# Climate Change - Biodiversity

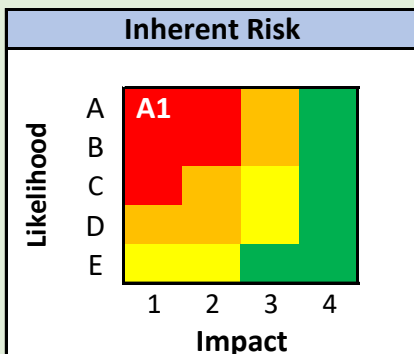
**Description**

Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.

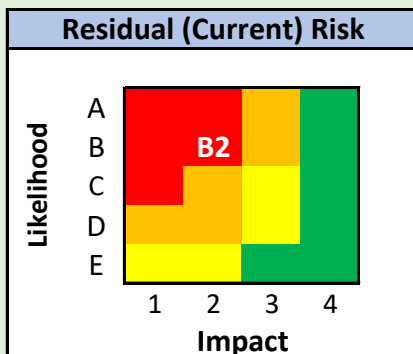
**Potential Impact(s)**

- Loss of biodiversity leads to reduction in ecosystem resilience, and reduction in ecosystem resilience will compromise the provision of ecosystem services. These are the services or benefits which we gain from the natural environment.
- Ecosystem services include climate change mitigation and adaptation.
- Climate change mitigation includes the sequestration and storage of carbon by plants, especially long-lived species such as trees. Reduction of this ecosystem service makes it harder to reduce net carbon emissions. Annually Cardiff's trees (not including other aspects of green infrastructure) provide ecosystem services worth £3.31 million, of which £1.9 million is in carbon storage and sequestration (iTree Study, Sept 2018).
- Climate change adaptation services include storm water attenuation by vegetation and reduction of surface water volume through evapotranspiration
- Trees, green walls and green roofs allow cooling and shading, thereby mitigating the urban heat island effect which may become more prevalent with a warmer climate.
- Hotter summers also increase risk of aerial pollution through air stagnation, and green infrastructure can remove certain pollutants from the air as well as having a cooling effect.
- The National Priorities of the WG Natural Resources Policy include 'Delivering Nature-based Solutions'. Failure to ensure protection of biodiversity and ecosystem resilience risks failure to deliver these nature-based solutions, which include climate change mitigation and adaptation.

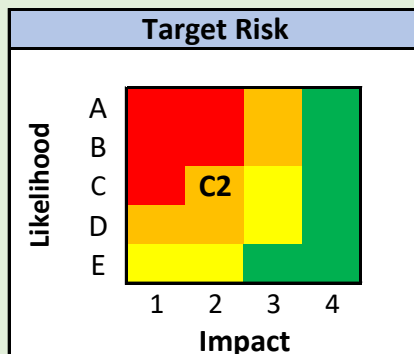
- Type(s) of Impact**
- Service Delivery
  - Reputational
  - Legal
  - Financial
  - Health & Safety
  - Partnership
  - Community & Environment
  - Stakeholder



Last Reviewed Q2 2023/24  
Last Revision Q2 2023/24



Movement from Prev Qtr. ↔



Target Reduction Date Q4 2023/24

**Risk Owner(s)**

**Andrew Gregory**  
(Simon Gilbert/ Jon Maidment)

**Councillor Caro Wild**  
Climate Change

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Cabinet Report of 14/10/21 Recommended the Council sign the Edinburgh Declaration.
- Developed a Biodiversity and Resilience of Ecosystems Duty Forward Plan, to implement the statutory duty to seek to maintain and enhance biodiversity and in doing so to promote ecosystem resilience.
- Undertaken an 'iTree-Eco' study to look at the value of trees in terms of the ecosystem services that they provide.
- Working with neighbouring Local Authorities through the Local Nature Partnership Cymru project to share ideas and best practise for enhancing biodiversity across the City and identifying opportunities for cross-boundary projects to improve habitat and species connectivity and increase ecosystem resilience.
- Contributed to the Central South Wales Area Statement recently published by Natural Resources Wales.
- In June 2023 the Council agreed the Replacement LDP Preferred Strategy for consultation. This Strategy includes Strategic Policy SP19 which aims to ensure the Cardiff's green infrastructure assets are strategically planned and delivered through a green infrastructure network.
- The Coed Caerdydd Project has also resulted in further officer resource to support volunteer activity relating to tree planting and maintenance / aftercare and whereby grant funding has enabled the appointment of a Volunteer Co-ordinator on a fixed term contract up until July 2023.
- Successful appointment of Principal Planner (Ecology) in Q4 2022/23
- Regular meetings of Council "Green Infrastructure Officer Group" including colleagues from Planning, Parks, Drainage, and Public Rights of Way - re-commenced in Q4 2022/23 following appointment of Principal Ecologist post and ongoing
- Further funding has been obtained which has resulted in the LNP Co-ordinator post being extended at full time hours up until 31/3/23. This funding has also enabled the creation of a temporary Community Ranger Post until 31/3/23 to assist with the delivery of Local Places for Nature funded Projects.
- Deliver an enhanced tree planting programme - 2022/23 = 30,264 achieved (target 25,000)
  - 2023/24 - commenced the scoping exercise to inform the 23/24 planting programme and developing an action plan aimed at maximising opportunities for increase tree canopy within the highway / street scene. Investigations are underway to determine street tree planting locations in existing grass verges and retrofit planting locations within hard landscaped street scene.
  - Finalisation of Scoping Exercise / determine Planting Programme for 23/24 completed Q2 2023/24

**What we plan to do to meet target**

- A Habitat Regulations Screening Assessment has been completed on the Replacement LDP Preferred Strategy which was approved by Council in June 2023. Consultation on the Preferred Strategy and the background papers is running for 10 weeks to the 5th October 2023. **Q3 23/24**
- Update the Cardiff Biodiversity and Resilience of Ecosystems Duty Forward Plan, including the Action Plan, in line with legislative requirements - now pushed back to Q1 2024/25 due to resources and competing priorities, including preparation of the Nature Recovery Action Plan (NRAP) and LDP. **Q1 24/25**
- Recruitment of vacant Planner (Ecology) post and consideration of additional resources to enhance the Planning (Green Infrastructure) functions, subject to available candidates and resources.
- Officer attendance at all Wales Planning and Diversity Forum - **Q1, Q2, Q3, Q4 2023/24**
- Seek opportunities for partnership working under the 5 main themes of the South Wales Area Statement (building resilient ecosystems, working with water, connecting people with nature, improving our health, improving our air quality). - **ONGOING**
- Develop the local Nature Recovery Action Plan through the Local Nature Partnership (LNP) - work is progressing well in partnership with the LNP steering group partners e.g. NRW, RSPB, WTSWW. Consultation workshops with the public and interest groups are planned for this summer to feed into the NRAP. **ONGOING**
- Discussions between the Council, Welsh Government and the Wales Council for Voluntary Action concerning LNP grant funding for a further 2 years is ongoing. - Formal confirmation has been received which will see the extension of LNP funding up until 31/3/25.
  - Finalise Scoping Exercise / determine Planting Programme for 23/24 - Q2 2023/24
  - Implement Planting Programme and action plan for maximising opportunities for increasing canopy within the highway / street scene - Q3/4 2023/24.

- Linked Risks**
- Coastal Erosion
  - Air Quality
  - Business Continuity
  - Energy decarbonisation

- Linked Documents**
- <https://www.evaccardiff.co.uk/>
  - <https://www.cdp.net/en>

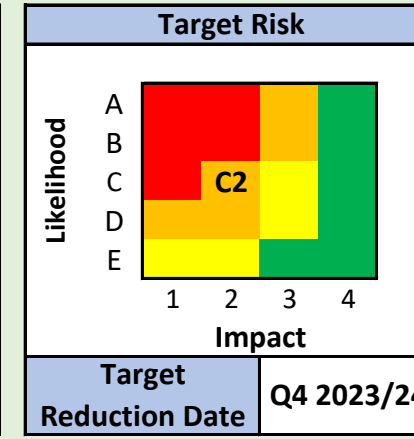
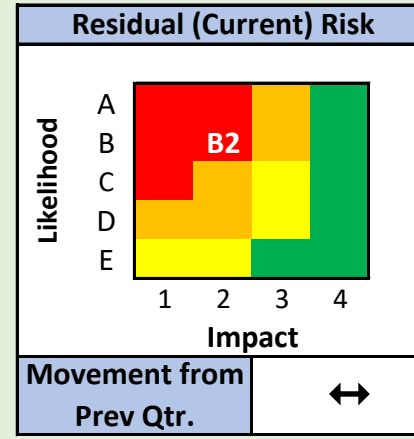
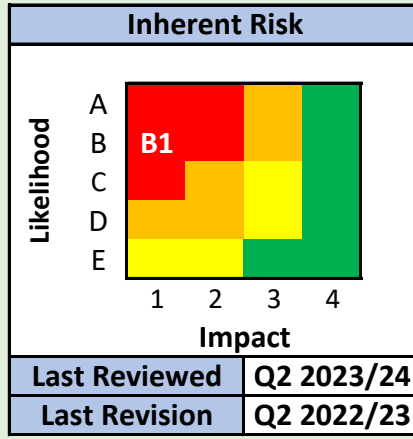
**Key Indicators / Measures used to monitor the risk**

Extent of Green Infrastructure in the City.

Updated 408

# Climate Change - Energy Security & Decarbonisation

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.



**Risk Owner(s)**

<b>Andrew Gregory</b> (Gareth Harcombe/ Liz Lambert)	<b>Councillor Caro Wild</b> Climate Change
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**Potential Impact(s)**  
**Energy security (energy efficiency & decarbonisation of supply)**

- Inconsistent energy supply
- Increased costs
- Inability to deliver public services
- Decrease in economic output
- Disruption to the supply of utilities
- Increased transport costs
- Increased costs for heating / providing services to buildings
- Increased fuel poverty

**What we've done/are currently doing to achieve the Residual Risk Rating**

**Energy security (energy efficiency & decarbonisation of supply)**

- Climate Emergency Declared by Council
- Council approved the final "One Planet Cardiff" Strategy on October 14th 2021 which addresses the Climate emergency and sets a pathway to a carbon neutral Council by 2030.
- Established internal and external partnership and governance boards to steer our response to the climate emergency.
- Energy efficiency measures being installed through Re-Fit and Salix projects - Now managed by FM
- Phase 2 of Re-Fit project finalised and going through due diligence with Salix funding organisations - Schools focus for this tranche
- NPS Consortium approach to purchasing energy to secure best prices - continuing by Economic Development
- Lamby Way solar farm complete including the private wire connection to the Welsh Water Waste Treatment Works.
- District Heat Network - Construction commenced on site in Jan 22 with a 3 year programme to completion
- Carbon baselining and impact modelling reported to Welsh Govt and included in One Planet Cardiff. This has been used to inform the priorities in the action plan and progress will be monitored and reported annually.
- Scoping additional carbon reduction projects for future action as part of the One Planet Cardiff project with key target areas confirmed in the One Planet Cardiff Action Plan - Funding secured to develop final business case for two major ne renewables schemes
- Delivering Low Emission Transport Strategy - approved April 2018 and implementation of action plan underway:
  - first tranche and second phases of residential chargers delivered, and further phases in Council car parks and other residential areas underway - over 70 now installed
  - WG funding secured to install EV chargers at council buildings for small fleet vehicles
  - ULEVTF funding secured to install charging infrastructure in car parks and additional in-year funding awarded to implement Rapid charging infrastructure at Lamby Way depot for 12 electric refuse collection vehicles, and to engage consultant/ specialist to scope/design & specification for renewable connection & switch gear to produce green energy from landfill gas and/or the solar farm.
- Working with the Cardiff City Region to develop a new domestic retrofit grant scheme using Energy Company Obligation funding. Plans for a major energy retrofit of council owned low-rise domestic blocks also in preparation and Welsh Government ARBED grant funding being targeted at "Hard to Treat" steel framed properties for implementation later this year. Outline of options to accelerate Domestic Retrofit presented to OPC Cex meeting April 23
- OPC commits to a long term strategy for public engagement and behaviour change to build public resilience and positive action through advice and guidance and based on best practice and observed impact of initiatives elsewhere. This work is guided by advice from the Centre for Climate Change & Social Transformations (CAST) .

**What we plan to do to meet target**

**Energy security (energy efficiency & decarbonisation of supply)**

- Implement and monitor the One Planet Cardiff Strategy with carbon reduction targets and associated action plan for delivery over the to 2030 - Overall target March 2030 with specific project based targets stated in the detailed action plan **ONGOING**
- Implement schemes to secure low/zero carbon development and retrofit in the Council's Estate - (Strategic Estates/ Schools/ Housing) by 2030
- Promote and implement the approved policy position to guide new private sector development in the city - Ongoing - Relates to the Planning/development control process **ONGOING**
- Complete Phase 1 of the Cardiff District Heat Network – by **Q4 2023/24**
- Develop a pipeline of new renewable generation assets for cabinet approval in 22/23 - by **Q4 2023/24**
- Deliver Steel Frame Retrofit scheme by Q4 24/25 and work with CCR to finalise arrangements for "LA Flex" Energy Company Obligation funded works and small measures retrofit initiatives by **Q4 23/24**
- Electric Vehicle strategy - Proposals to convert council fleet to electric being reviewed/ assessed to allow for impact of Covid-19 and changes to requirements/ working practices **ONGOING**
- Funding secured from Innovate UK to recruit a new post focussed on integrating Climate Change and Carbon reduction into Council's decision making and budget processes. Recruitment undertaken in Q2 2023/24, with programme of action developed by end **Q4 23/24**

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Partnership</li> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul>
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**Linked Risks**

Coastal Erosion  
Air Quality  
Business Continuity

**Linked Documents**

<https://www.evaccardiff.co.uk/>  
<https://www.cdp.net/en>

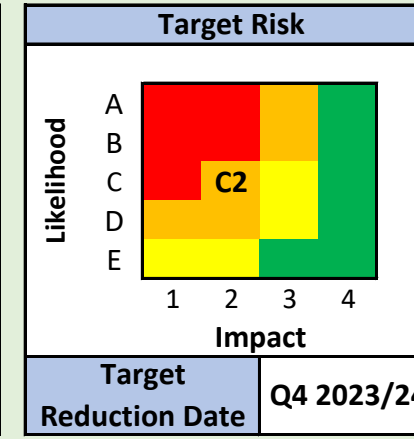
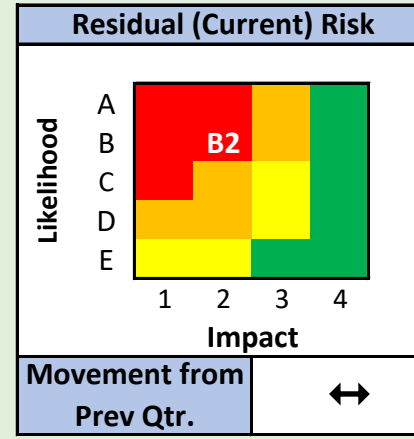
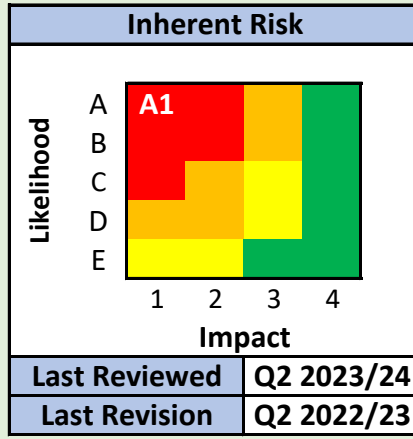
**Key Indicators / Measures used to monitor the risk**

Energy use / renewable energy production of Cardiff Council

Tudalen 409

# Climate Change - Extreme Weather

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.



**Risk Owner(s)**

<b>Andrew Gregory</b> (EMU/Gary Brown)	<b>Councillor Caro Wild</b> Climate Change
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**Potential Impact(s)**

- Loss of life and risk to life
- Damage to infrastructure & utilities
- Service delivery
- Increase in health related issues including air quality
- Blight of development
- Migration of ecosystems

**What we've done/are currently doing to achieve the Residual Risk Rating**

**The Council has declared a Climate Emergency**

**Extreme Heat**

- Working with Partners in the LRF to warn them of anticipated heatwave impacts upon vulnerable groups and support response to such a risk
- Supporting the enhancement of the public's own resilience through advice and guidance available from the EVAC Cardiff Website

**Extreme Cold/ Snow**

- Implementation of Council's Cold Weather Response Plans
- Winter Service review undertaken to consider the potential impact of Covid-19:
  - concentration made to build resilience into Winter Service as high risk to staff resource due to illness and the requirements of isolation
  - required training and staff rotas put in place, however there is a limited available resource with the required skillsets within the authority
  - investigations into feasibility/ availability of external assistance
  - Winter Service 21/22 delivered in line with statutory requirements

**What we plan to do to meet target**

**Extreme Heat**

- Develop a 20 year heat mitigation strategy for the city. Working with partner agencies and commercial stakeholders to support development of heat reduction programmes. - **2023/24**
- Engage with Welsh Government with in WLGA, and PSB to ensure consistent support in managing this risk ensuring the planning process works for all stakeholders to ensure we develop sustainable planning strategy's for future developments, planning the management of this risk (WG Technical Advice Note (TAN) 15) - a new updated Technical Advice Note TAN 15 is due to be published in June 2023 - postponed due to re-consultation and analysis, unlikely to come into force before end of this year - **Q4 2023/24**

**Extreme Cold/ Snow**

- Investigate further whether external assistance can be utilised/is available to build future resilience - risk remains for disruption to the service next winter if the current pandemic continues/ other new external factors emerge - **2023/24**

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Partnership</li> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul>
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**Linked Risks**

Coastal Erosion  
Air Quality  
Business Continuity

**Linked Documents**

<https://www.evaccardiff.co.uk/>  
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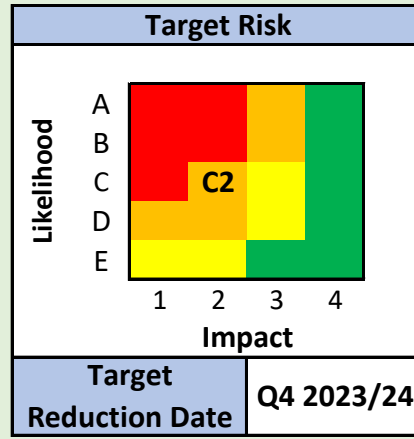
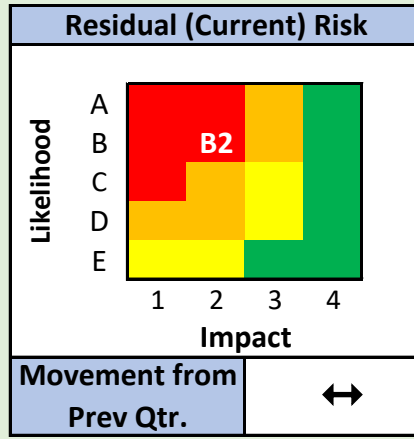
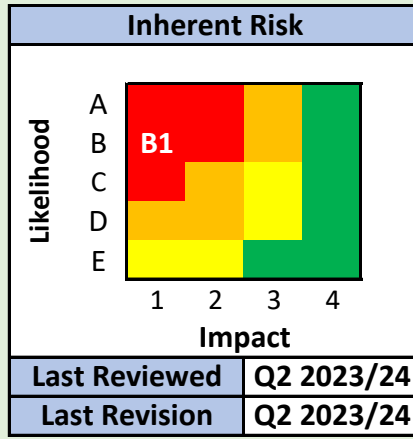
**Key Indicators / Measures used to monitor the risk**

Tudalen 410



# Climate Change - Flooding

**Description**  
Cardiff is not able to manage the effects of climate change and energy security due to lack of future proofing for key (social and civil) infrastructure and business development.



**Risk Owner(s)**

<b>Andrew Gregory</b> (Gary Brown/ Simon Dooley Simon Gilbert/ Stuart Williams)	<b>Councillor Caro Wild</b> Climate Change
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**Potential Impact(s)**

**Flood & Storm**

- Loss of life and risk to life
- Direct damage to property, utilities and critical infrastructure
- Blight of Land and Development
- Disruption to service delivery
- Contamination and disease from flood and sewer water and flood on contaminated land
- Increase in health issues
- Break up of community and social cohesion
- Increase cost of insurance
- Migration of ecosystems
- Associated impacts of river flooding not owned by NRW

Tudalen 411

**What we've done/are currently doing to achieve the Residual Risk Rating**

The Council has declared a Climate Emergency

**Flood & Storm**

- Working with partners within the Local Resilience Forum (LRF) to support the management of this risk including supporting the emergency response to this risk
- Supporting the enhancement of the public's own resilience through advice and guidance available from the EVAC Cardiff Website
- Implementation of Schedule 3 of the Flood and Water Management Act 2010 requires all new development over 100m2 to implement sustainable drainage, resilient to flooding
- We have introduced Flood Incident Management software to provide better understanding of spatial distribution of flood events filtered by source, and determine priority areas for future flood alleviation schemes to be implemented (subject to WG funding bid opportunities). Successful funding bids were submitted and funding awarded in 20/21 for Business Justification Cases for a number of these schemes, with grant funding also now awarded for 21/22 for continuation of these schemes.
- Applications to WG were successful for grant funding in 2021/22 to support studies and implementation of localised flood prevention schemes.
- Ongoing CCTV and asset capture work taking place in drainage networks to review high risk areas.
- Asset management - Delivery of Flood Management and Coastal Improvement Schemes and rationalise/ prioritise gully maintenance schedule based on the outputs of the Flood Incident Management software - Phase 1 of new gully maintenance schedule completed.
- Highway Asset Management Plan approved by Cabinet in Q4 2022/23 - This captures the asset types, responsibilities and financial challenges.

**What we plan to do to meet target**

**Flood & Storm**

The following actions are ongoing :

- Completion by October 2023 of a draft combined Flood Risk Management Strategy and Flood Risk Management Plan as required by The Flood and Water Management Act (2010) and The Flood Risk Regulations (2009) respectively. The final strategy must be submitted to Welsh Government and published by March 2024 - The flood risk strategy will be delayed past Q3 2023/24 due to resource issues within this specialist area. Recruitment continues with reviews of post grades. Welsh Government have been made aware of the delays being experienced.
- Develop enhanced engagement programme with partners supporting the public in enhancing their own resilience - this will be a key aspect of the above Plan - initial discussions with Dwr Cymru/Welsh Water and Natural Resources Wales (NRW) have taken place, work is ongoing - Target **Q3 2023/24**
- Improve communication on what to do in a flood and raise awareness of risk - as above - initial talks underway to produce a role & responsibilities video, as well as flood safety guidance in co-operation with Dwr Cymru/Welsh Water, NRW and Blue Light organisations **ONGOING**
- Improve the service provided by the SuDS Approval Body (SAB) through additional resource - Recruitment remains unsuccessful, a grade review process is ongoing - **Q4 2023/24**
- Deliver guidance to increase standards and ease of development - in development **Q3 2023/24**

**Flood Risk Management Programme:**

- Phase 2 of new gully maintenance schedule delivered by Q3 2023/24
- The Flood Risk Management Team have been successful in achieving Welsh Government funding to undertake full business case development to identified flood risk areas in the City in 2023/24.
- Funding has been achieved to deliver property level flood protection at a number of locations. Some works have been delivered and others are ongoing during **Q2/3 2023/24**.
- Detailed design has commenced on the Whitchurch flood alleviation scheme (Greener Whitchurch). Consultation with Key Stakeholders and Local Members has commenced and is ongoing.
- Further FBC's are being developed for identified flood risk area in the city

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Partnership</li> <li>• Community &amp; Environment</li> <li>• Stakeholder</li> </ul>
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**Linked Risks**

- Coastal Erosion
- Air Quality
- Business Continuity

**Linked Documents**

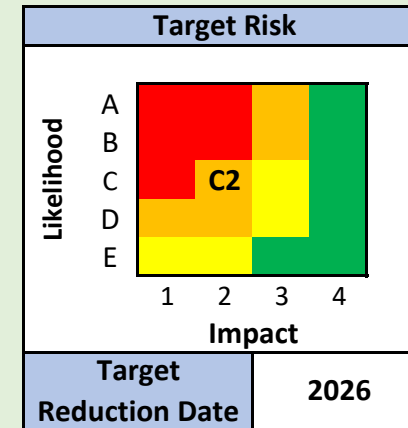
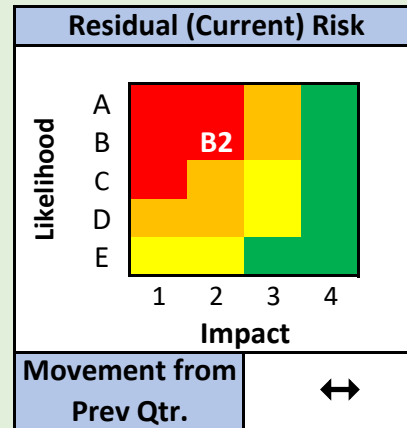
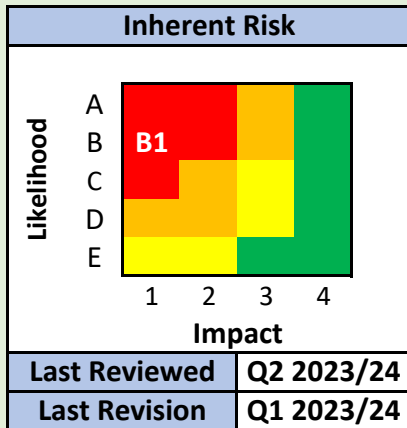
- <https://www.evaccardiff.co.uk/>
- <https://www.cdp.net/en>

**Key Indicators / Measures used to monitor the risk**

- Storm Events that meet silver & gold emergency intervention
- Annual number of flooded properties and severity (statutory reporting)
- Energy use / renewable energy production of Cardiff Council

# Coastal Erosion

**Description**  
Breach of current defences resulting in widespread flooding (current defences are ad hoc and are in a very poor condition)



**Risk Owner(s)**

**Andrew Gregory**  
(Matt Wakelam/ Gary Brown/ Simon Dooley)

**Councillor Caro Wild**  
Climate Change

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Incident management arrangements are in place, which whilst not preventative, represent a level of emergency management for a flood and coastal erosion risk event occurring in a significant storm event.  
Coastal Defence Scheme:
- The Flood Risk Management Team are undertaking detailed design for the coastal defence scheme - the necessary works are holistic and cannot be phased, therefore residual risk rating cannot be lowered until the completed construction of the coastal defence scheme in its entirety.
- The inundation risk will be improved by implementing the coastal defence scheme, which will provide defence for a 1 in 200 year severe weather event, plus an allowance for climate change influence of 40%.
- The total costs associated with the Design, Early Contractor Engagement and Construction phases were originally estimated at £10.9m (Welsh Government 75% funding = £8.2m and CCC 25% funding = £2.7m)
- Formal application was submitted to Welsh Government (WG) under the WG Coastal Risk Management Programme and development of the Detailed Design and Full Business Case (FBC) was programmed for completion in May 2020, however was impacted by Covid-19.
- Work ongoing with Emergency Management to formulate interim measures.
- Due to the costs of funding the East side (Lamby Way), that WG will not fund, it has been removed from the scheme. Following completion of scheme the risk to properties will be addressed, however, a risk to significant infrastructure including Lamby Way landfill will remain in place, and is being dealt with as a directorate based risk.

Scheme Delivery Progress update:  
At the request of WG, approval of the full business case and therefore financial confirmation was not provided until 2023/24:

Key steps:

- Approval by Welsh Government of the FBC and funding allocation received Q1 2023/24
- Internal legal and procurement processes completed
- Contract awarded to Knights Brown
- Client (CC)/Contractor pre-contract meetings commenced

**What we plan to do to meet target**

We will be designing & delivering an effective coastal flood protection scheme as a matter of priority - Anticipated construction starting 2023, with completion 2025/26.

Key steps:

- Commence construction - Anticipated on-site commencement date Q3 2023/24 following WG extension of funding programme due to various challenges. **Q3 23/24**

**Potential Impact(s)**

- Continued coastal erosion along the coast threatening the Rover Way Traveller site and critical infrastructure including Rover Way and the Rover Way/Lamby Way roundabout
- Erosion to two decommissioned landfill sites, with risk of releasing landfill material into the Severn Estuary and having significant environmental impacts
- Flood risk to 1,116 residential and 72 non-residential properties over 100 years, including risk to life, property, infrastructure and services
- N.B. the predicted rates of erosion threaten the Rover Way Travellers Site and the adjacent electrical substation within 5 years, and further release of large volumes of unknown tip material from the Frag Tip into the Severn Estuary.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>Health &amp; Safety</li> <li>Health</li> <li>Reputational</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Strategic</li> <li>Service Delivery</li> </ul>
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**Linked Risks**

Climate Change risks

**Key Indicators / Measures used to monitor the risk**

- Award of contract for detailed design and Full Business Case - achieved
- Completion of detailed design and Full Business Case by May 2020 & submitted to WG
- Delivery programme of coastal protection scheme

Judalen 412

# Performance Management

**Description**

The risk that the Council's Performance Management arrangements do not provide timely performance information to allow the Council's political and managerial leadership to effectively deliver corporate priorities, statutory services or performance improvement

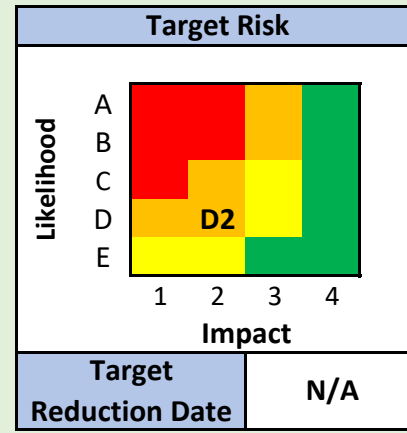
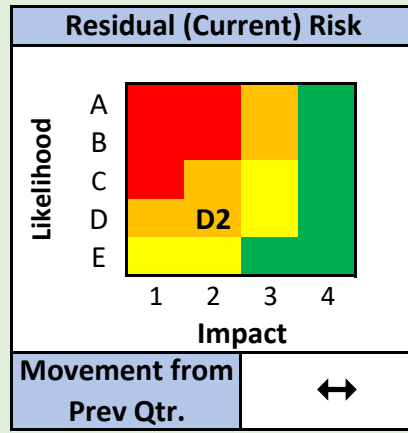
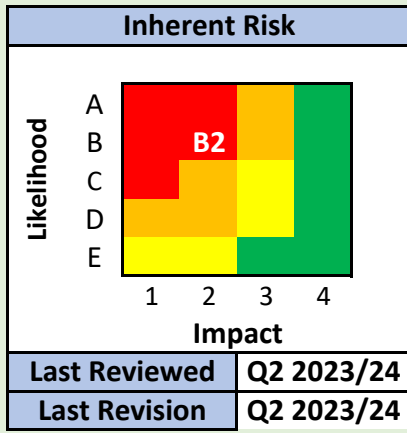
Performance Management arrangements are essential for discharging statutory requirements, delivering the administration's priorities and ensuring Council core business is delivered effectively. Weak corporate performance management arrangements heighten the risk of poor performance, service failure, financial overspend or legal non-compliance going unidentified, unchallenged and unresolved.

The Council must therefore maintain a focus on the Key Performance Indicators it has identified within the Corporate Plan as a pointer to overall organisational success. The Council must also ensure that more granular indicators of performance- the Council's Core Data which is managed by individual Directorates- are established and monitored to provide more detailed insight into the drivers of corporate performance.

Changes to the Statutory Performance Requirements have been set out in Local Government & Elections Act, and new processes have been put in place within the Council to embed these requirements in the performance management framework.

- Potential Impact(s)**
- Council unable to effectively deliver corporate priorities, statutory services or performance improvement
  - Failure to comply with performance duties set out in the Wellbeing of Future Generations Act and Local Government and Elections Act.
  - Compliance failure leading to external sanctions and reputational damage.

- Type(s) of Impact**
- Service Delivery
  - Reputational
  - Stakeholder



**Risk Owner(s)**

**Sarah McGill**  
(Gareth Newell)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

Audit Wales have undertaken an assessment of the Council's process for setting of well-being objectives while developing the Corporate Plan, and the links to the partnership Well-Being Plan (<https://www.audit.wales/publication/cardiff-council-well-being-objective-setting-examination>). The Audit Wales report was received in June 2023 and contained no recommendations. Audit Wales found that "The Council has used the sustainable development principle to drive the setting of its well-being objectives including good use of data and a strong collaborative approach." The report also concluded that 'the Council has robust arrangements for monitoring its Corporate Plan and wellbeing objectives throughout the year.'

As part of the Council's Internal Audit Programme, an audit of performance management was undertaken in Quarter 1 2023/24 across all Directorates during Quarter 1 2023/24. The purpose of the audit was to provide assurances that there is a sound system of internal control within the area under review. The audit found overall assurance ratings to be effective across the board, with a small number of recommendations provided for improvement, all of which have been accepted with management responses provided.

To inform the Council's Annual Well-Being Report, a series of assurance sessions with the CEX were scheduled where directors presented their directorate self-assessment exercises, all of which informed the development of the Council's statutory self-assessment of performance; the Annual Wellbeing Plan.

The Council's Annual Well-being Report 2023 was formally considered by Performance Panel (which brings together all Scrutiny Chairs) in June and the Policy Review and Performance (PRAP) Scrutiny Committee. The report was also considered Governance & Audit Scrutiny Committee and, in preparation for this this, a briefing session was held with the committee on 21 June 2023 on the performance requirements of the Council. Consideration by the Performance Panel, Policy Review and Performance Scrutiny Committee and Governance and Audit Committee preceded the report being formally considered by Cabinet in July 2023 and Council in September 2023. Performance is also presented via the Corporate Performance Dashboard, which is now available to all Members, as well as the public, as an interactive appendix to the Cabinet Report relating to the Well-being Report.

A number of recommendations on the Report were given by Performance Panel, all of which were either accepted or partially accepted. Governance & Audit Scrutiny Committee and PRAP Scrutiny Committee provided no formal recommendations, expressing their satisfaction with the report and noting the improvements made following recommendations on the previous report in 2022. Governance & Audit Committee stated that in their view "a robust exercise has been completed in which duties have been sufficiently discharged".

**What we plan to do to meet target**

To improve the presentation of performance management information, the Corporate Performance Dashboard now includes the steps and KPIs from the Corporate Plan **2023-26**. Work will continue throughout the year to keep the dashboard up to date with performance updates each quarter.

The dashboard presents the latest updates against every step and KPI from the Council's Corporate Plan in an interactive format that can be filtered by directorate, wellbeing objective, and by scrutiny committee. The Team will continue to collect feedback from users in order to make usability improvements, while also improving how data is stored and managed in the background.

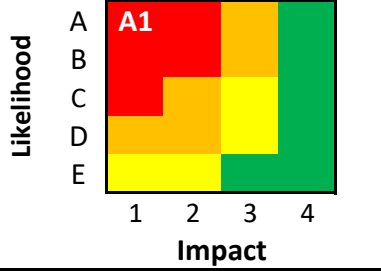
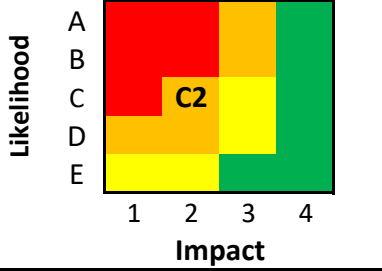
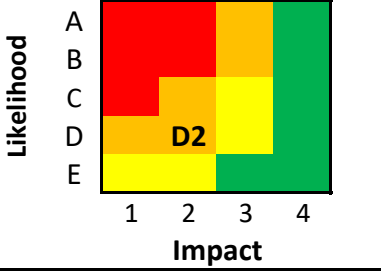
The next Chief Executive Assurance Sessions will be scheduled in Q3 to inform the Mid-Year Self-Assessment Report. **Q3 23/24**

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

Quarterly monitoring of corporate plan indicators (159) provide a pointer to organisational health and corporate performance. Corporate Plan indicators are also risk assessed as part of the performance monitoring process.

## Budget Monitoring (Control)

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)																	
<p>Failure to achieve the budget set, inclusive of budgeted spend and savings across Directorates, with increased use of emergency finance measures and the unplanned drawdown of reserves.</p>	 <table border="1" style="width: 100%; text-align: center; font-size: small;"> <tr><td colspan="2">Last Reviewed</td><td colspan="2">Q4 2022/23</td></tr> <tr><td colspan="2">Last Revision</td><td colspan="2">Q4 2022/23</td></tr> </table>	Last Reviewed		Q4 2022/23		Last Revision		Q4 2022/23		 <table border="1" style="width: 100%; text-align: center; font-size: small;"> <tr><td colspan="2">Movement from Prev Qtr.</td><td colspan="2">↔</td></tr> </table>	Movement from Prev Qtr.		↔		 <table border="1" style="width: 100%; text-align: center; font-size: small;"> <tr><td colspan="2">Target Reduction Date</td><td colspan="2">Q4 2023/24</td></tr> </table>	Target Reduction Date		Q4 2023/24		<p><b>Chris Lee</b> (Ian Allwood)</p>	<p><b>Councillor Chris Weaver</b> Finance, Modernisation and Performance</p>
Last Reviewed		Q4 2022/23																			
Last Revision		Q4 2022/23																			
Movement from Prev Qtr.		↔																			
Target Reduction Date		Q4 2023/24																			
What we've done/are currently doing to achieve the Residual Risk Rating			What we plan to do to meet target																		
<ul style="list-style-type: none"> <li>Clear financial procedure rules that reduce the level of risk of financial commitments being identified late in the financial year. The rules clearly set out the roles and responsibilities for budget management and are an area of interest for internal audit.</li> <li>Month 4 Monitoring report indicated an Directorate overspend but with further work required until the end of the year to achieve a balanced position. Management controls have been put in place which include reviews on all vacant posts as well as controls on spend.</li> <li>The Corporate Directors of Resources and People collectively have continued to hold challenge meetings with each individual Director in order to ensure joint understanding of financial matters and any mitigations to be put in place.</li> <li>Regular meetings continue to be held in respect to key overspend areas in Children's Services, Education (Home to School Transport and Economic Development. These meetings are used to identify keep reassures and deliver effective mitigations which at least stems the overspend.</li> <li>Continual regular oversight on short and medium term impacts of price inflation in order to react to changes quickly. There is an increased reliance on Directorate Delivery areas to flag up inflation issues as they arise as they are best placed to see them first.</li> <li>Close working with Service areas in order to identify cost pressures and compensating mitigation strategies that impact on delivery of Capital Programme and repair schedules to ensure works remain within budget. Where those budgets cannot be maintained then consideration of delays / reprofiling of programme are undertaken.</li> <li>Regular review and refresh of key matters / risks in order to ensure focus is maintained in areas of high uncertainty and cost impact as a result of exceptional inflationary pressures that arise</li> </ul>			<ul style="list-style-type: none"> <li>2023/24 Month 6 monitoring report scheduled for November 2023</li> <li>2023/24 Month 9 monitoring report scheduled for February 2024 - Underpinning the above reports will be a continued review which will identify any need of mitigations due to overspend pressures, reduction in income or saving proposals not being delivered as anticipated.</li> </ul>																		
Type(s) of Impact		Linked Risks		Key Indicators / Measures used to monitor the risk																	
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>		<p>Financial Resilience</p>		<ul style="list-style-type: none"> <li>Monthly Directorate Monitoring reports detailing likely outturn position and performance against savings accepted</li> <li>Review of use of earmarked reserves and balances - Half Yearly</li> <li>Amount of Hardship Support claimed successfully</li> </ul>																	
Potential Impact(s)																					
<ul style="list-style-type: none"> <li>Inability to balance spend against budget, for the financial year</li> <li>Requirement to implement emergency measures to reduce spending during the financial year thus adversely impacting on ability to meet Corporate Plan objectives</li> <li>Requirement to draw down from General Reserves at the year end</li> </ul>																					

Tudalen 414



# Financial Resilience

## Description

- Failure to deliver a balanced annual budget and a fully informed Medium Term Financial Plan.
- Lack of appropriate mechanisms to identify and manage unexpected financial liabilities.
- The Q1 outlook is that there is a Budget Gap of £113 million for the period 2024/25 to 2027/28.

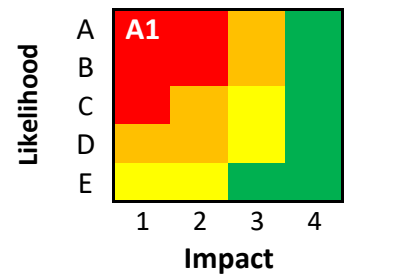
## Potential Impact(s)

- Failing to meet statutory obligations and potential for service delivery to be adversely affected.
- Reputational damage to the Council.
  - Needing to draw down significant unplanned amounts from reserves.
  - Inability to progress policy initiatives through incomplete Full Business Cases and no forthcoming external funding to bridge any affordability gap
  - Inability to manage adverse external factors - e.g. adverse settlements, WG rent policy etc.
  - Financial constraints and budget proposals result in unintended consequences such as increased instances of non-compliance and financial impropriety.
  - Requirement for significant savings at short notice that are therefore not identified in a coherent, strategic way and which impact on service delivery.
  - Level of borrowing limits the ability of future generations to take forward new priorities.
  - Reaching the point where a s114 notice is required to be issued by the S151 Officer.

## Type(s) of Impact

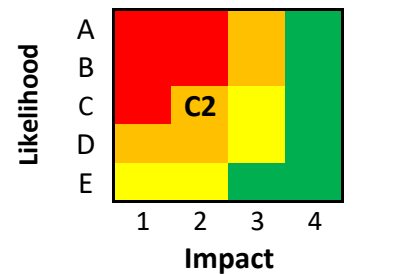
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| <ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul> | <ul style="list-style-type: none"> <li>• Stakeholder</li> </ul> |
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## Inherent Risk



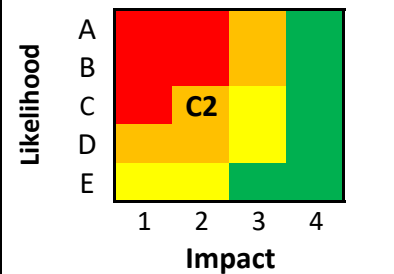
Last Reviewed	Q1 2023/24
Last Revision	Q1 2023/24

## Residual (Current) Risk



Movement from Prev Qtr.	↔
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## Target Risk



Target Reduction Date	Q3 2023/24
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## Risk Owner(s)

Chris Lee  
(Ian Allwood)

Councillor  
Chris Weaver  
Finance, Modernisation and  
Performance

## What we've done/are currently doing to achieve the Residual Risk Rating

### 2023/24 and Medium Term

- Regular monitoring to understand the in-year position and gain early insight into emerging risks that need to be factored into the MTFP work. This includes the identification of earmarked reserves that were either increased during outturn of 2021/22 and those being reviewed to establish level of need reflecting the current priority is balanced budget.
- Engaging and working in partnership with directorates during the budget process to ensure that budget proposals and services are deliverable within timescales and quantum (revenue and capital)
- Mechanisms in place such as Treasury Management Reserve and Financial Resilience Mechanism in order to dampen the impact of a worse than anticipated financial climate / settlements.
- Preparation of Prudential Indicators to help assess the affordability, prudence and sustainability of the capital programme and associated levels of borrowing
- Close alignment with Corporate Plan objectives, to ensure resources are allocated appropriately, and that longer term financial savings are developed in enough time to be realised.
- Annual review of contingent assets and liabilities, and provisions to ensure the Council has adequate cover for emerging liabilities.
- An approved TM Strategy that identifies borrowing interest cost as a significant risk to be managed. Security, Liquidity and Yield in that order to preserve investments.
- A Major Projects accountancy function supporting the identification of key risks / financial issues in relation to large schemes. Targeted accountancy support to Children's Services, VAT and Outside Bodies.
- Maintaining approach to robust financial control mechanisms and strengthening complex / areas of risk through training e.g. VAT.
- Undertaken initial assessment against CIPFA FM code with high level findings. There will be a future need to review and refresh.
- Inclusion within the 2022/23 Budget of a £10 million COVID Contingency Budget to protect the Council's resilience in light of the ending of the Hardship Fund on 31/3/22. This assisted in achieving a balanced outturn position for 2022/23 and provided capacity to facilitate more permanent realignments as part of the 2023/24 Budget Process.
- Established a corporate approach to business case development, approval and post project monitoring to ensure expenditure assumed to pay for itself can do so over its expected life thus providing assurance that financial resilience will not be undermined by projects exceeding their cost parameters.

## Linked Risks

Budget Monitoring (Control)

## Key Indicators / Measures used to monitor the risk

- Financial Snapshot which highlights historical & current performance with regards budget monitoring, achievability of savings, levels of borrowing, and financial ratios.
- Outturn vs Budget: Main budget lines under or overspend as a % of budgeted expenditure.
- Delivery of planned savings: Total (£) unachieved planned savings as a % of total (£) planned savings.
- Use of reserves: 1) Ratio of useable reserves to Net Revenue Budget (NRB), 2) Amount of useable reserves used to balance budget as % of NRB.
- Council tax: 1) Council tax and other income as % of NRB, 2) Council tax collection rates (in-year actual).
- Borrowing: 1) Total commercial investment income as % of total net general fund budget, 2) Total (£) commercial investments and (£ plus%) amount funded from borrowing, 3) Borrowing related to commercial investments as % of General Fund total borrowing, 4) Capital interest costs and MRP as a proportion of NRB.
- Performance against Budget Timetable.
- Frequency / timeliness of engagement with SMT/Cabinet.
- Proportion of Savings Proposals in Realised or at Delivering stage.
- Section 151 Officer Statement in respect of capital strategy, adequacy of reserves and other statutory commentary.
- Consider usefulness of benchmarking data re: financial resilience produced by External Audit Bodies - e.g. Audit Wales

## What we plan to do to meet target

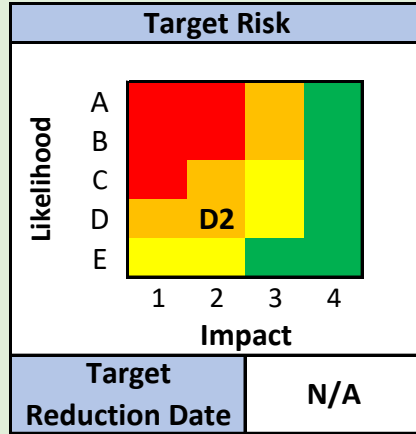
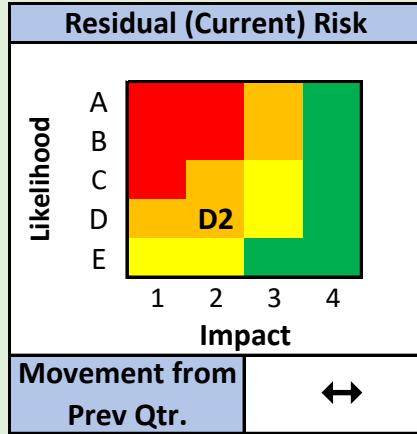
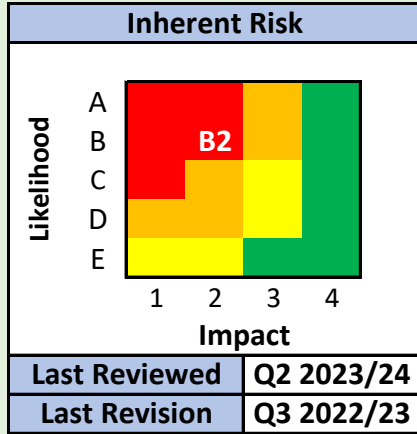
### 2023/24, 2024/25 and the Medium Term

- Strengthening links between financial planning and asset management strategies, which consider the current condition of assets and future requirements. **Q2 2023/24**
- Work with Property Service to ensure clear, detailed plans and timescale for delivery of capital receipts targets. **Q2 2023/24**
- Enhance focus on a multi-year position (recognising limitations where settlement information is for one year only.) **Q3 2023/24**
- Review approach to governance and financial monitoring of special purpose vehicles to ensure liabilities and any financial guarantees are understood and are appropriate. **Q2 2023/24**
- Refresh self-assessment against the CIPFA FM code and Balance Sheet Review and develop implementation plan in respect of any findings or recommendations, which provide further financial resilience. **Q3 2023/24**
- Confirm approach and reporting of commercial investments as part of standard monitoring processes and reports. **Q3 2023/24**
- Continue to work within current structures to ensure appropriate governance is undertaken. **ONGOING**
- Regular monitoring of 2023/24 position to gain early insight into risks to factor into medium term planning **ONGOING**

# Fraud, Bribery & Corruption

**Description**

Fraud, financial impropriety or improper business practices increase as internal controls are weakened as resources become severely stretched.



**Risk Owner(s)**

**Chris Lee**  
(Ian Allwood)

**Councillor Chris Weaver**  
Finance, Modernisation and Performance

**What we've done/are currently doing to achieve the Residual Risk Rating**

- The Council communicates a zero-tolerance approach to fraud, bribery and corruption.
- Regular review of relevant policies and procedures e.g. the Fraud, Bribery and Corruption Policy, Anti-Money Laundering Policy and Disciplinary Policy.
- Financial Procedure Rules and Contract Standing Orders and Procurement Rules and training.
- National Fraud Initiative data matching exercises in collaboration with the Cabinet Office and Audit Wales.
- Receipt and dissemination of fraud intelligence alerts from law enforcement agencies.
- Regular counter-fraud updates to the Section 151 Officer, Governance and Audit Committee, Portfolio Cabinet Member and the Chief Executive.
- Governance and Audit Committee review of the risk management, internal control and corporate governance arrangements of the authority.
- Independent assurance from Internal and External Audit on the effectiveness of governance, risk and control.
- Mandatory disciplinary e-learning module for all managers to complete and a programme of mandatory e-learning modules and training for Disciplinary Hearing Chairs, Investigating Officers and Presenting Officers.
- Fraud Publicity Strategy, to publicise the Council's approach to counter fraud work / sanction activity and explain the roles and responsibilities of key parties.
- Counter-Fraud and Corruption Strategy, with associated Fraud Awareness eLearning and face-to-face training rolled out.
- Annual participation in International Fraud Awareness week.
- Investigation Team provision of investigation and counter-fraud advice, guidance and support.
- SMT annual participation in CIPFA fraud tracker assessment and response.
- Revised 'Anti-Money Laundering Policy' approved by Cabinet in Q3 2020/21 and eLearning rolled out to officers with key roles and those working in high-risk areas.
- 'Authorisation and Protocol Requirements for Review of Work Activities' approved by Cabinet in Q4 2020/21.

**What we plan to do to meet target**

- Review the suite of Counter-Fraud Operational Policies alongside the review of the Council's Disciplinary Policy underway. Targeted to conclude during **2023/24**.
- Monitoring and reporting completion rates of mandatory fraud awareness training and anti-money laundering training. **Ongoing**

**Potential Impact(s)**

- Increase in frauds and losses to the Council
- Reputational risk as more frauds are reported
- Increased time investigating suspected fraud cases impacting on capacity

**Key Indicators / Measures used to monitor the risk**

- Mandatory Fraud Awareness eLearning completion and face-to-face attendance rates
- Anti-Money Laundering eLearning completion rates
- Delivery of Fraud Awareness week campaign annually
- Delivery of Policy updates in accordance with associated targets
- Delivery of mandatory investigating officer training and the note taker training
- Timely completion of casework and investigations
- Provision of timely investigation and counter-fraud advice, guidance and support to Directorates
- Adherence to the NFI Security Policy and annual completion of compliance forms

**Type(s) of Impact**

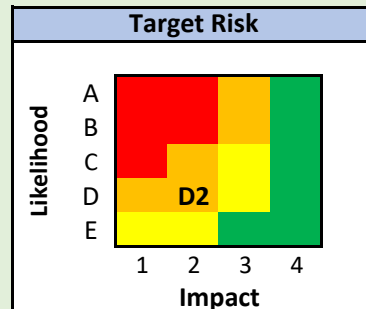
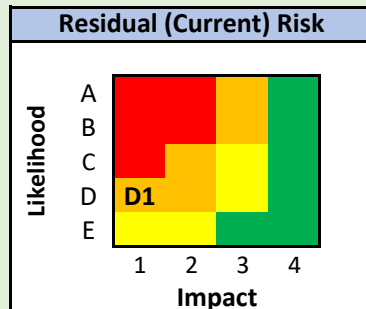
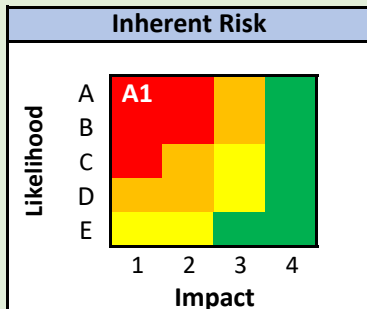
- Service Delivery
  - Reputational
  - Legal
  - Financial
- Stakeholder

**Linked Risks**

Tudalen 416

# Information Governance

**Description**  
 Information handled inappropriately leaves the Council exposed to intervention and financial penalties issued by the Information Commissioner (ICO). This includes information held by Cardiff Schools.



Last Reviewed **Q2 2023/24**  
 Last Revision **Q2 2023/24**

Movement from Prev Qtr. **↔**

Target Reduction Date **Q3 2023/24**

**Risk Owner(s)**

Chris Lee (Dean Thomas)	Councillor Chris Weaver Finance, Modernisation and Performance
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**What we've done/are currently doing to achieve the Residual Risk Rating**

- Gold level assurance has been achieved through the annual Cyber Security Plus ISAME Accreditation in September 2022, the next annual accreditation of this process will take place in September 2023
- A quarterly Information Governance Report and briefings of decisions or recommendations are provided on a quarterly basis to the Information Governance & Security Board, along with any concerns and risks from IG risk registers.
- A corporate Information Asset Register is held which details personal data assets held by each Council directorate. The next review scheduled for August 2023.
- Service Level Agreements in place for Schools Information Governance Support (All Cardiff Schools) and where Cardiff Council is the Data Controller for regional services, including Rent Smart Wales, National Adoption Service and Cardiff Capital City Deal.
- Corporate Retention schedule is in place and updated annually in line with any legislative changes or in line with any requests from services to update.
- Information Governance Maturity Model established to monitor risks against areas of information governance to feed into corporate risk status.
- The Digitisation of Paper Records Strategy and associated business process changes are in place with alternative delivery contracts in place to support increased paper storage demands, with processes established to support corporate programmes.
- Data Protection e-learning training available for Council staff to complete. Managers are able to monitor compliance with information provided as part of the Information Governance Board Report.
- An Information Governance Champions Group has been established.
- The Data Protection Officer has established a Data Protection Impact Assessment Panel to ensure that all changes to data processing activities are considered and any risks documented and escalated where necessary.
- Corporate escalation processes embedded to improve directorates failure demand with answering and providing information in respect of FOI requests .
- Support is being provided to Legal Services and HR with ensuring that an appropriate agreement is put in place to manage data protection risks associated with employee information data transfers and handling with TCS.
- Released training and education communications to support schools with their Information Governance responsibilities.
- All Directors have received a copy of the Record of Processing Activity (RoPA) and have been asked to prioritise this review for their respective directorates supported by Information Governance. The ROPA return will be used to support ICT with gathering information on non personal data systems and a review of security and protection linked with Cloud Impact Assessment processes
- A process has been established with procurement to identify new tenders involving personal data. Results from the Pre Tender Reports are then provided to ISB to enable Information Governance & Security Board to have oversight of DPIA's completed against Procurement Contract Awards
- A paper was taken to ISB in relation to compliance with the 12 principles of the Surveillance Camera Code of Practice, A response has also been issued to the Surveillance Camera Code of Practice Annual survey and action plan for improvements will be initiated to improve accountability and compliance with CCTV operations when a response is received
- New training modules on FOI and Data Protection launched to school staff Q2 2023/24

**What we plan to do to meet target**

- Consider options for destruction processes for the Council's Records Centre. **Q3 2023/24**
- Publish an online Publication Scheme taking onward recommendations from the Information Governance & Security Board. **Q3 2023/24**
- An Information Governance Framework will be developed to help provide assurance of IG processes within Directorates. Implement during **Q4 2023/24**
- A new FOI e-learning module is being designed and will be made available via Cardiff Academy. Further training options will be presented to IGSB to decide who the training will be available to **Q3 2023/24**
- Emails and teams retention to be reintroduced Q3 2023/24 - 1 year retention to be achieved by end of **Q4 2023/24**

**Potential Impact(s)**

Leads to the Information Commissioner issuing notices of non-compliance

These could consist of:

- A "Stop Now" Order which would mean that no personal data could be processed by the Council in its entirety
- An Information Notice which would mean that a service would have to provide information in a very limited period thereby impacting on service delivery
- A Decision Notice could be issued as a result of non compliance with an FOI/EIR request which would require information disclosure
- Undertaking which requires an Action Plan of Remedial Measures which would be subject to ICO Audit
- Enforcement Notice requires immediate improvement action to be put in place
- Financial Penalty up to £17.5 million for Higher Level Tier and £8 million for Lower Level Tier breaches of the Data Protection Act.
- Compensation unlimited liability claims for damages as a result of a data breach from individuals.

**Type(s) of Impact**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul> | <ul style="list-style-type: none"> <li>• Stakeholder</li> </ul> |
|--|---|

**Linked Risks**

Cyber Security

**Key Indicators / Measures used to monitor the risk**

- Suite of IG Indicators/Service Metrics
- No. of ICO complaints
- No. of FOI /EIR SAR Requests
- No. of individuals trained on Data Protection
- No of Data Protection Impact Assessments being undertaken
- No of data protection breach complaints/claims

# Cyber Security

**Description**

There are 10 areas of potential risk identified within the National Cyber Security Centre cyber risk model. These cover :-

- Risk management
- Engagement and training
- Asset management
- Architecture and configuration
- Vulnerability management
- Identity and access management
- Data security
- Logging and monitoring
- Incident management
- & Supply chain security

<https://www.ncsc.gov.uk/collection/10-steps>

Cardiff uses this framework to continually assess our cyber security maturity level and improve both proactive measures to prevent attacks, and reactive measures to deal with potential incidents

**Potential Impact(s)**

The intent of cyber attackers includes, but is not limited to:

- financial fraud;
- information theft or misuse,
- activist causes to render computer systems intolerable and to disrupt critical infrastructure and vital services.

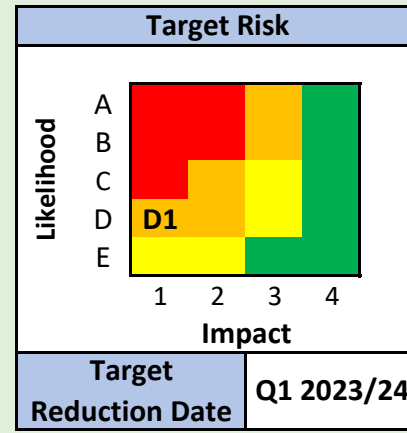
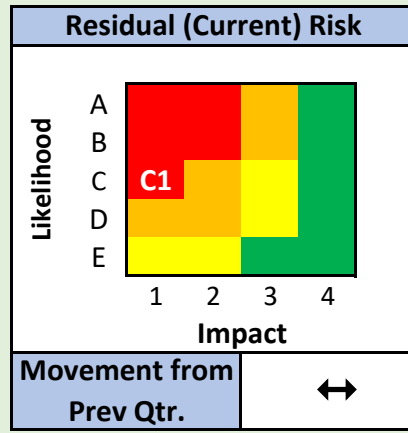
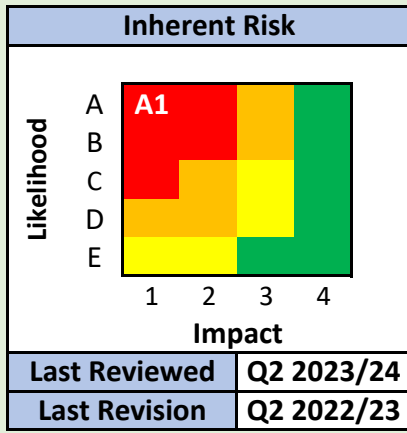
The impact of a cyber-attack / incident has the potential to involve the realisation of the risks associated with:

- An information governance breach (i.e. Stop Now Order, Information Notice, Enforcement Notice, Financial Penalty etc.)
- A business continuity incident – with a potential for major loss of service and legal, health and safety and financial implications.
- A financial / fraud related attack.

A malicious attack could result in loss of confidence from those transacting with the Council (reputation), as well as legal, asset, system, operational and financial implications.

**Type(s) of Impact**

<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Stakeholder</li> </ul>
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**Risk Owner(s)**

Chris Lee (Phil Bear)	Councillor Chris Weaver Finance, Modernisation and Performance
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**What we've done/are currently doing to achieve the Residual Risk Rating**

The principal controls for the high risk areas are as follows:

- Cybersecurity risk assessments
- Audits and remediation of identified issues
- Network access controls
- Implementing cyber security systems & tools to prevent attack
- Active patch management
- Network traffic monitoring
- Incident response planning
- Links to physical security measures
- Attack surface minimisation
- Employee education on cybersecurity best practices and policies
- Supply chain management

**What we plan to do to meet target**

- A continuing focus on improving cyber security processes within the council
- Threat intelligence reporting which will inform any required changes to our cyber security processes and policies
- Liaison with key cyber security agencies to both receive and share information and guidance on best practice
- Monitoring of progress on cyber security improvement actions
- Reporting to relevant internal governance boards on cyber compliance status, threats and risks

**Linked Risks**

Information Governance

**Key Indicators / Measures used to monitor the risk**

- Threat intelligence from National Cyber Security Centre (NCSC), including national posture and guidance via the National Cyber Security Strategy/Programme
- Threats and risks highlighted by NCSC Cyber Security Information Sharing Partnership (CiSP), Cymru WARP (Warning, Advice and Reporting Point) and Welsh Government/WLGA
- General UK posture and issues raised in national and local media
- Number of compromises - breaches are monitored, investigated and reported back via Information Security Board and where applicable the ICO
- Monthly reporting of number of virus attacks via email blocked



# Business Continuity

**Description**

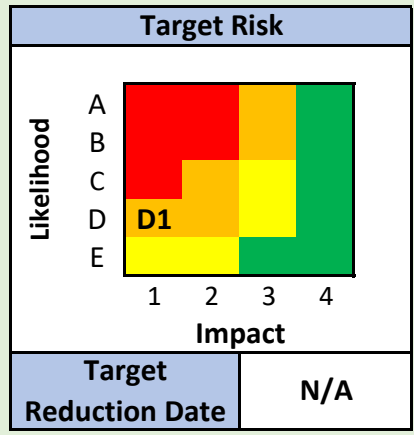
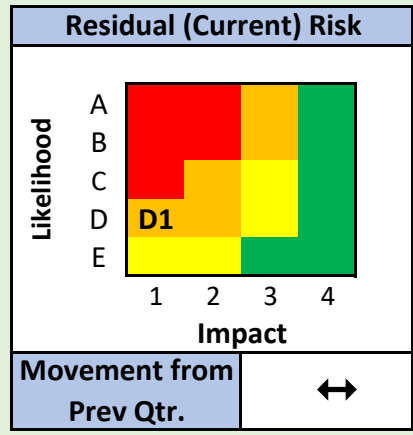
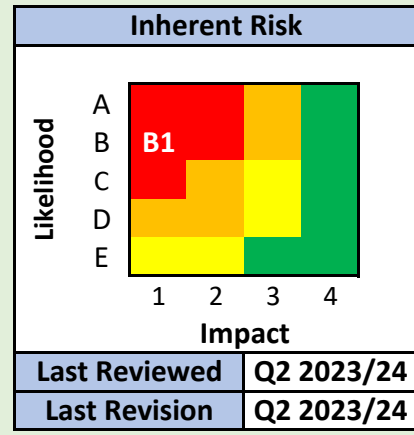
Large scale incident/loss affecting the delivery of services.

The potential risk is that our most time sensitive activities are not sufficiently resilient and fail, following an incident which impacts on their delivery and that our incident management structure, used in response to internal incidents and external emergencies, also fails in response to an incident.

**Potential Impact(s)**

- **Health and Safety** – potential impact on staff and on the public relying on our most, time sensitive, critical services
- **Legal action** -Failure of key services could lead to Legal action against the council
- **Financial** - Failure of key services could led to significant financial cost both in terms of Ombudsman action and Enforcement action from regulatory bodies, as well as individual legal action against the corporate body where service failure leads to legal action against us from private claimants
- **Reputational** - Impact on key services to the public could lead to significant reputational damage to the organisation
- **Stakeholder** – Impact on key stakeholders as result of failure
- **Service delivery** – Potential significant impact on service delivery to the public, impact of key services could lead to significant impacts to the public and the corporate body un delivering its services

Type(s) of Impact	
<ul style="list-style-type: none"> <li>• Service Delivery</li> <li>• Reputational</li> <li>• Legal</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Safety</li> <li>• Stakeholder</li> </ul>



**Risk Owner(s)**

Chris Lee / Deborah Marles

Councillor Huw Thomas  
Leader

**What we've done/are currently doing to achieve the Residual Risk Rating**

- The Council has a BCM Champion who sponsors BCM at a strategic level
- We have an approved Business Continuity Policy which is aligned to ISO22301:2012
- BCM toolkit is available on CIS or by contacting the Resilience Unit, as the organisation continues its transition to SharePoint.
- The Council employs a Business Continuity Officer who is a qualified ISO22301:2012 lead auditor.
- The Council has a 24 hour Incident Management structure for Gold and Silver Officers.
- Cardiff Council is a member of the Core Cities Business Continuity Group
- Q2 of 2022/2023 saw the council undertake a full review and update of the activities delivered across the council allowing us to focus on the resilient delivery of key activities. This was carried out by Each Directorate Management Team.
- As a result of the Covid-19 pandemic areas were forced to change to a far more agile way of operating with our core ICT requirements changing to support far more agile/home working. The mode of delivery worked exceptionally well and provides the potential for longer-term resilient agile working in, in addition to positively supporting other aims and corporate risks, as long as the ICT that supports this mode of working can be delivered resiliently.
- The Emergency Management Unit has developed an Incident Management Plan (Cardiff Council's Emergency Management Plan) to ensure alignment with ISO22301:2012. This was fully reviewed and updated in 2021
- Internal Audit completed an audit of the Business Continuity Risk in Q4 of 2021/2022 and the assurance statement was "Effective with opportunity for improvement".
- The Resilience Unit supported directorates in looking at supply chain risks following the tragic war in Ukraine, this work will be on going as the risk horizon changes as a result of the conflict.
- The Business Continuity Programme recommenced in Q1 of 2022/2023.
- In Quarter 2 the Resilience Unit initiated a Horizon Scan on energy security and potential issues for the security of gas and electricity provision for Winter of 2022/2023 and how the UK position could impact on key service delivery.
- The Resilience Unit delivered a briefing to the SMT on the emerging risks around the security of energy supplies for winter 2022/2023. As a result SMT asked the Resilience Unit, to carry out targeted work to supporting the wider organisation in some targeted risk and resilience work around this potential risk. This work continued into Q3 to support the resilient deliver of key services should the UK experience risks to energy supply.
- In Q4 2022/23 the Resilience Unit engaged with ICT around future enhancements to delivery of key ICT services this engagement will be ongoing.
- In Q1 of 2023/24 the Resilience Unit reviewed and updated the Councils Emergency Management Plan with the minimal changes necessary to keep the plan current to support our response to an incident that could impact on the Council.

**What we plan to do to meet target**

- The BC Officer is working to develop and enhance individual Directorate response capability to ensure Directorates are in a stronger position to respond to incidents which could impact on the Council and our most time sensitive activities this work is ongoing. This work is on going and cyclical and will be reviewed again in Q3 2023-24.
- The BC officer is continuing a review of 4x4 resources across the council to support our response capability to deal with the potential of winter storms. The next updated review will be carried out in Q3 of 2023/24.
- The Business Continuity Officer will support areas in undertaking targeted work around the emerging Energy security Risk focussed on key Red activities delivered by the council. This work remains on going and under review as the UK risk around energy resilience remains for 2023/2024, targeted work with key service areas remains ongoing with target of Q3 2023/2024.
- The Business Continuity Officer is to engage with ICT to look at the existing ICT resilience in delivery of core services and look at how services will be delivered in 2023/2024 and beyond. Ongoing
- The Resilience Unit is looking to engage with internal stakeholders around current agile working and management of the corporate estate to ensure future workplace office solutions consider resilience as a key factor for supporting delivery of key services as we move into a period of change. Ongoing
- The Resilience Unit is working with ICT around the cyber risk and ensuring we continue to manage this risk effectively. We will review work around this risk in Q4 2023/2024.
- The UK National Risk Register will be published in August 2023. The Resilience Unit will assess this register against council risks and mitigation, this review should be complete by Q3 of 2023/2024.
- Review the Energy Resilience planning for winter 2023 for Electricity generation in the UK associated risks and mitigation, and review the Gas resilience for winter 2023 with associated risks and mitigation. This review should be complete by Q3 of 2023/2024.

**Linked Risks**

**Key Indicators / Measures used to monitor the risk**

The Red activity BC plan status is reviewed via a report to SMT . Additionally the risk is managed as part of the Corporate Risk Management process via the CRR returns and the BC risk is also audited by Internal Audit . The last Internal Audit of the Business Continuity Risk was in in 2021/2022.

## Increase in Demand (Children's Services)

**Description**

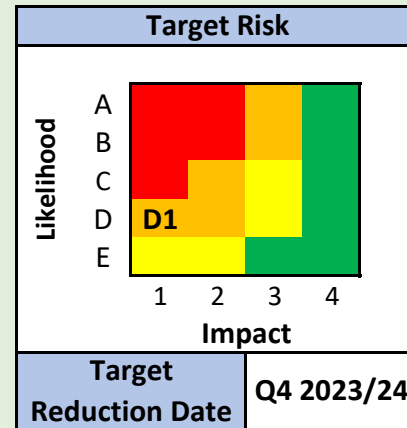
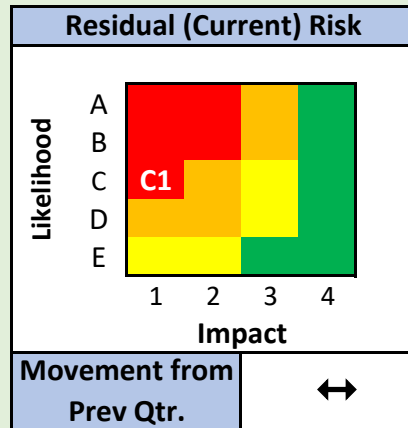
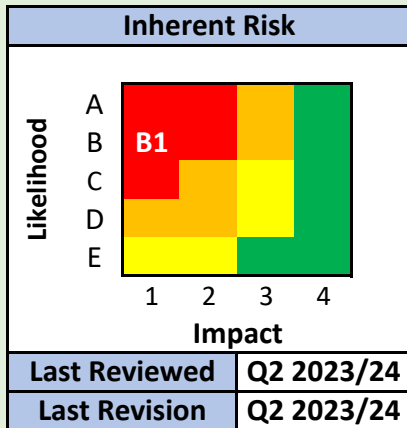
Failure to effectively manage demand (and respond to increasing demand due to Covid-19), resulting in increase in number of children requiring services and financial pressures this presents.

**Potential Impact(s)**

- Family breakdown leading to children becoming looked after.
- Growth in the number of children entering the looked after system and associated costs for the Authority.
- Insufficient placements to meet need resulting in increase in numbers living outside Cardiff.
- Challenges in improving outcomes for children leading to children being less likely to achieve their potential and to be fully participating citizens.
- Delays in issuing care proceedings because of existing capacity in Children's Services and consequential impact on budgets if work needs to be outsourced.
- Challenges in effectively managing service and financial pressures.
- Impact of high caseloads on staff and potential increase in social worker turnover.
- Reliance on newly qualified social workers and non qualified social care practitioners to deal with complex cases and statutory work.
- Welsh Government programme of work to eliminate profit from the care sector and potential impact on destabilisation of placements.
- Increase in use of unregulated placements.
- Inability of Interventions Hub to meet demand for family support leading to delays in response times and / or the need to outsource the service.

N.B. All demand risks carry safeguarding implications.

Type(s) of Impact	
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Community &amp; Environment</li> <li>Stakeholder</li> </ul>



**Risk Owner(s)**

Sarah McGill (Deborah Driffield)	Councillor Ashley Lister Children & Families
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**What we've done/are currently doing to achieve the Residual Risk Rating**

- Early Help - Cardiff Family Advice and Support Services for families who do not require statutory services.
- Interventions Hub - additional resource agreed to manage waiting list and to extend Family Support Service to include out of hours family support.
- Referrals to services such as Safe Families and Ymbarel made as required to provide support to families.
- Dedicated worker to focus on young carers in post.
- Increasing in house residential provision.
- Option for families to use Direct Payments available (policy reviewed). Potential use for children other than children with disabilities to be considered.
- Shifting the balance of care and associated workstreams progressing - new operating model (prudent social work) and new practice model (trauma informed and strength based) under development.
- Children's Services Strategy in place and supported by Workforce Strategy, Accommodation Strategy and Commissioning Strategy to address recruitment and accommodation sufficiency issues and manage the market.
- 4th team implemented in each locality to increase management capacity.
- OM1 posts provide strategic overview of case management and support services.
- Working hours are flexible to meet service and personal needs.
- Provision and analysis of performance information is tailored to meet arising issues.
- Appropriate use of Welsh Government and other funding streams; and financial planning around how longer term needs will be met.
- Temporary Resource Assistants recruited for OMs and social workers to test proof of concept - long term arrangements being considered via review of business support.
- Vulnerability Change Project is reviewing the police mechanism for referrals to Children's Services - with the aim of reducing PPNs on low level cases.
- Resource Panel in place to oversee decisions regarding placements and review of panels being undertaken.
- Family Drug and Alcohol Court pilot (to better support parents with drug and alcohol issues through the care proceedings process) under review due to funding issues.
- Projects to address demand and accommodation sufficiency issues ongoing - one to specifically focus on services for children with disabilities and another to consider the wider cohort of children looked after.
- Reviewing Hub in place to ensure cases are stepped down (or up) appropriately.

**What we plan to do to meet target**

- Business processes to be reviewed as part of implementation of Eclipse system **2024 - Spring**.
- Work with judiciary re: planned changes to private and public law **Q4 2023/24**.
- Review the Early Help offer and consider how this dovetails with the Interventions Hub to ensure that interventions are not being duplicated **Q3 2023/24**.
- Implementation of Accommodation Strategy **2023-26**.
- Implementation of Workforce Action Plan **Q4 2023-24**.

**Linked Risks**

- Workforce Planning (Social Services)
- Safeguarding

**Key Indicators / Measures used to monitor the risk**

Children's Services:

- Contacts 1 - Number of Contacts / Referrals Received
- CS LAC 3e - Number of children looked after
- Number of children on the Child Protection Register
- CH/012 - Percentage of assessments completed for children within statutory timescales

# Safeguarding Children & Adults at Risk

Description	Inherent Risk	Residual (Current) Risk	Target Risk	Risk Owner(s)
Systemic failure in the effectiveness of the Council's safeguarding arrangements together with other statutory safeguarding partners.				<p><b>Councillor Huw Thomas</b> Leader</p> <p><b>Councillor Norma Mackie</b> Adult Services</p> <p><b>Councillor Ashley Lister</b> Childrens Services</p> <p><b>Councillor Chris Weaver</b> Finance, Modernisation and Performance</p>
	<p>Last Reviewed: Q2 2023/24</p> <p>Last Revision: Q2 2023/24</p>	<p>Movement from Prev Qtr. ↔</p>	<p>Target Reduction Date: N/A</p>	<p><b>Sarah McGill</b> (Deborah Driffield)</p>

Potential Impact(s)
<ul style="list-style-type: none"> <li>A child(ren) or adult(s) suffer(s) preventable abuse or neglect which may result in harm or death</li> <li>Reputation of Council and partners                             <ul style="list-style-type: none"> <li>Severe adverse publicity</li> </ul> </li> <li>Potential regulator intervention</li> <li>Loss of confidence by community in safety of children and adults</li> <li>Loss of confidence of staff in the overall "safety" of the service, impacting on morale, recruitment and retention</li> <li>Potential litigation with associated financial penalties</li> <li>Significant financial implications of formal intervention</li> </ul>

What we've done/are currently doing to achieve the Residual Risk Rating
<p><b>Regional</b></p> <ul style="list-style-type: none"> <li>Regional Safeguarding Board oversee the safety and well-being of children and young people across the partnership.</li> <li>Annual RSB plan published outlining key priorities for this year accompanied by strengthening / streamlining governance .</li> </ul> <p><b>Corporate</b></p> <ul style="list-style-type: none"> <li>Annual plan 2023/24 has been developed and ratified</li> <li>Corporate Safeguarding Board strengthened with development of Steering Group and appointment of Directorate Lead Officers</li> <li>Improved data capture and reporting on training compliance allowing targeted action by managers.</li> <li>Initial Analysis of referral data completed, with further work underway to enable a more granular breakdown.</li> <li>Recruitment and Selection Policy updated, including additional information on safeguarding</li> <li>Recommendations of Audit Wales review actioned.</li> <li>Output of self-assessments have been quality assured and is included and tracked through Directorate Delivery Plans.</li> <li>Training compliance rates now at 82% across the Council with pilots underway in areas of low compliance.</li> <li>Work commenced with Procurement team to strengthen safeguarding arrangements in contract award and management.</li> <li>Positive feedback reviewed from initial paper based pilot - Incremental rollout on going</li> </ul> <p><b>Contextual Safeguarding</b></p> <ul style="list-style-type: none"> <li>Safeguarding Adolescents from Exploitation model developed, SAFE partnership in place and working effectively.</li> </ul> <p><b>Children's Services (Summary Position)</b></p> <ul style="list-style-type: none"> <li>Child protection procedures continue to take precedence and children at the highest risk will be prioritised. Operating model is review regularly.</li> <li>Systems in place to learn lessons from Child Practice Reviews, Adult Practice Reviews and multi agency practitioner forums.</li> <li>Safeguarding Adolescents From Exploitation (SAFE) approach reframed in light of experience and being implemented city wide.</li> <li>Quality Assurance Framework in place; learning workshops introduced to complete feedback loop. Action plan in placed.</li> <li>High Risk Panel facilitates robust and timely multi-agency decision making at senior management level for our highest risk young people reviewed and Terms of Reference being updated.</li> <li>Practice development group set up with leads allocated to workstreams to shape good practice.</li> <li>Children's Services and Education working closely, including in the development of locality working and response to the recent issues in Ely / Caerau.</li> <li>Close partnership working in relation to serious youth violence, including with Violence Prevention Unit and Community Safety is ongoing.</li> <li>Successful bid for Youth Endowment Funding - for two Preventative &amp; Engagement Service multi-agency teams to tackle criminal exploitation and risks posed to young people and their families.</li> <li>Revised Supervision process launched following feedback from pilot and a new recording mechanism now in place</li> <li>Child Sexual Abuse practice leads training programme with Centre of Excellence in place.</li> <li>Review of escalating concerns process underway to strengthen arrangements and interface with safeguarding procedures and large scale enquiries.</li> <li>Practice leads appointed in locality teams to support newly qualified staff and improve quality and consistency of practice.</li> <li>MISPER co-ordinator in post and working with the Police to ensure a consistent approach to missing young people.</li> </ul> <p><b>Adult Safeguarding</b></p> <ul style="list-style-type: none"> <li>Review of escalating concerns process underway to strengthen arrangements and interface with safeguarding procedures and large-scale enquiries.</li> <li>Advice / guidance has been produced for family members re: choosing, visiting or concerns about a loved one in a care home</li> <li>Quality Assurance Frameworks have been included with the DAPL and DPS Framework and this has been implemented.</li> <li>Contributing to and supporting the regional review of MARACs (domestic abuse, SWOT and Human Trafficking).</li> <li>Supporting people who hoard and self-neglect and developing sustainable and holistic approaches- Phase 2 commenced.</li> <li>Young person's MDT launched and is fully operational with performance measures expected in future.</li> <li>Actions put in place to address low take up of training in front facing services.</li> <li>Ongoing development and implementation of the Corporate Safeguarding Policy is monitored in line with best practice guidance from Welsh Government.</li> <li>Consistency in external and internal reporting of Safeguarding referrals embedded.</li> <li>Developed more robust performance indicators (in line with Welsh Government requirements) and use of the self-assessment Quality Assurance document.</li> </ul>

What we plan to do to meet target
<p><b>Regional Safeguarding Board</b></p> <ul style="list-style-type: none"> <li>Regional Safeguarding Board Governance arrangements have been reviewed and a new governance structure is being piloted.</li> <li>Improvements have been made in utilising data to capture the boards performance</li> <li>A comprehensive risk register has been developed for use at the board, which allows for increased oversight and mitigation of emerging and escalating risks</li> </ul> <p><b>Contextual Safeguarding</b></p> <ul style="list-style-type: none"> <li>Successful YEF funding application to pilot multi-disciplinary teams to tackle youth violence and exploitation.</li> </ul> <p><b>Corporate Safeguarding</b></p> <ul style="list-style-type: none"> <li>Targeted training exercise underway with schools catering staff to increase training compliance, due to be completed by Dec 23</li> <li>Corporate Safeguarding Self Assessment 2023 has been completed by all directorates</li> <li>KPIs developed for board oversight</li> <li>Annual Report Published</li> <li>Training compliance stats now stand at 89%</li> </ul> <p><b>Children's Services</b></p> <ul style="list-style-type: none"> <li>Strengthen contractual arrangements in relation to safeguarding (Q4 23/24).</li> </ul> <p><b>Adult Services</b></p> <ul style="list-style-type: none"> <li>Develop whole home large scale enquiry process - to be completed Q4 23/24</li> <li>Partnership development activity between Learning Disabilities Team, third sector services and Adult Safeguarding to better address incidents of Service User on Service User abuse in supported living services setting target removed as project on hold due to current work pressures. Q4 23/24</li> <li>Develop and improve our public facing Safeguarding communications to build trust and confidence with the public. Ensure there is consistency in external and internal reporting of Safeguarding referrals - Q2 2023/24</li> </ul>

Type(s) of Impact	Linked Risks	Key Indicators / Measures used to monitor the risk
<ul style="list-style-type: none"> <li>Service Delivery</li> <li>Reputational</li> <li>Legal</li> <li>Financial</li> </ul>	<ul style="list-style-type: none"> <li>Increase in Demand (Children's Services)</li> <li>Workforce - Social Services</li> </ul>	<ul style="list-style-type: none"> <li>SCC.014 Percentage of initial child protection conferences carried out within statutory timescales during the year</li> <li>SCC.034 Percentage of child protection reviews carried out within statutory timescales during the year</li> <li>SSWB 27 Percentage of re-registrations of children on local authority Child Protection Registers</li> <li>SSWB 28 Average length of time for all children who were on the CPR during the year</li> <li>Res 15 - Percentage of Council staff completing Safeguarding Awareness Training</li> </ul>

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# Legal Compliance

**Description**

Changes in services and staff roles across the Council resulting in:

- gaps in Council wide knowledge of the local authority framework of responsibilities and duties within which we have to operate;
- inability to deliver the services in accordance with all duties and responsibilities due to lack of resource:

In each case leading to increased risk of challenges.

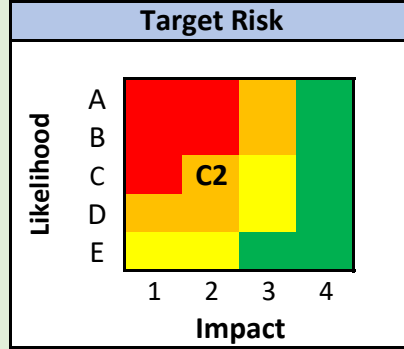
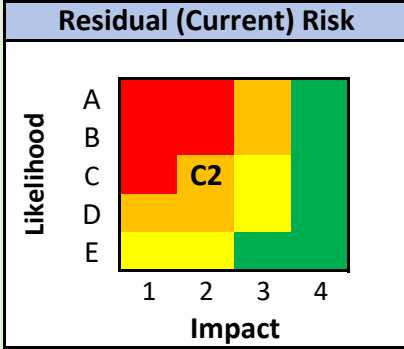
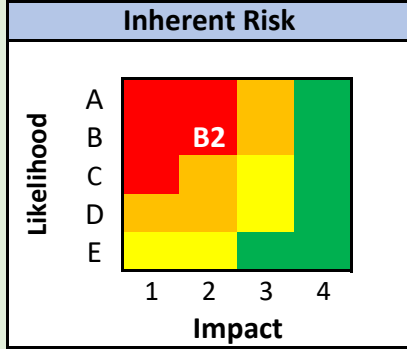
Reduction and changes in front-line services, discretionary and statutory, will lead to increased risks of challenge from users and other stakeholders affected.

**Potential Impact(s)**

- Increase in number of challenges and complaints with consequences in terms of already stretched resources and impact of adverse decisions
- Implementation of decisions delayed due to challenges and potentially fatally disrupted
- Impact on projects if reputation for sound management and implementation of projects is damaged
- Major incident
- Adverse press/media reaction
- Involvement from Welsh Government in terms of performance standards or measures
- Increased costs
- Impact on capacity to deal with proactive legal work

**Type(s) of Impact**

- Service Delivery
- Reputational
- Legal
- Financial



Last Reviewed: Q2 2023/24  
Last Revision: Q4 2022/23

Movement from prev Qtr: ↔

Target Reduction Date: N/A

**What we've done/are currently doing to achieve the Residual Risk Rating**

- Professional internal legal and financial advice provided to a high standard.
- Maintaining robust decision-making process by providing legal implications on all Council, Cabinet and Committee reports and Officer Decision Reports at Director level
- Appropriate use of NPS Legal Services by Solicitors Framework to increase resilience where it is necessary to outsource legal work
- Dedicated Corporate teams in specialist areas e.g., equalities, FOI / DPA
- Sharing training/publications received internally to the legal department and when necessary to client departments
- Encourage Directorates to ensure Committee and Cabinet reports are discussed at preliminary stage in development to ensure all legal issues are addressed early through client department relationships
- Decision Making Training to both the Senior Management Forum and the Managers Forum carried out in 2020 and Pre-Election Period and Decision-making Pre and Post the Local Election briefings given to the Senior Managers Forum and the Cardiff Managers Forum in January 2022
- Decision Making training session held for the Environment Directorate managers in Jan 2022
- Decision making training provided to Councillors and Cabinet as part of induction training.

**Linked Risks**

**Risk Owner(s)**

Chris Lee      Councillor Huw Thomas  
Leader

**What we plan to do to meet target**

- Where identified, provide guidance based on standard precedents for use in cases of low value/low risk/repetitive matters to minimise the gaps in Council wide knowledge **ONGOING**
- Provide, if requested, ad-hoc legal training to Directorates to develop knowledge within Directorates of specific statutory functions. **ONGOING**

**Key Indicators / Measures used to monitor the risk**

Number of Judicial Reviews and Number of Successful Challenges

Judalen 422



**CARDIFF COUNCIL  
CYNGOR CAERDYDD****CABINET MEETING: 14 DECEMBER 2023**

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**CALCULATION OF THE COUNCIL TAX BASE****FINANCE, MODERNISATION AND PERFORMANCE  
(COUNCILLOR WEAVER)****AGENDA ITEM: 6**

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**Reason for this Report**

1. To seek approval of the Council Tax Base for 2024/25 which the authority is required to calculate in accordance with the statutory provisions governing Council Tax under Part 1 of the Local Government Finance Act 1992.

**Background**

2. Section 33 of the Local Government Act 1992 requires each billing authority to calculate the Council Tax Base each year. The Local Authorities (Calculation of Council Tax Base)(Wales) Regulations 1995, as amended, contain rules for this calculation, which in essence, are as follows:
  - a) Determine the number of chargeable dwellings in each valuation band, taking account of exemptions and anticipated changes during the year.
  - b) Adjust the numbers in each band to take account of the disablement reductions.
  - c) Allow for discounts in respect of disregarded individuals and those occupied by one person only.
  - d) Adjust for premiums on long term empty properties and second homes
  - e) Weight the adjusted total for each band to equate it to band D.
  - f) Repeat the calculation for each of the six Community Councils that issue precepts.

## Issues

3. The Council Tax Base calculation is a complex annual exercise that is used by the Welsh Government (WG) for the distribution of Revenue Support Grant. It is also used by the Council for calculating the Council Tax charges for each year. Appendices A to G set out the detailed calculation. As the Appendices are in a format prescribed by WG the following points explain the details included in those Appendices.
- The number of domestic dwellings in the valuation list in force at the 31 October is used and adjusted to take account of anticipated new properties, demolitions, appeals and exemptions which is represented as chargeable dwellings (line A1 Appendix A).
  - Properties in receipt of disablement relief receive a reduction of 1 band in their amount payable. Lines A2 and A3 reflect these adjustments. For example, the number of properties in band B (at line A1) amounting to 18,263 is reduced by 102 for those that will receive the 1 band reduction and increased by 346 for those properties coming down from band C. This gives a new total of 18,507.
  - An estimate of the number of single person discounts (B2a), double discounts (B2b) and premiums for long term empty properties and second homes (B3c) are also taken into account in the calculation. The total in line C2 takes the total (A3) and adjusts for the weighted number of discounts and premiums.
  - To convert the total in each band to a band D equivalent the appropriate ratio, as set out in line C3, is applied to reach the total band D equivalents in C4.
4. The total band D equivalent properties calculated are then adjusted to take account of the estimated collection rate, as well as any contributions in respect of Ministry of Defence properties, as follows:

<b>2023/24</b>		<b>2024/25</b>
152,724.02	Total Discounted chargeable dwellings: band D equivalent (a)	153,629.44
98.50%	Estimated Collection Rate (b)	98.50%
150,433.16	(a) x (b)	151,325.00
48.55	M.o.D. exempt dwellings: band D equivalent	47.00
<b>150,481.71</b>		<b>151,372.00</b>
<b>150,482</b>	Council Tax Base for tax-setting purposes	<b>151,372</b>

The table above shows an increase in the Council Tax Base of 890 properties at band D equivalent.

5. In previous years, the large increases in development were primarily due to new purpose-built student accommodation. Although we are expecting the scale of development to decrease with very small amount of student development in 2023/24 and 2024/25, there is still significant level of investment in new properties in the city.
6. The increase in the level of premium for long term empty properties from 50% to 100% and the introduction of the premium for second home properties has also increased the base.
7. The review and subsequent realignment of exemptions included in the base has had a dampening effect on the increasing base.
8. The council tax base calculations have been reviewed to ensure that they reflect the current demographic makeup of properties and occupancy within the city. In future years due to the Local Development Plan and Cardiff Living it is anticipated the scale of development will continue to see increases in new properties and commensurate increases in the tax base.
9. For Council Tax setting purposes, it is necessary to assume an ultimate collection rate for 2024/25. The ultimate collection rate reflects the final position achieved after a number of years of collection rather than the in-year position. Since 2016/17 we have used an ultimate collection rate of 98.5%. There have been reduced in-year collection rates in the last few years due to Covid-19, the cost-of-living crisis and the introduction of premiums but it is still too early to determine whether these will have an impact on the ultimate collection rate or whether the rate will continue to be achieved but over a longer period of time. The most appropriate estimate of our ultimate collection rate is still 98.5%. This position will continue to be kept under review.

#### Schedule of precept payments

10. Regulations require that by 31 December each year the Council inform each of its precepting authorities of the proposed dates of monthly precept payments in the following year and determines a payments schedule by 31 January.
11. Currently instalment payments to The Police and Crime Commissioner for South Wales are paid on the last working day of each month and to the Community Councils on 1 April, and it is recommended that these arrangements should continue for 2024/25.

#### **Reason for Recommendations**

12. It is a statutory obligation for the Council to agree its Council Tax Base annually and this figure is used for Council Tax setting.

## **Financial Implications**

13. The Council Tax Base will be used to set the specific Council Tax charges for 2024/25 when the budget is approved. There are a large number of variables that are included in this calculation such as new properties, demolitions, effect of appeals, changes to discounts and exemptions and it is important to ensure that the resulting estimate of properties is as accurate as possible. A small percentage variance could result in a large difference against the budget. The tax base calculation is also used by the Welsh Government for the determination of the distribution of Revenue Support Grant. The final financial settlement from the Welsh Government will include the redistribution impact of these figures across Wales.
14. Whilst the council tax premiums are quantified and included as part of the council tax base calculation the resultant adjustment ensures that local authorities retain any additional income generated by the premium and does not result in any compensating reduction to revenue support.
15. The increase in the tax base, as set out in this report, is estimated to generate an additional £1,523,627 in 2024/25 without raising the actual rate of tax. The £1,523,627 represents additional revenue for the Police and Crime Commissioner for South Wales of £288,779 whilst Cardiff Council will receive an additional £1,234,848. At present, this is not taken into account in the draft budget position. Established practice is to wait until the final financial settlement from Welsh Government before taking any benefits from increased Council Tax Base. This is due to the fact that if a Council's Council Tax Base increases relative to the tax base of other Councils, then Revenue Support Grant will reduce as a direct consequence.

## **Legal Implications**

16. The Council Tax Base is essentially the constituency of Council Tax payers having regard to the fact that some persons will be entitled to reductions in Council Tax and others will be eligible for exemptions from payment. The Council Tax Base is calculated in accordance with a complicated formula laid down in the Local Authorities (Calculation of Council Tax Base) (Wales) Regulations 1995, as amended ("the Regulations").
17. The central provision is regulation 3, which provides that the Council Tax Base is calculated by multiplying the total of the 'relevant amounts' by the authority's estimate of its collection rate for the year. It is therefore necessary to identify both the 'relevant amount' and the 'collection rate'.
18. Regulation 3 of the Regulations provides the formula for calculation of the Council Tax Base, using certain "relevant amounts", which are calculated, from April 2017, according to a formula set out in Regulation 5B. The relevant amount for each Council Tax band is a measure of the number of dwellings in that band after taking account of exempt dwellings, discounts and premiums.



19. The 'relevant amount' is the maximum sum which the authority would recover in respect of the dwellings in the particular band. However, the Regulations anticipate that this will not always be the case. Thus, in order to ascertain the Council Tax Base, it is necessary to determine the collection rate, which is estimated in accordance Regulation 3 of the Regulations. The Council must estimate its collection rate for the financial year by estimating the aggregate of the amounts in respect of Council Tax for the year which are likely to be paid to the Council expressed as a proportion of its estimate of the total of such amounts which are payable to the Council taking into account certain discounts. In order to calculate the Council Tax Base, the authority then adds up the total of the relevant amounts previously calculated and multiplies this by the estimate of the collection rate. This leaves the 'Council Tax Base'.
20. The sum which the authority calculates must be raised locally in accordance with its approved budget is then divided by the Council Tax Base figure to give the 'basic amount of Council Tax' as defined in section 33 of the Local Government Finance Act 1992.
21. The Well-being of Future Generations (Wales) Act 2015 requires the Council to consider how its decisions will contribute towards meeting the well being objectives as set out in the [Corporate Plan 2023 to 2026 \(cardiff.gov.uk\)](https://www.cardiff.gov.uk/corporate-plan-2023-to-2026). Members must also be satisfied that the decision complies with the sustainable development principle, which requires that the needs of the present are met without compromising the ability of future generations to meet their own needs.
22. Calculation of the Council Tax Base is a local choice function, allocated in Section 3 of the Scheme of Delegations to Council. At the Council meeting in December 2013, the Council agreed to allocate responsibility for calculation of the Council Tax Base to the Cabinet (Council minute 129(5)).
23. All decisions taken by or on behalf the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers of behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.

### **Property Implications**

24. The Strategic Estates Department have reviewed report in respect of the calculation of the Council's tax base and there are no particular issues identified, at this stage, from a property implications perspective for its non-residential estate. Any matters involving the Council's non-residential estate should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## HR Implications

25. There are no HR implications for this report.

## RECOMMENDATIONS

Cabinet is recommend to approve the following resolutions:

- (1) the calculation of the Council's tax base for the year 2024/25 be approved.
- (2) that pursuant to this report and in accordance with the Local Authorities (Calculation of Tax Base) (Wales) Regulations 1995, as amended, the amount calculated by Cardiff Council as its Council Tax Base for the year 2024/25 shall be 151,372.
- (3) that pursuant to this report and in accordance with the Local Authorities (Calculation of Tax Base) (Wales) Regulations 1995, as amended, the amounts calculated by the Council as the Council Tax Base for the year 2024/25 in the community areas subject to a precept shall be as follows:

Lisvane	3,068
Pentyrch	3,709
Radyr	4,090
St. Fagans	2,006
Old St. Mellons	2,512
Tongwynlais	830

- (4) that the arrangements for the payment of precepts in 2024/25 to the Police and Crime Commissioner for South Wales be by equal instalments on the last working day of each month from April 2024 to March 2025; and to the Community Councils, be by one payment on the first working day of April 2024, reflecting the same basis as that used in 2023/24; and the precepting authorities be advised accordingly.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>CHRISTOPHER LEE</b>
	Corporate Director Resources 8 December 2023

*The following appendices are attached:*

Appendix A: Calculation of the Council Tax Base for the City and County of Cardiff

Appendices B-G: Calculation of the Council Tax Base for the 6 Community Councils

**Background papers**

Council report, 'Calculation of Council Tax Base', 19 December 2013; and minutes thereof

Mae'r dudalen hon yn wag yn fwriadol

**CARDIFF COUNCIL  
COUNCIL TAX BASE CALCULATION FOR 2024/25**

**APPENDIX A**

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	5,303	20,263	34,478	37,007	31,230	22,060	10,475	2,825	1,455	165,096
All Chargeable Dwellings (A1)	0	4,628	18,263	31,172	34,640	27,309	20,218	9,984	2,711	1,425	150,350
Dwellings subject to disability reduction (A2)		13	102	346	430	408	376	229	65	74	2,043
<b>Adjusted chargeable Dwellings (A3)</b>	<b>13</b>	<b>4,717</b>	<b>18,507</b>	<b>31,256</b>	<b>34,618</b>	<b>27,277</b>	<b>20,071</b>	<b>9,820</b>	<b>2,720</b>	<b>1,351</b>	<b>150,350</b>
Dwellings with no discount or premium (B1)	7	1,516	7,619	16,685	20,371	18,129	14,625	7,729	2,202	1,132	90,015
Dwellings with one discount excluding long term empty and second properties (B2a)	6	3,157	10,598	14,212	13,802	8,753	5,209	1,989	491	199	58,416
Dwellings with two discounts excluding long term empty and second properties (B2b)		2	51	82	113	87	63	35	8	9	450
Dwellings with long term empty properties or second homes discount (B3b)		0	0	0	0	0	0	0	0	0	0
Dwellings with long term empty properties or second homes premium (B3c)		42	239	277	332	308	174	67	19	11	1,469
<b>Total adjusted chargeable dwellings</b>	<b>13</b>	<b>4,717</b>	<b>18,507</b>	<b>31,256</b>	<b>34,618</b>	<b>27,277</b>	<b>20,071</b>	<b>9,820</b>	<b>2,720</b>	<b>1,351</b>	<b>150,350</b>
Long term empty property & second home discount adjustment (B6)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Long term empty property & second home premium adjustment (B7)	0.0	42.0	239.0	277.0	332.0	308.0	174.0	67.0	19.0	11.0	1,469.0
<b>Total dwellings including discounts (C2)</b>	<b>12</b>	<b>3,969</b>	<b>16,071</b>	<b>27,939</b>	<b>31,443</b>	<b>25,353</b>	<b>18,911</b>	<b>9,372</b>	<b>2,612</b>	<b>1,308</b>	
Band D Relation (C3)	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent (C4)	6.39	2,645.83	12,499.67	24,834.67	31,443.00	30,987.31	27,316.25	15,620.42	5,224.50	3,051.42	153,629.44
Ultimate Collection Rate											98.50%
Adjusted for Class O exemptions											47.00
Council Tax Base for tax-setting purposes											151,372.00

Tudalen 431

Mae'r dudalen hon yn wag yn fwriadol

# CARDIFF COUNCIL COUNCIL TAX BASE CALCULATION FOR 2024/25

APPENDIX B

LISVANE

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	0	2	11	87	79	240	871	320	210	1,820
New properties October 2023 March 2024	0	0	0	0	1	9	18	24	8	4	64
New properties April 2024- March 2025	0	0	0	0	0	2	12	27	9	2	52
Dwellings per V.O. listing (+ projections)	0	0	2	11	88	90	270	922	337	216	1,936
Exemptions	0	0	0	-2	-5	-2	-12	-8	-7	-2	-38
Chargeable dwellings Total	0	0	2	9	83	88	258	914	330	214	1,898
Disablement Relief	0	0	0	0	1	2	12	6	2	0	23
<b>Adjusted Chargeable Dwellings Total</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>10</b>	<b>84</b>	<b>98</b>	<b>252</b>	<b>910</b>	<b>328</b>	<b>214</b>	<b>1,898</b>
Dwellings with one discount	0	0	0	8	52	28	60	163	44	28	383
Dwellings with two discount	0	0	0	0	0	0	0	4	0	0	4
Dwellings with premium	0	0	1	1	1	1	2	2	2	2	12
Dwellings with no discount or premium	0	0	1	1	31	69	190	741	282	184	1,499
<b>Total adjusted chargeable dwellings</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>10</b>	<b>84</b>	<b>98</b>	<b>252</b>	<b>910</b>	<b>328</b>	<b>214</b>	<b>1,898</b>
Long term premium adjustment	0.00	0.00	1.00	1.00	1.00	1.00	2.00	2.00	2.00	2.00	12.00
<b>Total dwellings including discounts</b>	<b>0.00</b>	<b>0.00</b>	<b>3.00</b>	<b>9.00</b>	<b>72.00</b>	<b>92.00</b>	<b>239.00</b>	<b>869.25</b>	<b>319.00</b>	<b>209.00</b>	<b>1,812.25</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.00	0.00	2.33	8.00	72.00	112.44	345.22	1,448.75	638.00	487.67	3,114.41
Estimated Collection Rate											98.5%
Tax Base											3,067.69

Tudalen 433

Mae'r dudalen hon yn wag yn fwriadol





Mae'r dudalen hon yn wag yn fwiadol



Mae'r dudalen hon yn wag yn fwriadol

# CARDIFF COUNCIL COUNCIL TAX BASE CALCULATION FOR 2024/25

## APPENDIX E

### ST. FAGANS

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	1	70	132	246	381	347	272	96	44	1,589
New properties October 2023 March 2024	0	0	0	0	0	12	0	0	1	0	13
New properties April 2024- March 2025	0	0	0	0	0	11	0	0	0	0	11
Dwellings per V.O. listing (+ projections)	0	1	70	132	246	404	347	272	97	44	1,613
Exemptions	0	0	-2	-1	-1	-4	-3	-2	0	0	-13
Chargeable Dwellings	0	1	68	131	245	400	344	270	97	44	1,600
Disablement Relief	0	1	0	2	6	5	5	2	0	0	21
<b>Adjusted Chargeable Dwellings Total</b>	<b>1</b>	<b>0</b>	<b>70</b>	<b>135</b>	<b>244</b>	<b>400</b>	<b>341</b>	<b>268</b>	<b>97</b>	<b>44</b>	<b>1,600</b>
Dwellings with one discount	0	0	49	63	77	82	57	42	15	9	394
Dwellings with two discount	0	0	0	0	0	2	0	0	0	1	3
Dwellings with premium	0	0	0	0	1	5	1	1	2	0	10
Dwellings with no discount or premium	1	0	21	72	166	311	283	225	80	34	1,193
<b>Total adjusted chargeable dwellings</b>	<b>1</b>	<b>0</b>	<b>70</b>	<b>135</b>	<b>244</b>	<b>400</b>	<b>341</b>	<b>268</b>	<b>97</b>	<b>44</b>	<b>1,600</b>
Long term premium adjustment	0.00	0.00	0.00	0.00	1.00	5.00	1.00	1.00	2.00	0.00	10.00
<b>Total dwellings including discounts</b>	<b>1.00</b>	<b>0.00</b>	<b>57.75</b>	<b>119.25</b>	<b>225.75</b>	<b>383.50</b>	<b>327.75</b>	<b>258.50</b>	<b>95.25</b>	<b>41.25</b>	<b>1,510.00</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	0.56	0.00	44.92	106.00	225.75	468.72	473.42	430.83	190.50	96.25	2,036.95
Estimated Collection Rate											98.5%
Tax Base											2,006.40

Tudalen 439

Mae'r dudalen hon yn wag yn fwriadol

**CARDIFF COUNCIL**  
**COUNCIL TAX BASE CALCULATION FOR 2024/25**  
**OLD ST. MELLONS**

**APPENDIX F**

DESCRIPTION	BAND A*	BAND A	BAND B	BAND C	BAND D	BAND E	BAND F	BAND G	BAND H	BAND I	TOTAL
Dwellings per V.O. listing	0	104	158	427	375	487	431	141	79	65	2,267
New properties October 2023 March 2024	0	0	0	6	20	4	1	1	2	0	34
New properties April 2024- March 2025	0	0	0	2	5	21	2	1	0	0	31
Dwellings per V.O. listing (+ projections)	0	104	158	435	400	512	434	143	81	65	2,332
Exemptions	0	-6	-4	-9	-5	-5	-10	0	-4	0	-43
Chargeable Dwellings	0	98	154	426	395	507	424	143	77	65	2,289
Disablement Relief	1	0	4	3	4	5	6	0	1	0	24
<b>Adjusted Chargeable Dwellings Total</b>	<b>-1</b>	<b>102</b>	<b>153</b>	<b>427</b>	<b>396</b>	<b>508</b>	<b>418</b>	<b>144</b>	<b>76</b>	<b>65</b>	<b>2,288</b>
Dwellings with one discount	0	76	98	220	140	104	61	32	17	10	758
Dwellings with two discount	0	0	0	0	0	0	0	0	0	0	0
Dwellings with premium	0	0	2	1	3	1	3	1	1	1	13
Dwellings with no discount or premium	-1	26	53	206	253	403	354	111	58	54	1,517
<b>Total adjusted chargeable dwellings</b>	<b>-1</b>	<b>102</b>	<b>153</b>	<b>427</b>	<b>396</b>	<b>508</b>	<b>418</b>	<b>144</b>	<b>76</b>	<b>65</b>	<b>2,288</b>
Long term premium adjustment	0.00	0.00	2.00	1.00	3.00	1.00	3.00	1.00	1.00	1.00	13.00
<b>Total dwellings including discounts</b>	<b>-1.00</b>	<b>83.00</b>	<b>130.50</b>	<b>373.00</b>	<b>364.00</b>	<b>483.00</b>	<b>405.75</b>	<b>137.00</b>	<b>72.75</b>	<b>63.50</b>	<b>2,111.50</b>
Band D Relation	5/9	6/9	7/9	8/9	1	11/9	13/9	15/9	18/9	21/9	
Band D Equivalent	-0.56	55.33	101.50	331.56	364.00	590.33	586.08	228.33	145.50	148.17	2,550.24
Estimated Collection Rate											98.5%
Tax Base											2,511.99

Tudalen 441

Mae'r dudalen hon yn wag yn fwriadol





Mae'r dudalen hon yn wag yn fwriadol

**REVISIONS TO THE FAIR WORK (LONG TERM AGENCY WORKER) POLICY****FINANCE, MODERNISATION AND PERFORMANCE  
(COUNCILLOR CHRIS WEAVER)****AGENDA ITEM: 7**

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**Reason for this Report**

1. To ask Cabinet to approve the revisions to the new Fair Work (Long Term Agency Worker) Policy to promote the employment of long-term agency staff by the Council.

**Background**

2. Decent work can help achieve a stronger, modernised, more inclusive economy. It contributes to national growth and prosperity and assists in addressing inequality, reducing poverty and promoting well-being. In March 2019, The Fair Work Commission published 'Fair Work Wales', which defines fair work, identifies levers for promoting it, and includes recommendations to help deliver it in Wales.
3. Fair work is defined in Wales where workers are fairly rewarded, heard and represented, secure and able to progress in a healthy, inclusive environment where rights are respected.
4. Cardiff Council made a commitment as part of its 2022/25 Corporate Plan to be a 'Fair Work' employer by reviewing long-term agency placements and taking appropriate actions to reduce the use of agency workers on long-term assignments.
5. On 14<sup>th</sup> July 2022 Cabinet approved the Fair Work (Long Term Agency) Policy which provided temporary employment for agency workers after 2 years continuous assignment and permanent employment after 4 years combined service.

## Issues

### The Fair Work (Long Term Agency Worker) Policy

6. The Fair Work (Long Term Agency Worker) policy has been successful in bring onto Council employment over 136 agency workers since its inception.
7. The Fair Work (Long Term Agency Worker) Policy continues to uphold the Council's current policy of acquired rights for temporary contract employees (including those employed through Cardiff Works). It confirms that temporary contract employees with 4 years' continuous service with the Council will be treated as if permanent. Those with four or more years' service in the same role will be made permanent in that role without having to go through any recruitment process.
8. Following engagement with our Trade Unions as part of the Council's Trade Union Partnership process, discussions have taken place to reduce the initial 2 year period for gaining temporary employment to 12 months. There has also been a commitment to look further at Council policy on the period for temporary employees to gain permanent employment once the requirements for Council budget savings over the next financial year are fully known and mapped out.
9. Agency Workers with more than 12 months continuous assignments in the same or very similar role (with breaks equivalent to annual leave), but less than 4 years, a temporary contract will be offered, subject to relevant pre-employment checks.
10. Agency Workers offered temporary contracts as set out in paragraph 9 above, their previous Agency assignment within the Council will be added to their temporary contract service, and when this exceeds 4 years in total, paragraph 7 above will apply. This will also apply to agency workers who gained employment prior to this policy coming into being.
11. The revisions to the policy will be commended to Schools.
12. As part of the Policy there is a requirement that managers must not engage Agency Workers on assignments that they believe will be for longer than 12 months, but instead they must advertise the role through the Council's normal recruitment channels. The only exception to this is where the normal recruitment channels have been exhausted.
13. It is the intention to work with Trade Unions over the next 6 months to review the clause in the policy that relates to permanent employment to see whether this period of time can also be reduced. This will be dependent on the situation that the Council finds itself in with regards to any employee savings as part of the budget setting process.

## **Reason for Recommendations**

14. To comply with the Council's commitment to be a Fair Work employer and reduce the number of long-term Agency worker assignments.

## **Financial Implications**

15. The Council's budgetary framework permits spend on agency employees where there is a budgetary allocation for employees or specifically agency. On that basis, any changes arising from the implementation of this policy such as moving staff from agency to employees will not contravene the council's budgetary framework. It remains the responsibility of directorates to ensure that their staff establishment can be contained within their overall directorate employee budget.

## **Legal Implications**

- 16 Agency workers do not qualify as employees under the Employment Rights Act 1996. Agency workers are however afforded "equal treatment" to permanent employees after 12 weeks of continuous assignment under the Agency Worker Regulations 2010. Equal treatment for the purposes of these Regulations means equal pay, automatic pension enrolment and paid annual leave.
- 17 The implications of the revised Policy on contractual terms are set out in the body of the report.
- 18 In considering this matter, regard should be had to:
  - (a) Public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, when making decisions, Councils must have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are a. Age; b. Gender reassignment; c. Sex; d. Race – including ethnic or national origin, colour or nationality; e. Disability; f. Pregnancy and maternity; g. Marriage and civil partnership; h. Sexual orientation; i. Religion or belief – including lack of belief. An Equalities Impact Assessment (EIA) should be carried out to assess the equalities impact of any proposed changes to policy and due regard should be given to the outcomes of the EIA; and
  - (b) the Well Being of Future Generations (Wales) Act 2015. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') is about improving the social, economic, environmental and cultural well-being of Wales. The Act places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language and is globally responsible. In discharging their respective duties under the Act, each public body listed in the Act must set and published

wellbeing objectives. These objectives will show how each public body will work to achieve the vision for Wales set out in the national wellbeing goals. When exercising its functions, Cabinet should consider how the proposed decision will contribute towards meeting the wellbeing objectives set by the Council and in so doing achieve the national wellbeing goals. The wellbeing duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Cabinet must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, Cabinet must:

- look to the long term.
- focus on prevention by understanding the root causes of problems.
- deliver an integrated approach to achieving the 7 national wellbeing goals.
- work in collaboration with others to find shared sustainable solutions.
- involve people from all sections of the community in the decisions which affect them.

### **HR Implications**

- 19 The review of the Fair Work (Long Term Agency Worker) Policy is intended to reduce the number of Agency Workers on long term assignment with the Council.
- 20 This will benefit Agency Workers and provides a more stable workforce.
- 21 The trade unions have been consulted on the revised policy and are supportive of the proposed changes.

### **Property Implications**

- 22 There are no property implications.

### **RECOMMENDATIONS**

Cabinet is recommended to:

- (1) Approve the revisions to the Fair Work (Long Term Agency Worker) Policy (Appendix 1) and note its ongoing review; and,
- (2) Delegate responsibility to the Corporate Director, Resources in consultation with the Chief Executive and the Cabinet Member for Finance, Modernisation and Performance, with advice from the Director of Governance and Legal Services (or authorised representative) to make any further revisions to the Fair Work (Long Term Agency Worker) Policy,

which are considered appropriate in order to reflect the Council's commitment to being a 'Fair Work' employer.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Chris Lee</b> Corporate Director Resources & Section 151 Officer
	8 December 2023

*The following appendix are attached:*

*Appendix 1: The revised Fair Work (Long Term Agency Worker) Policy*

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**CARDIFF COUNCIL**

**FAIR WORK (LONG TERM AGENCY WORKER)  
POLICY**

<b>DATE DOCUMENT PUBLISHED</b>	
<b>APPROVED BY</b>	
<b>APPROVAL DATE</b>	
<b>DOCUMENT OWNER</b>	<b>Employee Relations Team</b>
<b>DATE FOR REVIEW</b>	

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## **SECTION 1 - INTRODUCTION, ROLES AND, RESPONSIBILITIES**

### **INTRODUCTION**

- 1.1 Decent work can help achieve a stronger, modernised, more inclusive economy. It contributes to national growth and prosperity and assists in addressing inequality, reducing poverty and promoting well-being. In March 2019, The Fair Work Commission published 'Fair Work Wales', which defines fair work, identifies levers for promoting it, and includes recommendations to help deliver it in Wales.
- 1.2 Fair work is defined in Wales where workers are fairly rewarded, heard and represented, secure and able to progress in a healthy, inclusive environment where rights are respected.
- 1.3 Cardiff Council made a commitment as part of its 2022/25 Corporate Plan to be a 'Fair Work' employer by reviewing long-term agency placements and taking appropriate actions to reduce the use of agency workers on long-term assignments.
- 1.4 This policy is intended to set out the actions the Council will take in order to reduce Long Term Agency Workers.
- 1.5 The Council will not depart from this policy without a variation to the policy agreed directly by Cabinet or through an agreed delegation.

### **ROLES AND RESPONSIBILITIES**

- 1.6 It is important that everyone clearly understands their roles and responsibilities within this process.
- 1.7 Manager's must ensure the details within the policy are adhered to without any deviation.
- 1.8 HR People Services will monitor the consistent application of this policy and oversee the contractual changes required for Agency Workers.
- 1.9 The Policy will be commended to School Governing Bodies.

## **SECTION 2 - THE POLICY**

### **PURPOSE OF POLICY**

- 2.1 The purpose of this document is to outline the Policy and Procedure on long term agency workers.

### **SCOPE**

- 2.2 The policy applies to all eligible temporary employees of the Council, and eligible Agency workers engaged by the Council, irrespective of age, disability, gender reassignment/affirmation, marriage and civil partnership, pregnancy and maternity (including same sex), race, religion or belief, sex, sexual orientation and Welsh language.
- 2.3 The policy will be commended to school governing bodies..

### **KEY PRINCIPLES**

#### **TEMPORARY CONTRACT EMPLOYEES AND PERMANENT STATUS**

- 2.4 In accordance with Legislation, Cardiff Council treats employees who have been employed on continuous temporary contracts for 4 years or more, as if they were permanent employees. Also, if an employee has been employed in the same role, on a temporary basis, for 4 years or more, they will be classed as permanent in that role and given a defined permanent contract of employment.

#### **AGENCY WORKERS WITH MORE THAN 4 YEARS CONTINUOUS ASSIGNMENT WITHIN A SERVICE AREA**

- 2.5 Agency Workers with 4 or more years continuous assignment in the same or very similar role (with breaks equivalent to annual leave) will be offered a permanent contract of employment with the Council. The offer will be subject to relevant pre-employment checks such as Right to Work, Occupational Health, and where appropriate, a DBS check. Under normal circumstances there would be no requirement for references, except in circumstances where references, or confirmed employment checks are a recruitment requirement for the role, such as employment in social care.
- 2.6 Previous Agency service will not be taken into account for any national or local terms and conditions, and polices, which relate to continuity of service, with the exception of service counting towards permanent employment.

## **AGENCY WORKERS WITH MORE THAN 12 MONTHS BUT LESS THAN 4 YEARS CONTINUOUS ASSIGNMENT WITHIN A SERVICE AREA**

- 2.7 Agency Workers with more than 12 months but less than 4 years continuous assignment in the same or very similar role (with breaks equivalent to annual leave) will be offered a temporary contract of employment with the Council. The offer will be subject to relevant pre-employment checks such as Right to Work, Occupational Health, and where appropriate, a DBS check. Under normal circumstances there would be no requirement for references, except in circumstances where references, or confirmed employment checks are a recruitment requirement for the role, such as employment in social care.
- 2.8 Once the employee has completed 4 years (taking into account their agency service and temporary contract service) they will be treated as permanent as detailed in 2.5 above.
- 2.9 With the exception of point 2.8 above, previous Agency service will not be taken into account for any national or local terms and conditions, or polices, which relate to continuity of service.

## **MANAGERS RESPONSIBILITIES WHEN CONSIDERING AGENCY WORKERS ASSIGNMENTS**

- 2.10 There is a requirement on managers not to engage Agency Workers on assignments that they believe will be for longer than 12 months, but instead to advertise the role through the Council's normal recruitment channels. The only exception to this is where the normal recruitment channels have been exhausted.

## **SECTION 3- STATEMENT OF INTENT**

- 3.1 The Council will formulate, publish and keep under review this policy.



**COUNCIL HOUSING RENT & SERVICE CHARGE SETTING  
2024/25****HOUSING & COMMUNITIES  
(COUNCILLOR LYNDA THORNE)****AGENDA ITEM:**

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**Reason for this Report**

1. To seek Cabinet approval for the approach to the setting of rents and service charges on council owned dwellings in the Housing Revenue Account for the financial year 2024/25.
2. To brief Cabinet on proposed efficiencies to be made in the Housing Revenue Account for 2024/25.
3. To brief Cabinet on the help and support available to tenants who are struggling with the cost-of-living crisis.

**Background**

4. The Housing Revenue Account (HRA) records income and expenditure arising from the provision of Cardiff Council's 13,937 council homes. The HRA is ringfenced for the council's housing landlord functions and cannot be used for other purposes.
5. The main source of income to the HRA is from tenants in the form of rents and service charges. The purpose of reviewing rents is to ensure the Housing Revenue Account has enough income to provide quality housing services for current and future tenants. Rental income allows the service to invest in the maintenance and improvement of existing homes and neighbourhoods; provide good tenant support services; contribute to the funding of our community Hubs and also build new homes.
6. The Renting Homes (Wales) Act 2016 came into force on 1<sup>st</sup> December 2022. This new legislation requires landlords to give tenants two months' notice of any change to rents. Previously only 28 days' notice was required.
7. To meet the new notice period requirements as laid out in the Act, rent and service charge levels are now decided ahead of the normal budget process annually. The detail of the HRA budget for 2024/25 and the finalisation of any savings proposals will still be considered as part of the Council's normal budget setting process in February.

## **Rent Setting Policy**

8. Whilst the responsibility for setting rents rests with the Council, the Welsh Government rent policy framework sets limits and boundaries for this. These rules are as follows:
9. When determining the setting of rents and service charges, social landlords must make an assessment of cost efficiencies, value for money and affordability for tenants which should be discussed at Cabinet or Council.
10. The maximum overall rent increase allowable in any one year is the September Consumer Price Index (CPI) +1%. Should CPI fall outside the range of 0% to 3%, the responsibility will rest with the Housing Minister to determine the appropriate change to rent levels for the year.
11. In September 2023, CPI was 6.7%, well above the range allowed for by the policy. Therefore, a decision regarding the rent setting was required by the Minister. The Minister announced on the 27<sup>th</sup> October 2023 that the maximum that rents can increase by is 6.7%, it was confirmed that this is the maximum increase and decision making is with the Council. The Minister also confirmed that the commitments made by social landlords to prevent evictions and support tenants in 2023/24 must continue to be implemented. Details of these commitments can be found at paragraphs 62 - 71.
12. Uncertainty remains about future rent levels, due to the impact of inflation on the policy and the end of the current rent setting framework in 2025. This is a significant risk to the resilience of the HRA as it means that the Council cannot control or effectively predict a key component of HRA business planning.

## **Issues**

### **Proposal**

13. Following a full review, it is proposed that council rents should increase by the full amount allowed of 6.7%.
14. In considering the appropriateness of this level of rent increase the impact on tenants has been considered, including:
  - Whether Cardiff's rents are good value for money
  - The affordability of Cardiff's rents
  - The support available to tenants

The impact on the HRA business plan has also been considered including the ability to continue to:

- Maintain and improve existing homes
- Build new homes
- Support tenants



## The Impact of Rent Increase on Tenants

The table below shows the impact on council average weekly rent levels of a 6.7% increase.

Property Type/Size	2023/4 Current Weekly Net Rent	2024/5 Proposed Weekly Net Rent (6.7% increase)	Weekly Increase
1 bed flat	£100.42	£107.13	£6.71
2 bed flat	£116.22	£124.01	£7.79
3 bed flat	£132.02	£140.87	£8.85
4 bed flat	£147.82	£157.72	£9.90
1 bed house	£113.63	£121.05	£7.42
2 bed house	£129.43	£138.08	£8.65
3 bed house	£145.23	£154.25	£9.02
4 bed house	£161.03	£171.44	£10.41

*NB: rents above are based on 49 weeks collection and do not include service charges.*

15. Cardiff's rents will continue to represent **good value for money**. Even after the application of the maximum increase, council rents will still be significantly lower than private sector rents. Council properties are also more energy efficient than private sector properties. (see paragraph 73 below for further information)
16. It has also been demonstrated that rents remain **affordable** at this higher level, with the new rent levels scoring well against the Joseph Roundtree Foundation (JRF) living rents model (see paragraph 52 to 55 below for further information).
17. While any increase in rent is difficult at this time, it should be noted that 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits. In November 2023, it was announced that from April 2024, benefits including Universal Credit will rise by 6.7% and the state pension will increase by 8.5%.
18. For those who do struggle with their rent payments a **range of support is available** to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team, this support and its success is set out at paragraphs 59 to 60.
19. As in 2023/24, a commitment has been given that there will be no evictions due to financial hardship for the term of the rent settlement in 2024/25, where tenants engage with officers.

## Impact of the Rent Increase on the Housing Revenue Account

20. Prior to the announcement by the Minister of the maximum rent increase, all Local Authorities were asked by Welsh Government to model the impact of four rent increase options on the delivery of the HRA Business Plan, 2%, 4%, 6.5% and 8%. The table below shows these impacts:

### Rent Increase Modelling

Rent Uplift %	Income Loss/(Gain) Compared to HRA Business Plan assumption of 5.3% 2024/25	Inflationary cost increase forecasts compared to HRA Business Plan 2024/25 (includes increased cost of borrowing)		Estimated Total Revenue Shortfall/ (Surplus) 2024/25
		Management and Supervision	Revenue Repairs and Maintenance	
	£'000	£'000	£'000	£'000
2%	2,971	1,339	459	4,769
4%	1,171	1,339	459	2,969
6.5%	(1,081)	1,339	459	717
8%	(2,431)	1,339	459	(633)

21. As can be seen above, all the rent increase options that were modelled resulted in a deficit to the HRA other than an 8% increase.
22. Following the announcement by the Minister that the maximum increase would be 6.7%, this figure was also modelled to assess the impact on the delivery of the HRA Business Plan. This high-level modelling indicates a potential revenue budget shortfall of £537,000 based on estimated cost pressures.
23. The following assumptions have been made in producing the above figures:
- Income loss/(gain) scenarios set out a comparison against the current 30-year HRA business plan which assumed a 5.3% rent uplift for 2024/25.
  - Management and supervision - staffing cost impact is based on the 2023/24 budget uplifted for the latest pay award offer.
  - Management and supervision – non staffing cost increase is based on the 2023/24 budget uplifted by assumed average inflationary increases across all budget heads reflecting the current range of pressures.

- Revenue repairs and maintenance - uplifted by assumed inflationary increases across all budget heads.
  - The rental impact is added to the cost impact to give an overall potential revenue budget shortfall as compared to the 2023/24 HRA business plan.
24. This is a high-level interim assessment of the impact of various factors on the 2024/25 budget and funding requirement. The current volatility in costs and uncertainty as to how these variables are likely to develop make any predictions very difficult at present and these estimates are likely to change over coming months. An up-to-date assessment of these variables will be included in the detailed budget that will be developed in the next few months to be presented to Cabinet for approval in February 2024.

### **Increase in Borrowing Costs and the Cost of Energy and Materials.**

25. Borrowing costs within the HRA are substantial and increases over the last few years are linked in the main to the successful delivery of the Directorate's house building programme. Other costs are also impacting on the HRA such as material cost inflation and increases in energy costs. It is envisaged that both material cost inflation and energy costs may have stabilised, but any further fluctuations can impact negatively on the HRA and will need to be monitored closely.

### **The Impact of Universal Credit on Rent Recovery Levels**

26. In Cardiff, from October 2023 those in receipt of Tax Credits were migrated onto Universal Credit (UC). A date for full migration for all benefit claimants in Cardiff has not yet been finalised. This change is likely to place additional pressures on rent arrears collection rates. To help mitigate this, as well as all of the support that is in place for all tenants, who fall into rent arrears as detailed in paragraphs 56 - 61, processes are also in place to request that the housing element of UC is paid directly to a tenants rent account for those who are in two months arrears or more.
27. A rent increase lower than 6.7% would have a significant and ongoing impact on the Council's ability to maintain existing homes and build new homes. Cuts to services would be required that would impact on the most vulnerable of our tenants.
28. It should also be noted that these figures do not include any amounts to address the current and emerging service pressures that are outlined below.

### **Addressing the Budget Deficit**

29. As stated above, even when applying a 6.7% increase the modelling shows that a deficit of £537,000 would occur. Therefore, efficiencies would need to be made in order to ensure that the HRA Business Plan is sustainable.

30. A full review of HRA expenditure has therefore taken place and a number of areas have been identified where efficiencies can be made. This includes:
- Review of the Senior Management Team
  - Alignment of Advice Services
  - Review of staffing establishments and related funding requirements
31. It is anticipated that the savings identified in these areas will mitigate the estimated £537,000 revenue shortfall that would result from the application of a proposed 6.7% rent increase.
32. Additional opportunities for service change that will create savings will continue to be explored next year, including:
- Increased utilisation of Community Hubs.
  - An increase in digital solutions for customers who contact services in Housing & Communities.
  - Review of the Responsive Repairs Unit processes
  - A full review of Caretaking Services
33. While opportunities for savings will continue to be sought, the impact of any cuts to services and investment in homes at this time would be severe. The service is currently responding to a range of additional pressures, and these are set out below:

### **The Need to Maintain and Improve Existing Properties**

34. All social housing must be maintained and kept in good condition. The Housing Revenue Account or HRA pays for the maintenance, upkeep and upgrading of council housing. In addition to responsive repairs, a programme of planned works is in place to ensure that council homes are maintained and upgraded in a timely manner.
35. All social landlords in Wales are responsible for meeting and maintaining homes to the housing quality standard. On 24<sup>th</sup> October 2023, Welsh Government announced that the existing Welsh Housing Quality Standard would be replaced with WHQS 2023. The new standard aims to address decarbonisation in the social housing stock and ensure that homes are of a higher quality and affordable to heat.
36. The standard includes a number of new requirements with significant implications for the HRA business plan:
- A whole stock assessment must be carried out by March 2027 and Target Energy Pathways must be produced for all properties.
  - All stock is to reach Standard Assessment Procedure (SAP) Energy Performance Rating (EPC) "C" by 2030, and EPC "A" by 2034 and carbon emissions from homes must be minimised by 2034.

- The new standard includes a range of other requirements on social landlords including the provision of suitable floor covering for all habitable rooms, staircases and landings at the change of tenancy, provision of water butts and water saving devices and external bicycle storage.
37. The cost of implementing the new standard will be significant and as yet there has been no indication that additional funding will be made available. A full assessment of the cost implications of this change is underway and will be included as part of the HRA Business Plan which is due to be considered by Cabinet in March 2024.

### **The Need to Build New Homes**

38. There are currently 707 families, 806 single people and 186 young people residing in Temporary Accommodation in Cardiff. Combined waiting lists for Temporary Accommodation across the Single Person Gateway, Family Gateway and Young Person's Gateway are up by 150% in two years. Currently, over 150 units of hotel type accommodation are being utilised by families needing accommodation. All of these individuals and families will need to be provided with settled, permanent accommodation.
39. There are also significant issues in the private rented sector. Short supply of privately rented properties in the city is driving up rent prices which have increased by 16.1% since 2015. This increase is resulting in very few properties being let at, or close to the Local Housing Allowance Rate, the maximum that can be claimed in housing related benefits. The average shortfall across all property types according to data obtained by the Council's Private Rented Sector team in September 2023, is circa £62 per week. For 4 bedroomed properties the shortfall is around £145 per week. These issues in the private rented sector are causing more people to approach the local authority for help. 774 households presented to the homeless service in 2022/23 with a Section 21 Notice to Quit, averaging 65 per month. Compared to pre-pandemic levels, this is an increase of 446 notices (136%).
40. The cost-of-living crisis is expected to continue, with as many as 1.4 million households in the UK facing mortgage interest rate rises in 2023, this not only affects families and individuals but also private landlords who have buy-to-let mortgages. The majority of mortgage fixed term rates that will end in 2023 were set below 2%, representing a significant future hit to household budgets.
41. It is therefore more important than ever that Cardiff Council is able to provide good quality, affordable permanent housing to those who need it most and the ambitious new-build programme contributes significantly to this. The building of new homes is an investment in the future, and the rents from these properties will yield an income, that will, in time, repay any borrowing that was required to build the home. However, in the short term it is important that funds are available within the HRA to fund this capital investment.

## **Meeting the Demand on Council Services**

42. There has been a significant increase in the needs of existing council tenants. Many tenants are vulnerable individuals who need support to remain in their own homes and to prevent eviction. The Tenancy Management Team are responsible for ensuring that tenants (contract holders) and leaseholders comply with their tenancy conditions or the terms of their lease, providing advice and guidance to tenants and leaseholders, identifying support needs and where necessary taking enforcement action. The team have reported that they are now dealing with an increasing number of tenants who have complex and challenging needs.
43. The Tenancy Sustainment Team work closely with other housing teams and take proactive measures to support vulnerable tenants to sustain their tenancy by utilising a range of support services and prevent enforcement action. The Tenancy Sustainment Team are now supporting 86 individuals, an increase of 22.8% on the same time last year.
44. The Welfare Liaison Team support tenants with budgeting, debt advice and income maximisation. More than ever this team needs to continue to carry out this vital work as the cost-of-living crisis continues to persist. The team has now aligned with Advice Services and since April 2023, over £2 million in additional benefits has been identified for council tenants, an increase of 26.4% on the same period last year.
45. The Community Hubs are seeing an increase in footfall month on month. These spaces are at the heart of the city's communities and are a vital lifeline to thousands of people. Footfall across Community Hubs has increased by 25% on the same period last year. The Hubs provide tenants (contract holders) with advice on tenancy issues, rehousing, homeless prevention, employment support, money advice as well as holding events for tenants of all ages to help them engage with the council and their community and to improve their wellbeing. Hubs are also providing Foodbank vouchers and parcels and Warm Welcome spaces over the winter.

## **Consultation with Tenants on the Rent Increase**

46. Consultation with tenants took place between 25<sup>th</sup> September 2023 and 22<sup>nd</sup> October 2023. Given the time constraints it was necessary for consultation to take place before the decision of the Minister was received on the amount of the maximum rent increase. Given the significant impacts of a below inflation increase in rent, it was decided to consult tenants on:
  - Whether they considered their rents to be good value for money
  - A proposal to set rents at the full amount allowed by Welsh Government, as long as this was demonstrated to be good value for money and affordable.
  - If efficiencies were to be made, which areas we should prioritise to make those efficiencies.

47. The Consultation comprised of:

- An online survey. This was promoted through a wide range of channels, including the Cardiff Tenants website and 15 face to face events were held in Hubs across the city to encourage responses.
- In addition to this, front facing staff who have regular contact with tenants including the finance, welfare liaison and housing helpline officers promoted the survey when they were helping tenants with other enquiries.
- A paper survey was sent to 2,774 (20%) tenants, who were selected randomly.

48. 210 tenants responded to the survey. This is a 289% increase on the number who completed the survey in 2022.

49. The responses that were received are set out below:

- 55.2% of respondents fully or partially pay their own rent, so the impact of any rent increases would affect them the most.
- Overall, 77.6% of respondents thought their rent offered good value for money with 36.2% finding it very good value. Only 12.4% said that it was poor or very poor value for money.
- 69.5% agreed that Council rents should be set in line with the full amount allowed by the Welsh Government, as long as this is affordable.
- 83.3% tenants stated that they were not experiencing any difficulties in paying their rent, while 16.7% said that they were. 8.7% requested contact from officers to assist with payment of rent or any money issues they may have. These tenants will be contacted directly.
- Further information about the consultation can be found at Appendix 1.

### **Value for Money**

50. All social landlords in Wales must consider affordability issues for tenants when proposing their rent increase to ensure rent and service charges represent value for money.

### **Comparison with the Private Rented Sector**

51. The table below shows, that even when a 6.7% rent increase is applied, Cardiff's rents remain very good value for money when compared to private rents. As well as enjoying lower rents, council tenants also enjoy a wide range of services and support not available to private tenants as set out in the paragraphs above. In November 2023 it was announced that from April

2024, the Local Housing Allowance (LHA) rate will be increased for the first time in three years and will now cover the lowest third (30<sup>th</sup> percentile) of local market rents. The Department for Work and Pensions will inform the authority of the new rates for Cardiff, but these are not expected to be received until January 2024, so LHA rates for 2023/24 have been used in the following table:

**Market rents compared to new proposed Council rents**

No. of Bedrooms	Average Weekly Current Rent 23/24	Proposed Weekly Rent 2024/25 (6.7% increase)	Weekly Local Housing Allowance (23/24)	Average Weekly Private Market Rents (September 2023)
1	£106.24	£113.36	£120.82	£182.77
2	£122.43	£130.64	£149.59	£252.00
3	£140.81	£150.25	£178.36	£298.15
4	£156.06	£166.52	£218.63	£363.92

*NB: Estimated rents above are based on 52 weeks collection and include estimated current service charges to make them directly comparable with LHA rates.*

*Average Weekly Private Market Rents have been calculated using information the Council's Private Rented Sector team have gathered using a survey of 381 properties available to rent in September 2023.*

**Affordability**

52. The Joseph Roundtree Foundation (JRF) Living Rent Model has been used to review the proposed rents.

53. The model states that a Living Rent should be affordable for a household with someone in full-time employment and earning around the minimum wage. The model uses the earnings of the lower quartile (lowest 25%) of earners resident in Cardiff. The model assumes that 28% of income is available to pay rent. This figure is then adjusted for household size.

54. As can be seen from the table below Cardiff's rents are well below the JRF Living Rent, with a one-bedroom flat being £11.58 below and a 3-bedroom house being £34.70 below. For larger properties the difference is even greater with a £65.19 difference for a 4-bed flat and £52.26 for a 4-bedroom house.



## Comparison of Council Rents with Living Rents

Property Type	<i>Proposed Cardiff Council Net Rent – per week 2024/25</i> 6.7% (before service charges are added)	<i>Proposed Living Rent – per week 2024/25</i> (before service charges are added)	Difference in charge per week (Total & %)
Bedsit	£85.08	£112.53	£27.45
			32.26%
1 Bed Flat / Maisonette	£100.95	£112.53	£11.58
			11.47%
2 Bed Flat / Maisonette	£116.86	£146.29	£29.43
			25.18%
3 Bed Flat / Maisonette	£132.74	£180.05	£47.31
			35.64%
4 Bed Flat / Maisonette	£148.62	£213.81	£65.19
			43.86%
2 Bed House / Bungalow	£130.11	£146.29	£16.18
			12.44%
3 Bed House / Bungalow	£145.35	£180.05	£34.70
			23.88%
4 Bed House / Bungalow	£161.55	£213.81	£52.26
			32.35%

55. The living rent for Cardiff has been calculated using the JRF formula and are calculated before service charges are applied. Further detail can be found in the Affordable Rents Report at Appendix 2.

### Support Available for Tenants

56. There are a range of advice and support services to help tenants who are struggling to pay their rent or any other bills.

57. A new rent arrears pathway was introduced in 2021. This ensures that anyone experiencing rent arrears is able to access help and support easily

via a gateway approach. Practical support as well as financial help via Discretionary Housing Payments or the Homeless Prevention Fund is provided. In the first 6 months of this year, 361 social housing tenants have already been supported through this pathway.

58. A new Discretionary Hardship Scheme has been launched this year. This new scheme provides dedicated advice and financial assistance to Council tenants who are at risk of eviction due to rent arrears. The scheme is administered by the Housing Finance section and a decision to award financial assistance is made by a panel of three managers from Advice Services, Housing Finance and Benefits.
59. The Welfare Liaison Team are a dedicated team supporting council tenants and work alongside the Money Advice team to provide one to one help with income maximisation and budgeting. They provide a holistic service and act impartially to work out affordable repayment plans for rent and other household bills. Since April 2023, over £2 million in additional benefits has been identified for council tenants, an increase of 26.4% on the same period last year.
60. The Team has recently been aligned to the Council's Money Advice Service. This ensures additional capacity from the Adviceline is available so tenants can access support for longer hours, including late nights and Saturdays. This join-up of teams has also allowed Welfare Liaison officers to provide services from within the community and now provide services from 8 Community Hubs on a drop-in basis, increasing the reach of the team. The team also refer into more specialist support from partner organisations including Citizens Advice and The Speakeasy Law Centre.
61. Where finding work or upskilling a tenant would help improve their financial position, the Council's Into Work team provide a wraparound employment support service for people of working age 16+. The service is accessed by a single point of entry via a gateway and people are triaged to the most appropriate support. This includes job clubs, one to one mentoring, training and funding to help remove barriers into employment.

### **Additional Commitments to Support Tenants**

62. As part of the rent settlement for 2023/24, Cardiff Council made an agreement with the Welsh Government to comply with a number of voluntary commitments to ensure that tenants, particularly those who pay all or part of their rent were protected. Welsh Government has confirmed that these existing commitments and initiatives must continue to be implemented going forward into 2024/2025. These commitments include:

**There will be no evictions due to financial hardship, where tenants engage with officers.**

63. Cardiff Council has not evicted a tenant who engaged with Finance Officers for rent arrears since March 2020 and continues to prevent evictions by using all resources available. This includes an emphasis on early intervention and prevention. In addition to this, a new multi-disciplinary panel has been

introduced, chaired by the Assistant Director for Housing and Communities to ensure that all support across the Council and partners is offered to the tenant to prevent eviction. This has proved very successful and tenants who have proved difficult to engage with are now on the right path to addressing their arrears and have been prevented from being evicted from their home.

64. As outlined in paragraphs 59 to 60, the Welfare Liaison Team, which is now aligned with Advice Services supports tenants via one-to-one help with income maximisation and budgeting advice. They provide a holistic Money Advice Service and act impartially to help tenants who may be experiencing difficulty in paying their rent and work out affordable repayment plans.
65. The Advice Service enables tenants to access a range of support including Food Bank Vouchers, Emergency Fuel Vouchers, Debt Advice, Universal Credit and other Benefits, Welsh Government Winter Fuel Support Scheme, Discretionary Assistance Fund, Disability Cost of Living Payment and the Pensioner Cost of Living Payment.
66. As detailed in paragraph 58, a new Hardship Scheme supports those tenants who are in crisis.

**Take part in a joint campaign, encouraging tenants to talk to their landlord if they are experiencing financial difficulties and access support available, will be launched across Wales.**

67. Cardiff Council takes a person-centred approach to rent arrears, with an emphasis on early intervention and prevention. Working closely with the Welfare Liaison Team, staff within the Finance Section can help tenants struggling at an early stage to prevent further action taking place. Considerable time and resources have been invested into assuring a balanced approach towards the collection of rent arrears. This approach, with the tenant at the centre of the process, has ensured that all services are working to provide the right support to address the tenant's needs. There is also a commitment to working with Welsh Government on any future joint campaigns.

**Agreement to maximise the use of all suitable social housing stock, with a focus on helping those in the poorest quality transitional accommodation move into longer term homes that meet their needs.**

68. 80% of general social housing lets are allocated through the Cardiff Housing Waiting List to homeless individuals and families in Cardiff, supporting those who need to move on from temporary accommodation by providing them with permanent, affordable accommodation. The current pressures on homelessness and temporary accommodation services across the city are significant and it is therefore vital to continue with the award-winning housebuilding programme to deliver the homes that are much needed.

**A commitment to invest in existing homes to keep them safe, warm and affordable to live in.**

69. It is essential that homes are maintained to a high standard. The Responsive Repairs Service which carries out repairs to council owned housing stock is currently undergoing transformational changes to improve the experience for tenants. Maintenance Persons complete minor jobs in properties, allowing skilled tradespeople time to carry out the more complex work, ensuring a rapid response to tenants.
70. The issue of damp and condensation in council homes is now being managed in a more effective and co-ordinated way. Following a review, changes have been implemented to improve the response to this important issue. A monthly Damp and Mould meeting with oversight by the Housing & Maintenance Board, is chaired by the Assistant Director for Housing & Communities. Additional resources have been allocated to this area and six new workstreams are being taken forward and are closely monitored via the Housing Management and Maintenance Board.

**Building on existing engagement with tenants in rent-setting decisions, including explaining how income from rent is invested and spent.**

71. The Tenant Participation Team consult directly with tenants and leaseholders, ensuring their voice is heard and giving them a say on how services can be improved. The team has recently undergone transformational change and rebranded as “Tenants Together”. There is now a focus on developing a co-produced engagement programme, including the development of focus groups to enhance decision-making, focusing on tenant’s views and opinions, allowing them a voice to be heard and to feel valued. Tenant’s contribution is also vital to ensure that value for money is delivered across all services, especially in the current cost of living crisis. Each year tenants are consulted on rent setting proposals.
72. These commitments will be continued to be delivered in 2024/25.

**Energy Performance**

73. The energy performance of Cardiff’s council homes is better than the average for any tenure. This makes Cardiff council properties more affordable to heat.

Tenure	Average SAP Ratings
Owner Occupier	62
Private Rent	63
Social Rent	71
Cardiff Council	72
Cardiff Council New Build	85

**Service Charges**

74. Social landlords are required to review service charges annually, to ensure they are reasonable, provide value for money for tenants and are affordable.

Landlords are required to list their service charges separately to the rent to allow for transparency to tenants.

75. Most service charges are eligible for housing benefit/universal credit, except where personal heating / water is provided.
76. In previous years, service charges have been based on the September CPI rate or on actual cost where this is known. It is proposed to continue with this approach and uplift service charges by 6.7%, in line with inflation, or by actual costs where these are known. The impact of this on the more commonly applied service charges can be seen in the table below.

<b>Property Type</b>	<b>Average service charge 2023</b>	<b>Proposed Increase (6.7%)</b>
Houses	£4.61	£4.92
Flats	£10.20	£10.88
Sheltered Bungalow	£17.83	£19.03
Community Living	£49.52	£52.84

77. It is proposed that service charges for personal heating and hot water, where provided, are based on actual costs (based on costs for September 2022 to August 2023). The personal heating charge within community living schemes would increase on average from £10.92 to £12.67 an increase of 16%. The maximum charge that would apply would be £16.75. Support will be provided to tenants to claim their entitlements under government schemes and any tenants suffering hardship will be offered help through the Council's own financial support schemes, available for those most in need.
78. A full list of service charge proposals can be found at Appendix 3. It should be noted that the costs of some specialist accommodation schemes are still being established and also costs for some contracted services for 2024/25 are not yet available. However, all service charges will either be increased by 6.7% or by actual costs where known.

### **Single Impact Assessment**

79. A Single Impact Assessment including an Equality Impact Assessment has been carried out and did not give rise to any concerns. This is attached at Appendix 4. The proposals are in line with the requirements of the Future Generations Act.

### **Reasons for Recommendations:**

80. To set the rents for council homes taking into account the needs of tenants, affordability and value for money and the requirement to set a sustainable budget for the Housing Revenue Account for 2024/25.
81. To set service charges for council tenants for 2024/25.

## **Financial Implications**

82. The Council has a statutory duty to ensure that the Housing Revenue Account (HRA) achieves a balanced budget. Any liabilities of the HRA are ultimately liabilities of the Council and it is essential that the budget setting in any year has regard to robust viability and risk assessments, particularly in respect of the rent setting policy.
83. This report sets out the background to the current Social Housing Rent policy, the ministerial decision to set the maximum rent level for 2024/25 at 6.7% and the proposed approach to the setting of rent and service charge levels for 2024/25. This is aligned to the need to give increased notice periods to tenants for annual rent uplifts as a new legislative requirement of the Renting Homes Wales Act 2016 which came into force in December 2022.
84. While 6.7% is the maximum increase allowable for 2024/25, landlord decisions on rent must also consider the affordability of rents for tenants. The rent policy recognises the requirement to balance the needs of landlords with the interests of tenants and includes a requirement that social landlords make an annual assessment of affordability and cost efficiencies which demonstrate that their homes and services represent value for money. The assessment carried out as detailed at paragraphs 50 to 55 includes a comparison of rent levels with the private rented sector. Prior to determining the recommendations in this report, members should be content with the outcomes of this assessment.
85. This report sets out the potential implications of a rent uplift based on various scenarios as highlighted in the table at page 4 of the report. A decision to set rents at the maximum 6.7% is considered, based on current information, to have the potential to result in a revenue budget shortfall in the region of £537,000. It should be noted that this table sets out very high-level indicative positions based on assumptions and variables which are subject to change and will need to be firmed up as more information becomes available. These include, but are not limited to, inflationary pressures across a wide range of goods and services, interest rate movements, future pay award settlements and other full year impacts of the costed staffing establishment, progress of the new build programme and timings of availability to let.
86. The current volatility in costs, and uncertainty as to how these variables are likely to develop, make any predictions very difficult and these estimates are likely to change over the coming months. An up-to-date assessment of these variables will be included in the detailed budget to be developed and presented to Cabinet for approval in February 2024.
87. Rent uplifts lower than assumed in previous budgets and business plans have the potential to impact on the level and quality of service provision to tenants and on the capital schemes that can be taken forward, due to considerations of affordability, prudence and the sustainability of additional borrowing requirements.

88. It will be necessary for the directorate to review and prioritise revenue operating costs to identify the required savings and to support ongoing financial resilience. In addition, a review and reprioritisation of the HRA Capital Programme will be required with, where feasible, a realignment of future spend plans to ensure that capital spend commitments entered into remain affordable in the short and longer term.
89. The report proposes a range of uplifts to service charges as set out at paragraphs 74 to 78 above and at Appendix 3. Whilst some charges are proposed to be increased in line with the September CPI of 6.7% others are proposed to be uplifted at a level to fully recover costs. It will be essential to monitor any outcomes of these uplifts, not least the impact on tenants of the proposed increases to rent and service charges and their ability to pay in the current economic climate and cost of living crisis.
90. The HRA Budget 2024/25 and MTFP will be developed in the coming weeks and will be presented for approval by Cabinet as part of the Council budget setting process in February 2024. Decisions on the setting of rents and service charges for 2024/25 will be a key factor in determining the future resources available to the HRA and the requirement for efficiencies and reprioritisation of service delivery plans.
91. It should be noted that there are significant capital expenditure commitments for the HRA both incurred and proposed for the future, with a resultant increased borrowing requirement in order to invest in homes and create new assets. The HRA Capital Programme will be reviewed in the coming weeks in line with the 30-year HRA Business Plan. The latter will be reported to Cabinet for approval in March 2024.
92. Paragraphs 29 to 33 set out the approach to identification of potential efficiencies in service delivery. These along with the impact of decisions with regard to the timing of planned spend within the capital programme and borrowing levels as a result will need to be considered in detail as part of the detailed budget and business plan work.
93. The report highlights a number of pressures on the HRA as a result of increased demand for housing services and tenant support along with new build ambitions and other initiatives and strategies. This includes the Wales Housing Quality Standard 2023 which includes new requirements around decarbonisation and energy efficiency of homes. There is a significant risk to the affordability of these strategies and continuation of service delivery which highlights the need to seek all sources of available additional funding to mitigate where possible any impact on the HRA.
94. Paragraphs 38 - 41 of the report refer to the new build programme and the requirement that funds are available within the HRA to fund this ambitious capital investment. Decision making in this regard should be subject to undertaking best practice viability assessments and ensuring future mitigations are in place which do not place the HRA at financial resilience risk. This is particularly crucial given the number of variables that are not controllable and that could impact on the financial viability, including rent levels, interest rates and inflation, including within the construction industry.

95. There are a number of significant risks to the financial resilience of the HRA which will need to be monitored and managed closely. This will be reported in further detail and set out within the proposed HRA Budget 2024/25 and the HRA Business Plan. Any decisions to manage the position in the short term through the use of earmarked reserves and balances must be taken in the knowledge that such reserves are one off, finite and will not meet any ongoing funding gap in the longer term.
96. In addition, as part of the HRA budget and business plan processes, it will be essential to revisit assumptions with regard to the viability of the HRA and the sufficiency of reserves to meet future commitments of the MTFP and capital investment programme. This will be developed in the coming weeks as part of the HRA detailed budget process and business plan development and will be dependent on the robustness and adequacy of detailed service information provided in support of these plans.

### **Legal Implications**

97. All decisions taken by or on behalf of the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. standing orders and financial regulations; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.
98. Section 104 of the Renting Homes (Wales) Act 2016 allows the landlord to vary the rent payable under a secure contract by giving the contract-holder a notice setting out a new rent to take effect on the date specified in the notice. The notice may not be less than two months. Subsequent rent variation notices must specify a date which is not less than one year after the last date on which a new rent took effect.
99. The Council has to satisfy its public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are:
- Age
  - Gender reassignment
  - Sex
  - Race – including ethnic or national origin, colour or nationality
  - Disability
  - Pregnancy and maternity
  - Marriage and civil partnership
  - Sexual orientation
  - Religion or belief – including lack of belief.



100. As such a decision to implement the proposal has to be made in the context of the Council's equality act public sector duties.

101. The report identifies that an Equality Impact Assessment has been carried out and is appended at Appendix 4. The purpose of the Equality Impact Assessment is to ensure that the Council has understood the potential impacts of the proposal in terms of equality so that it can ensure that it is making proportionate and rational decisions having due regard to its public sector equality duty. The decision maker must have due regard to the Equality Impact Assessment in making its decision.

### **HR Implications**

102. There are no direct HR implications arising from this report.

### **Property Implications**

103. There are no specific further property implications in respect of the Council Housing Rent & Service Charge Setting 2024/25 report. Where there are any associated property acquisitions or related valuations required to deliver any proposals, they should be done so in accordance with the Council's Asset Management process and in consultation with Strategic Estates and relevant service areas.

## **RECOMMENDATION**

Cabinet is recommended to approve the proposed approach for rent and service charge setting for Council owned dwellings for financial year 2024/25.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Jane Thomas</b> Director Adults Housing and Communities
	8 December 2023

*The following appendices are attached:*

- Appendix 1 - Tenant Consultation Report
- Appendix 2 - Affordable Rents Report
- Appendix 3 - Proposed Service Charges 2024/25
- Appendix 4 - Single Impact Assessment

Mae'r dudalen hon yn wag yn fwriadol



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# Your Rent, Your Say 2024

Results October 2023

Tudalen 477



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[#GweithioDrosochChi](#)

[#WorkingForCardiff](#)  
[#WorkingForYou](#)

# Background



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As part of the Rent Setting process, Cardiff Council consult with our tenants regarding the proposals.

As there is now a legal requirement to give tenants **2 months' notice** when their rent is changed, it is necessary for this consultation to take place **before the decision of the Minister is received** on the maximum rent increase.

This means that consultation with tenants is carried out without advising them what the proposed increased rent will be.

Given the significant impacts of a below inflation increase in rent, tenants were consulted on:

- Whether they consider their rents to be **good value for money**
- A proposal to set rents at the **full amount allowed** by Welsh Government, as long as this is demonstrated to be good value for money and is affordable.

Affordability issues are also considered using the Joseph Rowntree Foundation Living Rents Model.

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#GweithioDrosochChi

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#WorkingForYou



# Background



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## The consultation comprised of:

- **An Online survey** promoted on the Cardiff Tenants website
- **15 face to face events** including focus groups across the city in community Hubs to encourage responses
- Front facing staff including Finance, Welfare Liaison and Housing Helpline officers promoted the survey with tenants and offered help to complete the survey on line, whilst assisting with other enquiries
- **Social Media** promotion
- Promotion on the Tenant Participation **website**
- **Paper survey** sent to 2,774 (20%) of tenants - selected randomly.



Tudalen 479

The survey ran from 25<sup>th</sup> September to 22<sup>nd</sup> October 2023.

**210 responses** were received – a **289% increase** on the number of responses received last year.



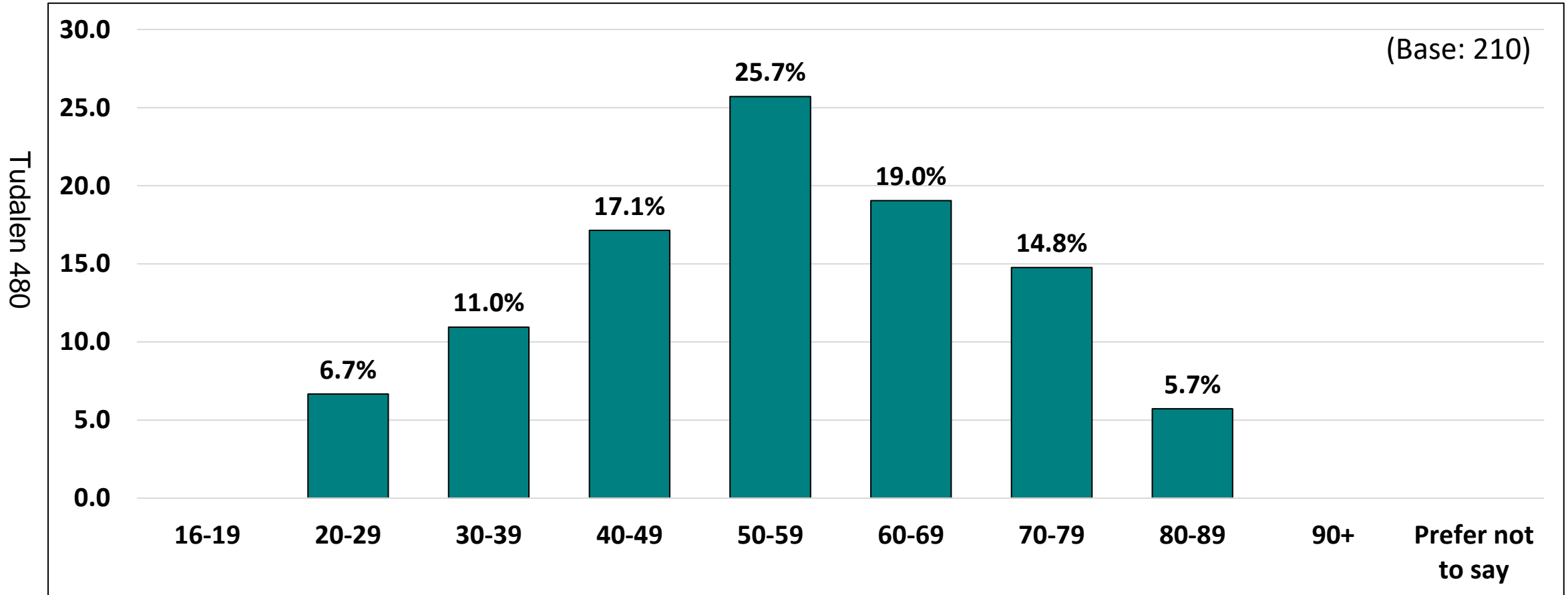
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# Age band of Respondents



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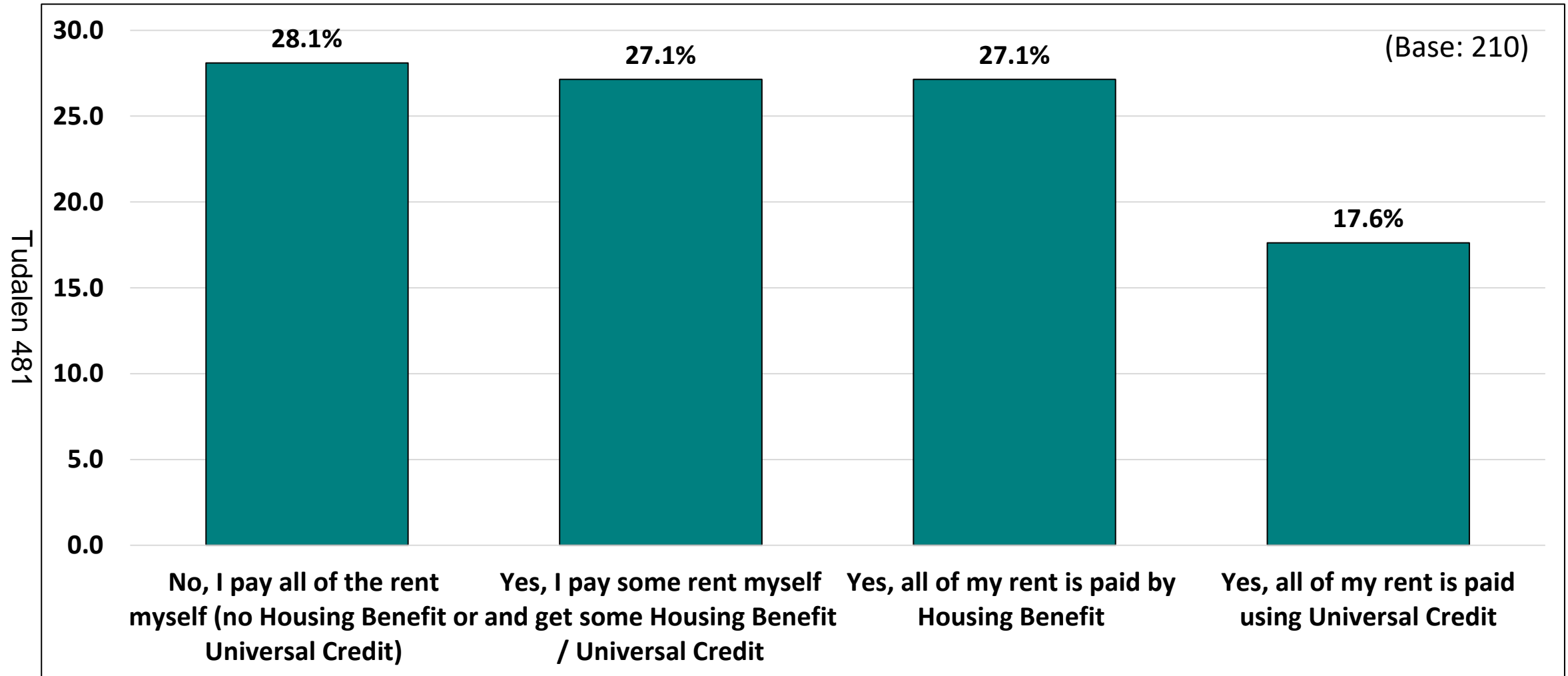
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# Do you receive Housing Benefit or Universal Credit to help pay your rent?



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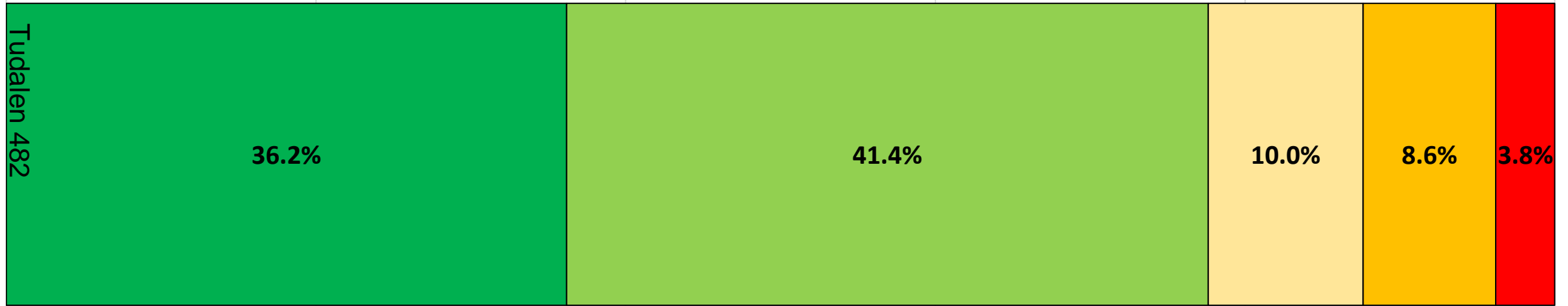
Taking into account the accommodation and the services we provide, do you think that the proposed rent for your property represents good value for money?



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(Base: 210)



0% 20% 40% 60% 80% 100%

Very good Fairly good Neither Fairly poor Very poor

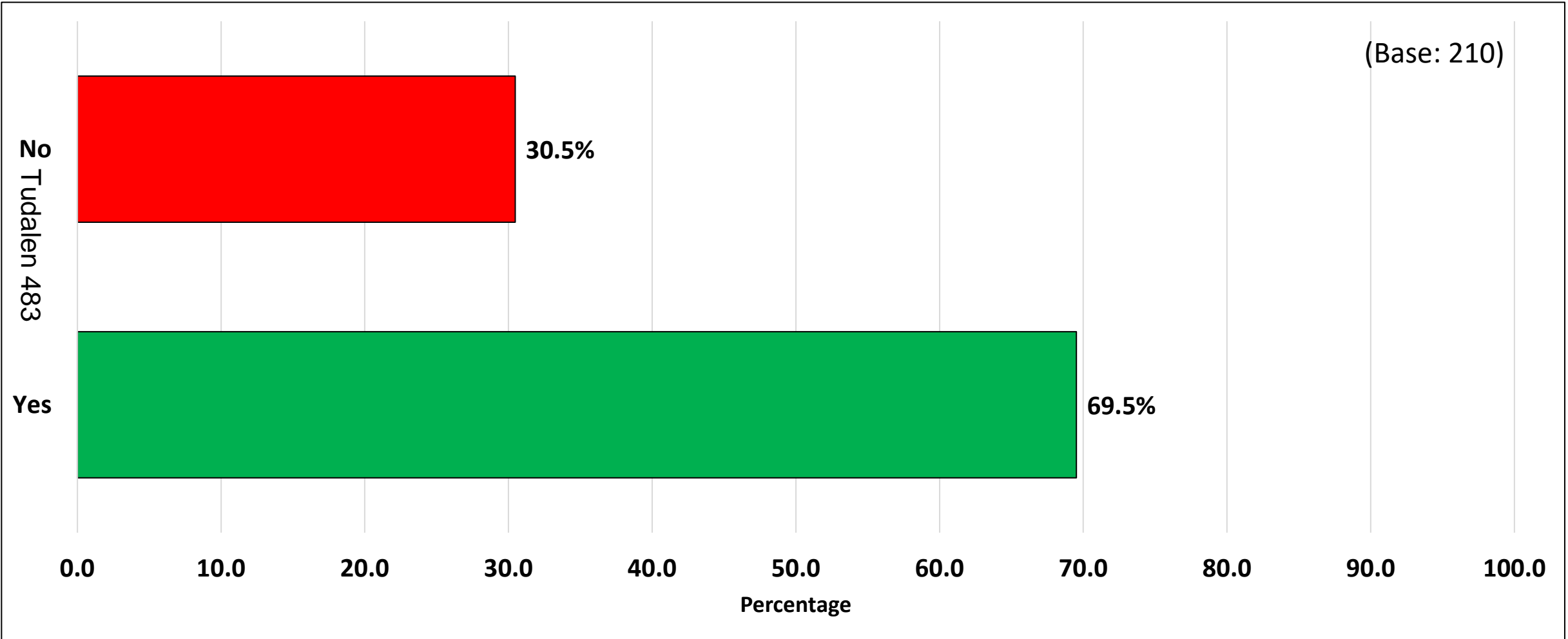
**77.6% of respondents thought their rent offered good value for money.**



# Do you agree with the proposal to set rents in line with the full amount allowed by the Welsh Government, as long as this is affordable?



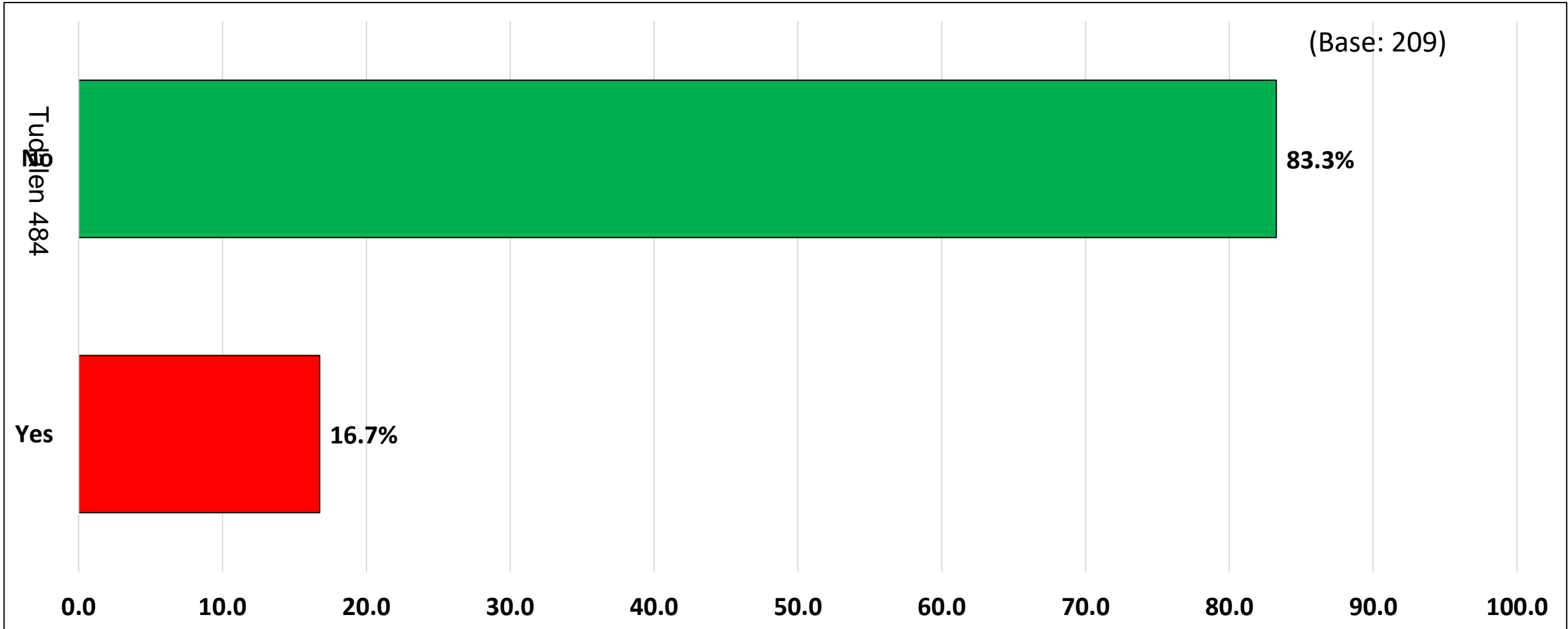
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# Are you currently experiencing any difficulties in paying your rent?



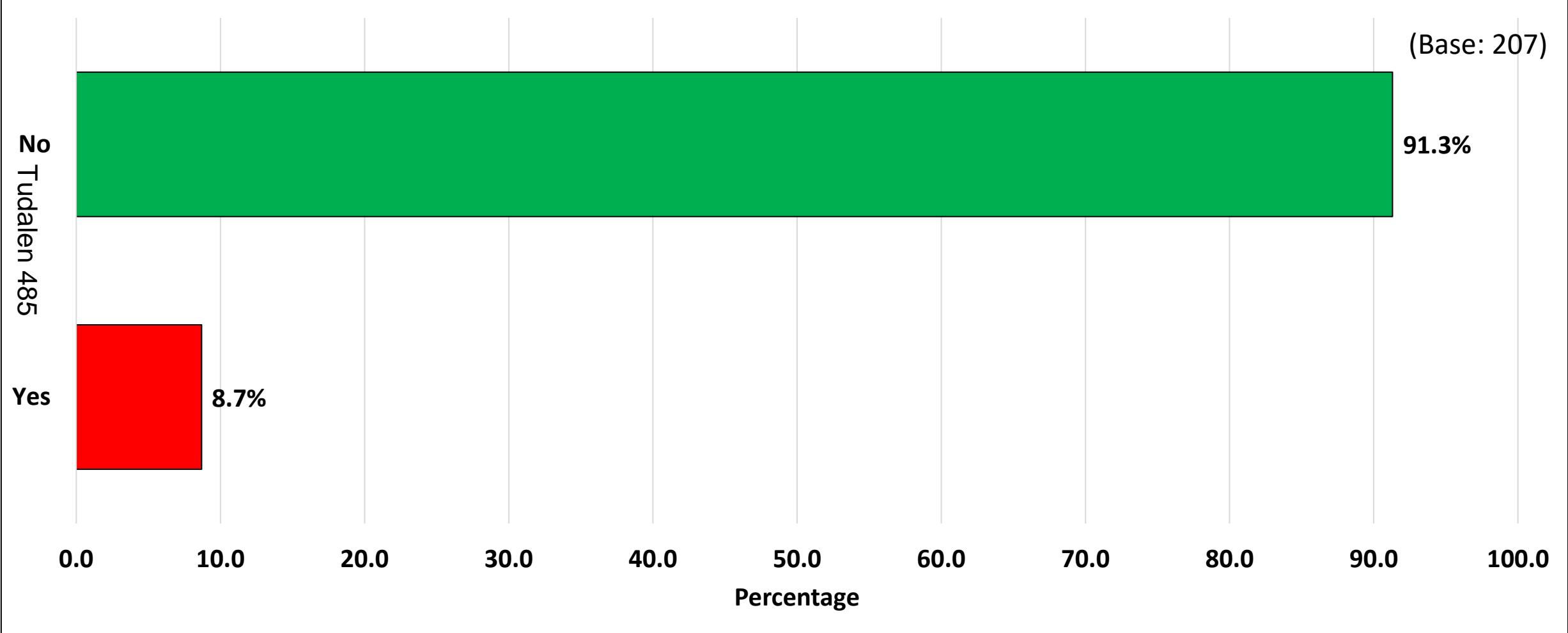
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GREENER



**Would you like us to contact you so we can discuss how we might be able to help you to pay your rent and with any other money issues you may have?**



**STRONGER  
FAIRER  
GREENER**



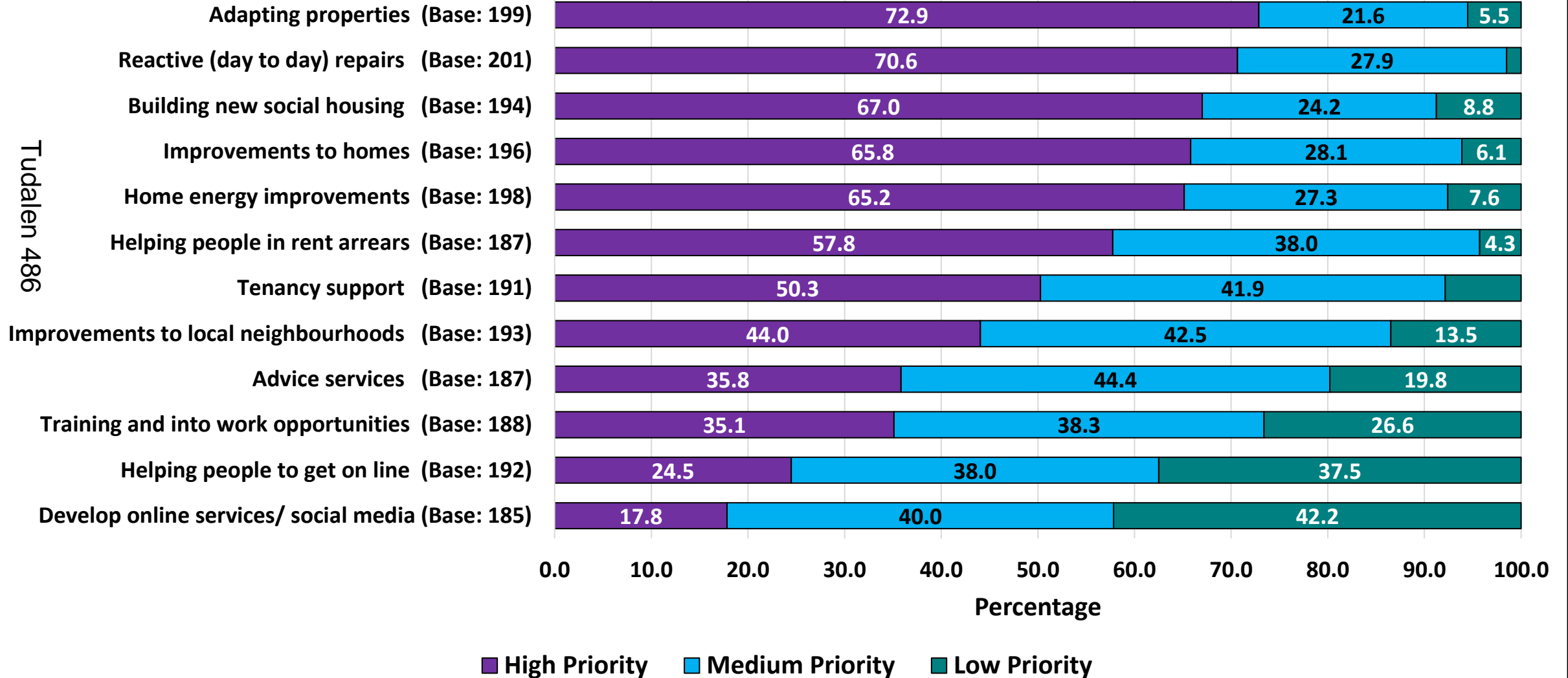
# What do you think our priorities should be over the next 5 years?



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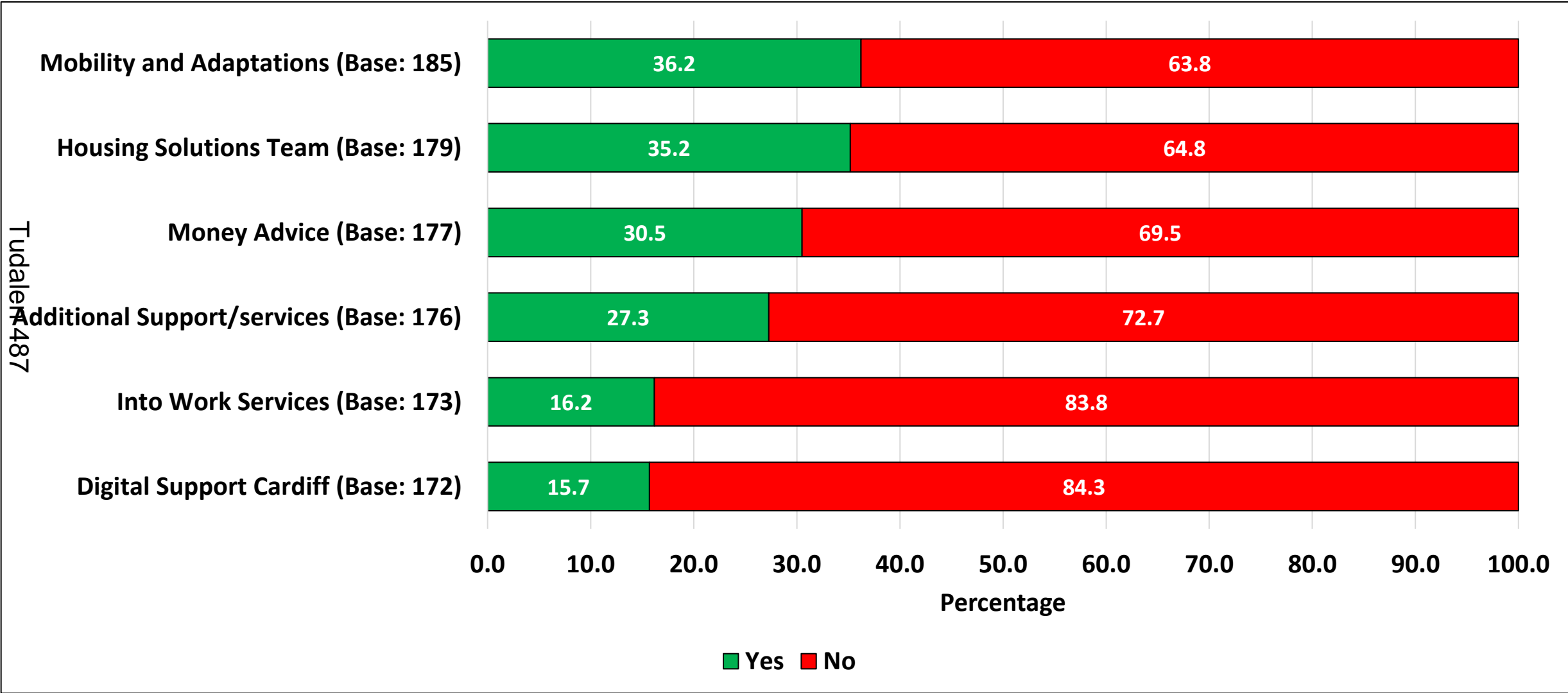
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# Other Services - Would you like to receive information on the following help and support services?



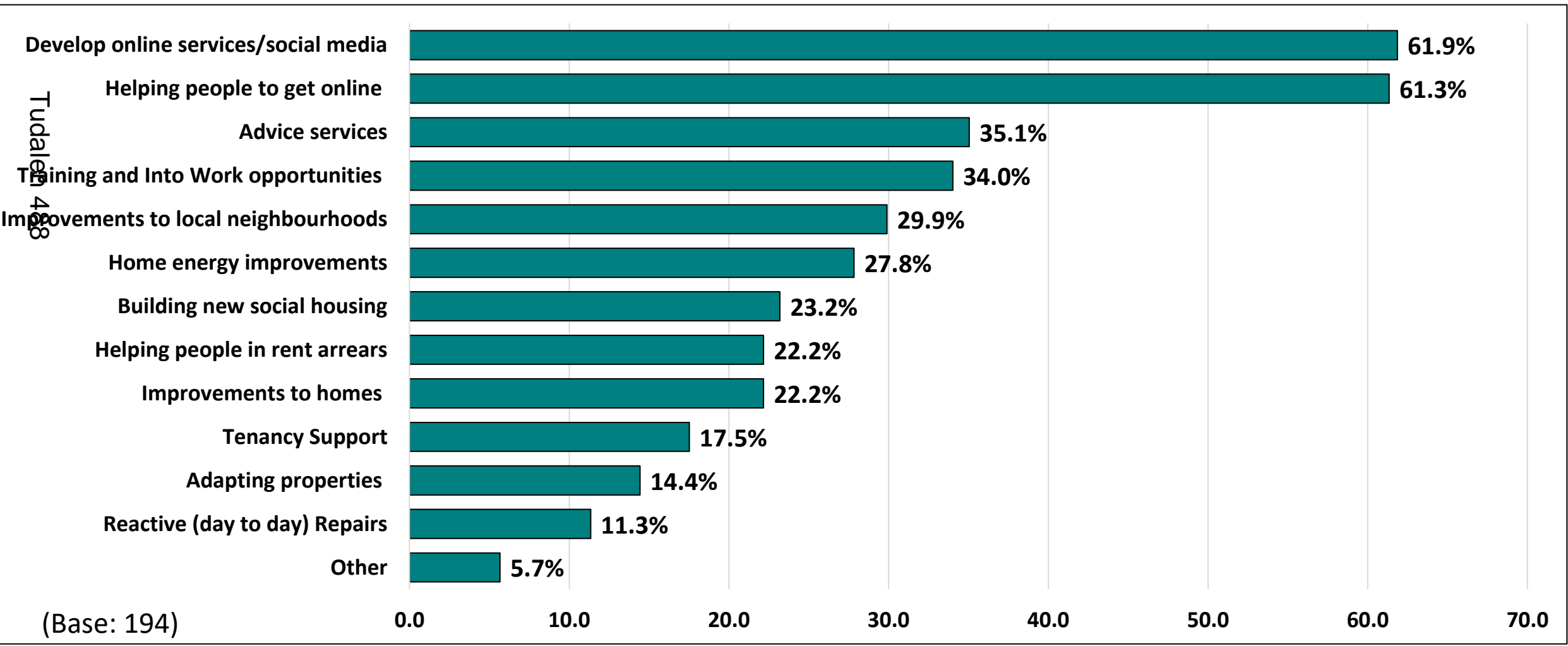
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# If following the Welsh Government decision, the forecasted rent income is below the level needed to maintain our current level of service, which areas do you think should be scaled back?



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**Affordability of Rents in Cardiff**

**Rent levels and value for money**

Whilst the responsibility for setting rents rests with the Council, this is specified within boundaries laid out in the Welsh Government rent policy framework.

When determining the setting of rents and service charges, social landlords must make an assessment of cost efficiencies, value for money and affordability for tenants.

The maximum overall rent increase allowable in any one year is the September Consumer Price Index (CPI) +1%. Should CPI fall outside the range of 0% to 3%, the responsibility rests with the Climate Change Minister to determine the appropriate change to rent levels for the year.

In September 2023, CPI was 6.7%, well above the range allowable by the policy. Therefore, a decision regarding the rent setting was required by the Minister. On 27<sup>th</sup> October 2023 the Minister announced that the social rent cap had been set at 6.7%.

It is therefore proposed to increase the rent for Cardiff Council homes by 6.7% from April 2024.

Cardiff Council must provide housing that remains affordable for current and future tenants and is assessed for cost efficiency and value for money.

Rents charged by private landlords are significantly higher than Council rents. The table below shows the current weekly rent and the proposed average rent for 2023/24 compared with the current Local Housing Allowance (LHA) rates and with rents in the private rented sector.

**Weekly rent levels and corresponding LHA rates**

<b>No. of Bedrooms</b>	<b>Weekly Current Rent 23/24</b>	<b>Proposed Weekly Rent 2024/25 (6.7% increase)</b>	<b>Weekly Local Housing Allowance (23/24)</b>	<b>Weekly Average Private Market Rents – Sep 2023</b>
1	£106.24	£113.36	£120.82	£182.77
2	£122.43	£130.64	£149.59	£252.00
3	£140.81	£150.25	£178.36	£298.15
4	£156.06	£166.52	£218.63	£363.92

NB: Estimated rents above are based on 52 weeks collection and include estimated current service charges to make them directly comparable with LHA rates. Average Weekly Private Market Rents have been calculated using information the Council's

Private Rented Sector team have gathered using a survey of 381 properties available to rent in September 2023.

### **The Joseph Rowntree Foundation (JRF) Living Rent Model**

The JRF Living Rent model links rents directly to an index of earnings and uses a recognised equivalence scale to allow for household income and property size to produce a Living Rent.

The model states that a Living Rent should be affordable for a **household with someone in full-time employment, working the average number of hours worked per week (including overtime) and earning around the minimum wage**. This uses the lower quartile national earning figures.

However, this income needs to be adapted to reflect the differing composition of households in different-sized properties and the fact that household income for low-paid families with children is likely to be enhanced by benefits and tax credits.

The Living Rents are based on:

Lower quartile localised earnings data from the Office for National Statistics' Annual Survey of Hours and Earnings (**ASHE**). The gross weekly figure below which **25% of the lowest earners resident in Cardiff** earn in 2023 is **£401.90**.

- These earnings are then adjusted for property size, in accordance with the JRF model.
- The starting rent is then set at 28% of the adjusted earnings.

The full calculations including details of the equivalence rates are set out in Appendix One.

The calculated living rents are set out below:

<b>Property Type</b>	<b>Weekly Living Rent</b>
Bedsit	£112.53
One Bedroom	£112.53
Two Bedrooms	£146.29
Three Bedrooms	£180.05
Four Bedrooms	£213.81

### **Proposed rent levels**

The following table shows how the rents calculated using the Living Rent model compare with the proposed net rent for Cardiff Council properties from April 2024. It should be noted that this includes general housing stock only and does not include specialist accommodation.

It indicates that overall Cardiff rents for general needs accommodation falls within an affordable level.



**Breakdown of weekly rent before service charges**

<b>Property Type</b>	<b><i>Proposed Cardiff Council Net Rent – per week 2024/25</i> 6.7% <i>(before service charges are added)</i></b>	<b><i>Proposed Living Rent – per week 2024/25</i>  <i>(before service charges are added)</i></b>	<b>Difference in charge per week (Total &amp; %)</b>
<b>Bedsit</b>	<b>£85.08</b>	<b>£112.53</b>	<b>£27.45</b>
			<b>32.26%</b>
<b>1 Bed Flat / Maisonette</b>	<b>£100.95</b>	<b>£112.53</b>	<b>£11.58</b>
			<b>11.47%</b>
<b>2 Bed Flat / Maisonette</b>	<b>£116.86</b>	<b>£146.29</b>	<b>£29.43</b>
			<b>25.18%</b>
<b>3 Bed Flat / Maisonette</b>	<b>£132.74</b>	<b>£180.05</b>	<b>£47.31</b>
			<b>35.64%</b>
<b>4 Bed Flat / Maisonette</b>	<b>£148.62</b>	<b>£213.81</b>	<b>£65.19</b>
			<b>43.86%</b>
<b>2 Bed House / Bungalow</b>	<b>£130.11</b>	<b>£146.29</b>	<b>£16.18</b>
			<b>12.44%</b>
<b>3 Bed House / Bungalow</b>	<b>£145.35</b>	<b>£180.05</b>	<b>£34.70</b>
			<b>23.88%</b>
<b>4 Bed House / Bungalow</b>	<b>£161.55</b>	<b>£213.81</b>	<b>£52.26</b>
			<b>32.35%</b>

NB: rents above are for 52 weeks and *do not* include service charges to make them comparable with the living rent formula.

### **Appendix 1: Calculating the Living Rent**

In order to provide an initial estimate of how Cardiff Council's rent levels compare to the JRF Living Rent model the following two-part formula has been used:

- 1) New weekly wage x Equivalence Rating = Weekly equivalent income
- 2) Weekly equivalent income x 28% = Weekly Living Rent

ASHE has been used to obtain the **weekly** earnings figure, below which the **25% lowest earners resident in Cardiff** fall. The gross figure for 2023 is **£401.90**.

The model proposed by the JRF states that the weekly earnings figure must be adapted to reflect the differing composition of households in different-sized properties and the fact that household income for low-paid families with children is likely to be enhanced by benefits and tax credits. This is called the equivalence rating. The equivalence model used by JRF is the OECD modified scale. The equivalence scale will vary for each household member as seen in figure 2.

#### **Type of Household Member Equivalence value**

<b>Household Member</b>	<b>Equivalence Value</b>
First Adult	1
Additional Adult	0.5
Child aged 14 and over	0.5
Child aged 0-13	0.3

To account for the difference in equivalence value for children depending on their age a figure of 0.3 has been used for each additional child as the JRF model only provides equivalence values for one, two and three bed properties.

<b>Bedroom Size</b>	<b>Household Size</b>	<b>Equivalence Rating</b>
<b>Bedsit</b>	Single Adult	<b>1.0</b>
<b>One bedroom</b>	Single Adult	<b>1.0</b>
<b>Two bedroom</b>	One working adult and one child	<b>1.3</b>
<b>Three bedroom</b>	One working adult and two children	<b>1.6</b>
<b>Four Bedroom</b>	One working adult and three children	<b>1.9</b>

## Equivalence Table

Using a one bed property the calculation is set out as follows:

### One Bedroom

$$\text{£}401.90 \times 1.0 = \text{£}401.90$$

Gross weekly wage	Equivalence rating	Equivalent weekly income
-------------------	--------------------	--------------------------

$$\text{£}401.90 \times 28\% = \text{£}112.53$$

Equivalent weekly income	Weekly living rent
--------------------------	--------------------

Using a two-bed property as an example the calculation is set out as follows:

### Two Bedroom

$$\text{£}401.90 \times 1.3 = \text{£}522.47$$

Gross weekly wage	Equivalence rating	Equivalent weekly income
-------------------	--------------------	--------------------------

$$\text{£}522.47 \times 28\% = \text{£}146.29$$

Equivalent weekly income	Weekly living rent
--------------------------	--------------------

The JFR calculation of living rents does not cover specialist or supported accommodation rent levels. The model also uses net rent levels, i.e. does not include service charges.

It should be noted that the Welsh Government intend to review the affordability models used in Wales in the future with the aim of standardising this.

## Proposed Service Charges 2024/25

## Property Service Charges

Service	Current Service Charge	Proposed Service Charge	Proposed Increase Percentage	Notes
Communal Maintenance	£3.83	£4.09	6.7%	
Garages attached to property	£7.16 – 9.78	£7.64 - 10.44	6.7%	
Hardstand	£2.63	£2.81	6.7%	
Carport	£4.96	£5.29	6.7%	

## Flat Service Charges

Service	Current Service Charge	Proposed Service Charge	Proposed Increase Percentage	Notes
Cleaning Service (Rota)	£5.19	£5.54	6.7%	
Cleaning Service High Rise	£5.83	£6.22	6.7%	
Cleaning Service own entrance	£1.31	£1.40	6.7%	
Cleaning Service – Reduced Service	£2.89	£3.08	6.7%	
Concierge Service	£1.19	£1.27	6.7%	
Flat Communal Services – Maintenance, Door entry system, landlord lighting	£3.11	£3.33	6.7%	
John Kane Court – Cleaning, maintenance, and ground maintenance	£15.15	£16.16	6.7%	
John Kane Court own utilities – heating & water	£9.21	£12.02	30.51%	Based on cost for previous billing period

## Community Living (Sheltered) Schemes

Service	Current Service Charge	Proposed Service Charge	Proposed Increase Percentage	Notes
Scheme management, maintenance, cleaning, fire & safety checks, and telecare	£31.52	£33.44	6.1%	This charge includes scheme telecare costs, the charge for telecare is subject to final agreement as part of the budget process.
Communal Heating and Lighting *	£8.71	£10.74	23.3%	Based on costs Sep 2022 – August 2023
Own Heating*	£10.95	£12.67	15.7%	Based on costs Sep 2022 – August 2023
Own Water*	£4.32	£4.68	8.33%	Based on cost for previous billing period

\*Average Cost

## Specialist Accommodation (including hostels and supported housing)

Service	Current Service Charge	Proposed Service Charge	Proposed Increase Percentage	Notes
Housing related support services	£56.75 - £273.20	TBC	TBC	The charge for housing related support services is set by each service provider based on their costs. Figures for these charges will be available in January.
Communal utilities*	£3.04	£3.74	23.3%	Working towards full cost recovery as history for billing information becomes available
Own Electricity*	£7.56	£9.32	23.3%	Working towards full cost recovery as history for billing information becomes available
Scheme service charges – for example, security,	£193.03	£209.29	8.42%	Full cost recovery

management, and central support costs. Routine and specialist cleaning*				
Own use water*	£4.52	£7.32	61.9%	Improved billing accuracy at some sites has resulted in higher service charges being proposed as moving towards full cost recovery.
Own use Laundry*	£2.41	£2.58	6.7%	
Optional food provision	£22.10/£11.05	TBC	TBC	Current rates are for 2 meals £22.10 per week, per adult. £11.05 per week per child. New accommodation schemes will have varying levels of food provision dependent on the agreement with the provider.  The charges for food are set by the DWP. New figures are expected to be issued in January 2024
Private Leasing Scheme				As per Local Housing Allowance
Television Licence	£0.44	£0.44		

\*Average Cost

### Miscellaneous

Service	Current Service Charge	Proposed Service Charge	Proposed Increase Percentage	Notes
Optional Garage	£7.24	£7.73	6.7%	
Optional garage, water on site	£7.54	£8.05	6.7%	

Optional garage at community living scheme (electricity)	£10.21	£10.89	6.7%	
Contracted out Services. For example, grounds maintenance at new build sites, Tai Penylan waste treatment plant.				As per contracted charge
Telecare Full service	£5.92	15.15%	£6.82	Charge is subject to final agreement as part of the budget process
Telecare, contact only service	£2.86	33.4%	£3.82	Charge is subject to final agreement as part of the budget process



# Single Impact Assessment

Cardiff Council



## 1. Details of the Proposal

**What is the proposal?**

Title: Rent Setting Proposals 2024/25

**Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?**

New

Existing

**Directorate/Service Area:**

Adults, Housing & Communities

**Who is developing the proposal?**

Name: Helen Evans

Job Title: Assistant Director – Housing & Communities

**Responsible Lead Officer (Director or Assistant Director):**

Jane Thomas – Director - Adults Housing & Communities

**Cabinet Portfolio:**

Housing & Communities

**Authorisation**

Completed By: Jessica Tomlinson

Job Title: Improvement Project Manager

Date: 30/10/2023

C: Ddwyieithog



Tudalen 499

Approved By:	Helen Evans
Job Title:	Assistant Director, Housing & Communities

**Document History – do not edit.**

*The Single Impact Assessment (SIA) can be strengthened as time progresses, helping shape the proposal. Version control will provide a useful audit trail of how the SIA has developed. Draft versions of the assessment should be retained for completeness, however only the final version will be publicly available. Draft versions may be provided to regulators if appropriate.*

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023

## 2. Overview of the Proposal

### **What action is the Council considering and why?**

*Please provide a detailed outline of the proposal. This information will support your findings in the impact assessments.*

The Council Housing Rent & Service Charge Setting 2024/25 report sets out the proposed approach for rent and service charge setting on Council owned dwellings from April 2024.

The report will also brief Cabinet on how efficiencies will be made to address the budget deficit in the Housing Revenue Account and details the help and support available to tenants who are struggling with the continued cost-of-living crisis.

While any increase in rent is difficult at this time, it should be noted that 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.

For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team.

### **What are the costs and/or savings?**

*What will the proposal cost and how will it be funded?*

*How might costs be reduced through involvement and collaboration, across Cardiff Council and/or with external stakeholders?*

*Are there savings and how will these be realised?*

The Housing Revenue Account (HRA) records income and expenditure arising from the provision of Cardiff Council's 13,937 housing stock. The HRA is ringfenced for transactions related to the council's housing landlord functions and cannot be used for other purposes.

The main source of income is from tenants in the form of rents and service charges. The purpose of reviewing rents is to ensure the Housing Revenue Account has enough income to provide quality housing services for current and future tenants. Rental income allows the service to invest in the maintenance and improvement of existing homes and neighbourhoods, provide good tenant support services, partially fund our community Hubs and also build new homes.

The Renting Homes Act came into force on 1<sup>st</sup> December 2022. This legislation applies to Council, Housing Association, supported housing and privately rented properties in Wales. This legislation requires landlords to give tenants two months' notice of their rent change. Previously only 28 days notice was required.

The reviewing and setting of rent and service charges is normally decided by Cabinet during budget setting in February of each year. To meet the notice period requirements as laid out in the Act, rent and service charge setting are now decided ahead of the normal budget process annually.

### **Rent Setting Policy**

Whilst the responsibility for setting rents rests with the Council, this is specified within boundaries laid out in the Welsh Government rent policy framework These rules are:

When determining the setting of rents and service charges, social landlords must make an assessment of cost efficiencies, value for money and affordability for tenants which should be discussed at Cabinet or Council.

The maximum overall rent increase allowable in any one year is the September Consumer Price Index (CPI) +1%. Should CPI fall outside the range of 0% to 3%, the responsibility will rest with the Housing Minister to determine the appropriate change to rent levels for the year.

In September 2023, CPI was 6.7%, well above the range allowable by the policy. Therefore, a decision regarding the rent setting was required by the Minister who announced on 27<sup>th</sup> October 2023 that the maximum that rents can increase by is 6.7%. The Minister confirmed that this was a maximum increase and set and decision making is with the Council.

### **3. Impact Assessments**

#### **Which impact assessments do you need to complete to support your proposal?**

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

**Put Yes or No next to each of the impact assessments listed below to indicate which ones are being carried out.**

<b>Impact Assessment</b>	<b>Page</b>	<b>To be completed: Y/N</b>
A. Equality Impact Assessment	5	Y
B. Child Rights Impact Assessment		N
C. Welsh Language Impact Assessment		N
D. Habitats Regulations Assessment		N
E. Strategic Environmental Assessment		N

F. Data Protection Impact Assessment		N
G. Health Impact Assessment		N

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact [positive/negative]** on different age groups?

	Yes	No	N/A
Up to 18 years		X	
18 - 65 years	Y		
Over 65 years	Y		

### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The impact of the rent increase will affect all Council tenants regardless of age, however it should be noted that while any increase in rent is difficult at this time, 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.

For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team

### What action(s) can you take to address the differential impact?

As above a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme.

### Disability

Will this proposal have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment	X		
Learning Disability	X		
Long-Standing Illness or Health Condition	X		
Mental Health	X		
Neurodiversity	X		

Physical Impairment	X		
Substance Misuse	X		
Visual Impairment	X		
Other	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is no negative impact specifically anticipated for those with a Disability, however the impact of the rent increase will affect all Council tenants regardless of Disability.

It should be noted that while any increase in rent is difficult at this time, 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.

For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team

**What action(s) can you take to address the differential impact?**

As above a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme.

**Gender Reassignment**

Will this proposal have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated specifically for Transgender People, however the impact of the rent increase will affect all Council tenants regardless of gender identity

It should be noted that while any increase in rent is difficult at this time, 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.

For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team

**What action(s) can you take to address the differential impact?**

As above a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme.

**Marriage and Civil Partnership**

Will this proposal have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			
Civil Partnership			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated specifically for those who are married or in a civil partnership, however the impact of the rent increase will affect all Council tenants.

It should be noted that while any increase in rent is difficult at this time, 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.

For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team

**What action(s) can you take to address the differential impact?**

As above a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme.

**Pregnancy and Maternity**

Will this proposal have a **differential impact [positive/negative]** on pregnancy and maternity?



	Yes	No	N/A
Pregnancy	x		
Maternity	x		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated specifically for those who are pregnant however the impact of the rent increase will affect all Council tenants.

It should be noted that while any increase in rent is difficult at this time, 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.

For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team

**What action(s) can you take to address the differential impact?**

As above a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme.

**Race**

Will this proposal have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White		X	
Mixed / Multiple Ethnic Groups		X	
Asian / Asian British		X	
Black / African / Caribbean / Black British		X	
Other Ethnic Groups		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated on any specific groups, however the impact of the rent increase will affect all Council tenants.

It should be noted that while any increase in rent is difficult at this time, 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.

For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team

**What action(s) can you take to address the differential impact?**

As above a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme.

**Religion, Belief or Non-Belief**

Will this proposal have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist	X		
Christian	X		
Hindu	X		
Humanist	X		
Jewish	X		
Muslim	X		
Sikh	X		
Other belief	X		
No belief	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

No negative impact anticipated for people with different religions, beliefs or non-beliefs however the impact of the rent increase will affect all Council tenants.

It should be noted that while any increase in rent is difficult at this time, 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.

For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team

**What action(s) can you take to address the differential impact?**

As above a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme.

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**Sex**

Will this proposal have a **differential impact [positive/negative]** on male, female or non-binary persons?

	Yes	No	N/A
Male persons	X		
Female persons	X		
Non-binary persons	X		

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
No negative impact anticipated based on sex, however the impact of the rent increase will affect all Council tenants.  It should be noted that while any increase in rent is difficult at this time, 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.  For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team.
<b>What action(s) can you take to address the differential impact?</b>
As above a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme

**Sexual Orientation**

Will this proposal have a **differential impact [positive/negative]** on people with different sexual orientations?

	Yes	No	N/A
Bi	X		
Gay	X		
Lesbian	X		
Heterosexual	X		
Other	X		

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>

No negative impact anticipated, based on sexual orientation however, the impact of the rent increase will affect all Council tenants.

It should be noted that while any increase in rent is difficult at this time, 86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.

For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team.

**What action(s) can you take to address the differential impact?**

As above a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme

**Socio-economic Duty**

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

All social landlords in Wales must consider affordability issues for tenants when proposing their rent increase to ensure rent and service charges represent value for money.

When comparing the Councils new proposed rent charge it is still significantly lower than weekly private market rents.

The proposed rent increase has also been compared using a Living Rent model. The model indicates that overall Cardiff rents fall within an affordable level.

86% of council tenants are in receipt of benefits to assist with their rent.

For those tenants who pay all or some of their rental costs there is a range of support available for those experiencing difficulties in paying their rent and the service works

hard to reduce or remove the threat of eviction. The minister also set out a number of commitments in 2023/24 to be made by social landlords to prevent evictions and support tenants and these must be implemented again in 2024/5.

These are:

1. There will be no evictions due to financial hardship for the term of the rent settlement in 2023-24, where tenants engage with their landlords.
2. The Council will continue to provide targeted support to those experiencing financial hardship to access support available.
3. a joint campaign, encouraging tenants to talk to their landlord if they are experiencing financial difficulties and access support available, will be launched across Wales.
4. agreeing to maximise the use of all suitable social housing stock, with a focus on helping those in the poorest quality transitional accommodation move into longer term homes that meet their needs
5. a commitment to invest in existing homes to keep them safe, warm and affordable to live in
6. building on existing engagement with tenants in rent-setting decisions, including explaining how income from rent is invested and spent.
7. Working in partnership with tenants, Welsh Government, funders and other partners will develop a consistent approach to assessing affordability across the social housing sector in Wales.
8. Cardiff Council will also participate in an assurance exercise to reflect on application of the rent policy to date. This will build on the work undertaken by social landlords over the past three years, and inform future work to develop a consistent approach to assessing affordability

**What action(s) can you take to address the differential impact?**

As above – the above commitments will be implemented in 2024/25 along with providing a range of support to assist tenants with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and new Discretionary Hardship Scheme

**Welsh Language**

Will this proposal have a **differential impact [positive/negative]** on the Welsh language?

	Yes	No	N/A
Welsh language		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

All Welsh language policies will be followed. All tenants can express a language preference upon their first contact with services. This is then recorded on tenancy records to ensure their language preference is met.

**What action(s) can you take to address the differential impact?**

**Consultation and Engagement**

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

Consultation with tenants took place between 25<sup>th</sup> September to 22<sup>nd</sup> October 2023 and received 210 responses – a 289% increase on the number of responses received last year.

The Consultation comprised of:

- An Online survey promoted on the Cardiff Tenants website
- 15 face to face events including focus groups across Hubs to encourage responses
- Front facing staff including Finance, Welfare Liaison and housing helpline officers promoted the survey with contract holders and offered help to complete the survey on line, whilst assisting with other enquiries
- Social Media promotion
- Promotion on the Tenant Participation website
- Paper survey sent to 2,774 (20%) of tenants - selected randomly.

The outcome of the survey has informed the Council's decision on rent and service change setting.

**Summary of Actions (Listed in the sections above)**

	Actions
Age	None
Disability	None
Gender Reassignment	None
Marriage & Civil Partnership	None

Pregnancy & Maternity	None
Race	None
Religion/Belief	None
Sex	None
Sexual Orientation	None
Socio-economic Impact	None
Welsh Language	None
Generic/ Over-Arching (applicable to all the above groups)	<p>The impact of the rent increase will affect all Council tenants.</p> <p>86% of council tenants are in receipt of benefits to assist with their rent. In the majority of cases these tenants will have any increase in rent covered by an increase in their benefits.</p> <p>For those who do struggle with their rent payments a range of support is available to tenants to assist with their finances including a supportive rent arrears pathway focused on resolving issues together with a dedicated Welfare Liaison Team and a range of further commitments made to support tenants.</p>

### Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

## **B: Child Rights Impact Assessment**

The aim of a Child Rights Impact Assessment is to put children and young people at the forefront of decision-making. The assessment helps officers to consider how the rights of children and young people may be affected by a proposed policy or project.

Click [here](#) to start a Child Rights Impact Assessment.

You will receive an automated email containing a link to your Child Rights Impact Assessment template and the Child Friendly Cardiff Team will be in contact to support you.

Guidance for Local Government prepared by Unicef is available here:  
[Child Rights Impact Assessment - Child Friendly Cities & Communities \(unicef.org.uk\)](https://www.unicef.org/uk/child-rights-impact-assessment)

For further information or assistance in completing the Child Rights Impact Assessment, please contact the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

### **Next Steps**

Where it is considered that a Child Rights Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.



## C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

### Welsh Language Standards 88-97

#### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?		x	
Treating the Welsh language no less favourably than the English language?		x	

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

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#### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

--

**Treating the Welsh language no less favourably than the English language?**

--

#### Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

**The opportunities for persons to use the Welsh language?**

--

**Treating the Welsh language no less favourably than the English language?**

--

**Standard 91**

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

<b>The opportunities for persons to use the Welsh language?</b>

<b>Treating the Welsh language no less favourably than the English language?</b>

**Standard 92**

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>

<b>Treating the Welsh language no less favourably than the English language?</b>

**Standard 93**

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>

<b>Treating the Welsh language no less favourably than the English language?</b>

**Standard 94**

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council’s Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

**The opportunities for persons to use the Welsh language?**

N/A

**Treating the Welsh language no less favourably than the English language?**

### Standard 95

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

**The opportunities for persons to use the Welsh language?**

**Treating the Welsh language no less favourably than the English language?**

### Standard 96

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

**Treating the Welsh language no less favourably than the English language?**

### Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

**The opportunities for persons to use the Welsh language?**

**Treating the Welsh language no less favourably than the English language?**

--

**Material and Services**

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

- [Correspondence](#) - receiving and replying (emails, letters, online communication).
- [Telephone](#) – receiving and answering calls.
- [Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.
- [Public Messages – electronic – video](#)
- [Signs, Notices & Display Material](#)
- [Publicity & Advertising](#)
- [Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.
- [Producing Forms](#)
- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)
- [Education Training Courses](#)
- [Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>

**Cardiff Council’s Welsh Language Skills Strategy**

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>

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**Next Steps**

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## D: Habitats Regulations Assessment

	Yes	No
Will the proposal affect a European site designated for its nature conservation interest*, or steer development towards an area that includes a European site, or indirectly affect a European site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*\* Only two European sites designated for nature conservation interest lie within Cardiff's boundaries – the Severn Estuary and Cardiff Beech Woods, but be aware if your project affects an area close to a neighbouring authority.*

If the answer is 'Yes', then a screening exercise may need to be conducted to determine if a Habitats Regulations Assessment is required or not.

Contact the [Biodiversity Team](#) who will guide you through the process.

## E: Strategic Environmental Assessment

	Yes	No
Does the strategy, policy or activity set the framework for future development consent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Is the strategy, policy or activity likely to have significant environmental effects (positive or negative)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have answered 'Yes' to both of the above questions, then a full Strategic Environmental Assessment Screening is needed.

Contact the [Sustainable Development Unit](#) who will guide you through the process.

## F: Data Protection Impact Assessment

	Yes	No
Will the proposal involve processing information that could be used to identify individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer is 'Yes', then a Data Protection Impact Assessment may be required.

Click [here](#) to read the guidance and start the Data Protection Impact Assessment process if needed.

For further information, contact the [Data Protection Service](#).



## G: Health Impact Assessment

A Health Impact Assessment helps to develop policies and projects that consider the mental, physical and social health and well-being of a population during planning and development. Considering health inequalities and their impacts on local communities is an essential part of any Health Impact Assessment.

Health Impact Assessments will become a statutory requirement for public bodies in specific circumstances in the future. These circumstances have yet to be published by Welsh Government.

For further information and advice, please contact the Wales HIA Support Unit.

Website: [Home - Wales Health Impact Assessment Support Unit \(phwwhocc.co.uk\)](http://phwwhocc.co.uk)

Email: [WHIASU.PublicHealthWales@wales.nhs.uk](mailto:WHIASU.PublicHealthWales@wales.nhs.uk)

Mae'r dudalen hon yn wag yn fwriadol

**HOUSING EMERGENCY IN CARDIFF**

**HOUSING & COMMUNITIES (COUNCILLOR LYNDA THORNE)**

**AGENDA ITEM: 9**

***Appendices 1, 2, 3 & 7 are not for publication as they contain exempt information of the description contained in paragraphs 14, 16 and 21 of Part 4 of Schedule 12A of the Local Government Act 1972.***

**Reason for this Report**

1. To brief Cabinet on the Housing Emergency in Cardiff, and the unprecedented pressures this is placing on homelessness services.
2. To update Cabinet on the steps already being taken to address these pressures.
3. To seek in principle approval for changes to existing policies which impact on homeless assessment, (in line with current homelessness legislation).
4. To detail solutions to the current housing pressures through larger scale property purchases and package deal arrangements and the continuation of the meanwhile use of brownfield sites to deliver new modular homes for temporary accommodation, consistent with the existing arrangements in place within our Cardiff Living Partnership and with the current modular providers.

**Background**

5. Before and during the pandemic the Council had made significant progress in rapidly increasing good quality temporary and supported accommodation provision. New family homelessness centres had been developed at Briardene and the Gasworks site, and for single people, the new Single Homeless Assessment Centre had opened at Hayes Place; while Ty Ephraim hostel (formerly the YHA), and new supported housing at Adams Court had been developed.
6. Considerable achievements were also made in improving support services, with the development of the Homeless Multidisciplinary Team, combined with the new accommodation development resulting in very low levels of rough sleeping.

7. However now, Cardiff, like many other cities, is experiencing a housing emergency which is negatively impacting on this progress and is placing exceptional pressures on homelessness services and the provision of temporary accommodation.

### **Current Pressures**

8. Record numbers of individuals and families are seeking help from homelessness services, putting unprecedented pressure on temporary accommodation:
  - All 1,699 units of temporary accommodation in Cardiff are full, with 707 families, 806 single people, and 186 young people housed across the city.
  - Recent data shows that 28 more families are entering temporary accommodation than are exiting into permanent accommodation each month, so demand for accommodation is far outstripping supply.
  - Waiting lists to enter temporary accommodation have increased by 150% since 2021, even though the amount of temporary accommodation has increased significantly over the same period.
  - 88 single people are presenting to the homeless Out of Hours service each night for emergency accommodation. Unfortunately, rough sleeping in the city has also increased to 43 people.
  - The demand for affordable housing in the city is very high. There are currently over 8,000 people on the Cardiff Housing Waiting List. Even though a significant percentage of social housing lets are targeted at homeless households, move on is slow as relatively few properties are becoming available. Move on into the private rented sector is difficult due lack of availability and high rent levels. As a result, individuals who would not previously have sought help are presenting to homeless services. Further information on the challenges in the housing market are set out below.
9. Due to this demand, and the lack of move on options it has been necessary to develop additional emergency accommodation. The Council now has exclusive use of 4 hotels, offering 326 units of accommodation. These hotels are being used to accommodate homeless households, mainly families. Support from council staff is available on site and other services, such Early Help, Play, and Advice Services also provide assistance from these locations. Due to the need to respond quickly to the emergency direct awards have been made to these hotels, after a full review of other available hotel accommodation and their cost effectiveness. A further hotel to meet the need of single people has also been sourced and other emergency accommodation options continue to be considered as the full level of housing pressures becomes clear.

## Reasons for increased demand.

### Affordability and availability of accommodation in the Private Rented Sector (PRS)

10. The lack of affordable accommodation in the private rented sector is contributing significantly to the housing emergency in Cardiff. The average monthly private rent in Cardiff is £200 higher than the Welsh average.
11. Private properties are let at rates that are much higher than the Local Housing Allowance (LHA), the maximum amount of housing related benefits that can be claimed for those who are renting from a private landlord. The Bevan Foundation's report 'Wales Housing Crisis: an update on the private rental market in Wales in Summer 2022' found that only 6.3% of the 303 properties advertised for rent in Cardiff in May 2022 were available at or below the LHA rate.
12. The Private Rented Sector (PRS) team based within the Council's Homelessness Service work with private landlords to encourage them to let their properties to homeless households, matching their properties with potential tenants. Information that they have gathered demonstrates the unaffordability of privately rented accommodation in Cardiff, as set out in the table below.
13. The weekly shortfall for a 1 bedroom property is £61.95, and for a four bedroom property is £145.29 a week. This means that individuals or families would need to find this amount of money from their other income to meet their rent payments. This is unaffordable for many, especially those on a low income. Without an increase in Local Housing Allowance rates (a UK Government decision), this situation is unlikely to improve.

No. of Bedrooms	Weekly Local Housing Allowance (23/24)	Average Weekly Private Market Rents (September 2023)	Weekly Shortfall
1	£120.82	£182.77	£61.95
2	£149.59	£252.00	£102.41
3	£178.36	£298.15	£119.79
4	£218.63	£363.92	£145.29

Data obtained by Cardiff's Homelessness PRS team in September 2023

14. As well as many private rents being unaffordable, there is also a lack of availability of private rented accommodation. Many landlords are leaving the market due to taxation changes, mortgage interest rate rises, and increases in regulation. Also, some landlords feel that the changes

implemented under the Renting Homes (Wales) Act have impacted them negatively, leading them to sell their properties.

15. In the last quarter of 2022, the number of possession applications made by private landlords to courts in Wales increased by 354%. In 2022/23 Cardiff Council's Housing Options Service reported a 122% increase in eviction notices issued from landlords selling their property compared to pre-pandemic levels.
16. Cardiff has also experienced an increase in Airbnb lets. According to the Bevan Foundation's September 2022 "Holiday Lets and the Private Rental Sector" report, in Cardiff, an Airbnb property would take only 3 weeks for a 4-bed, or 5 weeks for a 1, 2 or 3 bed to earn the equivalent of a year's worth of rent at Local Housing Allowance rates.
17. A combination of these factors has led to a low supply of private rented properties. Anecdotal evidence from estate agents in Cardiff has stated that as many as 280 individuals have applied for a single available one-bedroomed flat in the city; they have advised that this is becoming more common place.
18. According to the 2021 Census, almost a quarter (24.3%) of households in Cardiff were privately renting, the highest figure in Wales. This had grown from 21.9% in 2011, an increase of over 4,500 households. This higher reliance on private rented accommodation means that any issues in the sector will have a far greater impact on housing provision in Cardiff.

### **Reduced Home Ownership**

19. According to the 2021 Census, 58.0% of households in Cardiff own their homes with 28.6% owning them outright. These are the lowest figures in Wales. The number owning their home with a mortgage or loan has fallen by over 3,000 people between 2011 and 2021.
20. The Office of National Statistics reported in October 2023 that the average gross weekly earnings for full-time employees in Cardiff was £642.80, equating to a salary of £33,425 per year. According to information gathered via the Land Registry, for the 12-month period between October 2022 and October 2023 the average cost of a property in Cardiff was £292,512. Typically, 10% of the property value is required as a deposit, this would equate to a deposit of £29,251. Taking into consideration that mortgage lenders work on a maximum borrowing limit of 4.5 times annual salary, most households would need to earn over £58,500 per year to afford the average price of a Cardiff home. High property prices along with rapidly rising interest rates mean that home ownership is largely unaffordable for many.

### **High number of students in the city**

21. According to data taken from the Higher Education Statistics Agency, the overall number of students enrolled in universities in the city has

increased by 6% from 66,195 in 2018/19 to almost 70,000 in 2021/22. Universities in the city are also increasing their recruitment of international students, who all require accommodation either through their university or in the wider community. In 2021/22 there were around 15,000 international students studying in the city an increase of 18% compared to 2018/19. In 2023, 9,596 properties in Cardiff claimed a student council tax exemption, an 18% increase compared to 2019. Whilst there is much purpose-built student accommodation in the city, as student enrolment increases, additional pressure is placed on housing in the wider community.

### **Lack of Social Housing**

22. While there are 8,000 people on the Common Housing Waiting List, during 2022/3 only 834 standard housing lets were made (excludes retirement and specialist accommodation). 75% of these lets were made to homeless households. Similarly, this year, up to the end of September, 74% of the 357 lets were made to homeless households. While this high level of lets to homeless applicants supports those who need to move on from temporary accommodation by providing permanent, affordable accommodation, unfortunately, the impact of this is that very few applicants who are not homeless are moving on through the general waiting list, even though they have very significant housing needs.
23. As a result, presenting as homeless is now perceived by some as a short cut to access social housing, rather than waiting for an allocation through the Common Housing Waiting List. This is in part responsible for the increase in the number of reported family relationship breakdowns, where extended family members are asked to leave the family home. This is currently the second highest reason for homelessness presentations, after loss of privately rented accommodation. This year so far there has been a 46% increase in the number of homeless presentations due to reported family breakdowns compared to the same period in 2019. There have also been clear examples of individuals giving up their private rented accommodation to access homeless services with the aim of securing social housing, further increasing the pressure on temporary accommodation.

### **The No-one Left Out approach**

24. The No-one Left Out approach was an important part of the response to the pandemic and services worked well to put additional housing in place to ensure everyone could have appropriate accommodation. New schemes such as Ty Ephraim (formerly the YHA hostel) were part of this approach and have become part of the permanent accommodation offer in the city. As the pandemic restrictions lifted and demand for homeless services increased, there is an expectation that services will continue to provide everyone with temporary accommodation, even when the Council does not have a duty. This expectation is another factor increasing the demand on services, demand which can no longer be met.

25. With the end of the pandemic those without recourse to public funds can no longer legally be supported with accommodation, this is impacting on street homelessness. Cardiff rough sleeper weekly reports show that 14% of the 43 current cases have no recourse to public funds, 23% have no local connection and in 30% of cases their local connection is unknown.
26. All of these pressures have combined to create a housing emergency in Cardiff, with demand for homeless services at an unsustainable level.

### **Emerging Pressures**

27. Additional demands have been identified that will further impact on homelessness services. Wales is a Nation of Sanctuary and Cardiff is proud to provide support and refuge to those who are fleeing world conflicts. The city has been an asylum dispersal area, successfully, for many years. However, due to a backlog of applications, the Home Office is now accelerating decision making on asylum cases. This Streamlined Asylum Processing (SAP) will fast track decision making for some cohorts of asylum seekers. In total 589 individuals and 127 families currently resident in Cardiff are due to have a decision made on their asylum application by December 2023.
28. If the decision is positive, and the asylum seekers are given refugee status, they can access employment, housing, and benefit services within the city. Not all refugees will wish to stay in the city, however it is estimated that at least 353 single people and 102 families will seek support with housing over a very short period of time. This will put additional pressure on already overstretched services.

### **Addressing the Housing Emergency**

29. A number of actions have already been taken to urgently respond to the emergency, to both reduce demand on service and to increase emergency and temporary accommodation.

### **Reducing Demand**

30. Homelessness Prevention services have been strengthened to meet the increasing need for assistance and to improve the focus on early intervention. Homelessness prevention support is now available locally in Community Hubs and from other locations across the city. There is also greater joined up working across services to resolve issues and prevent homelessness. As a result, waiting times for a homeless prevention appointment have reduced from 30 working days in September 2022 to 6 working days in September 2023 and the number of cases where homelessness has been prevented has improved from 71% in September 2022 to 83% in September 2023.
31. Mediation services have been improved to work with clients who are experiencing a family breakdown or facing issues of property disrepair or overcrowding. Mediation within the Young Persons Gateway has also



been improved, by working in partnership with Llamau it has been possible for more young people to remain or return home, with support in place, where it is safe to do so.

32. Where those who present to services have no local connection to Cardiff, services are referring them back to their originating local authority for help and support where possible. Where additional help is needed to return home, the Salvation Army's Reconnection Service offers tailored support.
33. Cardiff does not currently consider whether a person has intentionally made themselves homeless when they present to services. Unfortunately as referenced above there is evidence that some individuals are now deliberately giving up their existing accommodation to enter homelessness services with the intention of securing social housing. Examples include individuals refusing their private landlord access to the property to carry out required works and reporting that their property is unfit for habitation, while others are clearly making no attempt to pay their rent or even asking their private landlord to serve notice on them, this is increasing the already severe demand pressures. While this applies to the minority of homeless applicants, this behaviour is increasing the pressure on temporary accommodation.
34. It is proposed that in future an "intentionally homeless" decision will be made where there is clear evidence that an applicant has deliberately made themselves homeless. For those who are found to be intentionally homeless, no housing duty would be accepted. For groups protected by legislation, no housing duty would be offered only if they have been intentionally homeless twice within a 5-year period. This protection includes young people aged under 21, care leavers aged between 21 to 24, pregnant women and applicants with children. Exceptions would also be made for individuals with complex needs.

### **Increasing move on from temporary accommodation**

35. A new dedicated move-on team is in place to support people in temporary accommodation to move on to permanent accommodation. The team works with clients who are in work and have low support needs to find them accommodation in the private rented sector. Where necessary, financial support is available to support access to private rented accommodation, this is provided alongside Into Work and Money Advice services.
36. While the Council has an ambitious new build programme, it can take some time to develop new housing. To increase housing stock more quickly, properties are being purchased from the open market. This has resulted in an additional 120 properties available to let since this process started in April 2022. Both the Council and its housing association partners will continue to purchase properties into the future to improve the supply of affordable housing.

37. The Council is working in partnership with the YMCA, to increase capacity within the low-needs pathway for single people, while close working with Llamau has resulted in new supported accommodation schemes to support young people to move on from care. In addition, the new Tai Ffres project, which is a collaboration with United Welsh Housing association and Llamau, is expected to deliver 130 units of move on accommodation for young people by 2027.
38. Two large housing schemes have also been developed to support move on from hostel for single people. These schemes are owned by housing associations but managed by the Council's Specialist Accommodation Service, with appropriate support on site to ensure tenancies are sustained. A further managed scheme is planned for the new year.
39. To increase move on options it is proposed in future to make offers of private rented accommodation outside the Cardiff area, where appropriate. As outlined above availability of affordable privately rented accommodation is scarce in Cardiff, and there is not enough social housing to meet need. Making homeless households offers of accommodation in neighbouring local authority areas would increase the move on accommodation available and reduce stays in temporary accommodation. Such offers would only take place following a full assessment of housing and support needs as it is not intended to place households with support needs in private sector accommodation outside of Cardiff. The local authorities affected have been informed of the intention to use accommodation in their area.
40. It is also proposed to make permanent offers of social housing anywhere in the city. Currently, homeless applicants on the waiting list can choose the areas of the city where they wish to be permanently housed, although this must include 4 higher availability areas. Due to the shortage of social housing this can mean that households are in temporary accommodation for long periods of time. It is proposed that the current Allocations Policy is amended to remove the areas of choice for homeless applicants who are owed a full housing duty. Settled accommodation would be offered in any area of Cardiff, as long as there was no at risk for the applicant in that area of the city. It is anticipated that this will help prevent delays in move on out of Temporary Accommodation.

### **Increasing Temporary Accommodation**

41. As stated above the Council now has exclusive use of 4 Hotels which are used as emergency accommodation, with a 5<sup>th</sup> Hotel sourced recently for single people. A number of buildings have also been identified as a contingency, to offer emergency accommodation in times of peak demand.
42. The use of hotels is not ideal and therefore work has also commenced to increase the supply of more appropriate temporary accommodation. 2 new schemes have already opened this year offering an additional 61 units of accommodation and 2 further schemes are due to open shortly, offering 56 units. In addition, an extensive development at the Gas

Works site will deliver 154 modular units in total on a phased basis, making meanwhile use of land that is waiting for more permanent development. Some of these units will be offered as longer-term accommodation, to give families more settled housing.

43. While this is good progress there is a need to rapidly provide further temporary accommodation to address the housing emergency and to reduce the reliance on hotels.

#### **Increasing Accommodation at scale and pace.**

44. The long-term solution is of course to build more affordable homes and the Council's current development programme is progressing at scale. Over 60 sites have been identified which have the capacity to deliver over 4,000 new homes in the long term. Furthermore, by December of this year over 1,000 new council homes will have delivered since the Council's new build programme commenced in 2017.

45. Innovative solutions are being used as well as a wide range of construction methods to try and increase the scale and pace of the programme. Strategic support is also being provided to Registered Social Landlord partners. This combined programme of work will result in approximately 2,000 additional affordable homes delivered by 2028.

46. However, this is not enough to tackle current pressures and traditional delivery methods do not provide the speed of delivery needed to mitigate the current gap in the supply of temporary housing. Therefore, a strategic approach to tackling the pressures on Cardiff's housing emergency is being proposed. This will provide short to medium term housing supply solutions, alongside the long-term development programme. These measures will help to 'plug the gap' that currently exists within current Temporary Accommodation provision and help to reduce the reliance on short-term emergency hotel accommodation and other contingency accommodation.

47. The solutions being proposed include:

- In the **short-term**, large-scale property purchase.
- In the **Medium-term**: the continuation of the meanwhile use of sites with the delivery of modular homes through the Cardiff Living Programme.
- In the **long-term**, the continuation of the permanent new build programmes (Cardiff Living, the additional build programme, and the Second Partnership) to deliver new, permanent council homes at scale.

#### **Property purchases.**

48. In order to deliver new homes more quickly, a number of larger property acquisitions are being proposed. There is currently an acquisition which requires "in principle" Cabinet Approval due to the values involved. The

details of the acquisition are provided within Appendix 1 along with an independent valuation report.

49. The acquisition relates to the freehold purchase of a new build city centre commercial property suitable for conversion into residential. Although the property has been constructed as an office block, due diligence has been undertaken to satisfy officers that a residential conversion is achievable in full compliance with the Welsh Government WDQR standards and is financially viable within the agreed viability parameters. The building is structurally completed but not yet fitted out, making a conversion technically easier. The acquisition also includes an adjoining development site which is currently empty but does have planning history for student or private rented development. The conversion scheme will deliver ground floor commercial/office space and 84 family flats. The adjoining development has the potential to deliver circa 150 new flats and ground floor commercial/office space. Subject to Cabinet approval, officer delegated decision and satisfactory compliance with the requirements identified in relation to viability assessment, grant funding and delivery within the existing budget framework then the intention is to exchange and agree heads of terms and proceed to completion no later than March 2024.
50. The property purchase will be funded through the HRA Capital programme. The city centre conversion scheme is subject to a Welsh Government TACP grant application to help subsidise the purchase costs.

#### **Meanwhile use and modular continuation.**

51. Further to a report approved at Cabinet in July 2022, the temporary use of the large brownfield site of the former Gasworks in Grangetown for temporary accommodation is progressing at scale and pace.
52. The inclusion of the site within the Cardiff Living Partnership has enabled the Council's partner developer Wates, to deliver 155 demountable modular homes for temporary family accommodation, an office building and community centre, using 3 modular providers. The use of 3 providers has given us the capacity required to deliver this project at pace and will see the entire project completed by April 2024.
53. This is an impressive feat and is currently the largest council led modular development scheme in Wales. This model of delivery – using permitted development rights to enable work to start on site much sooner compared to a traditional project and deliver much needed temporary accommodation on a meanwhile basis, can offer a more immediate solution to help alleviate current housing pressures if repeated.
54. Now that the subcontracting chain is in place alongside the modular suppliers, two of which have secured additional manufacturing space to provide the capacity needed for this project, there is a unique opportunity to continue the delivery of additional modular units across a number of sites retaining the partnership already in place with Wates to deliver at

speed and provide a solution to the city's extraordinary housing pressures.

55. Through the development of design options at the Gasworks site, a suite of unit types are in place, designed in full compliance to Welsh Government standards. These are being used for temporary accommodation in the short-term but will be suitable for permanent accommodation in the longer-term. This set of pattern books are unique to the Wates contractual arrangements, as are the additional factory spaces and the design of the groundworks packages.
56. To enable the delivery of much needed accommodation on additional sites using the existing supply chain arrangements, it is proposed that a new contract be awarded to Wates. The sites and the costs of delivering meanwhile use on them, are detailed in Appendix 2 and have the potential to deliver around 350 additional family homes.
57. Two of the sites are owned by Welsh Government and will be leased to Cardiff Council for a meanwhile use (5 years). One site is owned by Cardiff and the Vale Health Board and will also be leased to the Council for a meanwhile use purpose and one site is in council ownership.
58. By putting in place a new contract consistent with the current set of contracting arrangements in place with Wates, it will be possible to secure factory slots and continue manufacture of compliant units beyond the Gasworks project, utilise the expertise developed during the Gasworks project including making use of the unique elements of the existing Wates arrangements and gain the speed of delivery required to provide the short-term solution which is desperately needed.
59. The use of permitted development rights, in agreement with planning, will be essential in order to deliver the additional sites over a 2-year period. The Development Team would work closely with Planning to ensure a retrospective Planning consent is achievable to provide the extended permission for a meanwhile scheme in the longer term.
60. The total capital requirements for the schemes above is £250m. Discussions are currently underway with Welsh Government regarding grant funding for this project via future years Transitional Accommodation Capital Programme (TACP) funding. A commitment of at least 50% grant funding over two years is being sought, this is the intended timescale to complete the delivery of new homes across all the identified sites.
61. In seeking approval to put in place a new contract with an existing provider, officers have considered alternatives. This being to run a competitive procurement procedure. However, it is considered that it would realistically take up to 12 months in order for such a procedure to be completed, including the appointment of consultants, the preparation of tender documents, the tender period, the evaluation period and post tender contract negotiation and obtaining the decisions needed. And up to 18 months before we could realistically achieve a start on site. The reasons for the urgency of delivering new temporary accommodation

have been clearly set out within this report and it can be demonstrated that the time needed to run a competitive procedure would mean that these additional works would not be completed within the required timescale.

62. In determining this position the Council has sought external legal advice which is provided in Appendix 3.
63. The urgent nature of the current housing crisis and the fact that no public authority could have foreseen the range of pressures currently being faced that have resulted in a severe lack of suitable temporary accommodation, provides weight to the reliance on the approach described in Appendix 3.
64. It should also be noted that in making this decision there is no intention to remove any of the sites currently being advertised to the market for development through the Second Housing Partnership, as the meanwhile use sites proposed are new sites. Any contractor seeking to work with Cardiff Council has an opportunity to tender for the Second Housing Partnership.

#### **Local Member consultation (where appropriate)**

65. Local Members will be consulted about individual accommodation schemes in their wards.
66. CASSC Scrutiny Committee were consulted on the changes on 20<sup>th</sup> November 2023. A copy of their letter and response can be found at Appendix 6.

#### **Impact Assessment**

67. A Single Impact Assessment and a Childs Rights Impact Assessment have been drafted and are attached at Appendix 4 and 5. These assessments will be finalised following further consultation.

#### **Reason for Recommendations**

68. To address the housing emergency in Cardiff.

#### **Financial Implications**

69. Financial Implications in full are attached at Appendix 7
70. The capital expenditure estimates identified in this report were not approved in March 2023 in relation to:
  - The acquisition and conversion of a city centre opportunity
  - The acquisition and development of an associated site.
  - The meanwhile use development on the 4 sites.

71. It is accepted that proposals may only proceed with confirmation of at least 50% grant, however no letter of principle or evidence of discussions has been seen at the point of drafting financial implications as to whether the levels of grant needed to take the projects forward is possible at a regional or national level. Any expenditure not paid for by WG grant is proposed in the report to be paid for by additional borrowing in the HRA.
72. A viability assessment for the city centre opportunity shows that grant for this scheme at circa 50% will result in a viability assessment in line with a 50-year repayment. This is the only site for which a viability assessment has been provided at this stage, however as per above no confirmation of grant exists.
73. No terms of reference have been seen in respect to lease agreements for sites not owned by the Council. Due diligence would have to be undertaken on these including any return conditions, which may not have been costed as part of the proposals submitted to Cabinet for approval.
74. The city centre acquisition proposes that the first two floors are used as commercial office space. No details are provided in this report as to the users of that space or service delivery implications. Accordingly, any wider financial implications in terms of income, VAT implications or budgetary impacts on other council areas cannot be determined in these financial implications.
75. Subject to confirmation, the report assumes grant at 50% will be receivable for the cost of the meanwhile use units. Whilst the modular schemes / homes can be deemed assets that may last for a significant period of years, they will continue to provide value only if they can be moved and continue to be used to generate rent beyond any temporary period. No exit or move strategy has been seen that considers what will happen to modular units currently being installed in the city or proposed to be installed as part of this report on sites deemed to be of a temporary nature. Cabinet should be clear that any investment in these temporary units can be sustained well into the long term to ensure borrowing to invest in them remains sustainable. Where such assets in future are not used, they will need to be charged to revenue over a shorter period.
76. This report proposed is being taken outside of the process of the annual review of the HRA business planning process, which would take into consideration all changes to previous business planning assumptions including rent, capital programme schemes existing, and new ones committed to be undertaken as well as cost inflation and interest rate impacts. When considering the budget proposals and business planning for 2024/25, additional mitigations should be considered to ensure manage financial resilience, long term viability and capacity of the HRA to undertake the significant borrowing commitments being proposed, particularly where these are done so in the absence of long term external grant certainty and Welsh Government Rent Policy commitments.
77. The pressures outlined in the report in terms of impact on housing demand and affordability for homelessness, asylum etc are significant

financial pressure in this and other Council's. Costs are currently managed within existing grant and revenue budgets. In the absence of mitigating measures, these revenue budget pressures would increase pressures in the Council's General Fund Budget, unless there is a transparent and long-term grant or revenue budget support allocation for the Council.

78. It is assumed that this is general needs housing as the report does not highlight any special requirements for which the Council may need to incur additional costs to support tenants on each of these sites. Where there are operating or voids costs that cannot be recovered through rental income or service charges, these will need to be managed within existing rental income.
79. Whilst the report does highlight capital expenditure estimates, the feasibility reports highlight any exclusions e.g inflation, project team costs etc. These would need to be confirmed as part of any contract award. However, Cabinet should also consider whether any delegations awarded should be exercised without further recourse to a cabinet decision where there is a material change at the point of exercising a delegation, e.g if any council contribution to any of these projects is in excess of 10% of the amounts disclosed in the report on which the Cabinet is making a decision.

#### **Legal Implications (including Equality Impact Assessment where appropriate)**

80. A local housing authority has duties to the homeless under Part 2 of the Housing (Wales) Act 2014. A local housing authority must carry out a homelessness review for its area, and formulate and adopt a homelessness strategy based on the results of that review. It must carry out an assessment of a person's case, if the person has applied to a local housing authority for accommodation or help in retaining or obtaining accommodation, and it appears to the authority that the person may be homeless or threatened with homelessness.
81. In relation to the property matters referred to in this report at paragraphs 47 to 49, and Appendix 1, the Council has specific power to acquire interests in land for the purpose of housing accommodation under s.17 of part II of the Housing Act 1985. Section 120 of the Local Government Act 1972 also provide general power to acquire land for any of its functions. The Council's Disposal and Acquisition of Land Procedure Rules requires the decision maker to have regard to advice from a qualified valuer.
82. In relation to paragraph 41, Legal services have provided legal advice previously to the relevant decision maker. The legal implications have been set out in the relevant decision report.
83. Under the Council's Contract Procedure rules, any direct award must be agreed with the Procurement Manager before proceeding.



84. Please also see exempt legal implications in Appendix 3.
85. It is noted that this report seeks an 'in principle' decision only in relation to the property and procurement matters with delegation to the Corporate Director for People and Communities for final approval subject to further consultation as set out in the recommendation. It is expected that all relevant information relating to the terms of the acquisition and contract award will be made available within the officer decision report upon which any further details legal advice can be provided before proceeding.

### **Equality Duty.**

86. In considering this matter, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). This means the Council must give due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of religion or belief.
87. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers ([WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 \(gov.wales\)](#)) and must be able to demonstrate how it has discharged its duty.

### **Well Being of Future Generations (Wales) Act 2015**

88. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
89. In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The well being objectives are set out in Cardiff's Corporate Plan 2023-26. When exercising its functions, the Council is required to take all reasonable steps to meet its well being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.

90. The well being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals
  - Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
91. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

## General

92. The decision maker should be satisfied that the decision is in accordance within the financial and budgetary policy and represents value for money for the council.
93. All decisions taken by or on behalf the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers of behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. Council Procedure Rules; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances
94. The decision maker should also have regard to, when making its decision, to the Council's wider obligations under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.
95. The report sets out that consultation will be undertaken. The general principles applicable to consultation are outlined in [\*R v London Borough of Brent, ex p Gunning \[1985\] LGR 168\*](#) and frequently referred to as "the **Gunning principles**":
- The consultation must be at a time when proposals are still at a formative stage.
  - The proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response. Those consulted should be

aware of the criteria that will be applied when considering proposals and which factors will be considered decisive or of substantial importance at the end of the problem,.

- Adequate time must be given for consideration and response.
- The product of consultation must be conscientiously taken into account in finalising any statutory proposals.

The carrying out of consultation gives rise to a legitimate expectation that the outcome of the consultation will be considered as part of the decision-making process.

### **HR Implications**

96. There are no HR implications directly arising from this report.

### **Property Implications**

97. By virtue of the delivering much needed accommodation across the city, there are a number of property transactions proposed. There are three proposals to acquire finished schemes and this will require independent external valuations to ratify the quoted values in delivering schemes that are already completed. As we as appropriate valuations, due diligence to be completed for the proposed acquisitions should include appropriate advice on the relevant property's title, ownership structure and any consequential financial / tax implications.

98. We note that there are two proposals for leasing land from other public sector bodies and whilst this may well take place under the Land Transfer protocol, there is a requirement to document the occupation which the Estate team will need to advise and provide relevant delegations.

## **RECOMMENDATIONS**

Cabinet is recommended to:

1. To undertake a consultation process on the proposed policy changes outlined in paragraphs 34, 39 and 40 of the report, including the consideration of intentionality in making homeless decisions, the removal of areas of choice for homeless applicants on the Common Housing Waiting List and offering private rented accommodation outside the city, in neighbouring local authority areas.
2. To delegate the final approval on implementing the changes under recommendation (i) above to the Corporate Director People and Communities in consultation with the Cabinet Member, Housing and Communities, following a full impact assessment and consultation with stakeholders.
3. To note and approve in principle the acquisition of the property identified in Appendix 1 and the direct award of a new contract for the meanwhile modular delivery of temporary accommodation across the sites identified in Appendix 2.

4. To delegate final approval of the acquisition of properties and direct award of the contract to Wates set out in recommendation (iii) above and any ancillary matters relating to it to the Corporate Director, People & Communities in consultation with the S.151 Officer, Legal Services and the Cabinet members for Housing & Communities and Finance, Modernisation and Performance subject to:
- Approval of appropriate grant funding being secured from Welsh Government,
  - Agreement of Head of Terms for the proposed lease arrangements with Welsh Government and Cardiff & Vale Health Board for the sites identified in Appendix 2 and in relation to the property purchase identified in Appendix 1.
  - Confirmation of a suitable financial viability assessment for each of the sites.
  - Confirmation that the decision does not result in commitments outside budget framework constraints.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Sarah McGill</b> <b>Corporate Director People and Communities</b>
	8 December 2023

*The following appendices are attached:*

- Confidential Appendix 1** – Proposed Property Purchase
- Confidential Appendix 2** – Meanwhile Use and Modular Continuation
- Confidential Appendix 3** – External Legal Advice
- Appendix 4** - Single Impact Assessment
- Appendix 5** – Childs Rights Assessment
- Appendix 6** – CASSC letter & response
- Confidential Appendix 7** – Financial Advice

*The following background papers have been taken into account.*

- "Wales Housing Crisis: an update on the private rental market in Wales in Summer 2022" - Bevan Foundation September 2022.
- "Holiday Lets and the Private Rental Sector" - Bevan Foundation September 2022

Yn rhinwedd paragraff (au) 14, 16, 21 Rhan (nau) 4 a 5 o Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972.

Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol

Yn rhinwedd paragraff (au) 14, 16, 21 Rhan (nau) 4 a 5 o Atodlen 12A  
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Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol



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Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol

# Single Impact Assessment

Cardiff Council



## 1. Details of the Proposal

### What is the proposal?

Title: Report on the Housing Emergency in Cardiff

### Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?

New

Existing

### Directorate/Service Area:

Housing & Communities

### Who is developing the proposal?

Name: Helen Evans

Job Title: Assistant Director, Housing & Communities

### Responsible Lead Officer (Director or Assistant Director):

Helen Evans

### Cabinet Portfolio:

Housing & Communities

### Authorisation

Completed By: Jessica Tomlinson

Job Title: Improvement Project Manager

Date:

Approved By:

Job Title:

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Ddwyieithog

Bilingual  
Cardiff

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Planet  
Cardiff  
Tudalen 753

Child  
Friendly  
CARDIFF  


**Document History – do not edit**

*The Single Impact Assessment (SIA) can be strengthened as time progresses, helping shape the proposal. Version control will provide a useful audit trail of how the SIA has developed. Draft versions of the assessment should be retained for completeness, however only the final version will be publicly available. Draft versions may be provided to regulators if appropriate.*

<b>Version</b>	<b>Author</b>	<b>Job Title</b>	<b>Date</b>
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023

## 2. Overview of the Proposal

### **What action is the Council considering and why?**

*Please provide a detailed outline of the proposal. This information will support your findings in the impact assessments.*

The purpose of the proposal is to brief Cabinet on the Housing Emergency in Cardiff, and the unprecedented pressures this is placing on homelessness services. Including but not limited to, record numbers of individuals and families seeking help from homelessness services, lack of social housing for those on the common waiting list, resulting in presenting as homeless being perceived by some as a short cut to access social housing and emerging pressures such as the Home Office accelerating their decision making on asylum cases where at over 450 households will seek support with housing over a short period of time.

The proposal provides an update to Cabinet on the steps already being taken to address these pressures including a strengthened homelessness prevention service, improvements in mediation services and referring those who present to the service with no local connection back to their originating local authority for help. Steps taken also include the opening of additional temporary accommodation including use of hotels within the city, and the meanwhile use of land and modular units to further increase supply.

The report seeks approval for changes to existing policies which impact on homeless assessment, (in line with current homelessness legislation). These changes are listed below:

- The consideration of intentionality in making homelessness decisions, where there is clear evidence that an applicant has deliberately made themselves homeless.
- The removal of areas of choice for homeless applicants on the Common Housing Waiting List.
- Offering private rented accommodation outside the Cardiff area in neighbouring local authorities, where appropriate.

The proposal also details solutions to the current housing pressures through larger scale property purchases and package deal arrangements and the continuation of the meanwhile use of brownfield sites to deliver new modular homes for temporary accommodation, using the existing arrangements in place within our Cardiff Living Partnership and with the current modular providers.

The proposal requests that Cabinet approve:

Approve a consultation process on the policy changes outlined in the report, including the consideration of intentionality in making homeless decisions, the removal of areas of choice for homeless applicants on the Common Housing Waiting List and offering private rented accommodation outside the city, in neighbouring local authority areas.

To delegate the final decision on these changes to the Director Adults, Housing and Communities in consultation with the Cabinet Member, Housing and Communities following a full impact assessment and consultation with stakeholders.

Approve the acquisition of the properties identified in the report, following the

completion of all due diligence.

Approve in-principle the award of a new contract for the meanwhile modular delivery of temporary accommodation across sites

Delegation of the final sign-off of each of the sites to the Corporate Director, People & Communities in consultation with the S.151 Officer and the Cabinet members for Housing & Communities and Finance. Final approval will be conditional on the following; Approval of TACP grant from Welsh Government, Agreement of lease arrangements with Welsh Government and Cardiff & Vale Health Board for the sites and a suitable financial viability assessment for each of the sites.

**What are the costs and/or savings?**

*What will the proposal cost and how will it be funded?*

*How might costs be reduced through involvement and collaboration, across Cardiff Council and/or with external stakeholders?*

*Are there savings and how will these be realised?*

All property purchases will be funded through the HRA Capital programme. The city centre conversion scheme is subject to a Welsh Government Transitional Accommodation Capital Programme (TACP) grant application. This grant supports a wide range of projects by local authorities and registered social landlords to create much-needed extra housing capacity across Wales.

Discussions are currently underway with Welsh Government regarding subsidy for this project via future years TACP funding.

A commitment of at least 50% grant funding over two years is being sought, this is the intended timescale to complete the delivery of new homes across all the identified sites.

### 3. Impact Assessments

#### Which impact assessments do you need to complete to support your proposal?

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

**Put Yes or No next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.**

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	Y
B. Child Rights Impact Assessment	Y
C. Welsh Language Impact Assessment	N
D. Habitats Regulations Assessment	N
E. Strategic Environmental Assessment	N
F. Data Protection Impact Assessment	N
G. Health Impact Assessment	N

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact [positive/negative]** on different age groups?

	Yes	No	N/A
Up to 18 years	X		
18 - 65 years	X		
Over 65 years	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposals contained within the report will have a positive impact on people of all age groups who require homelessness services, reducing the time spent in temporary accommodation and providing permanent, settled homes at scale and pace, however there is a particular benefit to children and young people.

### Children

There are currently 707 families with children residing in temporary accommodation in Cardiff. The report shows that that 28 more families are entering temporary accommodation than are exiting into permanent accommodation each month, so demand for accommodation is far outstripping supply. Due to this demand many families are now residing in emergency hotel accommodation. Support from council staff is available on site and other services, such Early Help, Play, and Advice Services also provide assistance from these locations, however the use of hotels is not ideal and spending time in any form of temporary accommodation can be unsettling for children.

We are working hard to reduce demand so that less families enter homelessness services in the first place and for those that those who do enter temporary accommodation we want to reduce the time spent there. The report sets out what we are currently doing to achieve this and outlines further proposals for improvement.

Homelessness Prevention services have been strengthened to meet the increasing need for assistance and to improve the focus on early intervention. This includes the



improvement of Mediation services for clients who are experiencing a family breakdown.

### **Young People**

In 2022/23, 27% of all those threatened with homelessness and 28% of all those found to be homeless were aged between 16 and 25. This compares to 18% of the population according to the 2021 census.

Support and accommodation for young people is managed through the Young Persons Gateway (YPG), a partnership with Llamau and the Salvation Army and all social landlords in Cardiff. 186 young people are currently housed in temporary accommodation in the YPG and all units of accommodation were full.

We are working to reduce the number of young people who become homeless. Mediation within the Young Persons Gateway has been improved, by working in partnership with Llamau it has been possible for more young people to remain or return home, with support in place, where it is safe to do so.

Young People move on from YPG accommodation into permanent accommodation when they are ready for independent living. To ensure this happens as successfully as possible, young people are given training on how to live independently.

The proposals set out in the report to improve homelessness services and develop and deliver further accommodation will benefit all young people who are being supported by the service.

The changes proposed with regards to considering intentionality where there is clear evidence that an applicant has deliberately made themselves homeless, will not apply to young people aged under 21, care leavers aged between 21 to 24, pregnant women and homeless applicants with children, unless they have been intentionally homeless twice within a 5-year period. This is unlikely to be the case but is still possible. Housing & Communities work closely with Children's Services on any case where a decision is made that there is no homeless duty to ensure the right support is in place.

The removal of areas of choice for homeless applicants on the Common Housing Waiting List will reduce the amount of time spent in temporary accommodation, particularly for families. However, it is accepted that moving to a different area of Cardiff may be disruptive for children in terms of their education and their family support networks. Advice and support is in place to assist families with education choices.

Any offers of private rented accommodation made outside the Cardiff area would be carefully considered and only as long as there was no risk to the applicant. It is accepted that moving out of Cardiff may be disruptive for children in terms of their education and their family support networks. The proposals in the report that aim to reduce the time spent in temporary accommodation will enable families to move into a

settled home more quickly and are therefore beneficial to families and children. We will also ensure advice and support is in place to assist families with education choices.

**What action(s) can you take to address the differential impact?**

We will continue to ensure that support from council staff is available on site at emergency hotels and other temporary accommodation sites, with other services such as Early Help, Play, and Advice Services also providing assistance from these locations. We will ensure children's education is uninterrupted if being relocated to other areas outside of the city.

For those children who may be moved to a different area of the city, or outside the city, advice and support is in place to assist families with education choices.

**Disability**

Will this proposal have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment	X		
Learning Disability	X		
Long-Standing Illness or Health Condition	X		
Mental Health	X		
Neurodiversity	X		
Physical Impairment	X		
Substance Misuse	X		
Visual Impairment	X		
Other	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposals contained within the report will have a positive impact on service users, particularly those with disabilities that are impacting on their housing situation.

The report outlines successes already achieved. Two large housing schemes have been developed to support move on from hostels. These schemes are owned by housing associations but managed by the Council's Specialist Accommodation Service, with appropriate support on site to ensure tenancies are sustained. A further managed scheme is planned for the new year.

The changes proposed with regards to considering intentionality where there is clear evidence that an applicant has deliberately made themselves homeless, will not apply to young people aged under 21, care leavers aged between 21 to 24, pregnant women and homeless applicants with children or those with complex needs unless they have been intentionally homeless twice within a 5-year period.

The removal of areas of choice for homeless applicants on the Common Housing Waiting List and the offering of private rented accommodation outside the Cardiff area in neighbouring local authorities, where appropriate will reduce the time spent in temporary accommodation. However, there may be impacts on those with specific health and support needs who need to be close to support networks.

Any offers of private rented accommodation made outside the Cardiff area would be carefully considered and only as long as there was no risk to the applicant. It is accepted that moving out of Cardiff may be disruptive to those with specific health needs, particularly if the move was away from specific health services and support networks. Advice and support is in place to assist those with disabilities.

**What action(s) can you take to address the differential impact?**

It is accepted that moving out of Cardiff may be disruptive to those with specific health needs, particularly if the move was away from specific health services and support networks. Advice and support is in place to assist with this.

**Gender Reassignment**

Will this proposal have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is no negative impact anticipated with regards to transgender people; however careful monitoring of services will take place to ensure that no service users are unduly impacted by any proposals in the report.

The homelessness service is inclusive and applicants who are part of the LGBTQ+ community will experience the positive impacts that these proposals will deliver.

**What action(s) can you take to address the differential impact?**

No action identified.

**Marriage and Civil Partnership**

Will this proposal have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A

Marriage		X	
Civil Partnership		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is no evidence to suggest that the proposals set out will have a differential impact on those who are married or in a civil partnership as the homelessness service is inclusive and supports all regardless of marriage status.

The proposals in the report aim to improve services for those who find themselves homeless across the city.

**What action(s) can you take to address the differential impact?**

No action identified.

**Pregnancy and Maternity**

Will this proposal have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy	x		
Maternity	x		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Pregnant women and people who reside with them have a priority need for housing and have access to accommodation via the Family Gateway.

The proposals in the report support the development of an increased amount of Temporary and Permanent Accommodation to address current increased demand on this service and a swifter journey through temporary accommodation.

The changes proposed with regards to considering intentionality where there is clear evidence that an applicant has deliberately made themselves homeless, will not apply to young people aged under 21, care leavers aged between 21 to 24, pregnant women and homeless applicants with children, unless they have been intentionally homeless twice within a 5-year period. This is unlikely to be the case but is still possible. Housing & Communities work closely with Children's Services on any case where a decision is made that there is no homeless duty to ensure the right support is in place.

**What action(s) can you take to address the differential impact?**

No actions identified.

**Race**

Will this proposal have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White	x		
Mixed / Multiple Ethnic Groups	x		
Asian / Asian British	x		
Black / African / Caribbean / Black British	x		
Other Ethnic Groups	x		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Homelessness Services are inclusive and any improvement to services will benefit all those who access the service, however research has shown that those from ethnic minority backgrounds are disproportionately impacted by homelessness.

Research by the Joseph Rowntree Foundation (2021) suggests that those that are from ethnic minority backgrounds are more than twice as likely to experience homelessness. These groups are less likely to be able to access wealth to buy a home and therefore rely on the private rented sector for housing which can be unaffordable compared to their income.

Of those clients who presented to Homelessness Services in Cardiff in 2022/23 as already homeless, overall, 35% were of an ethnic minority background. Of those who presented to the service as threatened with homelessness, 26% were of an ethnic minority background. This compares to 18% of the Cardiff population (aged 16+) according to the 2021 census.

The proposal sets out plans to increase accommodation across the city, in particular to assist refugees from across the world who may find themselves homeless once they leave their Home Office accommodation which will have a positive impact on this client group.

The removal of areas of choice for homeless applicants on the Common Housing Waiting List and the offering of private rented accommodation outside the Cardiff area in neighbouring local authorities, where appropriate will reduce the time spent in temporary accommodation. However, there may be impacts on those from specific ethnic backgrounds who would prefer to be housed in certain areas of Cardiff due to cultural considerations.

**What action(s) can you take to address the differential impact?**

No specific actions identified. Although there may be impacts on those from specific ethnic backgrounds who would prefer to be housed in certain areas of Cardiff due to cultural considerations, the provision of settled accommodation is considered to be beneficial.

### Religion, Belief or Non-Belief

Will this proposal have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist	X		
Christian	X		
Hindu	X		
Humanist	X		
Jewish	X		
Muslim	X		
Sikh	X		
Other belief	X		
No belief	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Homelessness Services are inclusive and any improvement to services will benefit all those who access the service regardless of religion.

The removal of areas of choice for homeless applicants on the Common Housing Waiting List and the offering of private rented accommodation outside the Cardiff area in neighbouring local authorities, where appropriate will reduce the time spent in temporary accommodation. However, there may be impacts on those with religious beliefs who would prefer to be housed near places of worship.

**What action(s) can you take to address the differential impact?**

No specific actions identified. Although there may be impacts on those from specific religious backgrounds who would prefer to be housed in certain areas of Cardiff due to location to places of worship, the provision of settled accommodation is considered to be beneficial.

### Sex

Will this proposal have a **differential impact [positive/negative]** on male, female or non-binary persons?

	Yes	No	N/A
Male persons	X		
Female persons	X		
Non-binary persons	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Homelessness Services are inclusive and any improvement to services will benefit all those who access the service regardless of gender.

Examining data relating to those presenting to homelessness services in 2022/23, shows that slightly more men than women are found to be homeless on the day, but that a higher proportion of females are presenting as threatened with homelessness. The report outlines some of the progress that has been made in improving prevention services, by providing them in community settings and in the home.

The removal of areas of choice for homeless applicants on the Common Housing Waiting List and the offering of private rented accommodation outside the Cardiff area in neighbouring local authorities, where appropriate will reduce the time spent in temporary accommodation. However, those applicants from single parent families may be impacted if they are moved away from family support networks.

**What action(s) can you take to address the differential impact?**

No action identified – whilst those applicants from single parent families may be impacted if they are moved away from family support networks, the provision of long-term settled accommodation is seen as beneficial.

**Sexual Orientation**

Will this proposal have a **differential impact [positive/negative]** on people with different sexual orientations?

	Yes	No	N/A
Bi	X		
Gay	X		
Lesbian	X		
Heterosexual	X		
Other	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Homelessness Services are inclusive and any improvement to services will benefit all those who access the service regardless of sexual orientation.

Services are closely monitored to ensure that anyone who identifies as LGBTQ+ is provided with the appropriate accommodation and support.

The removal of areas of choice for homeless applicants on the Common Housing Waiting List and the offering of private rented accommodation outside the Cardiff area in neighbouring local authorities, where appropriate will reduce the time spent in temporary accommodation. However, it is accepted that those applicants from the LGBTQ+ community may wish to remain close to support networks and community services within Cardiff.

**What action(s) can you take to address the differential impact?**

No action identified, whilst those applicants from the LGBTQ+ community may be impacted if they are moved away from support networks, the provision of long-term settled accommodation is seen as beneficial.

**Socio-economic Duty**

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposal will reduce socio-economic disadvantage by providing more accommodation in the city for those who find themselves homeless and reducing the time that homeless people spend in temporary accommodation, providing more people with a permanent, affordable, settled home.

Advice and support is provided across communities to those at risk of homelessness with a variety of financial and practical support is available along with the signposting into other support services.

The removal of areas of choice for homeless applicants on the Common Housing Waiting List and the offering of private rented accommodation outside the Cardiff area in neighbouring local authorities, where appropriate will reduce the time spent in temporary accommodation. However, it may impact on those who work in Cardiff, although being housed in settled accommodation is more beneficial than residing in temporary accommodation.

**What action(s) can you take to address the differential impact?**

No action identified, whilst applicants may be impacted if they are moved away from places of work and support networks, the provision of long-term settled accommodation is seen as beneficial.

**Welsh Language**

Will this proposal have a **differential impact [positive/negative]** on the Welsh language?

	Yes	No	N/A
Welsh language			X



**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

N/A

### Consultation and Engagement

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

Local Members will be consulted about individual accommodation schemes in their wards.

The proposals outlined in the report are to be consulted on with a wide range of stakeholders including homeless people and a further impact assessment will be undertaken following the consultation to inform decision making.

### Summary of Actions (Listed in the sections above)

	<b>Actions</b>
Age	<p>We will continue to ensure that support from council staff is available on site at emergency hotels and other temporary accommodation sites, with other services such as Early Help, Play, and Advice Services also providing assistance from these locations. We will ensure children's education is uninterrupted if being relocated to other areas outside of the city.</p> <p>For those children who may be moved to a different area of the city, or outside the city, advice and support is in place to assist families with educational choices.</p>
Disability	<p>It is accepted that moving out of Cardiff may be disruptive to those with specific health needs, particularly if the move was away from specific health services and support networks. Advice and support is in place to assist with this.</p>
Gender Reassignment	None
Marriage & Civil Partnership	None
Pregnancy & Maternity	None

Race	No specific actions identified. Although there may be impacts on those from specific ethnic backgrounds who would prefer to be housed in certain areas of Cardiff due to cultural considerations, the provision of settled accommodation is considered to be more beneficial.
Religion/Belief	No specific actions identified. Although there may be impacts on those from specific religious backgrounds who would prefer to be housed in certain areas of Cardiff due to location to places of worship, the provision of settled accommodation is considered to be more beneficial.
Sex	No action identified – whilst those applicants from single parent families may be impacted if they are moved away from family support networks, the provision of long-term settled accommodation is seen as more beneficial.
Sexual Orientation	No action identified, whilst those applicants from the LGBTQ+ community may be impacted if they are moved away from support networks, the provision of long-term settled accommodation is seen as more beneficial.
Socio-economic Impact	Advice and support is provided across communities to those at risk of homelessness with a variety of financial and practical support is available along with the signposting into other support services.  Whilst applicants may be impacted if they are moved away from places of work and support networks, the provision of long-term settled accommodation is seen as more beneficial.
Welsh Language	None
Generic/ Over-Arching (applicable to all the above groups)	The proposals set out in the cabinet report will have a positive effect on all groups who find themselves homeless or threatened with homelessness in the city reducing the time spent in Temporary Accommodation and providing an increased amount of affordable permanent, settled accommodation across Cardiff.

### Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

## **B: Child Rights Impact Assessment**

The aim of a Child Rights Impact Assessment is to put children and young people at the forefront of decision-making. The assessment helps officers to consider how the rights of children and young people may be affected by a proposed policy or project.

Click [here](#) to start a Child Rights Impact Assessment.

You will receive an automated email containing a link to your Child Rights Impact Assessment template and the Child Friendly Cardiff Team will be in contact to support you.

Guidance for Local Government prepared by Unicef is available here:  
[Child Rights Impact Assessment - Child Friendly Cities & Communities \(unicef.org.uk\)](https://www.unicef.org.uk/child-rights-impact-assessment-child-friendly-cities-communities)

For further information or assistance in completing the Child Rights Impact Assessment, please contact the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

### **Next Steps**

Where it is considered that a Child Rights Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

## C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

### Welsh Language Standards 88-97

#### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?			
Treating the Welsh language no less favourably than the English language?			

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

#### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

**Treating the Welsh language no less favourably than the English language?**

#### Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

**The opportunities for persons to use the Welsh language?**

**Treating the Welsh language no less favourably than the English language?**

#### Standard 91

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

**The opportunities for persons to use the Welsh language?**

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**Treating the Welsh language no less favourably than the English language?**

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### **Standard 92**

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

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**Treating the Welsh language no less favourably than the English language?**

--

### **Standard 93**

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

**The opportunities for persons to use the Welsh language?**

--

**Treating the Welsh language no less favourably than the English language?**

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### **Standard 94**

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council's Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

**The opportunities for persons to use the Welsh language?**

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<b>Treating the Welsh language no less favourably than the English language?</b>
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**Standard 95**

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

<b>The opportunities for persons to use the Welsh language?</b>
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<b>Treating the Welsh language no less favourably than the English language?</b>
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**Standard 96**

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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<b>Treating the Welsh language no less favourably than the English language?</b>
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**Standard 97**

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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<b>Treating the Welsh language no less favourably than the English language?</b>
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## Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

- [Correspondence](#) - receiving and replying (emails, letters, online communication).
- [Telephone](#) – receiving and answering calls.
- [Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.
- [Public Messages – electronic – video](#)
- [Signs, Notices & Display Material](#)
- [Publicity & Advertising](#)
- [Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.
- [Producing Forms](#)
- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)
- [Education Training Courses](#)
- [Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>

## Cardiff Council's Welsh Language Skills Strategy

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>



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**Next Steps**

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## D: Habitats Regulations Assessment

	Yes	No
Will the proposal affect a European site designated for its nature conservation interest*, or steer development towards an area that includes a European site, or indirectly affect a European site?	<input type="checkbox"/>	<input type="checkbox"/>

*\* Only two European sites designated for nature conservation interest lie within Cardiff's boundaries – the Severn Estuary and Cardiff Beech Woods, but be aware if your project affects an area close to a neighbouring authority.*

If the answer is 'Yes', then a screening exercise may need to be conducted to determine if a Habitats Regulations Assessment is required or not.

Contact the [Biodiversity Team](#) who will guide you through the process.

## E: Strategic Environmental Assessment

	Yes	No
Does the strategy, policy or activity set the framework for future development consent?	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
Is the strategy, policy or activity likely to have significant environmental effects (positive or negative)?	<input type="checkbox"/>	<input type="checkbox"/>

If you have answered 'Yes' to both of the above questions, then a full Strategic Environmental Assessment Screening is needed.

Contact the [Sustainable Development Unit](#) who will guide you through the process.

## F: Data Protection Impact Assessment

	Yes	No
Will the proposal involve processing information that could be used to identify individuals?	<input type="checkbox"/>	<input type="checkbox"/>

If the answer is 'Yes', then a Data Protection Impact Assessment may be required.

Click [here](#) to read the guidance and start the Data Protection Impact Assessment process if needed.

For further information, contact the [Data Protection Service](#).

## G: Health Impact Assessment

A Health Impact Assessment helps to develop policies and projects that consider the mental, physical and social health and well-being of a population during planning and development. Considering health inequalities and their impacts on local communities is an essential part of any Health Impact Assessment.

Health Impact Assessments will become a statutory requirement for public bodies in specific circumstances in the future. These circumstances have yet to be published by Welsh Government.

For further information and advice, please contact the Wales HIA Support Unit.

Website: [Home - Wales Health Impact Assessment Support Unit \(phwwhocc.co.uk\)](http://phwwhocc.co.uk)

Email: [WHIASU.PublicHealthWales@wales.nhs.uk](mailto:WHIASU.PublicHealthWales@wales.nhs.uk)

Mae'r dudalen hon yn wag yn fwriadol

**CHILD RIGHTS IMPACT ASSESSMENT (CRIA)**

Information or assistance in completing the CRIA, please email the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

<b>Title of policy/strategy/project/procedure/service being assessed:</b>	Housing Emergency in Cardiff - Cabinet Report
<b>Type of Assessment:</b>	Existing

Who is responsible for developing and implementing the policy/strategy/project/procedure/service?	
<b>Name:</b>	Helen Evans
<b>Job Title:</b>	Assistant Director, Housing & Communities
<b>Service/Team:</b>	Housing & Communities
<b>Directorate:</b>	Adults, Housing & Communities

**STAGE 1: PURPOSE/SCOPE**

- 1. What is the policy/strategy/project/procedure/service? Summarise its overall aims and any aims specific to children.**

The purpose of the proposal is to brief Cabinet on the Housing Emergency in Cardiff, and the unprecedented pressures this is placing on homelessness services. Including but not limited to, record numbers of individuals and families seeking help from homelessness services, lack of social housing for those on the common waiting list, resulting in presenting as homeless being perceived by some as a short cut to access social housing and emerging pressures such as the Home Office accelerating their decision making on asylum cases where at over 450 households will seek support with housing over a short period of time.

The proposal provides an update to Cabinet on the steps already being taken to address these pressures including a strengthened homelessness prevention service, improvements in mediation services and referring those who present to the service with no local connection back to their originating local authority for help. Steps taken also include the opening of additional temporary accommodation including use of hotels within the city, and the meanwhile use of land and modular units to further increase supply.

The report seeks approval for changes to existing policies which impact on homeless assessment, (in line with current homelessness legislation). These changes are listed below:

- The consideration of intentionality in making homelessness decisions, where there is clear evidence that an applicant has deliberately made themselves homeless.
- The removal of areas of choice for homeless applicants on the Common Housing

Waiting List.

- Offering private rented accommodation outside the Cardiff area in neighbouring local authorities, where appropriate.

The proposal also details solutions to the current housing pressures through larger scale property purchases and package deal arrangements and the continuation of the meanwhile use of brownfield sites to deliver new modular homes for temporary accommodation, using the existing arrangements in place within our Cardiff Living Partnership and with the current modular providers.

The proposal requests that Cabinet approve:

Approve a consultation process on the policy changes outlined in the report, including the consideration of intentionality in making homeless decisions, the removal of areas of choice for homeless applicants on the Common Housing Waiting List and offering private rented accommodation outside the city, in neighbouring local authority areas.

To delegate the final decision on these changes to the Director Adults, Housing and Communities in consultation with the Cabinet Member, Housing and Communities following a full impact assessment and consultation with stakeholders.

Approve the acquisition of the properties following the completion of all due diligence.

Approve in-principle the award of a new contract for the meanwhile modular delivery of temporary accommodation.

Delegation of the final sign-off of each of the sites to the Corporate Director, People & Communities in consultation with the S.151 Officer and the Cabinet members for Housing & Communities and Finance. Final approval will be conditional on the following; Approval of TACP grant from Welsh Government, Agreement of lease arrangements with Welsh Government and Cardiff & Vale Health Board for the sites identified in appendix 2 and a suitable financial viability assessment for each of the sites

**2. Please select the groups of children and young people who will be directly and/or indirectly impacted. Please review after completing the form.**

<input type="checkbox"/> Protected Characteristics	<input type="checkbox"/> <a href="#">EOTAS</a>
<input checked="" type="checkbox"/> Young Parents	<input type="checkbox"/> Gypsy Travellers
<input checked="" type="checkbox"/> Children of Single Parents	<input checked="" type="checkbox"/> Asylum Seekers
<input checked="" type="checkbox"/> Southern Arc Children	<input checked="" type="checkbox"/> BAME Community
<input type="checkbox"/> Children of Deaf Parents	<input checked="" type="checkbox"/> Care Experienced
<input type="checkbox"/> Young Carers	<input checked="" type="checkbox"/> Pre-School
<input type="checkbox"/> Primary School	<input checked="" type="checkbox"/> Secondary School
<input type="checkbox"/> Welsh First Language	<input checked="" type="checkbox"/> Non-Native Speakers of English
<input type="checkbox"/> Set Locality	<input checked="" type="checkbox"/> Citywide
<input checked="" type="checkbox"/> LGBTQ+	<input type="checkbox"/> ALN




Youth Justice

Other - Click or tap here to enter other identified groups

## STAGE 2: BUILD AND ASSESS

The General Principles of the UNCRC (United Nations Convention on the Rights of the Child) are at the heart of a child rights approach. [This link](#) will take you to a page on our website with a full list of Children's Rights and supporting information. [Click here](#) to access a list of articles grouped into common themes.

### 3. What is the likely/ actual impact of the proposal on children's rights? Is it positive, negative, or neutral?

<i>Describe the Impact</i>	<i>Impacted UNCRC Articles</i>	<i>Impact Scale</i>	<i>How to mitigate impact (if negative)  - additional info</i>
There are currently 707 families with children residing in temporary accommodation in Cardiff. The report shows that that 28 more families are entering temporary accommodation than are exiting into permanent accommodation each month, so demand for accommodation is far outstripping supply. Due to this demand many families are now residing in emergency hotel accommodation. The report sets out proposals to deal with this demand, reduce the use of hotel accommodation and move people on quickly to settled, permanent accommodation.	Article 27 - Adequate standard of living Article 31 - Right to play and leisure	Negative	The proposals set out in this report will address the impact of children residing in hotel accommodation. The proposals aim to reduce the use of hotels by developing increased temporary and permanent accommodation across the city. Support from council staff is available on site and other services, such as Early Help, Play, and Advice Services also provide assistance from these locations, however the use of hotels is not ideal and spending time in any form of temporary accommodation can be unsettling for children.
The changes proposed with regards to considering intentionality where there is clear evidence that an applicant has deliberately made themselves homeless.	Article 20 - children unable to live with their family, Article 27 - adequate standard of living	Neutral	Changes will not apply to young people aged under 21, care leavers aged between 21 to 24, pregnant women and homeless applicants with children, unless they have been intentionally homeless twice within a 5-year period. This is unlikely to be the case but is still possible. Housing & Communities work closely with Children's Services on any case where a

			decision is made that there is no homeless duty to ensure the right support is in place.
The removal of areas of choice for homeless applicants on the Common Housing Waiting List will reduce the amount of time spent in temporary accommodation, particularly for families	Article 27 - adequate standard of living, Article 28 - right to education, Article 9 - separation from parents	Negative	It is accepted that moving to a different area of Cardiff may be disruptive for children in terms of their education and their family support networks. The proposals in the report that aim to reduce the time spent in temporary accommodation will enable families to move into a settled home more quickly and are therefore beneficial to families and children. We will also ensure advice and support is in place to assist families with education choices.
Offers of private rented accommodation outside of Cardiff	Article 27 - adequate standard of living, Article 28 - right to education, Article 9 - separation from parents	Negative	It is accepted that moving out of Cardiff may be disruptive for children in terms of their education and their family support networks. The proposals in the report that aim to reduce the time spent in temporary accommodation will enable families to move into a settled home more quickly and are therefore beneficial to families and children. We will also ensure advice and support is in place to assist families with education choices.
Click or tap here to add an impact.	Click here to enter an article.	Choose a value.	Click or tap here to add a mitigation.
Click or tap here to add an impact.	Click here to enter an article.	Choose a value.	Click or tap here to add a mitigation.
Click or tap here to add an impact.	Click here to enter an article.	Choose a value.	Click or tap here to add a mitigation.
Click or tap here to add an impact.	Click here to enter an article.	Choose a value.	Click or tap here to add a mitigation.

### STAGE 3: VOICE AND EVIDENCE

4. How do you plan to review the policy/ strategy/ project/ procedure/ service to ensure that it respects, protects and fulfils children's rights? [i](#) - additional info

The report is a proposal at present - advising cabinet of the current housing emergency in the city.

5. **Have you sourced and included the views and experiences of children and young people? What do you know about children and young people's views and experiences that are relevant to the proposal?** [i - additional info](#)

Not at present, however consultation with a wide range of stakeholders on the proposals outlined in the report, at which time the impacts will be further assessed.

#### **STAGE 4: BUDGET**

It is important to consider the resource and budgetary elements which are directly attributed to children and young people to enable oversight.

6. **What is the budget for this policy/ strategy/ project/ procedure/ service? In your answer, include any allocations specifically for children and young people and whether any of the budget will be used to mitigate negative impacts identified above.**

N/A

#### **STAGE 5: IDENTIFIED ACTIONS**

7. **What actions have been identified or changes made to the policy/ strategy/ project/ procedure/ service as a result of this assessment?** [i - additional info](#)

None

#### **AUTHORISATION**

The template should be completed by the Lead Officer of the identified policy/ strategy/ project/ procedure/ service and approved by the appropriate manager.

Completed By:	Jessica Tomlinson
Submission Date:	24/11/2023
Job Title:	Improvement Project Manager
Approved By:	Click or tap here to enter name.

Job Title:	Click or tap here to enter job title.
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### **Governance & Decision-Making**

Where it is considered that a CRIA is required, you must append the completed form to the Cabinet or Officer Decision Report. A copy must also be emailed to the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

### **Advice & Support**

UNICEF Child Rights Impact Assessment Guidance for Local Government:  
[Child rights impact assessment - Child Friendly Cities & Communities \(unicef.org.uk\)](https://www.unicef.org.uk/child-rights-impact-assessment-child-friendly-cities-communities)

For further information or assistance in completing the CRIA, please email the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

29th Nov 2023

Councillor Lynda Thorne  
Cabinet Member for Housing & Communities  
*Sent via e-mail*



Dear Cllr Thorne,

**COMMUNITY & ADULT SERVICES SCRUTINY COMMITTEE – 20 NOV 2023 –HOMELESS CRISIS BRIEFING**

On behalf of Committee Members, a sincere thanks to you, and everyone present, for providing an early opportunity to assess forthcoming proposals to address the homelessness emergency in Cardiff.

We, as a committee, are acutely aware of both the seriousness and reality of the situation. With the current financial context forcing many individuals who, perhaps, have not faced hardship before, into destitute situations. We therefore welcome the significance placed on addressing this situation. We as a Council, must continue to place this issue at the forefront of our agenda and go above and beyond statutory requirements. We must continue to find ways of managing pressures, but also continue to place pressure on national government that this issue cannot be solved by the local authority alone; and we, and other organisations, must receive adequate support through an effective policy and financial framework.

Like you, we pay tribute to the hard work and dedication of all staff both within the council and in partner organisations, who provide such vital support to individuals facing homelessness. Whilst the performance of the council's Homeless Prevention team is welcomed, including the plans in place to address winter demands; we note that sadly, current measures are not enough to manage the situation.

Whilst remaining mindful to the current demand levels, and financial context in which we must operate, we offer our observations and recommendations to assist you in finalising proposals.

**Committee Members Observations**

- Support-led approach – whilst we recognise the importance of housing-led approaches in ensuring safe, suitable accommodation in the city; the principle of addressing the underlying causes and consequences of homelessness must not be lost.

We know addressing the underlying causes of homelessness is a key part of the Council's approach, and welcome the confirmation provided at our meeting that individuals with complex needs will not be offered unsuitable accommodation as a way of managing this emergency.

We therefore urge Cabinet to recognise the importance of balancing both the causes and consequence of homelessness and the availability of suitable accommodation when deciding on these, and all future proposals.

- Longevity of the Solutions – during the discussion we were informed the new build and modular accommodation proposed will fully comply with the Rapid Rehousing model, however some of the properties being purchased, along with the emergency provision contained in the proposals, may not.

Whilst the severity of the current situation is fully appreciated, the potential for emergency provisions and purchased properties to not align with the long-term strategic approach does raise questions about the longevity in the proposals, and in turn the value for money. We do however recognise it is a balancing act, and the proposal regarding the council purchasing property is overall welcomed due to the speed of solution it provides.

- Additional Accommodation– it was pleasing to note the plans to address the need by providing immediate accommodation solutions; and also, to receive assurance on the intent for the additional accommodation proposed to be dispersed across the city; and in particular, to reduce pressure in the Hansen Street area of the city centre.
- Applying intentionality – we note the need to manage demand and the desire to easily identify and support those most in need. Further, we recognise the need to deter people from the perception that presenting as homeless is the quickest route into social housing.

We are however deeply concerned about the Council's proposals to apply intentionality in determining whether an individual is owed a homelessness duty. We do not believe that this is a compassionate approach to homelessness. We are concerned that this intention to manage demand could have significant, damaging repercussions for some individuals. We would urge the Council to consider the extent to which this proposal could, inadvertently, move the problem along or even accelerate people's circumstance by potentially restricting an individuals' access to homelessness duties and housing support. We further note that this is contrary to Welsh Government proposals in its 'Ending Homelessness in Wales White Paper'.

Overall, we would recommend that other measures be considered in place of this proposal. We note the importance of strengthening the message that presenting as homeless is not a quick, easy route into social housing and we wonder if, as raised at the meeting, more could be done around how the councils delivers this message and its content; for example, if we could better project clear information on the average length of time waiting for social housing; and the lack of accommodation availability to a wider audience.

We heard at the meeting that at present, 14% of individuals living on the street have no recourse to public funds, and 23% have no local connection. As mentioned earlier in this letter, though the pressures and current context is understood, we would urge the authority to lead the way in going above statutory duty to support individuals and agree with the external partners present at our meeting on the need to remain mindful of our moral obligations when individuals are in destitute situations.

- Offers of Private Rented Accommodation outside of Cardiff – with regard to this proposal, there is initial concern this may present an increased risk of repeated homelessness due to the potential for individuals to be moved away from their support network, employment, and council services.
- Partnership Working – in the discussions we noted strong partnership working between Welsh Government, the authority, the third sector, and the private rented sector is vital, and we would strongly encourage this partnership being strengthened and continuously assessed.

### **Committee Members Recommendations**

From the discussion at the meeting, we were informed the council is limited in what it can do to reduce private landlords leaving the market to pursue Air BnB opportunities. Given the severity of how this issue is impacting the current context, we offer the following recommendation for your consideration:

**R1** As an authority, undertake, or increase efforts, to lobby the relevant government to enact legislation, such as placing covenants on buildings to reduce the prevalence of Air BnB's in the city; citing the pressures and ramifications the increased Air BnB markets presence is placing on the availability of long-term accommodation in the city. The council should also consider using new levers provided by Welsh Government to manage second homes and holiday lets.

**R2** We would strongly urge Cabinet to withdraw proposals to re-apply Intentionality in determining whether an individual is owed a homelessness duty, owing to the significant consequences this will have for individuals, and recognising that this proposal would not be in line with current Welsh Government proposals. We would encourage Cabinet to pursue alternative means of communicating the demand pressures on and waiting times for social housing.

To confirm, a response to this letter is requested which advises if the recommendations made<sup>1</sup> are accepted.

We wish to end by stressing the importance of exercising caution on the proposals relating to changes in policy and protocol. If these proposals to change policy / protocol are carried, we urge they are piloted with the possibility of allowing a revert to previous approaches in a timely manner, without undergoing any bureaucratic measures to do so.

Further, we also urge proposals that strengthen our support for complex needs in line with this continuing demand is also considered and carried. We note this matter is linked to resource and revenue funding and so we urge they be considered and prioritised in the council's forthcoming budgetary decisions.

Yours,



**COUNCILLOR RHYS TAYLOR**

**CHAIR, COMMUNITY & ADULT SERVICES SCRUTINY COMMITTEE**

cc. Members of the Community & Adult Services Scrutiny Committee

Jane Thomas, Director Adults, Housing & Communities

Helen Evans, Assistant Director, Housing & Communities

Dave Jaques, Assistant Director, Development & Regeneration

Matthew Evans, Operational Manager Supported Accommodation & Assessment

Huggard

The Wallich

Cardiff Council Chair of Governance & Audit

Tim Gordan, Head of Communications & External Relations

Jessica Tomlinson, Improvement Project Manager

Cabinet Office

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<sup>1</sup> R1 & R2



**SWYDDFA CYMORTH Y CABINET  
CABINET SUPPORT OFFICE**

Fy Nghyf / My Ref : [CE:0044997]

Eich Cyf / Your Ref :

Dyddiad / Date: 6<sup>th</sup> December 2023

Councillor Rhys Taylor  
Chair  
CASSC  
Cardiff Council  
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Dear Councillor Taylor

**CASSC Scrutiny Committee – 20<sup>th</sup> November 2023 – Homeless Crisis Briefing**

May I thank Committee for the opportunity to present a briefing on the Housing Emergency at the November meeting.

I note the observations set out in your letter, in particular I would wish to confirm that our work to continue to address the underlying causes of homelessness remains vital and we remain committed to the continued development of the multi-disciplinary support available for individuals with complex needs. While the briefing was focused on the housing emergency, I am very aware that housing alone cannot address homelessness.

In terms of your recommendations, I have set out my response below:

***R1 As an authority, undertake, or increase efforts, to lobby the relevant government to enact legislation, such as placing covenants on buildings to reduce the prevalence of Air BnB's in the city; citing the pressures and ramifications the increased Air BnB markets presence is placing on the availability of long-term accommodation in the city. The council should also consider using new levers provided by Welsh Government to manage second homes and holiday lets.***

While I agree that the Air BnB market is placing additional pressure on the housing market, I am also aware that some action is already being taken to address this issue. The Welsh Government have already announced new criteria that will need to be met before self-catering accommodation can be classified as a business and subject to Non-Domestic Rates rather than Council Tax. For those properties that are included in the Council Tax list a new premium is being introduced in Cardiff from the 1<sup>st</sup> April 2024 which will charge an additional 100% on top of the normal Council Tax charge for vacant furnished dwellings. It will also be possible to consider increasing the level

**GWEITHIO DROS GAERDYDD, GWEITHIO DROSOCH CHI**

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu'n ddwyieithog. Byddwn yn cyfathrebu â chi yn ôl eich dewis, dim ond i chi roi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

**WORKING FOR CARDIFF, WORKING FOR YOU**

The Council welcomes correspondence in Welsh, English or bilingually. We will ensure that we communicate with you in the language of your choice, as long as you let us know which you prefer. Corresponding in Welsh will not lead to delay.

Tudalen 791



of this premium in future years. This premium will apply to AirBnB properties where the owner is not in occupation. It is estimated that this premium will impact on at least 3000 properties in the city including second homes and vacant furnished lets, although there are some exceptions in the landlord sector for properties being actively marketed for sale or rent.

I also understand that a formal Welsh Government consultation was issued earlier in the year about registration of holiday lets. Hotels, B&Bs, caravans and other holiday lets were all in scope for the registration/ licensing scheme at the consultation stage. Benefits the scheme could provide include:

- the mechanism to address concerns about safety and compliance
- a comprehensive database of who is operating in the industry and
- a valuable tool to understand the scale, location and impact of the industry economically and on local communities.

The aim is to level the playing field as part of a long-term response to the major challenges faced by the loss of residential property in many Welsh communities, whilst enhancing the visitor experience and visitor safety.

I understand that Welsh Government is currently drafting new legislation relating to this issue.

While this is good progress I do however accept that further dialogue should take place with Welsh Government officials about any additional steps could be taken to address this issue.

***R2 We would strongly urge Cabinet to withdraw proposals to re-apply Intentionality in determining whether an individual is owed a homelessness duty, owing to the significant consequences this will have for individuals, and recognising that this proposal would not be in line with current Welsh Government proposals. We would encourage Cabinet to pursue alternative means of communicating the demand pressures on and waiting times for social housing.***

While I note and understand the Committee's concerns about this matter unfortunately, I cannot accept this recommendation. While I would not choose to implement this change in normal circumstances, given the current crisis I feel we have no choice. As set out during the meeting the consideration of intentionality during homeless decision making is necessary to prevent individuals from taking advantage of the homeless legislation to bypass the social housing waiting list. Officers report cases where individuals are deliberately giving up housing to enter homeless services with the intent of gaining social housing, this means that those households with higher housing needs are waiting longer on the Common Housing Waiting list as a result.

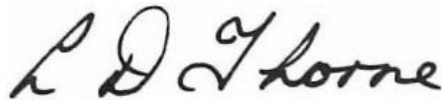
I regret that I find it hard to understand how communicating the demand pressures and waiting times for social housing would address this issue. While the Welsh Government's White Paper on Ending Homelessness in Wales proposes a future

change to this area, considering intentionality in homeless decision making is fully in line with current legislative requirements. This week I attended an all Wales Cabinet Member briefing and discussion on the Welsh Government white paper and every single Local Authority Cabinet member present made the case for not changing the intentionality rule.

I do however accept that implementing these proposed changes in protocol and policy this should be carried out with caution and therefore while the cabinet report will agree the approach in principle, further consultation will take place to inform a full impact assessment before these changes are taken forward and any action that is required to mitigate any issues. This approach will also ensure that the needs of individuals with complex needs are fully considered.

May I once again thank the Committee for the opportunity to present this issue.

Yn gywir / Yours sincerely

A handwritten signature in black ink, appearing to read 'L D Thorne'.

**Councillor / Y Cynghorydd Lynda Thorne**  
**Aelod Cabinet dros Dai a Chymunedau**  
**Cabinet Member for Housing & Communities**

Mae'r dudalen hon yn wag yn fwriadol

Yn rhinwedd paragraff (au) 14, 16, 21 Rhan (nau) 4 a 5 o Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972.

Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol

**DEVELOPMENT OF AN INDEPENDENT LIVING AND WELLBEING CENTRE.**

**SOCIAL SERVICES (COUNCILLOR NORMA MACKIE/  
COUNCILLOR ASH LISTER)**

**AGENDA ITEM: 10**

**Reason for this Report**

1. To take forward proposals for the development of an Independent Living Wellbeing Centre, including expanded warehouse facilities for the Joint Equipment Service, a multidisciplinary Wellbeing Hub and a new Smart House demonstration centre, to further the development of preventative services and to support independent living as set out in the Council's Ageing Well Strategy.

**Background**

**Ageing Well Strategy**

2. In January 2022 Cabinet agreed the Ageing Well Strategy (The Strategy) which set out a range of actions to support older people to live well in their homes and communities.
3. The Strategy recognised the ageing of the population in the city and the need to respond to this. The projected rise in the number of older people and those living with life limiting illnesses and dementia was set out in the strategy as follow:

In the decade to 2030 the number of people:

- Aged 65+ will increase by 17.8%
- Aged 85+ will increase by 9.2%
- Aged 90+ will increase by 5.9%
- The number of people that struggle with activities of daily living will increase by 17%, this will apply to 1 in 4 older people (over 65).
- Also the number of people living with dementia will increase by 30.1% and 41.1% for severe dementia.

4. These demographic changes will put increasing pressure on already overstretched services, both in terms of the number seeking help and the complexity of demand. Cardiff Council will spend more than £56 million on care and support services for older people in 2023/4 and this amount will grow significantly if preventative action is not taken.
5. The Strategy is clear that the policy decisions and actions that we take now to help people to remain independent at home could prevent these demographic trends from resulting in unsustainable demand for services while also improving the outcomes for older people in the city.
6. A key aim of the Ageing Well Strategy is therefore to support older people to live independently at home through strengths based preventative services. An important strand of this work is to improve the use of technology, equipment and adaptations to support people to be able to remain in their own homes and to prevent or reduce the need for care.
7. To support this work the Strategy proposed the development of a new Independent Living Wellbeing Centre. The purpose of this Centre would be to provide:
  - A single new location for the Cardiff and Vale Joint Equipment Stores, this service delivers equipment across the region and has outgrown its current premises.
  - A multidisciplinary hub of services to support independence, including facilities to train staff on preventative services through technology, equipment and adaptations
  - A new Smart House, to demonstrate the latest in technology and equipment to support people at home.
8. The previous Cabinet report supported the development of the Independent Living Wellbeing Centre, subject to a business case and further cabinet report. This proposal is now being brought forward for further consideration.

## **Issues**

### ***The Joint Equipment Service***

9. One of the key drivers for the development of the new Independent Living and Wellbeing Centre is the need to find a new location for Cardiff and Vale Joint Equipment Service (JES). JES is managed by Cardiff Council on behalf of the regional partnership and delivers a vital statutory service, delivering community medical equipment to support an individual's care needs directly to their own home. The equipment that the service provides can help to reduce or prevent the need for care packages; it can support discharge from hospital and prevent admission to hospital or residential care.
10. The service holds in excess of 700 product lines within its warehouses, including profiling beds, patient lifting hoists, suction machines and commodes. The service also delivers continence products for the University Health Board. In total the service carries out 76,000 deliveries



per year, including a same / next working day service to meet emergency need, providing an essential support service to vulnerable residents across the region.

11. The Joint Equipment Service has grown rapidly in recent years, since the service commenced in 2009 demand has increased by 209%. As nearly half of all deliveries are for those aged 70 years and over, a demographic that is projected to greatly increase, the demands on the service are likely to continue to rise.
12. The service has outgrown its existing warehouse facilities and functions in six separate buildings: Two main warehouses, one in the north of the city and one in the south and four other buildings which have been acquired to ease pressure on storage of equipment, this includes 16 self-storage containers. Despite this increase the amount of warehouse space is still not sufficient for the needs of the service.
13. This inadequate and disjointed warehouse space is inefficient, with significant staff resource required to travel to collect the stock from different sites. This together with the inability to store sufficient stock is now impacting on service delivery with 162 deliveries lost each month, a 7% reduction in medical deliveries in a year. The service is now unable to meet its target to achieve 80% of standard deliveries in 5 days, with performance in the first half of 2023/4 down to 69%. If these delays continue there is a serious risk of increased hospital admission, delayed discharges, and increased requirements for both domiciliary and residential care.

### ***Smart House and Multi-Disciplinary Working***

14. A Smart House, a purpose built home that showcases aids, adaptations, and solutions for independent living, is incorporated in the JES warehouse in the North of the City. This space is also used as a facility for training health and social care staff and for carrying out individual service user assessments. The Smart House is also used as a hub for multidisciplinary working. This space in this facility is no longer sufficient and it is extensively overbooked, also the location of the Smart House is not suitable for residents of the Vale of Glamorgan due to its location, resulting in inequity of provision across the region. The limitations of these facilities are impacting on the ability to deliver the change towards preventative working that was set out in the Strategy.
15. Following an extensive period of review and market investigation which has taken place over the past 3 years, no suitable property for lease or purchase has been identified.

### ***Proposal***

16. An opportunity has arisen to build a new, fit for purpose Independent Living Wellbeing Centre, as part of the development of the Gasworks site in Grangetown. This site has been acquired by the Housing Revenue Account for the development of affordable housing, and when fully developed the site will deliver a minimum of 500 units of social housing. However one section of the land is particularly suitable for non-domestic

use and would be an excellent location for the new Centre. The location, being on the border of Cardiff and the Vale of Glamorgan, and with good transport links, will be accessible for residents of both areas and will support the timely delivery of equipment across the region.

17. The proposed Independent Living and Wellbeing Centre presents a solution to the pressing needs of the Joint Equipment Service while also providing an opportunity to develop a state-of-the-art building supporting independent living and preventative services and multi-disciplinary working.
18. It is proposed that the Independent Living and Wellbeing Centre will comprise of two integrated and complimentary elements:
  - **The Joint Equipment Service** stores and logistical operations including a new decontamination unit
  - **A Multidisciplinary Hub** for both health and social care services, including a new Smart House to demonstrate a range of technology, equipment and home adaptations and to facilitate training.

The proposals for both elements are set out below:

### ***The Joint Equipment Service***

19. The proposal will provide a warehouse of 33,518 ft<sup>2</sup> / 3,114 m<sup>2</sup> which will be 24% larger than the current facilities allowing for current need and future growth. The facility will have the advantage of being based on one site allowing for more efficient working arrangements. This new warehouse space will alleviate the space constraints currently facing the service set out above allowing for better storage solutions and logistical efficiencies.
20. The new Centre will allow for a more resilient, reactive service, improving outcomes for citizens through quicker hospital discharge and admission avoidance. It also presents the opportunity to reduce costs to the Council, by preventing or reducing the need for domiciliary care and reducing residential placements, through timely delivery of equipment. The saving from preventing this care is estimated at £434k per annum.
21. With adequate space, the service can store a wider range of products to meet the developing needs of citizens, reducing spend on costly bespoke items. An estimated saving of £30,000 per annum will be made for Cardiff as the additional space will reduce the need for one-off items and instead allow them to be added to the standard stock range. The space will also allow the service to better prepare for periods of peak demand, such as winter pressures, improving business continuity and reducing waiting and delivery times.
22. In addition to increasing warehouse facilities the new Centre will provide the opportunity to deliver an inhouse recycling service. All equipment provided by JES is loaned, and when no longer required is cleaned and recycled back into use. The cleaning of medical aid equipment prior to re-

use is currently outsourced at a cost of circa £119k per annum. The contract is held by a company based in England. Around 6,000 items of equipment annually are transported across the country cleaned and then returned. This activity generates circa 36,000 avoidable travel miles per year and generates circa 219 tonnes of CO<sub>2</sub>.

23. It is proposed that this recycling and decontamination work would be brought in house, allowing a more cost effective and reactive service, this would realise a potential saving of £26.5k in the first year, increasing by 7% year on year. It is further anticipated that this would reduce the need to procure new items as the inhouse service would be quicker and more flexible in prioritising items that are in high demand.
24. There is an opportunity to provide the equipment recycling service through a model of supported employment, to allow those with additional needs and/or learning disability to be employed in secure, stable jobs. Only 5% of individuals with a learning disability are in employment in the UK, compared to 76% for the population as a whole, this scheme could help address this issue. Further work will be needed to ensure the viability of this model, however a similar scheme in Rhondda Cynon Taff has been in operation successfully for a number of years.
25. This co-location of the Joint Equipment Services will result in improved services, with the ability to respond to the changing needs of the region quickly both now and into the long-term future.

### ***The Multidisciplinary Hub***

26. The Multidisciplinary Hub within the new Centre would offer an additional 1,279 m<sup>2</sup> of space. This proposal includes:
  - Public facing welcome area and reception
  - Café area (servery & seating)
  - Waiting / computer areas, with community rooms and office
  - Multi-function Rooms (to hold classes and Events)
  - Kitchen area to support community groups
  - Community Rooms and Offices
  - Therapy and Consultation rooms
  - Open plan office area
  - Meeting and training rooms
27. The Centre will provide the unique opportunity to deliver a fully integrated health and social care service to support older people to live independently at home, realising one of the key aims of the Strategy. District Nursing Services, Occupational Therapy, Paediatric Therapies and Education Services already use the limited multidisciplinary space available in the JES facility. The new Centre would allow this to be greatly extended and enhanced to develop a full multidisciplinary locality working model.
28. The aim will be to bring together a combined set of skills from a range of community well-being services, social care, primary and acute health services, third sector organisations and private care providers within one co-located Hub, based within the new Centre. The Hub will be the

foundation for the provision of seamless, person-centred services focused on prevention and independent living and putting what matters to the citizen at the heart of services.

29. The proposal for the Hub will support the delivery of the Regional Partnership Board's locality working commitments and meets the aspirations of its @Home preventative programme. The services proposed for the new facility include:

- Falls Clinic – educating individuals and carers (both paid and unpaid) to maintain independence. This service would include frailty assessment and support and peer-mentoring for chronic conditions.
- Occupational Therapy and Social Work Services on site would offer advice and support and will directly prescribe equipment in individual cases.
- Expansion of the Independent Living Shop, which offers an opportunity for citizens to purchase items themselves to better support their individual needs and preferences.
- In some cases care assessments would be undertaken on site at the Smart House, identifying the right technology and equipment to support the individual and ensuring the right sizing of care provision.
- Integrated programmes such “Think Physio” would be provided on site.
- Appointments with a physiotherapist could be held in the Hub, providing an opportunity for direct referrals without the need for a GP with both the consultation rooms in the Hub and the Smart House providing excellent facilities. Immunisation, diabetes, and blood pressure clinics could be held in the facilities, enhancing the healthcare offer for the region.
- Provision for a strong third sector presence will be made in the Hub, delivering the community specific expertise needed to deliver real change. This would provide organisations such as Age UK, Hedway and Age Concern with the opportunity to have a presence within the Hub.
- Focused support groups will be held in the Hub, aimed at people living with, or caring for others with dementia; people transitioning through the stages of Motor Neuron Disease, or Multiple Sclerosis. The aim will be to provide peer/specialist support, practical advice, information alongside access to equipment/technology enabled care, which could enhance the quality of life for carers, and the cared for person.

### **Smart House**

30. A new Smart House will be at the heart of the new development. It will be a purpose-built home, demonstrating a full suite of technology, medical aids and adaptations in a domestic setting. This state-of-the-art facility will be available to support independence across Cardiff and the Vale of Glamorgan. The accommodation will deliver additional space (280 m<sup>2</sup>) to provide a much needed expansion of the existing provision including:

- Staircases, stair lifts and residential lifts
- Kitchen
- Living rooms
- Dining rooms
- WC/Bathrooms
- A range of bedrooms

- Bariatric/Mediatric equipment solutions, demonstration, and training facilities
  - All spaces will be equipped with the most appropriate tech enabled care provision.
31. The Smart House will both support individual assessment and provide a base for specialist training. It will allow the multidisciplinary team to review the equipment and technology available and consider whether it meets the needs of their individual clients. All the items stored within the JES warehouse would also be available to the team to help them assess the best equipment to support individuals on a case-by-case basis.
  32. A wide range of training will be provided through the Smart House. It will form a central part of induction for all new staff into older persons services in Cardiff and will serve as a location for a variety of training such as the All-Wales Manual Handling Passport, Medication and First Aid training, Tech Enabled Care, Dementia Awareness any many more, embedding an ethos of strength-based practice, moving away from traditional care solutions as appropriate.
  33. The Smart House will be available as venue for training across the health and social care sector, for private care providers and third sector organisations and for unpaid carers. The centre will utilise all the latest Technology Enabled Care (TEC), to train and support staff in the use of TEC in their assessment and care planning, potentially reducing the need for some care calls, at the same time empowering the citizen to retain their independence.
  34. The Smart House will provide cross sector support to reduce the reliance on care and to support effective hospital discharge, empowering the individual and providing confidence to their family/care networks and to professionals in the alternative solutions that can be tailored to meet their needs.
  35. The longer-term aim is for the Smart House to become a Training Centre of Excellence, offering Trusted Assessor Training to prescribe equipment and adaptations. The aim will be to become an accredited provider in this training, reducing costs. The space will reflect real life environments appropriate to deliver specialist training such as bariatric moving, and handling, this is a significant and growing area of need within the region. The aim is for the Smart House to be one of the first in-house bariatric and mediatric training centres in the UK.

### **Café and Social Spaces**

36. The development of the Independent Living and Wellbeing Centre will include opportunities for informal and relaxed interaction. Drawing people in through the provision of a café and social spaces. The space will include community rooms alongside multifunction rooms to support a wide range of group activities. These spaces will be supported by kitchen and welfare facilities offering further flexibility and autonomy. Rooms will also be available for local community groups to book for activities such as social events or exercise classes.

37. The aim will be to engage a wider range of individuals to visit the space, educating them on the technology and equipment that is readily available, supporting them to find their own solutions (both for themselves or their family/friends) and empowering them remain independent.
38. The provision of both the Wellbeing Hub, including the Smart House, and the enhanced JES facility will together form the Independent Living and Wellbeing Centre, leading the way for preventative services across Cardiff and Vale of Glamorgan.
39. A full business case for the MDT Wellbeing Hub will be developed in order to secure Welsh Government IRCF funding, this will be separate from the business case for the JES facility, and if necessary the two schemes can progress separately in phases allowing for more flexible delivery.

### **Options Appraisal and Business case**

40. A number of options were considered to resolve the increasing requirements of the Joint Equipment Service. A full outline business case has been produced detailing the financial appraisal and options analysis. An overview is provided within the Outline Business Case Executive Summary included at Appendix 1. The options considered included:
  - Option 1 - Leasing a third warehouse to supplement current provision
  - Option 2 - Leasing a large site to co-locate all services
  - Option 3 - Purchasing a large site to co-locate all services
  - Option 4 - Building a new provision to collocate all services
41. Adding a further warehouse to the current provision as in Option 1, was not considered a viable option due to the logistical issues with operating from so many sites.
42. Despite searching for 3 years with the support of the Strategic Estates Department supported by external professional advice, no buildings of sufficient size were identified that could make Option 2 or 3 a viable option. Option 4 has therefore been chosen as the only viable option.
43. In addition to being the only option available, a new build provision on the Gasworks Site has many advantages, it offers control over the design of the building and allows for flexibility to be built in, to future proof the project against future needs. The building will deliver ongoing savings in utility costs due to the sustainability standards within the design. Co-locating the service will also allow the service to better control staffing costs and its central location and proximity to transport links will allow easy access across the region.
44. The service has worked with Arup consultants and has completed the plans to RIBA 1, including a revision of the initial proposal to ensure the most cost-effective build and to deliver the most efficient operational function both now and into the future. The specification has been developed to deliver a BREEAM standard of "Excellent", BREEAM stands

for British Research Establishment Environmental Assessment Methodology. Next steps would be to take this design further to RIBA 2 and subject to a full business case and further cabinet report, to move forward to design and planning.

45. The project does not compromise the housing aspirations of the wider Gasworks site, the land will remain in the control of the Housing Revenue Account, and the housing scheme will take responsibility for any land remediation required as part of the wider scheme. Given the potential of the site to reduce the need for disabled adaptations through the better use of equipment, and the availability of community rooms to enhance the local community offer, it is appropriate that the HRA contribute towards the scheme through the use of the land.

### **Costs and Funding**

46. The cost of the project is estimated at £14.5m (£9.5m for the Joint Equipment Service accommodation and £5m for the MDT Hub and Smart House elements). A full breakdown of costs are detailed within the Outline Business Case. It is proposed that the Council provides the capital funding to support the development of the JES warehouse facility. It is anticipated that the costs for the Hub and Smart House will be funded through The Health and Social Care Integration and Rebalancing Capital Fund (IRCF) grant. There is agreement that that this project is a priority for the Cardiff and Vale Regional Partnership Board. There is in principle agreement that the project meets the criteria for this fund and the scheme is on the forward plan for future support, although a full business case will need to be developed to take this forward to Welsh Government for consideration.
47. The JES is a partnership with the University Health Board and the Vale of Glamorgan Council, there is currently an established Section 33 Agreement in place (a contract to provide statutory services on behalf of multiple organisations), this covers the pooled budget and sharing of overheads of the service. All parties currently contribute to buildings costs and there is an agreement in principle that this will continue. Therefore, while the Council will provide the capital for Joint Equipment Service element of the project, the partners will make a “rental” contribution and will also share utility costs.
48. In principle agreement has been given to the scheme by the partnership, all partners will be asked to reaffirm their commitment to the scheme before it progresses.

### **Risks of not taking action**

49. The performance of the Joint Equipment Service has dropped by 4% year on year since 2021 due to the dispersed nature of the service and the lack of space to store sufficient items. Only 69% of deliveries are made within 5 working days, well below the target of 80%. Should this situation continue **2,382 people will be put at risk**, with the number increasing year on year. Of these it is estimated that:

- 420 will be directly admitted to hospital or have their discharges delayed.
  - An additional 398 palliative discharges will fail, and patients' wishes to be cared for at home for end of life will not be able to be supported.
  - 337 domiciliary care packages will either fail or need to be increased
  - 124 informal carers may fall into crisis
  - 400 people will experience risk of falls and/or health and safety issues at home, resulting in additional intervention requirements
  - 703 people will have their wellbeing and independence at home compromised.
50. This will further increase pressures on both community and hospital services for both health and social care, the potential known cost of this service failure could be approximately £749,380 per annum. This includes costs to the University Health Board (UHB) of extended hospital stays amounting to £554,800, and additional costs of £194,580 as a result of additional care packages, of which £142,729 would accrue to Cardiff Council. While the greatest direct cost will be to the UHB, it is known that long stays in hospital result in individuals becoming deconditioned and often lead to increased need for care on an ongoing basis.
51. The Independent Living and Wellbeing Centre will not only prevent these risks by providing a future proof specially designed premises for the Joint Equipment Service, it will also provide a state of the art Smart House and Wellbeing Hub, bringing together multidisciplinary services aimed at increasing prevention and supporting independence, thereby delivering a key aim of the Ageing Well Strategy and reducing the impact of the growing older population on services and budgets.
52. The Outline Business Case shows that the new build proposal will result in an estimated increase on revenue costs of £184k per annum to Cardiff Council. However as outlined above the greater effectiveness of the service will result in avoidance of social care costs of at least £434k per annum through preventative action, in addition it will remove the increased service pressure costs to social services of £143k per annum that would result if the current service failure persists .

### **Equality Impact Assessment and Wellbeing of Future Generations**

53. A Single Impact Assessment has been completed and no issues were identified.
54. In developing the proposal, the Well-being of Future Generations (Wales) Act 2015 has been thoroughly considered and the development designed with the 'wellbeing duty' in mind. In taking the development forward, the requirement to ensure sustainability will be key in accordance with the 'sustainable development principle'. The proposal has been developed to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.



## **Local Member consultation**

55. Local Member consultation will take place at key points within the project design and delivery to ensure services and provisions meet the needs of local citizens.
56. In-depth consultation will be undertaken during the design phase of the project as part of the Pre-Application Consultation (PAC).

## **Reasons for Recommendations**

57. To address the critical need of the JES service for a new building to support the statutory provision of medical equipment and continence products.
58. To develop an Independent Living and Wellbeing Centre including Smart House and Wellbeing Hub, subject to receipt of grant funding, with the aim of ensuring that support is in place to help people live as independently as possible, for as long as possible in their own homes. Fully supporting the preventative and strength-based approach to social care provision as set out in the Council's Ageing Well Strategy.

## **Financial Implications**

59. The report sets out an Outline Business Case (OBC) following stage 1 design costings and an option appraisal exercise. In accordance with best practice a further report and Full Business Cases is to be brought back to Cabinet, were Cabinet minded to proceed to the next stage of the design process. The estimated cost of developing the FBC and next stage of the design process to secure planning permissions for all elements of the project is £500k. Opportunities are to be considered to secure grant funding towards project elements that are approved to be supported by the Health and Social Care Integrated Rebalancing Capital Fund – IRCF.
60. In the event that the project does not proceed after development of the FBC or is significantly changed in scope, there is a risk of abortive costs.
61. The Council has an approved budget of £3.9 million on a self-financing basis, to develop an independent wellbeing hub. At the end of 2021/22, a grant was received from Welsh Government of £1.100 million to support independent living solutions and allocated for this purpose as well. A total of £5 million. Following an options appraisal exercise, the preferred option is to build a bespoke Joint Equipment Store (JES), Multidisciplinary Team Independent Wellbeing Hub and Smart House. However, with initial costs significantly in excess of budget a further review of costing has taken place as part of the OBC, with the estimated capital costs of the JES element reduced to an estimated £9.5 million and the other elements being £5 million.
62. The JES is a partnership agreement formed under regulations. Initial discussions with Partners indicate that they would not be willing to contribute to Capital Costs but would be willing to pay towards revenue

costs of the facility via a rental agreement. This proposal would require Cardiff Council to take the lead and increase its overall borrowing requirement, on the assumption that income will be received from partners and existing council revenue budgets to meet operational and debt servicing costs. Any agreement would need to be formalised and agreed as part of set governance processes for the Partnership and respective partners including the University Health Board and Vale of Glamorgan Council, and cover the entire useful life of the asset to ensure the costs and benefits of any new facility are shared appropriately and does not adversely impact or leave a liability on the Council if it were to take a lead in the financing of the facility.

63. The Multidisciplinary Team Independent Wellbeing Hub and Smart House construction are proposed to be funded by external capital grant. In accordance with the established process of the funding, this will also require a full business case and the ongoing operating costs of such a facility are not yet determined for inclusion in the OBC. There should be a clear basis for ensuring the operating costs of the facility are sustainable in the short term as well as in the long term.
64. The cost of the preferred option in respect of the JES element will result in an estimated increased revenue budget cost to the Council of £185,000. The report sets out areas of future cost avoidance as well as service benefit. Annual revenue costs will need to inform the Council's Medium Term Financial Planning Process. Linked to the preventative approach outlined, this should include review of opportunities to reduce sums included in the current MTFP for demand growth, in order that they may be repurposed to support costs for any approved JES project and release wider revenue savings over the medium term.
65. Were Cabinet to approve progression of the project to Full Business Case of the JES element alone, an indicative increase of £4.5 million in the Capital Programme will need to be considered as part of the budget proposals and indicative investment programme. This would be on an invest to save basis and to be drawn down only following approval of a Full Business Case by Cabinet and all partners.
66. The FBC will need to be prepared in accordance with best practice and updated with the following: Have approval of external partners in line with their own processes and the Joint Agreement, as well as agreed contributions towards costs for certainty; Seek all opportunities for external funding; have undertaken all further due diligence set out to be actioned in the OBC; Address any VAT impacts as identified in the initial development of the proposals; Set out robust processes and data collection to ensure the benefits outlined for the project are measured and realised in order to capture any savings towards paying back the investment in the project; Ensure clarity of agreements between the rent payer and Council tax payer in respect to the proposed site which is currently held and acquired for a Housing Revenue Account Purpose.

**Legal Implications (including Equality Impact Assessment where appropriate)**

67. Legal services are asked to give the legal implications on 2 recommendations in relation to the development of the former Gas Works site in Cardiff. The first recommendation is to develop an Independent Living Wellbeing Centre on a site known as the Gas Works, which will be the premises for a Joint Equipment Service including a new Smart House to show case the range of provisions that can be provided to those requiring assistance, and a multidisciplinary Wellbeing Hub so that the Council is working within the Ageing Well Strategy. The reasons for recommending the former Gas works site is that out of all 4 options given it is thought to be the cost effective and viable option.
68. Apart from the Ageing Well Strategy the 'Social Services and Wellbeing (Wales) Act 2014', and 'Social Services (Wales) Act 2016' (which considers and assists an individual's need for care and/or support, (in particular support for unpaid carers) must be taken into account due the duties that it bestows on the Council. With regard to the situation of an affordable service and site, Cardiff has been impacted by the current economic situation, (like everywhere else), however Option 4 of the Options Appraisal and Business Case is the favoured option as it is considered to be the most sustainable and feasible option to proceed with. Detailed legal advice should be sought on the proposed procurement strategy and any proposed procurement route.

### **Legal Property**

69. The former Gas Works site is currently owned by the Council and does not raise any immediate implications relating to property transactions. The site is currently being developed for meanwhile housing and it is expected that the service area will have therefore undertaken extensive investigations as to the suitability of this land for this proposal.
70. Should the completed development require an appropriation of part of the site from the Housing Revenue Account to General fund, the Council has powers to do so where it is satisfied the land is no longer required for its current purpose pursuant to s.122 of the Local Government Act 1972. This may be dealt with under the scheme of delegation where the value land to be appropriated is less than £1m.

### **Grant conditions**

71. It is noted that part of this project will be funded by grant and accordingly the directorate should satisfy itself that it can comply with the same before proceeding.

### **Equality and other public duties**

72. In considering this matter the decision maker must have regard to the Council's duties under the Equality Act 2010. Pursuant to these legal duties Councils must, in making decisions, have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. Protected characteristics are: (a) Age, (b) Gender reassignment, (c) Sex,

(d) Race – including ethnic or national origin, colour or nationality, (e) Disability, (f) Pregnancy and maternity, (g) Marriage and civil partnership, (h) Sexual orientation, (i) Religion or belief – including lack of belief.

73. The purpose of the Equality Impact Assessment is to ensure that the Council has understood the potential impacts of the proposal in terms of equality so that it can ensure that it is making proportionate and rational decisions having due regard to its public sector equality duty. The decision maker must have due regards to the Equality Impact Assessment in making its decision.
74. Regard should be taken to the Council's wider obligations under the Social Services and Wellbeing (Wales) Act 2014; the Wellbeing of Future Generations (Wales) Act 2015; the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.

### **Social Services and Well Being (Wales) Act 2014**

75. In considering this matter, the decision maker must have regard to the Council's duties pursuant to the Social Services and Well Being (Wales) Act 2014. In brief the Act provides the legal framework for improving the well-being of people who need care and support and carers who need support and for transforming social services in Wales
76. **The Well-Being of Future Generations (Wales) Act 2015 ('the Act')**, which places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
77. In discharging its duties under the Act, the Council has set and published well-being objectives designed to maximise its contribution to achieving the national well-being goals. The well-being objectives are set out in Cardiff's Corporate Plan (2023-2026). When exercising its functions, the Council is required to take all reasonable steps to meet its well-being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well-being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
78. The well-being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
  - Focus on prevention by understanding the root causes of problems
  - Deliver an integrated approach to achieving the 7 national well-being goals

- Work in collaboration with others to find shared sustainable solutions
  - Involve people from all sections of the community in the decisions which affect them
79. The decision maker must be satisfied that any decision proposed or otherwise accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below:<http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

### **HR Implications**

80. The proposal seeks Cabinet approval for the development of a single Independent Living Wellbeing Centre, including expanded warehouse facilities for the Joint Equipment Service, a multidisciplinary Wellbeing Hub and a new Smart House demonstration centre.
81. The Joint Equipment Service currently has two sites within Cardiff; Llanishen and West Point, Penarth Road. The development of the new Independent Living Wellbeing Centre would create a single new location for services at the Gasworks site in Grangetown, Cardiff. All employees who are currently based at either Llanishen or West Point would be required to transfer from their current work location to the new Independent Living Wellbeing Centre.
82. Paragraphs 21 and 22 of the report outlines the proposal that recycling, and decontamination work would be brought in-house, allowing a more cost effective and reactive service. As this work is currently outsourced to an external contractor, further information would need to be sought on the current contractual arrangements and future arrangements to ascertain if the “Transfer of Undertakings (Protection of Employment) regulations 2006” (as amended) would apply in these circumstances. TUPE can apply if current outsourced activities or services are brought in-house (in-sourcing). If TUPE is considered to apply, employees currently engaged in this activity or service would transfer to the Council as the incoming employer.
83. Following consideration of the TUPE regulations as outlined in paragraph 82, in such circumstances where TUPE is considered not to apply; the service would not be able to support the new elements of the in-house recycling and decontamination work within existing staffing resources. Therefore, this would necessitate the creation of new posts to provide the service in house and further consideration would need to be given to the number of resources required and the associated costs.
84. The culture, health, wellbeing and engagement of employees is vitally important to keep the workplace safe and healthy, and our workforce engaged and resilient. Engagement with employees and trade unions regarding the proposed changes will need to continue to ensure that employees affected by the change of work location are kept up to date on the development of the new Centre.

85. The Trade Unions have been consulted on the information within this report and there will be ongoing engagement and consultation on the proposed development.

### **Property Implications**

86. SED have worked closely with the service area on all elements of the JES site search. Supported by external professional advice, the service area defined a clear site requirement including criteria such as size, location, configuration, value and availability. This was used to inform a search of potential suitable land and property options within the Cardiff area. The results of the search, once filtered according to the agreed criteria, identified only one building that may have been potentially suitable for conversion. However initial enquires with the landlord revealed that only a short-term occupation could be offered on a leased basis. Therefore the site was eliminated from further consideration.
87. Analysis of the search exercise by the JES project team concluded no privately owned sites available on the market were suitable for lease or purchase that met the agreed criteria of availability, configuration, value and location.
88. The JES service is delivered in partnership with Cardiff and Vale Health Board and also the Vale of Glamorgan Council. As a consequence the location criteria specified a South West Cardiff location for the new site. The potential JES site identified at the Gas Works meets the location criteria for the service, with good transfer links to the Vale.
89. The Gas Works site was originally acquired by the Council for Housing use and is currently vested in the HRA. The JES constitutes a General Fund use and therefore, should land at the Gas Works site ultimately be selected for JES development, it will be important to ensure an adequate mechanism is implemented, for example a Service Level Agreement, that fully considers the process and implications of achieving best value in reference to the land used.
90. Furthermore, if land at the Gas Works is selected as appropriate to develop the JES, and at some future date is then no longer required or declared surplus to JES requirements, it will be important for the business case to acknowledge the management of dilapidations or other related make good costs. This is due to the JES being a very service specific facility which may require additional investment in future years to finance conversion to potential alternative uses more aligned to the original land purchase intent.
91. The JES service model references a partnership with the NHS and the Vale of Glamorgan Council. It will be important for the business case to clearly articulate the nature of the partnership including any assumptions relating to the future lease of space in the (Cardiff Council owned) JES building with reference to any rent and service charge expectations, and the general regularisation of the landlord and tenant arrangements.

92. Where the Council is required to undertake property valuations, transactions or appraisals required to meet service objectives, they should be managed in accordance with the Council's Asset Management processes and in consultation with relevant service areas and professional teams as appropriate.

**RECOMMENDATIONS**

Cabinet is recommended to:

1. Approve in principle the proposals for the development of an Independent Living Wellbeing Centre to provide sustainable premises for the Joint Equipment Service together with a new Smart House and multidisciplinary Wellbeing Hub, in line with the aims set out in the Ageing Well Strategy.
2. To agree to proceed to detailed design stage for the Independent Living and Wellbeing Centre, the full business case for the development will be the subject of a further Cabinet report.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Jane Thomas</b> Director Adults, Housing & Communities
	8 December 2023

The following appendices are attached:

**Appendix 1** – Outline Business Case Executive Summary

**Appendix 2** - Single Impact Assessment

*The following background paper has been taken into account:*

Outline Business Case

Mae'r dudalen hon yn wag yn fwriadol



# Appendix 1 Executive Summary Report of Overview Business Case – Independent Living and Wellbeing Centre (ILWC) - Cardiff and Vale Joint Equipment Service (JES) Development Plan Business Case

## Service Overview:

The JES was developed as a formal partnership in 2009 under a Section 33 (S33) agreement between Cardiff Council (CCC), Vale of Glamorgan Council (VoG) and Cardiff and Vale University Health Board (UHB). Cardiff Council are the lead body and deliver the service on behalf of the partners who collectively contribute to a pooled budget.

The JES is responsible for all community equipment provision, maintenance, and recycling alongside the UHB's full continence product procurement and delivery service, vital to retain independence at home.

The service holds more than 700 different product types. Delivering in excess of 76,000 items annual (28,000 pieces of community loan equipment and 48,000 continence products)

The JES provides a statutory provision and directly supports hospital discharge, admittance avoidance, formal and informal care packages: Ultimately supporting citizens to live as independently as possible within their own homes for as long as possible preventing the need to access formal care for permanently or in the immediate future.

- The service is aimed predominantly at older people, 70% of deliveries are meeting the needs of those aged 70 years or above.
- The service is directed at community equipment provision that supports and negates the need for formal care and to support discharge in a timely manner, to negate deterioration and deconditioning.
- The service shows a 5% year on year average increase on deliveries.
- The service offers an emergency Same or Next Day Delivery Service to rapidly respond to urgent needs. 80% of such referrals are to support a palliative need and/or hospital discharge for citizens to be cared for at home in the community.
- More than £1.6m is spent on procuring products annually.

*NB – Throughout this document ‘the partners’ and ‘partnership’ are referred to in reference to the JES tripartite arrangement and partnership – Cardiff Council, Vale of Glamorgan Council and Cardiff and Vale University Health Board.*

## Current Occupation (buildings)

JES is fragmented – Currently operating over six buildings spread across the region and out of county.

Two Main Warehouses		Size ft <sup>2</sup>	Size m <sup>2</sup>
Westpoint (Penarth Road)		8,652	803.79
Llanishen	Including Smart House demonstration and training facility	11,079	1029.27
Two Auxiliary Storage Buildings			
St Melons	Overflow Storage for equipment	800	74.32
Splott (Used Equipment storage)	Storage prior to being sent to external Decontamination Service	8,11	75.34
Two Self-Storage Overflow			
Self-Storage Local	8 units	3,200	297.28
Self-Storage Out of County	8 units	3,200	297.28
<b>Total of Six Separate Buildings approx.</b>		<b>26,931 ft<sup>2</sup></b>	<b>2577.28 m<sup>2</sup></b>

## Current Service Provisions and Operations:

### Warehouse

The Joint Equipment Service has exceeded its warehouse capacity, this is already impacting on performance and this situation will become critical shortly.

- This restriction on space is a major risk as it is not possible to hold sufficient stock across all product lines to meet the needs, which is resulting in delays to deliveries and additional spend on one-off bespoke products and will lead to an increase in care costs if not addressed.
- There are significant health and safety risks in both warehouses, which have been mitigated by leasing auxiliary buildings and additional offsite storage facilities. However, this results in additional service pressure and cost.
- There is a need to assign significant staff resource to travelling to collect stock items from six different locations. This reduces the overall staff resource to deliver the service.
- Significant environmental impact - generates 219 Tonnes of CO<sub>2</sub> in avoidable mileage alone, through 36,864 avoidable miles per year. Equivalent to nearly 1.5 trips around the world.

### Decontamination/Cleaning (outsourced)

All community equipment is issued on a loan basis - When it is no longer required it is collected and returned. Equipment is held at a separate building to be collected by the decontamination provider; it cannot be held at our main buildings as space will not allow. Additional storage has been secured for this purpose.

The decontamination service is outsourced to a company in England, all items to be cleaned are transported across county and then returned.

### Smart house

The Smart House (a purpose-built home) is located in the Llanishen warehouse. The purpose of the smart house is to:

- Demonstrate different types of equipment, technology and adaptations to support independent living.
- Carry out individual assessments.
- Deliver training and education programmes to ensure all social care workers can identify where equipment can help meet need (e.g. Trusted Assessors).
- Create a shared space with our partners - a great area for skill sharing and integration.

The smart house has reached its maximum potential and capacity. Inhibiting training and assessments. The Obesity rates in Wales are increasing. The numbers of adults within this demographic projected to increase to 64% by 2030. (Healthy Weight, Healthy Wales Report, Welsh Gov, 2023). The service currently has no mediatic or bariatric facilities or the space to adapt or extend the facility to support this need.

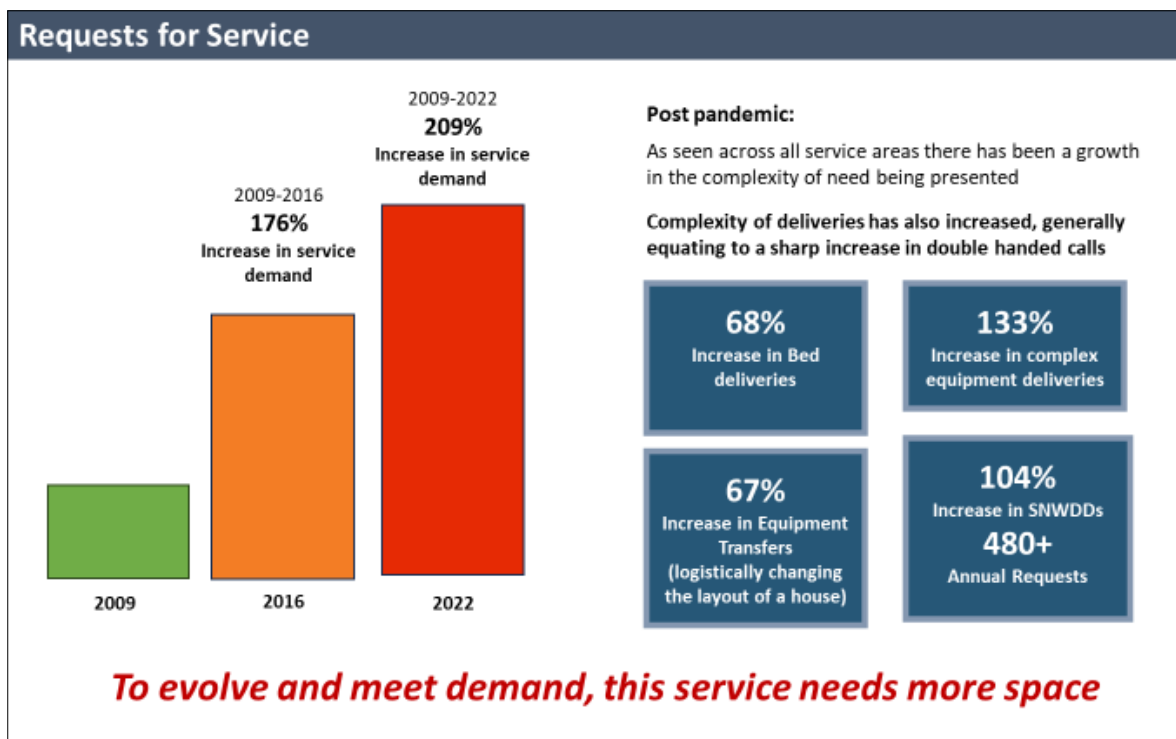
### Service Risks:

1. JES has exceeded its capacity in terms of warehouse facilities. Since forming (S33 2009) demand for service has grown by over 209%.
2. Post pandemic the complexity of equipment requests has increased. These citizens are most at risk of hospital admissions and need of statutory care provision should the JES service fail, due to existing frailty.
3. The service has undergone extensive operational changes to attempt to address the issues. Proactively reviewed its operational model and optimised its capacity for change within the restraints of the current buildings and multi-site way of working.
4. There are significant Health and Safety risks in both main warehouses (Llanishen and Westpoint), which has been mitigated by using the additional offsite storage facilities. However, this results in additional service pressure, cost, and environmental impact.

5. There is a need to assign significant staff resource to travelling to collect stock items from these six different locations. Monthly requirements to travel to multiple sites equivalent to:
  - 6 FTE days lost monthly.
  - 162 lost deliveries monthly.
  - Representing a 7% loss on community equipment deliveries made per year.
6. The JES Service has begun to experience service failings due to the space constraints and operational complexities of the current service model:
  - KPI target for deliveries made within 5 days = 80%
  - 21/23 = 73%
  - 23/24 (QTR 1+2) = 69%
7. The primary demographic for service recipients (70 years +) is growing and set to continue, adding additional pressure to both community and acute provisions.
 

Alongside this, *The Older People's Commissioner for Wales Report - Understanding Wales' ageing population: key statistics* (Nov 2022) suggests:

  - 67% - over 65s are living with one longstanding illness.
  - 32% - with two or more longstanding illnesses.



**Projected 2030 Population Increase**

- 17.8 % increase age 65+
- 9.2 % increase age 85+
- 5.9 % increase age 90+

**Cardiff Council already spends more than £50 million a year on care and support services for older people**

**The number that struggle with activities of daily living will increase by 17% by 2030 – 1 in 4 older people (over 65).**

***The requirement to provide timely equipment solutions at home will increase. And JES will be unable to meet the needs of our citizens to aid support or avoid crisis.***

## Impact:

### Risks of current operation and model

JES performance has dropped by 4% year on year since 2021, if performance continues to stay at 69% (13% below the KPI of 80%) there will be increased pressures on both Health and Social Care services, the potential cost of this service failure is approximately £749,380 per annum as set out in the full OBC:

**JES can identify 2,382 deliveries that directly place people at risk p/a**, with the number increasing year on year.

- **337 Formal care packages could either fail or need to be increased.** Total Potential Cost £186,024 *Figure based on Cardiff council costings for full double-handed care package per day of £184 for 3 days (average number of days late for the current service provision).*
- **124 Informal carers could fall into crisis.** Total potential cost £8,556, *Figure based on Cardiff council costings of £23 for a single-handed car call three times a day (£69)*
- **400 people could experience risk of falls and/or health and safety issues at home**, resulting in additional intervention requirements and/or statutory care provision.
- **703 people could have their wellbeing and independence at home compromised.**
- **420 could be directly admitted to hospital or have their discharges delayed.** Total potential cost: £554,800,
- **An additional 398 palliative discharges could fail**, and patients' wishes to be at home for end-of-life care could not be supported.

Increasing pressures on statutory social care services, formal packages of care, residential care as well as primary and secondary health services.

## Business Need:

1. Managing demand
  - Co-location of the JES service into one larger warehouse facility
  - Location of site needs be easily accessible across the region to both Cardiff and Vale of Glamorgan citizens
2. Bring decontamination services in house
  - To realise savings as well as improve flow and reduce procurement of new items
3. Needs to futureproof the demographic changes and meet our Preventative Agenda and the Cardiff Ageing Well Strategy 2022 – 2027
4. Develop and enhance a Smart House and Multi-disciplinary Team (MDT) facility

***These actions will resolve the issues outlined above and ensure the long-term stability of the service***

## Options:

	Summary	Outcome
<b>Option 1</b> Leasing a third warehouse to supplement current provision	Option repeats the same operational complexities of the current model – further increasing staff pressure and disaggregation. Greater increases the environmental impact of the service. Very time limited – projection indicate viability for a maximum of 5 years.	Not viable
<b>Option 2</b> Leasing a large site to co-locate all services	<b>NOT VIABLE</b> Both options have been extensively reviewed and investigated – CCC Estates have commissioned Knight Frank to undertake property searches and negotiations. From <b>2020 to date</b> no property has been identified or secured. <b>There is currently no stock available and no viable options predicted to be available in the short-medium term.</b>	
<b>Option 3</b> Purchasing a large site to co-locate all services		
<b>Option 4</b> Building a new provision to co-locate all services	Land in an ideal location on the site of the Gasworks has presented itself, offering a unique opportunity to support the full requirements of the JES service allowing for future development and security of the whole provision. Alongside the creation of an MDT Hub and redeveloped Smart House to create an Independent Living and Wellbeing Centre – funded through grant (Health and Social Care Integrated Rebalancing Capital Fund - IRCF). Allows possibility to embed holistic sustainability, achieve Net Zero in operation and Whole Life-cycle carbon reduction opportunities. Ideal location to service the entire region. Creating a financial asset for the council.	Preferred

## Costs

The cost used within this appraisal are based on known cost at this stage of the project. Additional revenue costs have been profiled and projections developed with senior UHB colleagues to understand the potential implications of utilities and business rates on options where a site has been located.

		Total increase to partners on current operation (of known capital and revenue)
<b>Option 1</b> Leasing a third warehouse to supplement current provision	Addition staff team and vehicles required – Maximum viability of 5 years (total extra cost £2.08M)	£417,093
<b>Option 2</b> Leasing a large site to co-locate all services	Cost estimated on market value of £11 per ft <sup>2</sup>	None identified - £357,024*
<b>Option 3</b> Purchasing a large site to co-locate all services	Based on £12M estimate by Knight Frank	None identified - £692,546
<b>Option 4</b> Building a new provision to co-locate all services	JES Element £9,496,000 (capital) MDT Hub and Smart House £5,236,000 (Potential IRCF grant)	£507,767

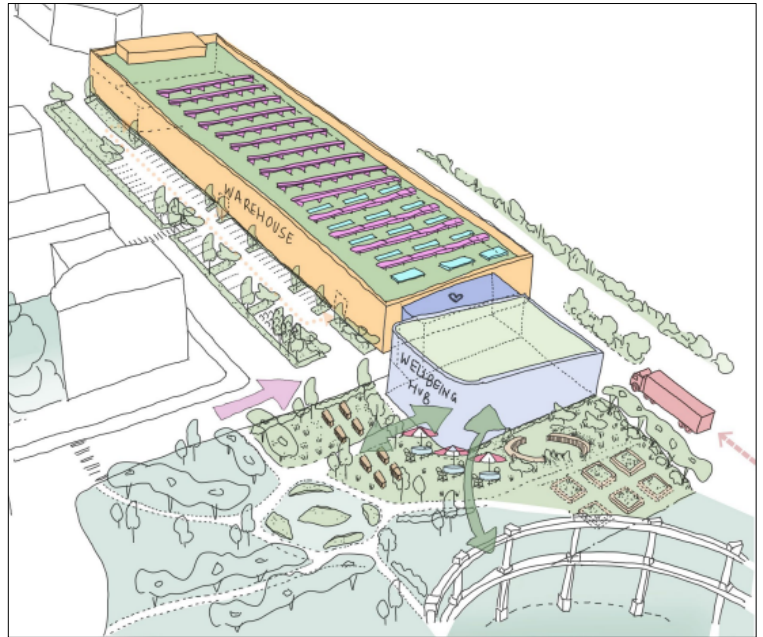


**Preferred Option (only viable option):**

**Option 4 - Build - Co-located site and create and Independent Living centre:**

This option would allow the development and security of the JES and also a co-located secondary MDT Hub Element through the opportunity to secure grant funding to meet the expansion in addition to the JES provision (£9.5M GF capital for JES and £5M grant funded MDT Hub elements) – there are also potential ongoing savings on utilities due to the sustainability standards sought within the design (BREEAM: Excellent).

*NB - The project has been scoped into the wider programme of works by the Regional Partnership Board (Health and Social Care Integration and Rebalancing Capital Fund – IRCF). Failure to secure this will not affect the JES development and still achieve the delivery and service outcomes of the logistical operation as outlines in this report.*



The extended proposal will deliver an **all-inclusive Independent Living and Wellbeing Centre** which presents the opportunity to provide a single point of access to a range of health and social care facilities.



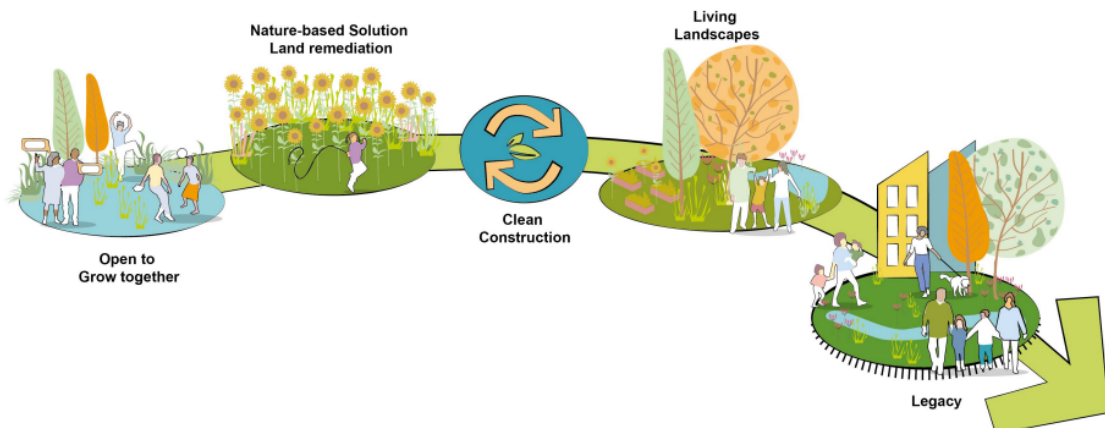
The **Independent Living & Wellbeing Centre (ILWC)** will comprise two integrated and complimentary elements:

1. The JES – warehouse and decontamination operation
2. A Wellbeing Hub including a new Smart House providing MDT provision of Health and Social services

The Gasworks Site is in an ideal location being on the border of Cardiff and the Vale of Glamorgan and therefore accessible for residents of both Local Authority areas and will support timely delivery of equipment across the whole region.

The design would embed holistic sustainability principles, align with the Wellbeing of Future Generations (Wales) Act 2015, Sustainable Development Goals (SDGs), and be developed to achieve Net Zero in operation and Whole Life-cycle carbon reduction opportunities.

**Delivering an efficient, effective, and reactive service within a sustainable and efficient environment.**



The partners have been updated on all proposals and are supportive of Option 4 in principle. The funding model and pooled budget arrangements for the JES service are set within the Section 33 Agreement. However, support for the new building via a contribution of “lease” costs and towards increased overhead costs from partners will need to be formally agreed before the project moves forward. d.

Initial discussions with senior UHB officers suggested a £6 per square foot rate would be viable. This was in 2021. However, and there is a need to renegotiate this based on the known current building market value of between £8-11. For the purposes of this report, we have used the midrange figure of £9.50. As with all changes, this cost will need to be agreed by partners once the option is finalised.

Increased cost of preferred option p/a	£507,767	Known revenue and capital borrowing
<b>Savings</b>		
Savings from Decontamination	£26,529	In-house model
Cost avoidance on one-off special items (non-standard)	£29,350	Increased standard stock line
Contributions from partners (including	£267,395	£9.5 per ft <sup>2</sup> contributions
<b>Total savings</b>	<b>£339,574</b>	
<b>Total remaining CCC increase</b>	<b>£184,493</b>	

*\*Figure based on Arup’s RIBA 1 design and footprint for JES provision. The Grant funded MDT element is not JES specific and as such not included in these calculations, the viability of the MDT is dependent on the grant funding and development of a secondary business case via Welsh Government (IRCF).*

Heads of Terms will be required once the second stage design phase (RIBA 2) has been received and a more robust understanding of costs and operational overhead projections of the new site are known.

The partners have opted to not contribute to the capital costs of the building, but instead to continue to make a revenue contribution.

The land is owned by Housing (HRA) and would remain in Housing ownership. A licence agreement would need to be developed between the services that would allow the ILWC to be constructed and sit on the site but allow HRA to retain the ownership to be utilised at such time as the ILWC is no longer required. Housing are contributing the use of the land at no lease cost due to the benefits the scheme will have to council tenants and the reduction in costly adaptations, through use of equipment which will benefit the HRA. Further advice will be sought from legal services on the nature of the agreement.

## The purpose, our vision:

Develop a new Independent Living and Wellbeing Centre (ILWC) comprising:

1. The JES – warehouse and decontamination operation
2. A MDT Wellbeing Hub including a Smart House for the provision of Health and Social services

*The centre would promote independence through the development of the JES service and provide targeted intervention to enable people to live as independently as possible in their own homes by creating a full multi-disciplinary hub and Smart House.*

### JES - Warehouse and Decontamination Unit

With an increase of 24% to the current facilities the new warehouse will alleviate the extreme space constraints currently facing the service, allowing for better storage solutions realising logistical efficiencies. With adequate space, the service can store a wider range of products to meet the developing needs of our citizens, potentially reducing spend on bespoke, one-off items (£91.3K 2022/23) where the standard stock does not currently meet the need.

As 50% of the stock which is currently purchased on a “one-off” basis could be included in the standard stock range, it is estimated that a saving of £45.6K p/a could be realised. The additional warehouse space will also key to meeting the region’s future demographic needs.

The co-located space will allow for a singular, more responsive, and efficient staff team, providing better delivery outcomes for citizens.

The decontamination operation is currently outsourced at significant cost (£119.5K 2022/2023). This element would be brought in house, allowing a more reactive service to meet the demand of provision across the year. Alongside this invest to save model there is also an expected cost avoidance, as the need to procure new items to meet the demand while equipment is being cleaned would not be as frequent (spend on equipment in 2022/23 was £615.4K). As decontamination would be a far shorter process, it could adapt to the changing service pressures. Where stock items are running low, they can be prioritised within the onsite decontamination service and returned to shelves much quicker, negating the need for new stock orders.

The service would be staffed using a supported model of employment to allow those with an additional need and/or learning disability to be employed in secure, stable jobs. This model has been successfully used for many years in Rhondda Cynon Taff Council’s Equipment Loan Service (Vision Products).

The development would realise a potential £26.5K saving in year 1, with an estimated increase of 7% year on year.

***Resulting in an efficient, operationally proficient logistical operation and equipment service, with the ability to respond to the changing needs of the region quickly, both now and into the long-term future.***

#### **Multi-Disciplinary Team Hub (Welsh Government Grant funded - IRCF)**

The development of the Gasworks site offers a unique opportunity to expand the provision to include a fully integrated health and social care Centre, allowing for the realisation one of the key aims of the Ageing Well Strategy to support older people to live independently at home through strengths based preventative services. The JES service already provides a limited MDT working space, this development would look to greatly enhance and increase this provision under a locality working model. Bringing together a combined set of skills from Community Well-being services, Social Care, Primary and Acute Health Services within one co-located building. The centre will be the foundation for the provision of seamless, person-centred services in partnership with 3rd and private sector organisations. It will set out to:

- Enhance the galvanised the whole systems approach by including Primary and Acute Health Services, ensuring equality of access to those who need all types of care and support.
- Deliver rapid response services that meet the needs to prevent admissions to hospital and support people to remain safely in the community.
- By using our trusted assessor approach, we will proactively and holistically explore community equipment, adaptations and/or TEC before looking at any care options.
- Reduce demand for statutory services (including hospital avoidance) through prevention.
- Remove unnecessary barriers and challenge the system, to refocus on what matters to the person.
- Delivering an efficient and cost-effective service, reducing red tape and embedding our learning from the pandemic.

This is fully in line with the Regional Partnership aims and ambitions.

#### **Smart House (Welsh Government Grant funded - IRCF)**

A new Smart House will sit at the heart of the Independent Living and Wellbeing Centre, alongside the MDT Hub . It will form a link link between the JES warehouse and the MDT community support facility to deliver the new Independent Living and Wellbeing Centre (ILWC).

***The Smart House will become the beating heart of the new development.***

A purpose built home offering a full suite of technology, community equipment and adaptations with immediate access to every item of equipment held by the onsite JES warehouse. Moreover, it will support training,



community education and room hire alongside state-of-the-art assessment facilities serving the entire Cardiff and Vale Region:

- The full suite will assess abilities and offer guidance, direct prescription of equipment and/or adaptation through grants.
- The centre will utilise all the latest Technology Enabled Care (TEC), to train and support staff in assessment, and care planning. This should see a reduction in the need for some care calls, at the same time empowering the citizen to take control of their lives.
- The Smart House will support discharge through assessments from hospital, with the potential to prevent care home admission, by assessing the ability of community equipment in a community setting, building confidence, and empowering the person and their family/care network on what can be tailored to meet their needs.
- Alongside this there will be a focus on turning the Smart House into a Training Centre of Excellence - offering Trusted Assessor Training, with an aim to becoming an accredited provider.
- Forming a central part of our induction for all new staff into older persons services, the Smart House will expand to offer many key social care training courses, such as The All-Wales Manual Handling Passport, Medication and First Aid training, Tech Enabled Care, Dementia Awareness etc. Embedding an ethos of strength-based practice, moving away from traditional statutory solutions as appropriate.
- Empowering staff to take forward the Trusted Assessor Protocol. Utilising skills to take into the community.
- The space will need to be adaptive, and the design will ensure configurable spaces to reflect real life environments to deliver evolving specialist training such as bariatric moving, and handling. (a significant area of need within our communities). The house will form one of the first in-house bariatric and mediatic training provision in the UK.
- The Smart House could be hired out at an estimated value of £15.9K pa (based on a 65% occupancy rate @ £250 per day). This income could help to offset the revenue costs of the Hub element of the building.

*Ultimately putting the person at the heart of what we do.*

#### **ILWC Service delivery would include:**

- Occupational Therapy and Social Worker Services on site to offer advice and support and will directly prescribe equipment, alongside the expansion of the Independent Living Service Shop which offers an opportunity to purchase items outside of the standard stock range where appropriate to better support individual preference.
- Falls Clinics, educating individuals and carers (informal) to empower them to maintain independence. Alongside frailty assessment and support services and Peer- mentoring for chronic conditions.
- Care assessments could be undertaken either at a citizen's home or on site at the Smart House followed by informal care support.
- Integrated programmes such as Physiotherapy on site ("Think Physio"). Providing appointments with a physiotherapist within Consultation rooms and/or Smart House as a partnered practice. Providing a space for direct referrals without the need for a GP. Alongside formal facilities such as consultation, immunisation, diabetes, and blood pressure clinics enhancing the healthcare offer for the region.
- Underpinning all this will be a strong Third Sector presence and integration. Offering the community specific expertise needed to deliver real change. Advisors such as Age UK, Hedway and Age Concern could have a consistent presence within the hub. Supported through the provision of charity meeting spaces to greater support community engagement and signposting.
- Café/social space providing opportunities for informal and organic interaction. Drawing people in through the provision of a café and social spaces. In doing so we engage a wider range of individuals who are exposed to the range of preventative services available to them. Educating and empowering our community

*The Provision of both the MDT Hub and redeveloped JES service and Smart House will create the Independent Living and Wellbeing Centre. Becoming a regional centre of excellence in preventative services, located in an area convenient for both Vale and Cardiff residents.*

## Summary of benefits:

1. Prevents service failure and consequent increase in care costs and hospital discharge delays.
2. Offers long term solution (20+ years). This will empower us to meet our Preventative Agenda through a reactive equipment delivery model which will save costs against formal and informal care needs.
3. This option will leave CCC with a financial asset.
4. The land/ownership would be retained by HRA.
5. Multiple options for expansion, development, and income generation without restrictions of lease conditions.
6. The ability to bring decontamination services and technicians workshops in house – creates jobs, allows a reactive, efficient service to restock items to meet demand. Reducing scrappage and realising savings by terminating currently outsourced contracts (even with the cost of the operation and staffing).
7. Offers ability to redevelop Smart House to meet current demographic needs – Bariatric assessment suite, Assistive technology hub and full training provision for partners (savings realised within registered services such as Home Care/CRT for mandatory training needs – which could also generate income more widely).
8. A phased programme of projects and development will be implemented to allow development of opportunities, income generation and to bring in other services. These could offer further efficiencies and cost reduction across the whole partnership.

## Conclusion:

Although the preferred option shows an increased cost (as detailed in the table, page 7), this is unavoidable as the service cannot carry on 'as is'. Moreover, the resulting costs of not acting and the consequent service failure are far higher, and these figures will continue to rise year on year as the **demand on service increases, and performance decreases**.

*The solution will address our demands for our demographic needs both now and in the future.*

### This will be achieved by the following:

The identified option sets the service up for the next 20+ years and will negate the need for additional social care costs. Allowing for a reactive, adaptable service both now and into the future.

There is a direct impact on health and social care costs when the JES fails to meet agreed delivery times. Alongside this there are further avoidable costs in purchasing one-off special items where the current structure fails to provide adequate space to stock the required product lines. The result of this can be seen in the table below:

Increased service costs p/a (potential costs of remaining with the 'as is' model)		
Health Care impact	£554,800*	Hospital admissions and delayed discharge
Social Care impact	£194,580	Domiciliary care costs
<i>Total attributable Cardiff Council</i>	<i>£142,729</i>	
<i>Total attributable Vale of Glamorgan Council</i>	<i>£51,851</i>	
<b>Total cost</b>	<b>£749,380</b>	
Cost of one-off special items (non-standard)	£91,300	
<i>Total attributable Cardiff Council</i>	<i>£58,700</i>	
<i>Total attributable Vale of Glamorgan Council</i>	<i>£32,600</i>	
<b>Total Cost</b>	<b>£840,380</b>	
<b>Total cost to CCC social care p/a</b>	<b>£201,429</b>	

*\*Health and Social Care Impact: We also know that delays in hospital discharge contribute to the deconditioning of patients, and as a result equipment may no longer be an option and therefore individuals default to statutory, long term care provision.*

*Information already collected by CCC estimates that about 25% of these individuals will need to go into a care home environment (based on known deconditioning of patients who have a delayed discharge of five days +). Hospital admissions of those with an existing identified frailty will often, also result in higher statutory social care provision upon discharge, further increasing CCC costs.*

**Prevention is key to avoiding such outcomes.**

The cost increase to CCC of the new build option is £184,493 (see table page 7). However, the implications of maintaining the service ‘as is’ could result in additional social care costs of £201,429 (see table above).. This represents a net decrease of £16,936. It should be noted that the additional social care cost will increase year on year as demand increases.

**Outcome of improved performance model will lead to reduced care costs:**

**Prevention**

- Not only will the new build option address the known care costs above, but efficiencies also realised through a new co-located model of working are estimated to increase service performance to 90% (from 63%)
- Of all recorded delivery outcomes (22/23), 66% are to meet a social care need with three quarters directly attributed to Cardiff Council social care spend.
- If the preferred option is supported, an additional 26,642 deliveries p/a could be made on time, to meet social care needs. 18,879 for Cardiff County Council residents alone.

The change represents a significant cost avoidance - As a minimum, if only half of these individuals required just a one-day low-level package of care (2 x one-hour single handed care calls) to support their needs until a piece of equipment could be delivered, the bridging cost would be significant:

	Preventative care costs at 50%	Preventative care costs at 75%
<b>Potential bridging costs (CCC)</b>	£434,223	£651,335

*Costs are based on one day’s provision. The average number of days late within the current service is three days, and the need for care varies.*

The cost of taking no action at this point would result in a potential £142,729 direct cost to CCC domiciliary care p/a.

Not realising the opportunity to co-locate services and realise operational efficiencies could also result in additional minimum costs of £434,223 p/a through increased care packages required to bridge services whilst awaiting equipment.

**A total potential CCC social care cost of £576,952/a**

***This estimate is conservative, it uses 2022-23 data. Service pressures have and will continue to increase (5% year on year).***

**The estimated cost increase of the new build option p/a is ££184,493 p/a**

Put simply, this option allows us to meet more people's needs, in a timelier manner, avoiding social care and health costs. Meeting the needs of citizens throughout the entire region by supporting independence and autonomy through delivery of the Preventative Agenda

***Directly avoiding statutory care costs by creating an efficient, effective, and reactive service to meet citizen's needs, now and in the future, through delivery our Preventative Agenda***

# Single Impact Assessment

Cardiff Council



## 1. Details of the Proposal

### What is the proposal?

Title:	Joint Equipment Service (JES) Development - Independent Living and Wellbeing Centre (ILWC).
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### Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?

New	<input type="checkbox"/>
Existing	<input checked="" type="checkbox"/>

### Directorate/Service Area:

Adults Housing & Communities, Preventative Services, Independent Living Services

### Who is developing the proposal?

Name:	Neal Hall
Job Title:	Service Manager (Joint Equipment Service)

### Responsible Lead Officer (Director or Assistant Director):

Jane Thomas Director Adults Housing & Communities

### Cabinet Portfolio:

Housing & Communities, Social Care, Health, and Wellbeing

Authorisation	
Completed By:	
Job Title:	
Date:	
Approved By:	
Job Title:	

**Document History – do not edit**

*The Single Impact Assessment (SIA) can be strengthened as time progresses, helping shape the proposal. Version control will provide a useful audit trail of how the SIA has developed. Draft versions of the assessment should be retained for completeness, however only the final version will be publicly available. Draft versions may be provided to regulators if appropriate.*

Version	Author	Job Title	Date
1	Fiona Gibson	Senior Corporate Policy Officer	12/10/2022
2	Fiona Gibson	Senior Corporate Policy Officer	12/04/2023

## 2. Overview of the Proposal

### **What action is the Council considering and why?**

*Please provide a detailed outline of the proposal. This information will support your findings in the impact assessments.*

This project represents an update to an existing provision and service delivered by the Independent Living Service (ILS) and its Cardiff and Vale Joint Equipment Service (JES).

Cardiff Council's Ageing Well Strategy 22/21 outlines ambitious development plans over the next five years, which will transform the way citizens receive help and support in their homes and communities, with a continued focus on enabling our citizens to live as independently as possible.

The Cardiff and Vale Joint Equipment Service (JES) delivers a statutory service providing community medical equipment to support care needs, reduce care packages, support discharge from hospital and prevent admission. At capacity, the service is currently split across multiple costly sites (two main warehouse, two auxiliary buildings and two self-storage facilities comprising 16 units). This project will co-locate this service, bring significant service efficiencies and creating an in-house decontamination service to decrease waste, reduce procurement and create jobs within an Invest to Save programme.

Demand for the services provided by the JES has been consistently growing year on year in line with the changing demographics of an ageing population. To the point that the existing infrastructure is insufficient to meet the demand now and will, (if action is not taken) rapidly decline to the point that our most vulnerable citizens will not receive the timely intervention that the JES provision of specialised equipment brings in order to enable them to continue to live in the community (either independently or with assistance from carers).

#### **Service Risks:**

1. JES has exceeded its capacity in terms of warehouse facilities. Since forming in 2008 it has grown by over 350%
2. The service has been actively pursuing alternative accommodation options for over 3 years.
3. There are significant Health and Safety risks in the two main warehouses, which has been mitigated by using the additional offsite storage facilities:  
Alongside the two main warehouses, the service utilises two auxiliary buildings and 16 self-storage containers split across two sites (in and out of county), to manage the stock storage needs of the service.  
However, this results in additional service pressure and cost.
4. If an alternative solution is not reached, JES will be unable to hold sufficient stock to meet the needs of our citizens, ensuring timely delivery of equipment to aid support and avoid crisis.
5. There is a need to assign significant staff resource to travelling to collect stock items from these six different locations. This reduces the overall staff resource to deliver the service.
6. Monthly requirements to travel to multiple sites equivalent to:
  - Six FTE days lost monthly.
  - 162 lost deliveries monthly.
  - Representing a 7% loss on medical equipment deliveries made per year.
7. The JES Service has begun to experience service failings due to the space constraints and operational complexities of the current service model:

8. KPI target of deliveries made within 5 days = 80%  
21/23 = 73%  
23/24 (QTR 1+2) = 69%
9. The pandemic showed the value of having a service that could rapidly respond to deteriorating situations both enabling safe discharge and preventing admissions. This is also echoed in the need to support more planned demand changes such as winter pressures.
10. The primary demographic for service recipients (70 years +) is growing and set to continue, adding additional pressure to both community and acute provisions.
11. Alongside this, The Older People's Commissioner for Wales Report - Understanding Wales' ageing population: key statistics– Nov 2022 suggests:
  - 67% - over 65s are living with one longstanding illness
  - 32% - with two or more longstanding illnesses
  - Meaning the requirement to timely provide equipment solutions at home will also increase

The project co-locates the Joint Equipment Service (JES) within a new Multi-Disciplinary Team (MDT) service to create an Independent Living and Wellbeing Centre (ILWC) to support a single point of access to a range of services that wrap around the individual.

Locality working will be delivered to bring together a combined set of skills from Well-being services, Social Care, Primary and Acute Health Services into the community.

The ILWC will be used to provide:

- suites with technology and equipment available for the training of the social care workforce.
- A Multi-functional space to be used to host group activities such as chair-based yoga, Falls clinics etc.
- Consultation rooms which would be made available to health colleagues (physiotherapists, nursing staff, occupational therapists etc.).
- A dementia friendly Café for carers and residents to meet.
- Advice/Guidance on a range of subjects from Healthy eating to advice on how to stay active/fit as you grow older.

### **What are the costs and/or savings?**

*What will the proposal cost and how will it be funded?*

*How might costs be reduced through involvement and collaboration, across Cardiff Council and/or with external stakeholders?*

*Are there savings and how will these be realised?*

The service has completed RIBA 1 and received an Order of Costs Estimate (OCE) through architectural firm Arup. The RIBA Plan of Work organises the process of briefing, designing, constructing, and operating building projects across eight key stages.

A subsequent RIBA 1 Revision to undertake a cost reduction exercise and deliver a Cost Optimisation Report was undertaken. The service is currently inefficient and experiencing failings. The proposed development will result in increased costs.

The project has been developed in part, with our JES Partners (Cardiff Council, University Health board and Vale of Glamorgan Council). The current JES operates under an established Section 33



Legal Agreement (a contract to provide statutory services on behalf of multiple organisations), covering its pooled budget and shared overheads).

All parties currently contribute to buildings costs and there is an agreement in principle that this will continue. The current Section 33 (S33) is in the process of being updated and will be reviewed against any changes to the service. Cardiff Council are the lead body and deliver the service on behalf of the partners who collectively contribute to a pooled budget – Cardiff County Council (CCC) 33.85% Cardiff and Vale University Health Board (UHB) 56.99% Vale of Glamorgan Council (VoG) 9.16%.

The JES is Responsible for all community medical equipment provision, maintenance, and recycling alongside the UHB's full continence product procurement and delivery service (community and hospitals).

The service holds more than 700 different product types. Delivering in excess of 28,000 pieces of medical loan equipment per year and an additional 48,000 continence deliveries – a total of 76,000 annual deliveries.

The JES provides a statutory provision and directly supports hospital discharge, admittance avoidance, formal and informal care packages: Ultimately supporting citizens to live as independently as possible within their own homes for as long as possible.

- 70% of deliveries are meeting the needs of those aged 70 years or above.
- With 54% of all deliveries being made to support discharge or improve wellbeing and independence.
- The service shows a sustained 5% year on year average increase on demand.
- The service offers an emergency Same or Next Day Delivery Service to rapidly respond to urgent needs both enabling safe discharge and preventing admissions - 80% of referrals are to support a palliative need and/or hospital discharge.

The project itself proposes to bring elements of the service currently subcontracted, in house. The savings realised will support a new staff team and ongoing cost, realising long term savings and cost avoidance.

The total project cost are split into two distinct Elements – The JES warehouse £9.496M Capital Loan and the Multi Disciplinary Team (MDT) Hub £5.236M dependent on Grant Funding - Health and Social Care Integration and Rebalancing Capital Fund (IRCF)

### 3. Impact Assessments

#### Which impact assessments do you need to complete to support your proposal?

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

**Put Yes or No next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.**

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	Y
B. Child Rights Impact Assessment	N
C. Welsh Language Impact Assessment	N
D. Habitats Regulations Assessment	N
E. Strategic Environmental Assessment	N
F. Data Protection Impact Assessment	N
G. Health Impact Assessment	N

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

# A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

## Impact on the Protected Characteristics

### Age

Will this proposal have a **differential impact [positive/negative]** on different age groups?

	Yes	No	N/A
Up to 18 years	X		
18 - 65 years	X		
Over 65 years	X		

### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is well understood that the health needs of the population grow as they age and the JES service’s own data shows that the majority of deliveries it makes are to citizens in the 70 plus age bracket. All ages however will benefit from an improved service. The ILWC will provide support to all ages with a focus on Ageing Well in Cardiff for those 65 and older (as per Ageing Well Strategy 22-27)

### What action(s) can you take to address the differential impact?

The ILWC will have a positive impact on all people using services, especially those with a disability or additional need aged 65 or over. The service will provide equipment, services and information and signposting as appropriate. Provisions will exist for those aged 0-65+ years. No differential action identified to date – each case is dealt with on an individual basis to meet needs.

### Disability

Will this proposal have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment	X		
Learning Disability	X		
Long-Standing Illness or Health Condition	X		
Mental Health	X		
Neurodiversity	X		
Physical Impairment	X		
Substance Misuse	X		
Visual Impairment	X		

Other			
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**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The JES Service is a support service to disabled citizens (in whatever form). The equipment it provides is to enable disabled residents to live more independently in the community.

The ILWC will have a positive impact on all people using services, especially those with are disabled or have additional needs. We are not differentiating but trying to support citizens with what matters to them. The service will provide equipment, services and information and signposting as appropriate.

**What action(s) can you take to address the differential impact?**

This is a positive and intended impact. Each case is dealt with on an individual basis to provide equity of service and provision. The ILWC sits within the Independent Living Service with a range of established signposting and additional service provisions. All aspects of ILWC have been designed to be inclusive and have a positive outcome for disabled service users living in Cardiff.

**Gender Reassignment**

Will this proposal have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The ILWC will have a positive impact on all people using services, including transgender people. The service will provide equipment, services and information and signposting as appropriate.

**What action(s) can you take to address the differential impact?**

Each case is dealt with on an individual basis.  
The ILWC sits within the Independent Living Service with a range of established signposting and additional service provisions.

**Marriage and Civil Partnership**

Will this proposal have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage	X		
Civil Partnership	x		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The ILWC will have a positive impact on all people using services, including those within marriages or civil partnerships. The service will provide equipment, services and information and signposting services as appropriate.

**What action(s) can you take to address the differential impact?**

Each case is dealt with on an individual basis.  
The ILWC sits within the Independent Living Service with a range of established signposting and additional service provisions.

### Pregnancy and Maternity

Will this proposal have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy	X		
Maternity	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The ILWC will have a positive impact on all people using services, including those in pregnancy or during maternity. The service will provide equipment, services and information and signposting services as appropriate.

**What action(s) can you take to address the differential impact?**

Each case is dealt with on an individual basis.  
The ILWC sits within the Independent Living Service with a range of established signposting and additional service provisions.  
The service provided by the JES service is dependent on a level of disability or additional need only, no other characteristics are taken into account when deciding eligibility.

### Race

Will this proposal have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White	X		
Mixed / Multiple Ethnic Groups	X		
Asian / Asian British	X		
Black / African / Caribbean / Black British	X		
Other Ethnic Groups	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The ILWC will have a positive impact on people of all ethnicities and backgrounds using services. The service will provide equipment, services and information and signposting services as appropriate, dependent on need.

**What action(s) can you take to address the differential impact?**

Each case is dealt with on an individual basis.  
 The ILWC sits within the Independent Living Service with a range of established signposting and additional service provisions.  
 The service provided by the JES service is dependent on a level of disability or additional need only, no other characteristics are taken into account when deciding eligibility.

**Religion, Belief or Non-Belief**

Will this proposal have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist	X		
Christian	X		
Hindu	X		
Humanist	X		
Jewish	X		
Muslim	X		
Sikh	X		
Other belief	X		
No belief	X		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The ILWC will have a positive impact on all people using services. The service will provide equipment, services and information and signposting services as appropriate, dependent on need.

**What action(s) can you take to address the differential impact?**

Each case is dealt with on an individual basis.  
 The ILWC sits within the Independent Living Service with a range of established signposting and additional service provisions.  
 The service provided by the JES service is dependent on a level of disability or additional need only, no other characteristics are taken into account when deciding eligibility.

**Sex**

Will this proposal have a **differential impact [positive/negative]** on male, female or non-binary persons?

	Yes	No	N/A
Male persons	X		
Female persons	X		

Non-binary persons	X		
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**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The ILWC will have a positive impact on all people using services. The service will provide equipment, services and information and signposting services as appropriate, dependent on need.

**What action(s) can you take to address the differential impact?**

Each case is dealt with on an individual basis.  
 The ILWC sits within the Independent Living Service with a range of established signposting and additional service provisions.  
 The service provided by the JES service is dependent on a level of disability or additional need only, no other characteristics are taken into account when deciding eligibility.

**Sexual Orientation**

Will this proposal have a **differential impact [positive/negative]** on people with different sexual orientations?

	Yes	No	N/A
Bi	X		
Gay	X		
Lesbian	X		
Heterosexual	X		
Other	x		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The ILWC will have a positive impact on all people using services. The service will provide equipment, services and information and signposting as appropriate, dependent on need.

**What action(s) can you take to address the differential impact?**

Each case is dealt with on an individual basis.  
 The ILWC sits within the Independent Living Service with a range of established signposting and additional service provisions.  
 The service provided by the JES service is dependent on a level of disability or additional need only, no other characteristics are taken into account when deciding eligibility.

**Socio-economic Duty**

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact	x		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The service is aware of socio-economic duty and is available to all in need of discharge regardless of people’s socio-economic status. First Point of Contact (FPOC) is able to refer to visiting team who can help with income maximisation, budgeting and applying for available benefits/grants.

Residents on low incomes/from deprived areas are known to suffer disproportionately from negative health outcomes, the service provided by the JES specifically serves to assist in the management of poor health and enables service users to live more independently. The ILWC will have a positive impact on all people using services by providing equipment, services and information and signposting as appropriate, dependent on need.

**What action(s) can you take to address the differential impact?**

This is a positive and intended impact. Each case is dealt with on an individual basis to provide equity of service and provision. The ILWC sits within the Independent Living Service with a range of established signposting and additional service provisions. The service provided by the JES service is dependent on a level of disability or additional need only, no other characteristics are taken into account when deciding eligibility.

**Welsh Language**

Will this proposal have a **differential impact [positive/negative]** on the Welsh language?

	Yes	No	N/A
Welsh language		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

We are meeting our duty to provide bilingual information and providing service in Welsh where requested.

**What action(s) can you take to address the differential impact?**

No differential action identified to date; each case is dealt on individual basis with the needs specific to that individual.

**Consultation and Engagement**

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

As the project is within the design phase the ILWC will seek to undertake formal consultation at key milestones. This will include (but is not limited to) consultation via the future successful external contractors to deliver a Pre-planning Application Consultation (PAC).



Progress and developments will be monitored and measures will be put in place to get feedback on the needs, aspirations, and nature of services within the ILWC from service users.

### Summary of Actions (Listed in the sections above)

	Actions
Age	
Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Socio-economic Impact	
Welsh Language	
Generic/ Over-Arching (applicable to all the above groups)	This proposal will have a positive impact on all protected characteristics therefore no action identified. Consultation will be undertaken at key milestones. This will include (but is not limited to) consultation via the future successful external contractors to deliver a Pre-planning Application Consultation (PAC).

### Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

## **B: Child Rights Impact Assessment**

The aim of a Child Rights Impact Assessment is to put children and young people at the forefront of decision-making. The assessment helps officers to consider how the rights of children and young people may be affected by a proposed policy or project.

Click [here](#) to start a Child Rights Impact Assessment.

You will receive an automated email containing a link to your Child Rights Impact Assessment template and the Child Friendly Cardiff Team will be in contact to support you.

Guidance for Local Government prepared by Unicef is available here:  
[Child Rights Impact Assessment - Child Friendly Cities & Communities \(unicef.org.uk\)](https://www.unicef.org.uk/child-rights-impact-assessment-child-friendly-cities-communities)

For further information or assistance in completing the Child Rights Impact Assessment, please contact the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

### **Next Steps**

Where it is considered that a Child Rights Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

## C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

### Welsh Language Standards 88-97

#### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?			
Treating the Welsh language no less favourably than the English language?			

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

#### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

**Treating the Welsh language no less favourably than the English language?**

#### Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

**The opportunities for persons to use the Welsh language?**

**Treating the Welsh language no less favourably than the English language?**

#### Standard 91

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

**The opportunities for persons to use the Welsh language?**

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**Treating the Welsh language no less favourably than the English language?**

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### **Standard 92**

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

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**Treating the Welsh language no less favourably than the English language?**

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### **Standard 93**

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

**The opportunities for persons to use the Welsh language?**

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**Treating the Welsh language no less favourably than the English language?**

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### **Standard 94**

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council's Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

**The opportunities for persons to use the Welsh language?**

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<b>Treating the Welsh language no less favourably than the English language?</b>
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**Standard 95**

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

<b>The opportunities for persons to use the Welsh language?</b>
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<b>Treating the Welsh language no less favourably than the English language?</b>
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**Standard 96**

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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<b>Treating the Welsh language no less favourably than the English language?</b>
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**Standard 97**

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
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<b>Treating the Welsh language no less favourably than the English language?</b>
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## Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

- [Correspondence](#) - receiving and replying (emails, letters, online communication).
- [Telephone](#) – receiving and answering calls.
- [Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.
- [Public Messages – electronic – video](#)
- [Signs, Notices & Display Material](#)
- [Publicity & Advertising](#)
- [Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.
- [Producing Forms](#)
- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)
- [Education Training Courses](#)
- [Public Address Announcements](#)

<b>Are all supporting materials and services compliant with the requirements of the Welsh language standards?</b>

## Cardiff Council's Welsh Language Skills Strategy

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

<b>Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?</b>

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**Next Steps**

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## D: Habitats Regulations Assessment

	Yes	No
Will the proposal affect a European site designated for its nature conservation interest*, or steer development towards an area that includes a European site, or indirectly affect a European site?	<input type="checkbox"/>	<input type="checkbox"/>

*\* Only two European sites designated for nature conservation interest lie within Cardiff's boundaries – the Severn Estuary and Cardiff Beech Woods, but be aware if your project affects an area close to a neighbouring authority.*

If the answer is 'Yes', then a screening exercise may need to be conducted to determine if a Habitats Regulations Assessment is required or not.

Contact the [Biodiversity Team](#) who will guide you through the process.



## E: Strategic Environmental Assessment

	Yes	No
Does the strategy, policy or activity set the framework for future development consent?	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
Is the strategy, policy or activity likely to have significant environmental effects (positive or negative)?	<input type="checkbox"/>	<input type="checkbox"/>

If you have answered 'Yes' to both of the above questions, then a full Strategic Environmental Assessment Screening is needed.

Contact the [Sustainable Development Unit](#) who will guide you through the process.

## F: Data Protection Impact Assessment

	Yes	No
Will the proposal involve processing information that could be used to identify individuals?	<input type="checkbox"/>	<input type="checkbox"/>

If the answer is 'Yes', then a Data Protection Impact Assessment may be required.

Click [here](#) to read the guidance and start the Data Protection Impact Assessment process if needed.

For further information, contact the [Data Protection Service](#).

## G: Health Impact Assessment

A Health Impact Assessment helps to develop policies and projects that consider the mental, physical and social health and well-being of a population during planning and development. Considering health inequalities and their impacts on local communities is an essential part of any Health Impact Assessment.

Health Impact Assessments will become a statutory requirement for public bodies in specific circumstances in the future. These circumstances have yet to be published by Welsh Government.

For further information and advice, please contact the Wales HIA Support Unit.

Website: [Home - Wales Health Impact Assessment Support Unit \(phwwhocc.co.uk\)](http://phwwhocc.co.uk)

Email: [WHIASU.PublicHealthWales@wales.nhs.uk](mailto:WHIASU.PublicHealthWales@wales.nhs.uk)

Mae'r dudalen hon yn wag yn fwriadol

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**REVIEW OF CARE HOME MARKET FOR OLDER PEOPLE AND  
THE APPROACH TO FEE SETTING FOR CARE AND SUPPORT  
SERVICES FOR 2024/5****SOCIAL SERVICES (COUNCILLOR NORMA MACKIE/  
COUNCILLOR ASH LISTER)****AGENDA ITEM: 4**

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*Appendices A, B and D of this report are not for publication as they contain confidential information pursuant to paragraph 16 of Part 4 of Schedule 12A to the Local Government Act 1972*

**Reason for this Report**

1. To provide an update on the care home market for older people and to agree an approach for the future commissioning of placements in this cohort of care homes.
2. To provide an update on work undertaken to gain an understanding of provider costs for care homes for older people and for other services and to approve the proposed approach for fee setting for care and support services for 2024/25 ahead of further consultation.
3. To provide an update on work currently being undertaken to strengthen quality assurance arrangements for care homes for older people.

**Background**

4. Care homes for older people play a vital role in supporting the city's most vulnerable residents. The Council requires residential and nursing care services for older people to provide:
  - a safe, secure, and stable environment, with onsite 24/7 access to care and support.
  - the opportunity to promote choice, engagement, and meaningful activities for its residents and family members.

- dignity and respect for all residents.
- a good quality of life for residents.
- appropriately skilled and qualified workforce that is competent to meet the individual needs of residents.

## National and Local Context

5. **The Welsh Government White Paper on Rebalancing Care and Support** published in January 2021, highlights the complexity of the care and support market landscape in Wales that comprises over 1,000 providers, mostly from the independent sector. It describes three critical areas where focused action is needed to improve and rebalance care and support:

- Refocusing the fundamentals of the care market away from price towards quality and value where a more diverse provider base including not-for-profit providers can grow.
- Reorientation of commissioning practices towards social value commissioning focused on managing the market and outcomes.
- Evolution, integration, and simplification of joint planning and delivery to enable local systems to support alternative and more innovative models of care.

Welsh Government conducted a consultation on the approach between May – August 2023. The responses to this consultation are currently being reviewed.

6. To support the rebalancing agenda, the **Code of Practice for Part 2 of the Social Services and Well-being (Wales) Act** and the **guidance for Part 9** have been redrafted to provide clearer and stronger requirements for local authorities to implement the Section 16 duty. This duty requires local authorities to promote social enterprises, co-operatives, user-led services and other third sector organisations for the provision of care and support and preventative services. In Cardiff it has been decided to implement separate Section 16 Forums for Adult Services and Children's Services in recognition of the different challenges and opportunities facing the two social care markets in the city. Planning for the relaunch of the Adults Services Section 16 Forum is currently underway, with the first full meeting expected to be held in January 2024. The aims of the Forum will be to:

- Transform care to achieve greater well-being and sustainability.
- Rebalance the care market to achieve greater diversity of service providers.

7. Section 16 service providers are in the minority in Cardiff's care home market and during the current year, 2 care homes operated by a charity have closed and a further 2 owned by a housing association are for sale. The work undertaken by the new Section 16 Forum will assist commissioners to gain a better understanding of why it is not currently attractive for Section 16 service providers to enter or remain in the care home market and to explore what action the local authority can take to address this in the future.
8. The Cardiff and Vale **Regional Market Stability Report (MSR)** was put before Cabinet and Council in October 2022. The report considered the overall sufficiency and stability of the care and support market for regulated services. It reflected that a change was required to care and support models with a strong emphasis on citizens remaining at home for longer, reducing the need for residential care but also in response to demographics which indicate an increase in need for specialist care. Consequently, it identified that more specialist care home capacity was required to support people with dementia and at end of life and it was predicted that an increase of 58 nursing care beds would be required per year across the region.
9. The MSR also indicated that occupancy levels in care homes for older people were below sustainable levels in some instances due to the impact of Covid 19, and that providers lacked confidence regarding the future sustainability of their business models with a reluctance to make capital investment due to the way in which the Council commissions placements. Consequently, there was a risk of disorderly withdrawals from the care home market. Since the MSR was published in October 2022, 2 Cardiff care homes have exited the market due to issues related financial sustainability, 2 more have exited for other reasons.
10. Cardiff's **Ageing Well Strategy** sets out a number of key aims:
  - Support older people to stay active and connected in an age friendly city.
  - Support older people to live independently at home through strengths-based preventative services.
  - Work in partnership to deliver high quality sustainable care and support.
  - Support informal carers and valuing their role.
  - Ensure our services meet the needs of the most vulnerable.
  - Proactively modernising our services.
11. The clear intention of the Ageing Well Strategy is to focus on prevention and reablement, supporting people to remain at home through a range of

measures including better use of equipment, adaptations, and technology and through an ambitious development programme of specialist older persons / extra care housing. There is a clear intention to move away from the use of general residential care, towards more cost effective and sustainable forms of care which support the independence and wellbeing of service users.

12. An analysis of changing demand for care home placements is located at **Section 2 in Appendix B.**
13. The Ageing Well Strategy recognises the need to work in partnership with the care sector to ensure the delivery of high quality, sustainable care and support and in particular to support the sector to meet the changing demographic makeup of the city, and commissioning priorities of the Council, which will increase demand for specialist care, such as nursing and nursing dementia care.
14. Currently Adult Services secures care home placements on a spot purchase arrangement where providers are invited to bid for each individual placement. A Dynamic Approved Provider List (DAPL) is used for tendering that is intended to support the development of an active market of quality providers. For care home providers to become “Approved Providers” and join the DAPL, they need to pass an accreditation process that gives the Council a level of assurance that they are a reputable provider that can appropriately deliver the services that are required.
15. The commissioning of each package of care on an individual basis means that Adult Services does not risk block booking beds that are not then utilised. However, commissioning in this way presents challenges to providers, there is no guarantee of work with the Council that would encourage them to invest in their premises or to make changes to their delivery models. The lack of certainty about future income also makes it difficult for them to secure investment in their services. It is also bureaucratic and onerous for both Council officers and providers.
16. There are currently 37 care homes for older people in Cardiff collectively registered to provide 1,899 beds. It should be noted that not all these will be in use at any one time for a number of reasons such as refurbishment of rooms or workforce issues. 30 of the 37 care homes are Approved Providers i.e., accredited on to the Council’s Dynamic Approved Provider List (DAPL) which equates to 1,598 registered beds.
17. Of the 7 Cardiff care homes that are not yet accredited, these care homes are collectively registered for 301 placements. 6 have placements commissioned by Adult Services through historical arrangements and work is underway to support them to become accredited and enrolled. It



should be noted that although these homes are not yet accredited by the Council, they are regulated by Care Inspectorate Wales.

18. In 2022/23 the Council spent £36.3m on care home placements for older people, 28.78% of the total Adult Services commissioning budget.

## Issues

### Data Analysis

19. An analysis of available data for care home placements for older people in Cardiff has been undertaken. An Executive Summary of key data is located at **Appendix A** and the care home market data analysis in full is located at **Appendix B**. Both Appendix A and B are confidential due to the commercially sensitive information contained within. Some key findings that are not exempt from publication are set out below.
20. As at 23 September 2023, there were 674 individuals in Cardiff care homes placed or funded by Adult Services. Council placements take up 35% of all registered care home beds for older people in the city, the other 65% are either currently vacant; commissioned by Health or occupied by individuals who are self-funding their own care.
21. **Section 2 of Appendix B** demonstrates the fluctuating demand for care home placements from April 2019 to April 2023 in respect of placement type. The information is based on the total number of placements as at the start of each financial year. Over this period demand for General Residential Care has dropped by nearly 50%, from 241 beds to 129 beds, whilst demand for Dementia Residential care has increased by 66%, from just 56 beds in April 2019 to 165 beds in April 2023. Demand for general Nursing placements has decreased by 25%, from 329 to 244 beds, however this remains the highest category of placement. Demand for Nursing Dementia placements has increased over the same period by 51%, from 58 to 119 beds. While Covid has impacted on the residential care market over this period, the trend in usage is still clear, with a move towards more specialist provision.
22. Following completion of a cost of care exercise in 2018, Cardiff Council agreed standard cost of care rates for care home placements for older people for four separate types of home:
  - Older Person Residential
  - Dementia Residential
  - Older People Nursing
  - Dementia Nursing

The current standard cost of care fee levels for 2023/4 are set out in the table below.

**Table 1: Standard Costs of Care 2023/4**

Category	Cost of Care Home
Residential	£912.29
Dementia Residential	£979.40
Nursing	£903.79
Nursing Dementia	£1001.17

23. Although cost of care rates are in place, the service is frequently paying above these rates. This can occur for a number of reasons; however, it is frequently due to a lack of bids at the cost of care rates. **Section 3, Part 3** in **Appendix B** shows a breakdown of the amount paid for care home placements as at September 2023 and how these relate to the set cost of care rates. The data shows that the service is regularly paying above the cost of care rates for placements. The highest percentage of placements above the current standard cost of care rate is General Nursing and Nursing Dementia placements reflecting demand for these categories of placements and the challenges that the service faces in securing them.
24. An analysis of bidding patterns undertaken in Quarter 2 of 2023/24 is located in **Section 4** in **Appendix B**. **Part 1 of Section 4** shows the number of bids received in the period for all placements via the DAPL and **Part 2** shows the number of care homes bidding via the DAPL and the range of associated placement costs.
25. **Section 4, Part 3** in **Appendix B** also provides details of the number of placements made via Direct Awards. An analysis of the reason why direct awards were made indicates there are legitimate reasons for these. A full breakdown of the rationale for direct awards is located at **Section 4, Part 4** in **Appendix B**. The reasons for direct awards include but are not limited to the following examples which reflect service user choice and change in needs:
- Choice where an individual or their family have identified a specific care home (possibly due to location). In some cases, an individual or their family may choose a care home where charges are more than the set cost of care rate or lowest bid through the DAPL. In those cases, a third party such as a family member or representative would need to accept responsibility for the additional payment and enter into an agreement with the Council and the care home provider.
  - Changes in need to achieve continuity of care where an individual has been admitted to a care home on a temporary basis for respite or to

support hospital discharge and needs to remain there on a longer-term basis.

- Escalation of need that require an individual to move from residential to nursing care and the change can be met in their current home, without the individual having to move, due to the home's dual registration as a residential and nursing provision.

26. This data analysis and the issues it has revealed have been used to inform the approach to fee setting for 2024/5 and the proposed approach to future commissioning, both of which are set out below:

### **Fee Setting Guidance and Good Practice**

27. Statutory guidance to local authorities on the commissioning of social care services is set out within Welsh Government statutory guidance '**Commissioning Framework Guidance and Good Practice. Standard 10 (2010)** This guidance sets out the factors a local authority should take into account when considering fees: The Guidance states,

*'Commissioners will have to take into account the full range of demands on them and their strategic priorities, as well as the resources they have at their disposal in developing their commissioning strategies.*

*Fee setting must take into account the legitimate and future costs faced by providers as well as the factors that affect those costs and the potential for improved performance and more cost-effective ways of operating. **The fees need to be adequate to enable providers to meet the specification set by the Commissioners together with regulatory requirements.***

*Commissioners must have a rational to explain their approach to fee setting. The primary concern is that services operate safely and effectively to promote the welfare of the service users and carers and meet regulatory requirement."*

### **Fee Setting for Care Homes for Older People**

28. A three-year Fee Setting Strategy was implemented in 2019 with the aim of bringing any packages of care receiving below the Council's set cost of care level up to the set rates over a three-year period. While the arrangements allowed for packages of care at the cost of care rate to receive an annual uplift, any packages of care higher than the set rates would not receive an annual increase, as these packages were considered higher than the Council would expect to pay. Uplifts to the cost of care rates for 2022/23 onwards have included the Real Living Wage (RLW) uplift for workers in registerable posts.

29. Adult Services initiated a new cost of care exercise for providers of care homes for older people in September 2022 with the intention of developing a new Fee Setting Strategy that would cover a 3–5-year period from April 2023. However, the low number of participants in the exercise meant that the cost data that was collected could not be viewed as representative of the sector and would not be a reliable basis on which to develop a new Fee Setting Strategy. It was also acknowledged that implementing a new Fee Setting Strategy at that time would not be sensible as it would commit the Council to a medium-term financial commitment at a time of great financial uncertainty in respect of its budget and at a time when providers continue to be uncertain about how the current rising costs will impact on their cost of care over the next few years. For that reason, it was agreed in the Budget Report for 2023/24 to extend the existing Fee Setting Strategy for a further year.
30. Therefore, the approach to fee setting remained the same. Placements already above the uplifted cost of care rate did not attract an annual uplift. Providers impacted by this arrangement and concerned about the ongoing sustainability of the placements were invited to contact the local authority for a discussion. A number of providers did this, and decision-making has been reviewed on a case-by-case basis in light of the outcome of the discussions.
31. The 2023/24 fee setting included an additional uplift for Residential Dementia, Nursing, and Nursing Dementia placements. This was intended to acknowledge, to some extent, the additional carer hours that are involved in providing these placements. As can be seen from the data in **Appendix B**, however the actual cost that the Council is paying for these placements is often significantly higher than the cost of care fee levels set.

### **Proposed Approach to Fee Setting for 2024-25**

32. In August 2023, Adult Services again attempted to carry out a new Cost of Care Exercise following the Welsh Government's "*Lets Agree to Agree*" methodology. To do this the service worked collaboratively with the Cardiff Nursing and Residential Care Home Association (CNARHA) committee with the intention of informing the development of a new Fee Setting Strategy for 2024/2027. To be sure that enough providers participated in the exercise to make it viable, expressions of interest were sought prior to the start of the exercise. At the commencement of the exercise 10 providers accounting for 41% of care homes for older people committed to participate which was felt to provide enough in each cohort to make the exercise viable. However, due to unforeseen circumstance several providers who had committed to participating were unable to do so and therefore the numbers that submitted their cost templates and participated

in the interviews were lower than anticipated. Additionally, those who participated provided a wide range of responses in relation to costs which meant it has not been possible to identify “normal” costs for each category. This meant that once again the exercise could not be relied upon to provide a representative position of the four categories of care homes.

33. However, whilst it was not possible to conclude the Cost of Care Exercise in the way it was intended, the information that was submitted by those who were able to participate provided a helpful insight into provider costs. This information, coupled with feedback from a provider survey on current costs and expected costs pressure for 2024/25 undertaken in November 2023 (see paragraphs 40-43), along with the detailed analysis that officers have undertaken around bidding patterns, current costs and benchmarking (See **Appendix B, Sections 3, 4 and 5**) have informed the approach to fee setting for 2024/25.

### **Financial Issues Impacting on the Care Home Market**

34. Occupancy level in care homes have increased and have largely returned to pre-pandemic levels, however care homeowners are facing a number of challenges. Those with mortgages and / or development loans are experiencing very significant increases in borrowing rates (for example up to 5.5% above Bank of England base rates) and tighter loan covenants. Loan covenants are agreements made between a debtor (borrower) and a creditor (lender), which expressly outline conditions that a borrower must meet. Within the care homes sector, this is generally related to requirements such as minimum occupancy that must be maintained, minimum weekly incomes (which in turn impacts on the costs that provider must charge) and in some cases a percentage of rooms that should be occupied by self-funders. Lenders are increasingly viewing the care sector as high risk.
35. The feedback provided by those care homes that participated in the Cost of Care Exercise revealed how volatile costs current are:
  - Providers indicated that they found it difficult to accurately predict financial pressures for 2024/25.
  - The RLW announcement was made following completion of cost templates so at that time providers were uncertain of the impact this would have.
  - Providers felt that interim uplifts would best meet their needs during the current period of financial uncertainty. However, they understood that the Council’s annual financial planning arrangements meant that this would not be practicable.

- An expected decrease in utility costs for 2024/25 may not impact on all providers as some providers have lower cost contracts that were put in place prior to the cost-of-living crisis so they expect an increase when there are renewed.
  - Providers felt it was difficult to accurately quantify the number of care and support hours required for different cohorts of placements (e.g. nursing / nursing dementia) with a wide range of lower and higher needs for individuals within the categories.
  - Providers indicate that costs have risen for investments in buildings such as general maintenance due to cost-of-living increases.
  - There was a general concern from those participating that low numbers of submissions to the Cost of Care Exercise may not provide a reliable indication of future cost due to the volatile nature of operating costs and high interest rates.
36. It is accepted that there may be a significant difference between ‘fees paid’ and ‘costs of delivery’. The Welsh Government commended ‘Lets Agree to Agree’ toolkit acknowledges that the price for care has to be *negotiated* as with any other contract, that “ ***there will always need to be a balance between what is an acceptable price, is affordable to the public purse (the tax payer) and what is fair for providers in order that they can deliver a sustainable business***”.
37. The National Commissioning Board (NCB) Standing Committee’s Cost of Care Report (Final Draft – 6<sup>th</sup> November 2023) highlights that public sector commissioners (local authorities and local health boards) are under significant financial strain. Most, if not all commissioners, are forecasting significant overspends in the current year (2023/4) and significant budget deficits for 2024/5. Therefore, to assure public value, it is broadly accepted that there is a real likelihood that statutory bodies will have no choice but to contain costs. Furthermore, it recognises that commissioners will require greater levels of transparency regarding operators’ business models, costs of capital and sources of financing and levels of returns, including profits on capital invested and corporate returns.
38. While it is recognised that putting a new Fee Setting Strategy in place for 2024 - 2027 would provide a clear understanding for providers of the Council’s intentions and commitments over the period of the strategy, it is once again felt unwise to propose this approach in the current financial climate. It is understood that in the next year, the Council will face its most challenging financial situation yet and there continues to be significant uncertainty about the on-going impact of the cost-of-living crisis on care home providers. It is therefore recommended a new Fee Setting Strategy should not be put in place in 2024 but instead the following approach to fee setting is taken which will provide a clear set of principles that govern

how the annual fee uplifts are determined and how a standard cost of care is calculated for the new financial year. The approach proposed, subject to further consultation, is as follows:

- Ensuring that cost of care rates reflect the need to uplift staffing costs to meet the Real Living Wage (RLW) that has been set at £12 a 10.1% increase. The RLW increase will be attributed to the workforce element of provider costs only.
- To provide an uplift that considers the increase in costs other than staffing, based on predicted inflationary pressures.
- Identifying separately the types of placements most in demand, and for which there is likely to be increasing need in the future. These placements offer a higher level of care and support, and most frequently cost the Council more than the current cost of care rates. To seek to reflect the additional care costs of these homes in a way that is affordable to the Council.
- Recognising the concerns of the providers that Return on Capital Employed is not fully represented in the cost of care rates, while understanding that any significant increase in this respect will be unaffordable in the current financial climate without additional investment from Welsh Government.
- The current arrangement whereby those placements above the new uplifted cost of care rate are not awarded an uplift will continue. It is anticipated that this will impact on approximately 254 placements. This approach is not without risk and may lead to provider challenge and issues regarding the future sustainability of some placements. In such instances Adult Services will need to review comments received from the providers on a case-by-case basis.
- Ensure that final fee setting decisions are informed by further consultation with providers so that commissioners can understand the expected impact of the proposals before formal decision-making takes place. It will be important to recognise that whilst it may not be possible for the Council to meet the gap between existing fees and the increased costs that providers have indicated they are experiencing, it is important that the providers are able to voice the impact of not doing so on market sustainability and sufficiency and that this can be fully considered.
- Share information and raise any concerns identified with the National Commissioning Board and Wales Government policy leads to inform Social Care Futures and Fair Work developments in order to contribute to national work being undertaken to begin to close the funding gap.

## Feedback on Cost Pressures – All Care Providers

39. In addition to the cost of care work with providers of care homes for older people, all providers were asked to provide information about their cost pressures. The results of this survey undertaken in November 2023 have also been considered and where possible have been taken into account in the fee setting proposals set out below. The key findings from the survey are detailed in paragraph 40 - 43.
40. Response rates to the survey from the care home sector was disappointingly low with only 11 completed surveys submitted, 8 of which were from care homes for older people and 3 from care homes for other population groups. Some sections of the completed submissions were invalid due to the way they were completed making it difficult to undertake a detailed analysis of findings. However, the feedback that could be analysed was consistent with the messages summarised in paragraph 35. Additionally, care home providers highlighted increased costs for food as well as insurance costs as financial pressures.
41. 24 surveys were returned by Domiciliary Care providers but 3 did not complete the section on cost pressures correctly and therefore had to be discounted from the analysis. Increased costs for staffing (including training, recruitment and meeting the RLW differential for back office/management staff) was highlighted as a significant pressure, along with travel and mileage (including fuel, insurance, parking tickets incurred and general costs for travel time etc.), utilities and establishment costs, increases in business / commercial insurance and PPE. It is likely this last cost pressure is related to the anticipated end in March 2024 of the Welsh Government funded PPE scheme.
42. 4 surveys were returned for Supported Living & Extra Care providers but 2 had to be discounted from the analysis on cost pressures due to a lack of information provided. Of those providers who correctly completed this section of the survey, cost pressures were highlighted to be increases in insurance, utility and staffing costs, the latter related to the Real Living Wage.
43. In addition to cost pressures, the survey asked providers to submit details of their pay rates for Care Workers and Senior Care Workers. All providers who submitted a response confirmed that they are currently paying above the Real Living Wage rate for Care Workers with Supported Living and Extra Care providers paying the highest rates and Nursing Home providers paying the lowest rates. Supported Living and Extra Care providers also pay the highest rate for Senior Care Workers, with the lowest rate being paid by Care Homes for older people with dual registration.



## **Approach to Annual Fee Uplifts for 2024/5 for other Groups of Commissioned Social Care Providers**

### **Care Homes for Other Population Groups**

44. A separate approach will be taken to fee setting for care homes for other population groups. Understanding the costs for this cohort of care homes that typically provide specialist care and support to people with Learning Disabilities, mental health issues and substance misuse problems, is challenging due to the range of different models of care delivered by this cohort of providers and varying individual needs of the service users. While in the case of Learning Disabilities the cost of placements is among the highest, this is inextricably linked to complexity of need. The importance of sustaining these placements is recognised and the need to reflect their additional costs accepted, therefore it is proposed that uplifts for these placements are calculated in line with the principles set out above, except that all placements receive an uplift. Longer term plans are in place to further develop specialist supported living schemes, which will reduce reliance on expensive residential placements while helping individuals to remain closer to home. A pipeline of such schemes has been identified and will be delivered over the next 3 years. With placements for mental health and substance misuse, needs can vary and therefore case by case decision-making on fee uplifts will take place for those care home placements that are above the proposed new cost of care rate for care homes for older people. Again, alternative accommodation and support arrangements to mitigate the need for residential care for people with mental health issues are under development and will be part of a 3-year development plan.

### **Domiciliary Care**

45. An effective domiciliary care provision is essential to support the Council's Ageing Well Strategy and the move from residential to care at home. Unlike many councils Cardiff has an active domiciliary care market and can provide the essential care needed. In November 2021, the Council approved a Domiciliary Care Fee Setting Strategy which was informed by national and regional Cost of Care Exercises, benchmarking of prices across several local authorities, and analysis of provider costs and rates that the Council was paying for Domiciliary Care at that time. It was agreed that a pricing envelope would be set for future fees in the city that clearly reflects a fair price of care, supports providers to be sustainable, viable and produce high quality care whilst ensuring best value for the Council and the public purse. The ceiling rate agreed at that time was felt to be generous and it was anticipated that due to competition in the market, provider rates would typically be somewhat below the ceiling rate which reflects current experience.

46. No change to the approach to fee setting for Domiciliary Care is proposed for 2024/25, with the continuation of the floor and ceiling. Arrangements will continue to reflect the approach set in 2021 when the Fee Setting Strategy was agreed, with a floor level that is felt to be the lowest fee level the Council would expect to pay that reflects sustainability and a ceiling rate that reflects the maximum fee it expects to pay, except in exceptional circumstances. However, it is noted that the difference between the floor and ceiling may have changed over the interceding period. It is proposed that fees will reflect the Real Living Wage increase and the predicted rate of inflation going forward. This proposal will be subject to further consultation with providers, while recognising the limited scope of the council budget.

### **Other Services Commissioned by Adult Services**

47. The annual uplifts for other services commissioned by Adult Services will also follow the approach set out in 2023/24, taking account of the range of current contractual arrangements in place, with some adjustments in recognition of the difference in timing of contractual uplifts and date of implementation of the Real Living Wage for eligible staff.

### **The Proposed New Approach to Commissioning Care Home Placements for Older People**

48. The analysis undertaken in the Market Sustainability Report (MSR) around sufficiency and stability highlighted the need for commissioners to collaborate closely with the provider market and to give providers certainty about future activity and fee levels. It is recognised that without this certainty they will not have the confidence needed to invest to modernise service models and expand capacity where needed.
49. The current method of commissioning care home placements through the DAPL has a number of disadvantages which are impacting both on the current cost of placements and the ability of the Service to manage the market towards meeting future needs.
- There are challenges in securing nursing and dementia nursing placements and also respite placements, low numbers of providers are bidding on a consistent basis.
  - Although every placement is put out to the market individually, a process that is administratively burdensome for both the Service and the providers, the actual prices paid for placements are often above the standard cost of care rates.

- It is difficult to build collaborative relationships with such a large number of providers or develop partnerships with the flexibility and commitment that is needed to meet the demographic challenges ahead.
- In relation to the 30 care homes on the DAPL, Cardiff has 19 homes that require investment to make them fully compliant with the Regulation and Inspection of Social Care (Wales) Act 2016 (RISCA) and suitable to provide services to residents with higher levels of need. 15 are partially compliant and 4 are non-compliant. There is a need to upgrade these homes, however, the current arrangements of purchasing placements on an individual spot basis does not give providers any assurance about the number of placements the Council will commission with them, and this provides a challenge when they are seeking to secure investment to improve their homes because there is no guarantee that their vacancies will be filled.

50. It is recognised that a new approach to commissioning is required that:

- Supports market management – in order to successfully address the Service’s commissioning priorities i.e. a reduction in the amount of general residential placements and increase the number of nursing and dementia nursing placements available and increase in providers offering short term respite placements.
- Creates the right conditions to encourage providers to invest in their homes so they can meet the population needs and to improve sufficiency and quality.
- Ensures that any new capacity created is at an affordable level whilst paying fair fee levels to ensure sustainability.
- Strengthens quality assurance processes and improves overall quality and value for money.

51. An internal project group was established to identify different commissioning models that could provide a new approach to future commissioning. This group was made up of representatives from Adult Services, Legal Services and Corporate Commissioning and Procurement. Four options were considered in detail which are listed below. A summary of the full options appraisal undertaken by the group is located at **Appendix C** which details the benefits and risks of each option.

- **Option 1 - Remain as is, continuing to use the DAPL** – commissioning all placements via the DAPL, either using existing processes or via improved and more relevant processes that address the issues with the current arrangements.
- **Option 2 - Use of Block Contracts** – which enable contracts to be put in place with providers for a specified type and amount of care

over an agreed timescale for an agreed rate. Providers are paid for a set number of placements at the agreed rate, whether these are used.

- **Option 3 – Use of Framework Arrangements** which enable contracts to be put in place with a range of framework providers. These frameworks would allow commissioners to “call off” placements as needed. Frameworks can be arranged into “lots” for specific types of care that reflects the cohorts of placements that are required (e.g., respite, general nursing etc).
- **Option 4 – A Hybrid Model using the DAPL with Frameworks** for lots that reflect the cohorts of placements the Service find most challenging to secure.

52. The recommended option identified by the group and approved by the Adults, Housing and Communities Commissioning Board on 16<sup>th</sup> September 2023 was Option 4 for the following reasons:

- A combination of Dynamic Approved Provider List together with a few Framework Arrangements would better support market management and market-shaping than the current arrangements - with the Frameworks reflecting the types of placements Adult Services have most challenges in securing currently and which are frequently more costly.
- Frameworks present less financial risk than block contracts where providers are paid for an agreed number of beds whether they are full. Adult Services have block contracted on occasions in response to specific needs (e.g., to support hospital discharge) but this has presented challenges as it is not always possible for providers to fill vacancies if there are compatibility issues with existing residents, also if the level of demand reduces over the term of the contract, then payments may be made for empty beds.
- However, Frameworks provide an opportunity to offer more security for providers. This is expected to increase their investment opportunities required to improve the quality-of-care homes, particularly those that are not currently RISCA compliant (e.g., rooms with ensuite facilities) and this will improve their sustainability.
- Agreeing a fee level for providers who are part of the Frameworks will also support more accurate financial projections, and critically will help ensure the affordability of care provision.
- Continuing to operate the DAPL alongside Frameworks with a number of specialist lots will have a number of benefits. It will ensure that all providers who tender for the Frameworks have previously onboarded to the DAPL and will have already been checked against appropriate quality standards. This will support the tender arrangements for the Frameworks.

- The maintenance of the DAPL for other types of placements where demand is reduced (e.g., general residential) would continue to support choice for individuals and enable the Service to maintain fair and equitable procurement arrangements for these types of placements. The maintenance of the DAPL would also provide an opportunity for placements that cannot be secured via the Frameworks, to be offered to the wider cohort of accredited providers.
  - Frameworks for specific cohorts of providers would also provide greater opportunity to develop a more collaborative working arrangement with a smaller number of providers who are committed to working with the Council, strengthening relationships between commissioners and providers but also providing an opportunity for providers delivering similar types of care to share learning to improve the experience of service users.
  - This hybrid model will also continue to provide choice for service users if enough providers tender for the Frameworks.
53. If this proposed approach is agreed as set out in Option 4, further work will be undertaken in consultation with Legal Services and Commissioning and Procurement to develop the specific operational requirements of the hybrid model along with the practical steps that will need to be undertaken to support its implementation. Discussions will also be undertaken with colleagues from the University Health Board to explore opportunities for collaboration in respect of the development of the Framework in relation to nursing placements.

### **Re-commissioning of the IT System that Supports the Delivery of the DAPL.**

54. An IT supplier called *adam* provides the end-to-end IT system that underpins the processes of procuring and managing both care home and domiciliary care placements. All approved providers have access to the system and use it on a day-to-day basis to make bids for placements and confirm provision of services.
55. The current contract with *adam* was put in place on 4<sup>th</sup> November 2018 for 4 years with an ability to extend for a further 2 years. This arrangement ends on 3<sup>rd</sup> November 2024. A new contract for hosting the DAPL and the Dynamic Purchasing System (DPS) used to secure Domiciliary Care packages will need to be put in place prior to the end date. If option 4 is agreed, arrangements for hosting the new Frameworks will also need to be negotiated with the IT supplier. Several developmental requirements have been identified that will need to be addressed to improve Adult Service's use of the IT system in the future and *adam* colleagues have

confirmed a commitment to work with the Service to address these matters in the new contract.

## **Improving Quality**

56. All care homes are regulated by Care Inspectorate Wales (CIW) under the RISCA regulations. Cardiff's current approach to monitoring quality comprises of contract monitoring visits to audit the standard of service delivery, safe recruitment practice and workforce related matters such as training and development as well as understanding the experience of residents.
  
57. The Regional Care Home Service Specification which accompanies the individual placement contract currently used by Adult Services for care homes for older people has an outcome focus and sets out the standards that care home providers are expected to achieve in service delivery. There are 18 service and individual outcomes set out in the service specification that fall under the following broad categories:
  - Autonomy, Choice, Control, Dignity and Respect
  - Staying Healthy - Protecting and Improving Health.
  - Individual Wellbeing
  - Workforce, Leadership and Management
  
58. Planned monitoring visits are undertaken by Contract Monitoring Officers within the Contracts and Service Development Team and it is expected that under usual contract monitoring arrangements, a care home will have at least one monitoring visit per year, but this will be enhanced where there are concerns regarding provider quality. The provider's quarterly monitoring reports and half-yearly quality of care reports required by CIW are also reviewed by Contracts Officers and intelligence about provider performance is shared in monthly Joint Quality Management Meetings (JQMM). Membership at this meeting includes representatives from CIW, Wales Ambulance Service, University Health Board Nurse Assessors and colleagues from Adult Services' Case-Management and Safeguarding teams.
  
59. Quality Assurance visits are also undertaken by the Dementia Quality and Care Team (DQCT) within Adult Services. This is a social work team which specifically consider the experience of the individual living in the care home and their agreed outcomes. The team also advise on good practice in dementia care and assist providers to improve the physical environment of the home to support improved outcomes.

60. Provider performance issues are carefully managed using the formal regional Escalating Concerns Procedures: *Quality Services – Delivering What Matters*. These procedures are underpinned by a culture of partnership working and a shared commitment towards supporting providers to ensure corrective or development action plans are put in place and that these there are robustly monitored to ensure they are sustained. While the focus is on supporting the provider to improve, where necessary, where a service is failing to the extent of posing undue risks to service users and/or staff there are provisions to suspend or withdraw the service in a planned manner with proper governance, and with full communication with the provider and service users. The procedures are enacted where:

- Cardiff and the Vale of Glamorgan Councils have been notified of significant issues by another local authority, the UHB or regulatory body and the provider is unable or unwilling to make the improvements required of them under usual monitoring arrangements.
- Repeated low level concerns or a serious single concern is raised by a case manager or other staff, service user or their representative/advocate. The nature of the concern/s highlights a risk to the wellbeing of service users or staff.

The procedures identify a 4-stage approach to managing provider performance concerns depending on the severity of the concern. These range from a Quality Assurance Meeting for lower-level concerns to a Service Operations Support Group where it is identified that there are serious concerns that have major adverse repercussions for individuals making care unsustainable or unsafe resulting in the need for a service to close. The process does not preclude escalating the process where there is a clear rationale to do so.

61. In July 2023 Adult Services commissioned the Institute of Public Care (IPC) to review existing processes that care home providers have in place for quality assurance and the local authority's arrangements for contract monitoring and quality assurance to support the Service to strengthen and improve quality assurance arrangements for care home. Several care home providers were also involved in the review.

62. In response to the findings of the review, an assessment tool informed by research into good dementia care has been introduced to provide consistency of approach for quality assurance visits. Work has also been undertaken to streamline processes and reduce duplication. A dementia learning network for providers was launched in November that will support them to share best practice and learn from research to improve service delivery and outcomes.

63. Adult Services intend to use the messages from the IPC review to engage in further discussions with care home providers about strengthening current arrangements to improve cohesion, reduce duplication and reinforce the focus on outcomes. Specifically work will be undertaken to address the following areas of quality assurance:

- The monitoring of service user outcomes
- Capturing service user feedback
- A provider self-assessment tool
- Development of a quality rating that reflects provider performance.

64. It is intended that these various components for monitoring quality will be brought together to inform an overall quality rating. It is expected that following consultation, the quality rating will become a factor in determining the awarding of new care placements.

### **Consultation**

65. The report does not contain a local issue so Local Member consultation has not been undertaken; however, consultation has taken place with a variety of care providers to gain a good understanding of their current and future costs and the results of this are set out in the body of the report. Should the way forward set out in this report be agreed, further consultation will be undertaken on the proposed fee uplifts which will inform decision-making in respect of fee increases for 2024/25.

### **Reason for Recommendations**

66. To inform Cabinet of the analysis undertaken to inform the future commissioning arrangement to address sustainability and sufficiency of placements in care homes for older people. To update Cabinet on arrangements to strengthen quality assurance in the sector.

67. To seek agreement for the approach to fee setting for care homes for older people, so that annual uplifts for 2024/25 can be applied in a fair and equitable way, balanced against the Council's available resources and affordability. To note the continuation of the current approach to the 2024/25 annual uplifts for other services commissioned by Adult Services.

68. To seek agreement for proposed new arrangements for the commissioning of care home placements for older people, to include both approved provider arrangements and a number of Framework arrangements with the aim of addressing sufficiency and sustainability whilst improving quality and value and ensuring affordability for the Council.



## **Financial Implications**

69. Adult Services net commissioned care budget is £119 million for 2023/24. Fee-setting and annual uplift decisions on a budget of this size can have a multi-million-pound impact. In the context of the financial situation that the Council is facing for 2024/25, affordability considerations in terms of both price and demand will need to play a key factor in decision making. The report seeks to delegate authority for 2024/25 fee-setting decisions; these will only be able to be finalised following approval of the Council's 2024/25 Budget and confirmation of the resources allocated to the Adult Services directorate for 2024/25.
70. The report also sets out a proposed approach for the future commissioning of care home placements for older people. This involves use of framework arrangements to supplement the current Dynamic Approved Purchasing List. Further work is planned to develop the proposed hybrid model; the need to operate within available resources, and to minimise financial risk will need to be pivotal considerations of this work and any associated decisions.

## **Legal Implications (including Equality Impact Assessment where appropriate)**

71. The exempt Legal advice is located at **Appendix D** and the Single Impact Assessment is located at **Appendix E**. The recommendations outlined in this report are not felt to present a negative differential impact on any of the protected characteristics.

## **Property Implications**

72. There are no direct property decisions contained within this report. Should the recommendations of the report lead to the need for the council to undertake property valuations, transactions or appraisals in order to meet service objectives, they should be managed and undertaken in accordance with the Council's established Asset Management processes, governance and in consultation with relevant service areas and professional teams as appropriate.

## **RECOMMENDATIONS**

73. Cabinet is recommended to:
- 1) note the findings of the review of care home placements for older people.

- 2) note the work being done to improve to quality assurance for care homes for older people.
- 3) agree the approach to fee setting for older people's care home placements for 2024-25 and other services commissioned by Adult Services, subject to further consultation with care providers and confirmation of the financial allocation through the budget setting process. Delegate the related decision-making authority in respect of the annual uplifts for care and support and the new standard cost of care rates for placements in care home for older people for 2024/25 to the Director of Adults, Housing and Communities in consultation with the Cabinet Member for Social Services (Adults) the Section 151 Officer and the Director of Law and Governance.
- 4) agree the approach for the future commissioning of care home placements for older people, including a combination of approved provider and framework arrangements and to delegate the decision-making authority regarding any related procurement of services to the Director of Adults, Housing and Communities in consultation with the Cabinet Member for Social Services (Adults) the Section 151 Officer and the Director of Law and Governance.

<b>SENIOR RESPONSIBLE OFFICER</b>	<b>Jane Thomas</b> Director Adults, Housing & Communities
	8 December 2023

*The following appendices are attached:*

**Confidential Appendix A:** Exempt Executive Summary of Care Home Market Data Analysis

**Confidential Appendix B:** Care Home Market Data Analysis

**Appendix C:** Options Appraisal

**Confidential Appendix D:** Exempt Legal Advice

**Appendix E:** Single Impact Assessment

*The following background papers have been taken into account:*

Final Draft of the National Commissioning Board (NCB) Standing Committee's Cost of Care Report

Yn rhinwedd paragraff (au) 16 Rhan (nau) 4 a 5 o Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972.

Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol

Yn rhinwedd paragraff (au) 16 Rhan (nau) 4 a 5 o Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972.

Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol

# Appendix C: Future Commissioning Models Options Appraisal

# Summary of Options Considered

<b>Option 1</b>	<b>DAPL – with Strengthened and Improved Business Processes</b>  This will require the commissioning of all placements via the DAPL, via improved and more relevant processes that address the issues with the current arrangements.
<b>Option 2</b>	<b>Block Contracts</b>  This will enable contracts to be put in place with providers for a specified type and amount of care over an agreed timescale for an agreed rate. Providers are paid for a set number of placements beds at the agreed rate, whether or not these are used.
<b>Option 3</b>	<b>Framework –with specialist lots</b>  This will enable contracts to be put in place with a range of framework providers that permit commissioners to secure placements for the specific types of care ( arranged via “lots”) reflecting the cohorts of placements that are required that present greatest need (e.g. respite, general nursing etc) and present the most challenges in respect of current commissioning arrangements.
<b>Option 4</b>	<b>Hybrid model – Framework/DAPL</b>  This would provide a combination of DAPL and a framework with specialist lots for those types of placements where there is greatest (e.g. Nursing) need or specialist requirements ( e.g. respite) and present the most challenges in respect of current commissioning arrangements.



## Option 1: New DAPL – With Strengthened & Improved Business Processes

New DAPL arrangements with revised business rules and operating procedures to strengthen compliance and maximise the benefits it provides.

### Pros

- Internal staff & Providers familiar with process so there would be no additional training requirement.
- Significant staffing resources have already been invested in establishing DAPL.
- Provide a choice for citizens if used appropriately ( i.e. bidding levels are good)
- Bidding using an electronic IT system is more streamline and requires less officer capacity to administer methodology.
- A refresh provides an opportunity to set out expectations that providers bid at cost of care
- Transparent and consistent process for both internal and external stakeholders
- Allows new entrants to the market at any time resulting in an increase in capacity
- Provides a good level of Quality Assurance when onboarding – all providers have to pass a quality threshold before they are enrolled and accredited.
- Whilst there is a quality threshold for joining the DAPL, there is currently no quality rating in the process for awarding contracts which are currently awarded based on cost. A refresh provides an opportunity to address current lack of quality in the process for awarding placements.

**Cons:** *(N.B. Issues in red are felt to present the greatest risk or are felt to have the greatest impact).*

- Work is required to review business processes, strengthen arrangements and ensure compliance. The ethos of the DAPL is based on inviting bids at varying prices when we want to aim for consistency in respect of securing placements at the Cost of care rate. Also high cost providers can enter at any time.
- We do not always make placements at cost of care rates and often bids come in that are above this, which presents a challenge when trying to predict budget spend due to fluctuations in costs and effectively manage spend.
- Currently we receive low number of bids. The high number of direct awards has impact on a reluctance of some providers to bid so the system is not operating as effectively as it could be if there was greater competition in the market.
- Commissioning on an individual spot purchase is not providing longer term financial stability to Providers and is impacting on provider's ability to secure investment in their homes and their willingness to invest.
- The high numbers of providers on the DAPL would continue to make contract monitoring a challenge in respect of the frequency of monitoring visits .
- Difficult to maintain a consistent collaborative working relationship due to the high numbers of providers resulting in a lack of visibility of market intelligence.
- There is a reliance on providers to correctly service receipt which sometimes results in overpayment when errors are made – but there is an automatic recover function to mitigate this.

## Option 2:Block Contracts

- Enter into block contracts for all or some categories

### Pros:

- Would provide stability to awarded providers which would provide better opportunities for them to secure investment as they would be guaranteed a number of placements at an agreed fee level whether placements were made.
- Would secure set rates to enable more accurate budget predictions. Potential to agree a fair and fixed placement price
- Provides the opportunity to create smaller market in order to strengthen relationships between providers and commissioners
- Ability to commission blocks in respect of the placement categories to reflect demand.
- Provides ability to plan for the longer term.
- Ability to focus on quality as less Providers to monitor – resulting in more frequent monitoring visits
- Reduction in capacity required to manage open market e.g. enrolment process

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**Cons:** *(N.B. Issues in red are felt to present the greatest risk or are felt to have the greatest impact).*

- Will limit choice for citizens with fewer providers
- May result in overpayment if blocks not fully utilised
- Block contract rates may result in higher costs than agreed cost of care rate
- Limits provider growth – Lack of incentives for providers who are not commissioned via block contracts. Would create instability in market for those providers not awarded which could result in disorganised exits that would destabilise the market. It could also create provider uncertainty when contracts come to an end.
- Risk to the authority if a block Provider is in escalating concerns and there is an embargo due to smaller market of providers. This may present a challenge to meeting need.
- It could prove challenging for the LA to end the contract prematurely due to lack of demand or performance issues and this is likely to take some time to achieve, resulting in possible loss of qualified care staff if providers
- Homes would need to demonstrate compliance with regulations regarding decision-making regarding admissions ( re compatibility and meeting of needs) so could turn down placements even if they had vacancies and were being paid a contract price for delivery.
- Reduces longer term market share
- Damage to Provider relationships not awarded block contracts

## Option 3: Framework

- Enter into a new framework for all/some categories of placement

### Pros

- Provides the opportunity to create smaller market and therefore strengthen relationships between providers and commissioners.
- Potential to agree a fair and fixed placement price
- Ability to commission the relevant placement categories to reflect greatest need at a fair price with the ability to set rates to enable more accurate budget predictions
- Ability to plan for the longer term – capacity and internal staffing
- Ability to focus on quality as less providers to monitor so monitoring visits could be more frequent. Also, quality of providers would be assured via tendering arrangements for joining the framework.
- Ability to shape a market that best fits the ongoing requirements with specific lots on the framework for types of placements that have greatest demand or provide specialisms ( e.g. respite) whilst managing cost.
- Reduction in officer capacity to manage open market e.g. enrolment process
- Provides providers with slightly more assurance of placements than a DAPL whilst ensuring that the Council is not locked into paying for voids which is a feature of block contracts.

**Cons:** *(N.B. Issues in red are felt to present the greatest risk or are felt to have the greatest impact).*

- Ranking could impede the providers business plans / development / future planning as it will limit the amount of placements they can secure.
- Risk of not having enough providers on the framework to meet demand and offer appropriate choice for service users due to a smaller numbers of provider on the framework than currently on the DAPL
- Could create instability in market for those providers not on the framework. This is also likely to cause damage to Provider relationships for those not on the Framework.
- Framework rates may result in higher costs than established Cost of care rates ( although they are expected not to be any higher than what we are currently paying and in many instances may be lower).
- Provider uncertainty when contract expires resulting in possible loss of qualified care staff if providers
- No guarantee of business albeit this would provide more assurance than the current DAPL

## Option 4: Hybrid model – Framework with a DAPL

- Enter into a new framework for some categories of placement ( via different lots).

### Pros:

- Access to the DAPL, providers successfully applied, then undertake mini tenders for specific requirements
- Wider option of providers than a block arrangement – wider contingency options to plan for home closures etc.
- Would secure set rates for those on the framework to enable more accurate budget predictions
- Would allow new entrants to the market if demand requires, flexibility and ability to undertake new mini tenders as required
- Would provide greater understanding of provider speciality e.g. a framework with a smaller no. of homes for certain categories where there is greatest need/demand
- Opportunity to plan ahead but also react to demand
- Possibly allow a more agile approach when responding to the need to implement urgent new frameworks, combined with stronger Provider relations.
- The maintenance of the DAPL would enable placements to be made outside of the framework but on the DAPL if for any reason, the framework providers were unable to offer choice / meet need on occasions.
- Provides an opportunity for framework providers delivering within their specialist lots to work more collaboratively to share their experiences and learn from good practice in order to drive up quality.
- Negotiation of a new contract with the IT supplier provides an opportunity to create an end to end system for the administration of the Framework as well as the DAPL.
- This will also negate the need for Finance and Brokerage staff to operate a separate system for the Framework and DAPL. This also means that management information reports generated by the IT system can be inclusive of all placements made whether via the DAPL or the Framework.
- It is expected that this arrangement will improve the opportunities to manage the market because those entering the Framework will have an expectation they are able to make new placements and therefore are expected to be more actively engaged.

**Cons:** *(N.B. Issues in red are felt to present the greatest risk or are felt to have the greatest impact).*

- Ranking could impede the Providers business plans / development / future planning
- May limit choice for citizens with framework providers if small numbers join
- Two tier system – uncertainty for providers not successful on framework tenders which could impact on provider / commissioner relationships and provider sustainability for non-framework providers.
- Framework rates may result in higher costs than established cost of care rates but are expected to be lower than some rates that are currently paid.
- Some providers could challenge the introduction of a framework as this was not noted in the original contract regarding the DAPL. It will be important to work collaboratively with providers to mitigate this risk.

## Recommended Option: Option 4 Framework with a DAPL

### Rationale and Mitigation of Risks:

- Would better support market management and market-shaping than current arrangements - with the frameworks reflecting the types of placements we have most challenges with securing currently / are more costly.
- Less financial risk than block contracts.
- Opportunity to provide more security for providers on the framework than the DAPL in respect of price – as a framework price would be agreed for all placements made via that route – which is expected to improve investment opportunities as investors often require a guaranteed rate for all placements in a care home.
- Would better support our financial planning if we made placements at agreed framework price. Whilst framework rates may be above cost of care rates for some placement categories we would expect rates overall to be lower than some rates we are currently paying via the DAPL or direct awards.
- Would provide greater opportunity to develop a more collaborative working arrangement with a smaller number of framework providers
- would continue to provide choice if sufficient numbers enter the frameworks – it is expected that providers who deliver the category of placements that form the lots of the framework will wish to join in order to have the best opportunity of securing future placements made by the LA.
- Negotiation of a new contract with the IT supplier provides an opportunity to include the IT arrangements for hosting an end to end process for the framework and associated lots.
- Careful consideration of how the ranking of Framework providers will be implemented around cost and quality will mitigate some of the risk identified regarding impact on business planning / future developments.
- Legal advice will need to be sought regarding the risk of introducing a Framework alongside current ( albeit improved) DAPL arrangements in order to mitigate the risk of provider challenge or non-engagement. It is felt that robust consultation with provides and collaborative working around the development of the Framework will further mitigate the risk of challenge.

Mae'r dudalen hon yn wag yn fwriadol

Yn rhinwedd paragraff (au) 16 Rhan (nau) 4 a 5 o Atodlen 12A  
o Ddeddf Llywodraeth Leol 1972.

Mae'r ddogfen yn gyfyngedig

Mae'r dudalen hon yn wag yn fwriadol



# Single Impact Assessment

APPENDIX E

Cardiff Council



## 1. Details of the Proposal

**What is the proposal?**

Title: **Review of Care Home Market for Older People and the Approach to Fee Setting for Care and Support Services for 2024/5.**

**Is this a new proposal or are you amending an existing policy, strategy, project, procedure or service?**

New

Existing

**Directorate/Service Area:**

Adults, Housing and Communities

**Who is developing the proposal?**

Name: Angela Bourge

Job Title: Operational Manager, Resources

**Responsible Lead Officer (Director or Assistant Director):**

Jane Thomas

**Cabinet Portfolio:**

Social Services ( Adults) – Cllr Mackie

Authorisation	
Completed By:	Angela Bourge
Job Title:	Operational Manager – Resources
Date:	9 <sup>th</sup> November 2023
Approved By:	
Job Title:	

**Document History – do not edit**

*The Single Impact Assessment (SIA) can be strengthened as time progresses, helping shape the proposal. Version control will provide a useful audit trail of how the SIA has developed. Draft versions of the assessment should be retained for completeness, however only the final version will be publicly available. Draft versions may be provided to regulators if appropriate.*

Version	Author	Job Title	Date
1	Angela Bourge	Operational Manager - Resources	9.11.23

## 2. Overview of the Proposal

### **What action is the Council considering and why?**

*Please provide a detailed outline of the proposal. This information will support your findings in the impact assessments.*

The proposal seeks to provide Cabinet with:

- an update on an analysis of the care home market for older people with regard to its sufficiency and sustainability and to agree an approach for the future commissioning of placements in this cohort of care home.
- an update on work undertaken to gain an understanding of current provider costs for care homes for older people and future financial pressures and to approve the proposed approach for fee setting for care and support services for 2024/25, subject to further consultation.
- an update on work currently being undertaken to strengthen quality assurance arrangements for care homes for older people.

The context to the proposals is as follows:

Care homes for older people play a vital role in supporting the city's most vulnerable residents. The Council requires residential and nursing care services for older people to provide:

- a safe, secure and stable environment, with onsite 24/7 access to care and support.
- the opportunity to promote choice, engagement, and meaningful activities for its residents and family members.
- dignity and respect for all residents.
- a good quality of life for residents .
- appropriately skilled and qualified workforce that is competent to meet the individual needs of residents.

As recognised in the Regional Market Stability Report, the approach of supporting older people to live independently at home will impact on the demand for general residential care. Additionally, the Ageing Well Strategy recognises the need to work in partnership with the care sector to ensure the delivery of high quality, sustainable care and support and in particular to support the sector to meet the changing demographic makeup of the city, which will increase demand for specialist care, such as nursing and nursing dementia care.

Currently Adult Services secures care home placements on a spot purchase arrangement where providers are invited to bid for each individual placements. The commissioning of each package of care on an individual basis means that Adult Services does not risk block booking beds that are not then utilised. However, commissioning in this way presents challenges to providers, there is no guarantee of work with the Council that would encourage them to invest in their premises or to make changes to their delivery models. The lack of certainty about future income also makes it difficult for them to secure investment in their services. It is also bureaucratic and onerous for both council officers and providers.

There are currently 37 care homes for older people in Cardiff collectively registered to provide 1,819 beds. 30 of these care homes are Approved Providers i.e. accredited on to the Council's Dynamic Approved Provider List (DAPL) which equates to 1,818 registered beds. However, not all these registered beds will be in use at any one time for a number of reasons such as refurbishment of rooms or workforce issues. Of the 7 Cardiff care homes that are not yet accredited, these care homes are collectively registered for 301 placements. 6 have placements commissioned by Adult Services through historical arrangements and work is underway to support them to become accredited and enrolled.

### **The Proposed Approach to Fee Setting**

The merits of putting a new Fee Setting strategy in place for 2024 - 2027 are recognised in that it would provide a clear understanding for providers of the Council's intentions and commitments over the period of the strategy. However, it is once again felt unwise to propose this approach in the current financial climate. It is understood that in the next year, the Council will face its most challenging financial situation yet and there continues to be significant uncertainty about the on-going impact of the cost-of-living crisis on care home providers. It is therefore recommended that Cabinet agrees that Adult Services does not implement a new Fee Setting Strategy for in 2024 but instead agrees the following approach to fee setting which will provide a clear set of principles that govern how the annual fee uplifts are determined and how a standard cost of care is calculated for the new financial year.

- Ensuring that fees reflect the need to uplift staffing costs to meet the Real Living Wage that has been set at £12 an 10.1% increase.
- To provide an uplift that reflects the increase in costs other than staffing, based on predicted inflationary pressures.
- Identifying separately the types of placements most in demand, and for which there is likely to be increasing need in the future. These placements offer the higher level of care and support, and most frequently cost the Council more than the current cost of care rates. To reflect this in a higher uplift.
- Recognising the need to review the profit margin that is currently applied to the cost of care template that was agreed in 2018 and

considering the importance of understanding the significance of working towards a sustainable figure to reflect Return on Capital Employed (ROCE) in the future.

- The current arrangement whereby those placements above the calculated cost of care rate are not awarded an uplift will continue.
- Ensure that final fee setting decisions are informed by further consultation with providers so that commissioners can understand the expected impact of the proposals before formal decision-making takes place. It will be important to recognise that whilst it may not be possible for the Council to meet the gap between existing fees and the increased costs that providers have indicated during the cost of care exercise that they have experienced in 2023/24 and expect to incur in 2024/5, it is important that the providers are able to voice the impact of not doing so on market sustainability and sufficiency.
- Quantify the gap between existing fees and illustrated costs of care gathered from the cost of care exercise, and share this with the National Commissioning Board and Wales Government policy leads to inform Social Care Futures and Fair Work developments in order to contribute to national work being undertaken to begin to close the funding gap.

### **Proposed New Approach to Commissioning**

An options appraisal was undertaken, and the following options were comprehensively considered:

- **Option 1 - Remain as is, continuing to use the Dynamic Approved Provider List (DAPL)** – commissioning all placements via the DAPL, either using existing processes or via improved and more relevant processes that address the issues with the current arrangements.
- **Option 2 - Use of Block Contracts** – which enable contracts to be put in place with providers for a specified type and amount of care over an agreed timescale for an agreed rate. Providers are paid for a set number of placements beds at the agreed rate, whether or not these are used.
- **Option 3 – Use of Framework Arrangements** which enable contracts to be put in place with a range of framework providers that permit commissioners to secure placements for the specific types of care (arranged via “lots”) reflect the cohorts of placements that are required (e.g. respite, general nursing etc)
- **Option 4 – A Hybrid Model using the DAPL with Frameworks** for lots that reflect the cohorts of placements the Service find most challenging to secure.

The recommended option identified by the group and approved by the Adults, Housing and Communities Commissioning Board held on 16<sup>th</sup> September 2023 was Option 4 for the following reasons:

- A combination of Dynamic Approved Provider List together with a few Framework Arrangements would better support market management and market-shaping than the current arrangements - with the Frameworks reflecting the types of placements Adult Services have most challenges in securing currently and which are frequently more costly.
- Frameworks present less financial risk than block contracts where providers are paid for an agreed number of beds whether they are full. Adult Services have block contracted on occasions in response to specific needs (e.g. to support hospital discharge) but this has presented challenges as it is not always possible for providers to fill vacancies if there are compatibility issues with existing residents, also if the level of demand reduces over the term of the contract then payments may be made for empty beds.
- However, Frameworks provide an opportunity to offer more security for providers in respect of price which is expected to increase their investment opportunities required to improve the quality-of-care homes, particularly those that are not currently RISCA compliant (e.g., rooms with ensuite facilities) and this will improve their sustainability.
- Agreeing a fee level for providers who are part of the framework will also support more accurate financial projections.
- Continuing to operate the DAPL alongside a Framework with a number of specialist lots will have a number of benefits. It will ensure that all providers who tender for the Framework have previously onboarded to the DAPL and will have already been checked against appropriate quality standards. This will support the tender arrangements for the framework.
- The maintenance of the DAPL for other types of placements where demand is reduced (e.g. general residential) would continue to support choice for individuals and enable the Service to maintain fair and equitable procurement arrangements for these type of placements. The maintenance of the DAPL would also provide an opportunity for placements that cannot be secured via the Frameworks, to be offered to the wider cohort of accredited providers.
- A Framework with specialist lots for specific cohorts of providers would also provide greater opportunity to develop a more collaborative working arrangement with a smaller number of

providers who are committed to working with the Council, strengthening relationships between commissioners and providers but also providing an opportunity for providers delivering similar types of care to share learning to improve the experience of service users.

- This hybrid model will also continue to provide choice for service users if enough providers tender for the Frameworks.

### **Quality Assurance**

All care homes are regulated by Care Inspectorate Wales (CIW) under the RISCA regulations. Cardiff's current approach to monitoring quality comprises of contract monitoring visits to audit the standard of service delivery, safe recruitment practice and workforce related matters such as training and development as well as understanding the experience of residents and their outcomes.

Adult Services intend to use the messages from research it commissioned by the Institute of Public Care (IPC) to engage in further discussions with care home providers about strengthening current arrangements to improve cohesion, reduce duplication and reinforcing the focus on outcomes. A quality assurance framework will be developed to inform an overall quality rating for providers which will link directly to whether a provider is in the formal Escalating Concerns Process arising from concerns related to quality / sustainability of the service. It is expected that in the future, the quality rating will become a factor in determining the awarding of new care placements.

The Cabinet is recommended to:

- note the findings of the review of care home placements for older people.
- note the work being done to improve to quality assurance for care homes for older people.
- agree the approach to fee setting for older people's care home placements for 2024-25 and other services commissioned by Adult Services and delegate the related decision-making authority in respect of the annual uplifts and new standard cost of care rates for placements in care home for older people for 2024/25 to the Director of Adults, Housing and Communities in consultation with the Cabinet Member for Social Services (Adults) the Section 151 Officer and the Director of Law and Governance.
- agree the approach for the future commissioning of care home placements for older people, including a combination of approved provider and framework arrangements and to delegate the decision-making authority regarding any related procurement of services to the Director of Adults, Housing and Communities in consultation with the Cabinet Member for Social Services (Adults) the Section 151 Officer and the Director of Law and Governance.

**What are the costs and/or savings?**

*What will the proposal cost and how will it be funded?*

*How might costs be reduced through involvement and collaboration, across Cardiff Council and/or with external stakeholders?*

*Are there savings and how will these be realised?*

There are no savings linked to this proposal, but the new approaches seek to ensure value for money as the spend on commissioning of care home placements for older people was £36.3m in 2022/23, 29% of the Adult Services commissioning budget.

The detailed work around the annual uplifts for social care providers and the new costs of care for care home placements for older people is yet to be finalised but the costs will be met within the Adult Services budget allocation for 2024/25. Decisions will be based on Adult Services understanding of provider costs informed by consultation with providers and benchmarking and data analysis undertaken, balanced against affordability.

Collaborative working will be undertaken with care home providers in respect of developing the new approach to commissioning and strengthening of quality assurance arrangements to inform the detail that will underpin implementation and operational issues.



### 3. Impact Assessments

#### Which impact assessments do you need to complete to support your proposal?

Further information is included about each assessment at the start of the relevant section.

The [Impact Assessment Screening Tool](#) provides advice tailored to your proposed policy, strategy or project regarding which impact assessments may be required and who to contact to find out more.

The screening tool is an online form with mainly multiple-choice questions which should take less than 10 minutes to complete.

Once the answers have been submitted, an automated email will be sent to you with the recommended next steps and details of who to contact for expert advice.

**Put Yes or No next to each of the impact assessments listed below to indicate which ones are being carried out. For assessments which are not being carried out, please delete the relevant sections on the subsequent pages.**

Impact Assessment	Completed: Y/N
A. Equality Impact Assessment	y
B. Child Rights Impact Assessment	
C. Welsh Language Impact Assessment	Y
D. Habitats Regulations Assessment	
E. Strategic Environmental Assessment	
F. Data Protection Impact Assessment	
G. Health Impact Assessment	

For further information on all the above impact assessments including who to contact for advice, please visit the [Policy Portal](#).

## A: Equality Impact Assessment

Guidance in completing this assessment can be accessed [here](#). Please consult the Equality Team for any further assistance with completing this assessment [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)

Under the Equality Act 2010, “differential impact” means that people of a particular protected characteristic (e.g. people of a particular age) will be significantly more affected by the change than other groups.

### Impact on the Protected Characteristics

#### Age

Will this proposal have a **differential impact [positive/negative]** on different age groups?

	Yes	No	N/A
Up to 18 years			
18 - 65 years			
Over 65 years	X		

#### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The proposals relate to care home provision for older people. If implemented the new arrangements for quality assurance and commissioning should strengthen Adult Services ability to meet demand and need and to improve quality for service users whilst paying a fair price for care. It is therefore felt that there will be a positive differential impact, on age.

#### What action(s) can you take to address the differential impact?

If the recommendations of the Cabinet report are agreed there will be a need to:

- Implement the new approach to fee setting for 24/25
- Strengthen quality assurance arrangements
- Implement the new approach to commissioning

#### Disability

Will this proposal have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment		X	
Learning Disability		X	

Long-Standing Illness or Health Condition		X	
Mental Health		X	
Neurodiversity		X	
Physical Impairment		X	
Substance Misuse		X	
Visual Impairment		X	
Other		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The proposals relate to care home provision for older people and some individuals may have hearing, physical and visual impairment. However, it is not felt that the proposals will have a negative or positive differential impact on these groups as the specific needs of individuals will be addressed on a case by case basis when care home placements are made – ensuring that the care home can appropriately meet the needs of the individual and promote their desired outcomes.

**What action(s) can you take to address the differential impact?**

No action required

**Gender Reassignment**

Will this proposal have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People (Transgender people are people whose gender identity or gender expression is different from the gender they were assigned at birth.)		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is not anticipated to be any differential impact on transgender people. However, part of the quality assurance arrangements will ensure that individual's needs are appropriately taken into consideration and met.

**What action(s) can you take to address the differential impact?**

No action required

**Marriage and Civil Partnership**

Will this proposal have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A

Marriage		x	
Civil Partnership		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is not anticipated to be any differential impact on marriage & civil partnership.

**What action(s) can you take to address the differential impact?**

No action required

### Pregnancy and Maternity

Will this proposal have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy		X	
Maternity		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is not anticipated to be any differential impact on pregnancy and maternity.

**What action(s) can you take to address the differential impact?**

No action required

### Race

Will this proposal have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White		x	
Mixed / Multiple Ethnic Groups		x	
Asian / Asian British		x	
Black / African / Caribbean / Black British		x	
Other Ethnic Groups		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is not anticipated to be any differential impact on race. However, part of the quality assurance arrangements will ensure that individual's needs regarding race are appropriately taken into consideration and met.

**What action(s) can you take to address the differential impact?**

No action required.

**Religion, Belief or Non-Belief**Will this proposal have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		X	
Christian		X	
Hindu		X	
Humanist		X	
Jewish		X	
Muslim		X	
Sikh		X	
Other belief		X	
No belief		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is not anticipated to be any differential impact on the basis of religion/belief/non-belief. However, part of the quality assurance arrangements will ensure that individual's needs are appropriately taken into consideration and met.

**What action(s) can you take to address the differential impact?**

No action required

**Sex**Will this proposal have a **differential impact [positive/negative]** on male, female or non-binary persons?

	Yes	No	N/A
Male persons		X	
Female persons		X	
Non-binary persons		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is not anticipated to be any differential impact on sex.

**What action(s) can you take to address the differential impact?**

No action required

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**Sexual Orientation**

Will this proposal have a **differential impact [positive/negative]** on people with different sexual orientations?

	Yes	No	N/A
Bi		x	
Gay		x	
Lesbian		x	
Heterosexual		x	
Other		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is not anticipated to be any differential impact on sexual orientation.

**What action(s) can you take to address the differential impact?**

No action required

**Socio-economic Duty**

Is the change anticipated to reduce or contribute to inequality of outcome as a result of socio-economic disadvantage? (e.g. will the change negatively impact on those on low-incomes or those living in deprived areas?)

	Yes	No	N/A
Socio-economic impact		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

It is not expected that there will be a negative differential impact in respect of social-economic duty. Individual entering a care home receive a financial assessment which identifies the appropriate contribution they are required to make to the care they receive based on what it is calculated they can afford.

**What action(s) can you take to address the differential impact?**

No action required.

**Welsh Language**

Will this proposal have a **differential impact [positive/negative]** on the Welsh language?

	Yes	No	N/A
Welsh language		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

There is not anticipated to be any differential impact on the Welsh language. Care Homes are expected to make the active officer to all individuals to determine if they wish to receive services in Welsh and those who are currently unable to meet this requirements are working towards it.

**What action(s) can you take to address the differential impact?**

No action required.

**Consultation and Engagement**

What arrangements have been made to consult/engage with equality/ community organisations, especially those who are representative of those you have identified as being likely to be affected?

Consultation has been undertaken with care providers to gain an understanding of their costs. However, specific consultation will be undertaken with the social care sector on the proposed uplift levels when work had been completed on the new rates.

Initial consultation has also been undertaken with care providers regarding quality assurance and this has included how they consult with residents and their families. Further work will be undertaken with providers to develop the detail around how the quality assurance framework will be implemented.

Consultation with providers will also be undertaken on the future commissioning arrangements if the preferred option is agreed by Cabinet. This will help Adult Services shape the detail around the operation arrangements for the framework approach.

Whilst there has been no specific consultation with service users, their feedback is routinely collected as part of usual contract monitoring and quality assurance visits to care homes that officer undertake and therefore the experience of service user has been considered to inform the proposals.

**Summary of Actions (Listed in the sections above)**

	Actions
Age	See generic actions
Disability	
Gender Reassignment	

Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Socio-economic Impact	
Welsh Language	
Generic/ Over-Arching (applicable to all the above groups)	<p>If the recommendations of the Cabinet report are agreed there will be a need to:</p> <ul style="list-style-type: none"> <li>• Implement the new approach to fee setting for 24/25</li> <li>• Strengthen quality assurance arrangements</li> <li>• Implement the new approach to commissioning</li> </ul>

### Next Steps

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

Where the Equality Impact Assessment shows negative impacts, you must append the form to the Cabinet or Officer Decision Report.

On completion of this Assessment, please ensure that the whole form is submitted to the Equality Team mailbox so that there is a record of all assessments undertaken in the Council [EqualityTeam@cardiff.gov.uk](mailto:EqualityTeam@cardiff.gov.uk)



## **B: Child Rights Impact Assessment**

The aim of a Child Rights Impact Assessment is to put children and young people at the forefront of decision-making. The assessment helps officers to consider how the rights of children and young people may be affected by a proposed policy or project.

Click [here](#) to start a Child Rights Impact Assessment.

You will receive an automated email containing a link to your Child Rights Impact Assessment template and the Child Friendly Cardiff Team will be in contact to support you.

Guidance for Local Government prepared by Unicef is available here:  
[Child Rights Impact Assessment - Child Friendly Cities & Communities \(unicef.org.uk\)](https://www.unicef.org.uk/child-rights-impact-assessment-child-friendly-cities-communities)

For further information or assistance in completing the Child Rights Impact Assessment, please contact the Child Friendly Cardiff Team [ChildFriendlyCardiff@cardiff.gov.uk](mailto:ChildFriendlyCardiff@cardiff.gov.uk)

### **Next Steps**

Where it is considered that a Child Rights Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

## C: Welsh Language Impact Assessment

Please consult with Bilingual Cardiff for any assistance with completing this assessment  
[Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

### Welsh Language Standards 88-97

#### Standard 88

Will this proposal have a **differential impact [positive/negative]** on:

	Yes	No	N/A
The opportunities for persons to use the Welsh language?		X	
Treating the Welsh language no less favourably than the English language?		X	

**Please give details/ consequences of the differential impact, and provide supporting evidence, if any.**

It is not felt that the proposal will have a differential impact on Welsh Language.

#### Standard 89

Could this proposal be formulated or re-formulated, so that it would have positive effects, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

Care Homes are expected to make the active offer to all individuals to determine if they wish to receive services in Welsh and those who are currently unable to meet this requirements are working towards it. The work undertaken in strengthening quality assurance arrangements will ensure that monitoring of the active offer is routinely undertaken and areas of development or improvement are followed up.

**Treating the Welsh language no less favourably than the English language?**

Please see above.

#### Standard 90

Could this proposal be formulated or re-formulated to ensure that it does not have adverse effects, or a decreased adverse effect, on:

**The opportunities for persons to use the Welsh language?**

It is expected that by ensuring monitoring is routinely undertaken regarding the active offer that this will improve opportunities for individuals to receive services in Welsh should they wish to do so.

**Treating the Welsh language no less favourably than the English language?**

See above.

**Standard 91**

When consulting on the proposal, were views considered, and sought, on the effects (both positive and negative) that it would have on:

**The opportunities for persons to use the Welsh language?**

No – but there will be opportunities for this to be considered as part of future collaborative working with providers when the detailed work around development of the quality assurance framework is undertaken.

**Treating the Welsh language no less favourably than the English language?**

See above

**Standard 92**

Did the consultation seek and give consideration to views on how the proposal could have positive, or increased positive effects, on:

**The opportunities for persons to use the Welsh language?**

No – please see response to Standard 91 which also applies to this standard.

**Treating the Welsh language no less favourably than the English language?**

See above

### Standard 93

Did the consultation seek and give consideration to views on how the proposal could have no adverse effects, or decreased adverse effects, on:

<b>The opportunities for persons to use the Welsh language?</b>
Plese see response to standard 91 which also applies to this standard.

<b>Treating the Welsh language no less favourably than the English language?</b>

### Standard 94

If the proposal includes the awarding of grants, has consideration been given to the guidance presented in Cardiff Council's Policy on Awarding Grants in Compliance with the Welsh Language Standards with regard to:

<b>The opportunities for persons to use the Welsh language?</b>
Yes – this is already build into the evaluation process in respect of providers on -boarding to the Dynamic Purchasing Approved Provider List ( DAPL) and will feature in any tenders that are undertaken regarding the proposed new approach to commissioning ( e.g. the implementation of frameworks alongside the DAPL).

<b>Treating the Welsh language no less favourably than the English language?</b>
See above

### Standard 95

If research was undertaken or commissioned to assist with the development of the proposal, did it give consideration to whether it would have a **differential impact [positive/negative]** on:

<b>The opportunities for persons to use the Welsh language?</b>
N/A – specific research was not commissioned to assist with the development of these proposals.

<b>Treating the Welsh language no less favourably than the English language?</b>

N/A
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### Standard 96

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have a positive effect, or increased positive effects, on:

The opportunities for persons to use the Welsh language?
N/A

Treating the Welsh language no less favourably than the English language?
N/A

### Standard 97

Did the research undertaken or commissioned to assist with the development of the proposal give consideration to how it could have no adverse effect, or decreased adverse effects, on:

The opportunities for persons to use the Welsh language?
N/A

Treating the Welsh language no less favourably than the English language?
N/A

### Material and Services

In addition to the impact assessment to ensure that the proposal meets the requirements of the Welsh Language Standards, consideration must also be given to the supporting materials and services that may be required.

These include (please click on the hyperlinks to view detailed information about the requirements under the Welsh Language Standards):

- [Correspondence](#) - receiving and replying (emails, letters, online communication).
- [Telephone](#) – receiving and answering calls.
- [Meetings & Public Events](#) – public meetings or events, group meetings, consultation, individual meetings.
- [Public Messages – electronic – video](#)
- [Signs, Notices & Display Material](#)
- [Publicity & Advertising](#)

- [Producing Public Documents](#) - policies, strategies, annual reports, corporate plans, guidelines, notices, codes of practice, consultation papers, licences, certificates, rules, brochures, leaflets, pamphlets or cards, ticket/vouchers.
- [Producing Forms](#)
- [Reception Services](#)
- [Websites, Apps and Online Services](#)
- [Social Media](#)
- [Self Service Machines](#)
- [Education Training Courses](#)
- [Public Address Announcements](#)

**Are all supporting materials and services compliant with the requirements of the Welsh language standards?**

Materials that will support the implementation of the proposals if agreed will be compliant with the requirements of Welsh Language Standards ( e.g. tender documents and evaluation criteria in respect of commissioning new arrangements for care home placements).

**Cardiff Council’s Welsh Language Skills Strategy**

This strategy may be viewed here and additional guidance documents have been produced to support its implementation:

- [Assessing Welsh Language Skills and Identifying Welsh Essential Roles](#)
- [Recruitment, Selection, and Interview Procedures and the Welsh Language](#)

**Do you have access to sufficient Welsh speaking staff to support the delivery of the proposal in compliance with the requirements of the Welsh language standards?**

The proposals related to the external care home market. It is expected that care homes enrolled on the DAPL are able to make the active offer or are working towards it.

**Next Steps**

Where it is considered that a Welsh Language Impact Assessment is required, you must append the form to the Cabinet or Officer Decision Report.

A copy must also be emailed to Bilingual Cardiff [Bilingualcardiff@cardiff.gov.uk](mailto:Bilingualcardiff@cardiff.gov.uk)

## D: Habitats Regulations Assessment

	Yes	No
Will the proposal affect a European site designated for its nature conservation interest*, or steer development towards an area that includes a European site, or indirectly affect a European site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*\* Only two European sites designated for nature conservation interest lie within Cardiff's boundaries – the Severn Estuary and Cardiff Beech Woods, but be aware if your project affects an area close to a neighbouring authority.*

If the answer is 'Yes', then a screening exercise may need to be conducted to determine if a Habitats Regulations Assessment is required or not.

Contact the [Biodiversity Team](#) who will guide you through the process.

## E: Strategic Environmental Assessment

	Yes	No
Does the strategy, policy or activity set the framework for future development consent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Is the strategy, policy or activity likely to have significant environmental effects (positive or negative)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have answered 'Yes' to both of the above questions, then a full Strategic Environmental Assessment Screening is needed.

Contact the [Sustainable Development Unit](#) who will guide you through the process.



## F: Data Protection Impact Assessment

	Yes	No
Will the proposal involve processing information that could be used to identify individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the answer is 'Yes', then a Data Protection Impact Assessment may be required.

Click [here](#) to read the guidance and start the Data Protection Impact Assessment process if needed.

For further information, contact the [Data Protection Service](#).

## G: Health Impact Assessment

A Health Impact Assessment helps to develop policies and projects that consider the mental, physical and social health and well-being of a population during planning and development. Considering health inequalities and their impacts on local communities is an essential part of any Health Impact Assessment.

Health Impact Assessments will become a statutory requirement for public bodies in specific circumstances in the future. These circumstances have yet to be published by Welsh Government.

For further information and advice, please contact the Wales HIA Support Unit.

Website: [Home - Wales Health Impact Assessment Support Unit \(phwwhocc.co.uk\)](http://phwwhocc.co.uk)

Email: [WHIASU.PublicHealthWales@wales.nhs.uk](mailto:WHIASU.PublicHealthWales@wales.nhs.uk)