Promoting Better Practice Program

REVIEW REPORT

BREWARRINA SHIRE COUNCIL

DECEMBER 2009

capacity building   good governance   improvement

Division of Local Government
Department of Premier and Cabinet

TABLE OF CONTENTS

PART I

1. ABOUT THE REVIEW

1.1 Review objectives

The Promoting Better Practice (PBP) review program has a number of objectives:

- to generate momentum for a culture of continuous improvement and greater compliance across local government
- to provide an 'early intervention' option for councils experiencing operating problems
- to promote good governance and ethical conduct principles
- to identify and share innovation and good practice in local government
- to enable the Department to use review information to feed back into its work in identifying necessary legislative and policy work for the local government sector.

Reviews act as a "health check", giving confidence about what is being done and helping to focus attention on key priorities.

1.2 Review process

The process involves a Division of Local Government, Department of Premier and Cabinet review team evaluating the effectiveness and efficiency of the council's operations and giving feedback. The review team takes a risk based approach that involves checking compliance, examining appropriate practices and ensuring that council has frameworks in place to monitor its performance. It includes: examining policies and procedures; interviews with key personnel and councillors; checking samples of documentation.

The results of reviews are analysed and reported to the elected council, the Deputy Director General (Local Government) and the Minister for Local Government.

1.3   Brewarrina Shire Council review

A recommendation from the second Public Inquiry into Brewarrina Shire Council required the Department to conduct a PBP review to verify the implementation of an action plan and identify any ongoing deficiencies. This report details the outcome of that review.

Council identified a large number of actions, or associated actions, that were required after undertaking its self-assessment using the PBP checklist. Following a review of these actions with Departmental staff, the number of actions, or associated actions, included in Council's PBP action plan was 71. It is these 71 actions that the PBP review focussed on during the on-site visit in 2009.

The recommendations from this review will form a new action plan for Council's future reporting to the Department.

Lyn Brown, Senior Investigations Officer and Carol Thomas, Principal Policy Officer conducted the on-site component of the review from 30 June 2009 to 2 July 2009.

The on-site review involved a meeting with Council's Mayor and General Manager, general discussions with some councillors, conducting interviews, attending a Council meeting and the review of a number of Council's policies and other documents.

Following the on-site review, further analysis was undertaken. Council management was then provided with the opportunity to respond to the review's preliminary findings.

This report details the review's findings, recommendations and Council's initial response. The Division expects councils to formally respond to the review process, to prepare an action plan to address agreed issues and to provide progress reports on the implementation of the action plan.

2. EXECUTIVE SUMMARY

Brewarrina Shire Council has faced a range of difficulties in establishing itself as an organisation that meets its obligations under the Charter in section 8 of the Local Government Act. The latest review of a range of Council's practices shows that considerable work has been undertaken on serious deficiencies that were identified in the first PBP review in 2005, and subsequently in the Public Inquiries that followed.

While Council still has some significant issues facing it, there is a willingness by the elected Council and the management team, led by the General Manager, to resolve these matters. The elected Council and the management team need to work together in addressing these issues. If Council allows division between councillors, management and staff, partiality when considering issues, and private interests to govern its decision making, then it will fail in its endeavour to rectify these issues.

This report has documented the observations of the review team in relation to areas of concern that were observed or raised with the reviewers during the review process. There are strong words used in this report in regard to the relationship between councillors and staff; relationship between management and staff; and the culture of the organisation. Councillors and staff should give serious consideration to these.

It is evident that Council has worked hard to rectify deficiencies previously identified. This report highlights those actions where the reviewers are satisfied that work is completed or extensively commenced to rectify the relevant issues. The report also provides some suggested areas for further improvement to assist Council to direct its resources to remaining outstanding matters. A summary of those areas is provided below.

A complete list of recommendations is contained in the Action Plan section of this report. The Action Plan is completed and adopted by council to guide the implementation and monitoring of the recommendations in this report.

COUNCIL'S STRATEGIC INTENT

Completed actions

Council has been proactive in commencing work on its community strategic plan in anticipation of the introduction of the "Integrated Planning and Reporting Framework".

Areas for improvement

Council must ensure that it allocates the necessary resources for the development of other vital strategic documents, such as its asset management plan, long term financial plan and workforce strategy as part of the community strategic planning process.

GOVERNANCE

Completed actions

- Improvements in management planning - 5.1.2
- Developed statement of business ethics - 5.1.6
- Delegations register maintained - 5.1.7
- Policy register in good order - 5.1.8

Areas for improvement

- Risk management and internal controls work to continue - 5.1.10
- Privacy management plan to be updated - 5.1.11
- Develop records management procedures - 5.1.12
- Council meeting practices require improvement - 5.1.13
- Develop information technology strategy - 5.1.16

PLANNING AND REGULATORY

Completed actions

- LEP underway and on target - 5.2.2
- DA notification in place - 5.2.4
- Section 94 contributions plan completed - 5.2.4
- On-site sewage management plan drafted - 5.2.5

Areas for improvement

- Develop companion animals management plan - 5.2.7
- Develop overall program to guide compliance activities - 5.2.8
- Develop waste management strategy - 5.2.9

ASSET AND FINANCIAL MANAGEMENT

Completed actions	Areas for improvement
• Plant replacement strategy completed - 5.3.3	• Continue work on asset management and maintenance - 5.3.8
• Registers of land assets, licences and leases in good order - 5.3.4	• Develop long term financial plan - 5.3.9
• Plans of management for community land developed - 5.3.5	
• Finance policies reviewed - 5.36	
• Water and sewer business plans underway - 5.3.7	

COMMUNITY, COMMUNICATION AND CONSULTATION

Completed actions	Areas for improvement
• Community engagement and communications strategies well developed - 5.4.2	• Develop customer service standards and inform community - 5.4.4
• Cultural planning underway - 5.4.3	

WORKPLACE RELATIONS

Completed actions	Areas for improvement
• Employee attitude survey conducted - 5.5.3	• Develop workforce strategy - 5.5.5
• OH&S systems well developed - 5.5.4	• Develop review program for HR policies and procedures - 5.5.6
	• Complete work on job descriptions, salary system and performance appraisal system - 5.5.7, 5.5.8
	• Monitor and report on employee grievance system - 5.5.9

3.   CONTEXT

Brewarrina Shire Council covers 19,155 sq kms in the north-west of NSW.

The Brewarrina Shire population at 2006 was estimated as 1,944 persons. Brewarrina township represents 55% of the total population of the Shire.

(Brewarrina Shire Council Management Plan 2010-2012)

The (then) Department commenced a review of Brewarrina Shire Council under the PBP program in 2005. The review found a number of serious deficiencies in the manner in which Council exercised its functions. As a result of these concerns, the review was discontinued. Subsequent to this, in June 2005, the first Public Inquiry into the efficiency and effectiveness of the governance of the Council was held. The Inquiry commissioner made 94 recommendations, of which 89 applied to the Council.

The (then) Department monitored the implementation of these recommendations. Following a range of interventions by the (then) Department, a second Public Inquiry was held in August 2007. That Inquiry commissioner made five recommendations, of which three applied to the Council. These recommendations primarily related to the completion of the PBP review checklist, the development of an action plan to address any deficiencies identified, and submitting the checklist, action plan and progress report to the Department within a specified timeframe.

PART II – OUTCOMES OF THE REVIEW

4.   COUNCIL'S STRATEGIC PLANNING

This part of the review focussed on Council's strategic intent and how it has involved its communities and other stakeholders in developing long term strategic plans. Monitoring and reporting progress to promote continuous improvement was also an integral consideration in regard to Council's performance in this area.

A new planning and reporting framework for NSW local government is about to be introduced to improve local councils' long term community planning and asset management as well as streamline reporting to the community.

The new framework aims to improve the sustainability of local communities by encouraging councils, residents and State agencies to work together on long term plans and appropriate delivery programs. Community strategic plans will be supported by a long term financial strategy (resourcing strategy), asset management plan and workforce strategy. The framework is set out in the following diagram.

Diagram 1   Proposed planning and reporting framework

Observations

Brewarrina Shire Council does not have a strategic plan. Council has recently engaged the services of a consultant to commence the process of developing an integrated community strategic plan for the area. This plan will be developed in accordance with the proposed "Integrated Planning and Reporting Framework".

A community engagement strategy and an issues paper have been drafted to provide the foundation for actions in developing the community strategic plan. A workshop was held with councillors in April 2009 to engage them in the process. Representatives from Council have already held a meeting with key State and Federal agency representatives to discuss their involvement in the development of this plan.

Council has been proactive to commence work on its community strategic plan in anticipation of the introduction of the "Integrated Planning and Reporting Framework".

However, there are a number of other components of the Framework that Council will need to ensure it resources as part of this process. This includes the development of an asset management plan, long term financial plan and a workforce strategy. These are critical areas that need to be addressed by Council.

Currently Council is completing its revaluation of assets and condition assessments. At the time of the review, this work was expected to meet the required timeframes.

However, Council has not commenced work on developing its long term financial strategy or its workforce strategy. Council needs to complete its asset management plan and develop its long term financial strategy and workforce strategy in conjunction with the development of its community strategic plan. Council should allocate resources to these processes. Council has not identified this activity in its 2009/10 management plan.

Recommendation 1

Council should ensure that it allocates the necessary resources for the development of its asset management plan, long term financial plan and workforce strategy as part of the community strategic planning process.

Council response

Council will allocate resources to ensure that all plans related to the Community Strategic Plan are finalised by the 30th June, 2012 deadline.

5. DELIVERING AND ACHIEVING

This part of the review focussed on examining key structures, systems and processes involved in delivering the stated outcomes of Brewarrina Shire Council's management plan. This included considering the means by which Council:

- governs its day to day operations;

- undertakes it planning and regulatory obligations;

- manages its assets and finances;

- involves the community; and

- recruits and retains its workforce.

5.1 GOVERNANCE

"Corporate governance refers to all the means by which entities are directed and controlled." (Standards Australia, HB401-2004:12) Corporate governance is important because it enhances organisational performance; manages and minimises risks; increases the confidence of the community and the local government sector in the organisation; ensures that an organisation is meeting its legal and ethical obligations; and assists in the prevention and detection of dishonest or unethical behaviour.

5.1.1 Scope of review

The review focussed on the areas in Council's action plan that it had identified required work to meet the required practices set out in the (then) Department's checklist. Many of the timeframes set to complete the identified work appeared overly ambitious, resulting in matters not being completed within the time identified. Council still has a lot of work to do in some key areas of its governance practices in order to meet its responsibilities.

Completed actions

5.1.2 Management plan

Council has reviewed and revised the format and content of its management plan. The management plan for 2009/10 largely complies with the legislative requirements. There is evidence that other Council plans are linked to the management plan.

5.1.3 Review of organisation structure

Council has re-determined its organisation structure within 12 months of the elections as required by section 333 of the Local Government Act. Prior to determining the structure a comprehensive review was undertaken by Local Government Employment Solutions (a unit of the Local Government and Shires Associations).

In addition to a review of Council documents, the Employment Solutions team utilised the information in an employee survey and a skills survey that had previously been conducted, consulted with staff during workshops, as well as conducting one-to-one interviews with staff who requested this. In all, the Employment Solutions team estimate that 77% of the staff contributed to the review.

The organisational review raised some serious issues relating to the culture of the Brewarrina Shire Council workforce. The strongest contributing factors to concerns about the lack of a positive, effective work environment was the constant turnover in management and difficulty in recruiting and retaining suitably qualified staff. This has

resulted in a lack of direction, discipline, respect and engagement by staff, leading, in some cases, to conflicts between staff and management.

The report raises significant and serious issues to be addressed if Council is to continue to meet its Charter obligations under the Local Government Act. A report on the outcome of this review was presented to Council at its meeting in February 2009. Council adopted the changes in the structure of the organisation as recommended by Employment Solutions at its meeting in June 2009. However, the reviewers noted that this was not without some difficulty.

The reviewers are not in a position to comment on the merits of the particular structure that has been recommended. However, Council, as the governing body, needs to be decisive in its condemnation of any lack of respect shown to management, councillors and other Council staff. The councillors, as the governing body, need to ensure that they support the General Manager in addressing the issues raised by the Employment Solutions team in their review. Councillors need to ensure that they "do not take sides", but support initiatives to improve the morale and work practices in the organisation.

There were a number of recommendations made by the review report. Some of these related to the employment and management of staff, which are to be implemented by the General Manager. The General Manager should develop an implementation plan to guide this process. The General Manager should also keep the governing body of Council informed of the progress in addressing the issues raised in the organisational review report.

Recommendation 2

The General Manager should develop an implementation plan for the recommendations from the Employment Solutions organisational review report.

Recommendation 3

The General Manager should regularly inform the governing body of Council about the progress in addressing the issues raised in the organisational review report.

5.1.4   Code of conduct

Council has adopted the revised Model Code of Conduct for Local Councils in NSW which was in force from 27 June 2008. Council needs to badge the document as Brewarrina Shire Council's code of conduct. It is evident that Council provides the code to new employees as this is included in the induction checklist. Training has been provided on the code of conduct in the past year. Council should ensure that training on the code of conduct is part of the on-going training program.

Council is required to review its code of conduct within 12 months of an election. As part of this process Council should review its policy on the provision of information to councillors and interaction between councillors and staff.

5.1.5   Written disclosures register and disclosure of interests returns

Council has established a file to maintain any written disclosures of pecuniary conflict of interests that are made by staff in accordance with section 459 of the Local Government Act. In addition, a spreadsheet has been established that currently records any disclosures made by staff who are not designated persons. It is suggested that this spreadsheet could be used to record disclosures by all staff regardless of whether they are designated persons.

The majority of councillors attended the councillor information sessions conducted by the (then) Department in November 2008. A review of their disclosure of interest returns, required to be submitted annually in accordance with section 449 of the Local Government Act, shows that councillors have an awareness of their obligations in this regard. Things for councillors to be aware of when completing their next returns are:

- the returns will be for the period just passed, i.e. the next returns should be for the period since their election until 30 June 2009 (or for the full financial year if a previously elected councillor).
- only use the "as at" date or the "period" date for the return. In all cases the next return should be for the "period" of the financial year.

- if there is a declaration of income as a director at part B of the form, then thought should be given as to whether a declaration needs to be made at part E of the form.

- ensure that all parts are completed in accordance with the instructions on the form i.e. use 'Nil' if there is no entry and do not leave blank, do not use N/A. Make sure that all the information that is required is provided eg the nature of any interest in real property at part A.

Councillors and designated persons should be provided with a copy of the Division's latest user guide to assist in completing the returns for this period.

5.1.6 Statement of business ethics

Council has developed a statement of business ethics that has been incorporated into its tendering policy and associated paperwork. The statement of business ethics has also been included in Council's latest management plan. Council has advised that it is currently implementing a procedure to ensure that contractors and suppliers receive, and make a commitment to, this statement.

Recommendation 4

Council should ensure that contracts entered into with Council require a commitment to the statement of business ethics.

5.1.7 Delegations

Council has a register of delegations. In addition, delegations are stored in an electronic format in the human resources system. The delegations appear to be reviewed regularly.

5.1.8 Policy register

Council keeps a register of its policies. Most of these policies contain version control. Some have not been reviewed for some time. Many of the policies are available on Council's website. Council should develop a program for the regular review of its policies.

Recommendation 5

Council should develop a program for the regular review of its policies.

Areas for improvement

5.1.9 Values

Council has still not developed a set of values in consultation with staff and councillors. Developing the values that guide the organisation has been identified as work that will be undertaken as part of the community strategic planning process.

Recommendation 6

Council should undertake work on determining the values of the organisation.

5.1.10 Risk management and internal controls

This remains an area where Council is exposed. It is acknowledged that Council has undertaken significant work in the area of risk management. This includes the filling of the risk officer position, the adoption of a fraud policy, the drafting of a risk management plan, and working with consultants on the development of a safety management system. Council needs to finalise its work on the risk management plan. In doing this, Council should ensure that the plan captures governance risks. This should include a risk assessment of its procurement and disposal practices.

The risk officer has focussed on the occupational health and safety risks that faced the organisation by providing training to staff. The efforts in this area have resulted in a significant reduction in workers compensation costs, and hence, savings for Council. Council is to be congratulated on this work.

Council has developed a fraud policy. However, there is no evidence that Council has a systematic process for assessing its fraud risks. Neither has Council developed an internal audit program. The risk management plan could provide the basis for the development of an internal audit program once it is completed. Council should consider including the auditing of procurement contracts, its purchasing and

tendering processes, its computer systems and legislative compliance as part of an audit program.

Council should develop an internal audit program to review relevant sections of its operations on a regular basis. The establishment of a regional approach to internal audit is an approach that should be considered. The (former) Department has recently released guidelines to assist councils in developing and implementing an internal audit function.

Council has not developed a business continuity plan.

Recommendation 7

Council should complete, as a priority, its overarching risk management plan to bring together its current risk management practices and manage all significant risk issues facing Council.

Recommendation 8

Council should develop an internal audit function and an internal audit program.

Recommendation 9

Council should develop an organisation-wide disaster recovery/business continuity plan that is inclusive of all business continuity risks that the organisation may face.

5.1.11   Privacy management

Council does not have an up to date privacy management plan. Council should review its plan in consultation with guidance provided by Privacy NSW. Once adopted, Council should ensure that councillors and staff receive training in the requirements of the privacy legislation. Additionally, a privacy contact officer should be identified.

Recommendation 10

Council should review its current Privacy Management Plan.

Recommendation 11

Council should provide training to councillors and staff in the requirements of the privacy legislation.

5.1.12   Records management

Council has a records management policy. However, the policy does not contain any requirements in relation to business continuity issues. The policy should be reviewed to incorporate relevant matters of business continuity and disaster recovery relating to record keeping.

Council does not have procedures relating to record management to support the policy. The procedures should incorporate a records disposal plan and schedule. Council advised that it has ordered the TR@cer program for records management from Liverpool Plains Shire Council.

Some staff have received training on records management issues. In addition, information on record keeping is covered in the induction process. Council should ensure that staff are given additional training when the TR@cer program is implemented.

Recommendation 12

Council should review its records management policy as a priority.

Recommendation 13

Council should develop procedures to support the records management policy as a priority.

Recommendation 14

Council should conduct staff training on records management as part of the implementation of the TR@cer program.

5.1.13   Council meetings

The review team attended Council's meeting on 30 June 2009. At this meeting Council discussed and adopted the draft management plan. While the meeting procedures were relaxed, the meeting still moved through the business in a reasonable timeframe. The Mayor had good control of the meeting, but was required to occasionally remind councillors to conduct themselves in accordance with the appropriate meeting procedures.

Council may benefit from a review of its agenda. For example, it currently lists reports from other committees. However, the information that is presented is the minutes of the meetings of other organisations, not Council committees. The minutes could be provided to councillors as part of a weekly information pack (see *Information papers* below) and only relevant items reported to Council for any necessary action. A report could be prepared by the General Manager or an item added to the Council agenda at the request of a councillor.

Operational matters

It was observed that some councillors still spend a lot of time focussed on operational matters. The Mayor had to remind councillors to use the councillor request system that has been put in place for such items. Councillors are reminded to use the system that has been established.

Information papers

Council's business paper includes a lot of material that is only for the information of councillors and required no action. It is suggested that Council implements a system of "weekly papers" that provides councillors with relevant information that has come to the General Manager's attention in that week. This includes material such as the local government weekly publication, conference information, relevant correspondence and minutes of meetings of other organisations. A process should be established whereby a councillor can request that an item relating to this information is debated at Council. This should include notice of any motions that the councillor wishes the Council to consider.

Alternatively, the information could be discussed at a Council committee meeting and any necessary further report from Council staff requested. In this way, the matter could be an agenda item at a future Council meeting.

Council resolutions

The review team noted that councillors are not giving the minute taker clear direction as to decisions that are being made. There were numerous motions passed that 'moved the recommendation of the report'. However, in many of those cases the recommendation was that Council determine the matter. For example:

"RECOMMENDATION:

That Council:

Determines if it wishes to make comment on the Proposed SA2 boundaries for NSW."

Council resolved that the recommendation be adopted. This makes the minute-taker's task extremely difficult and leaves staff in the position of having to second guess exactly what the Council has decided. This can also lead to inaccurate recording of Council's decisions requiring correction at the following Council meeting. The risk in not getting the Council's intentions clearly documented is that the General Manager may implement a different decision to that made by the Council.

The responsibility to get this right rests with the elected Council. Councillors should be clear in what they are moving and voting on. Councillors should have read the business paper before attending the meeting and should have any proposed motions prepared.

Declarations of conflict of interests

The review team observed three occurrences of such declarations at the meeting on 30 June 2009. The declarations were not made in accordance with the requirements of the Act or the Council's code of conduct. Council's agenda identifies that declarations of interests can be made at the beginning of the meeting. No

declarations were made at this time. In two cases this is understood as the item that raised the conflict of interests was an item introduced as a matter of urgency.

In one case when the meeting came to the relevant item where a declaration was made, this was not properly declared nor would it have been possible to record the declaration in the minutes. After being reminded by other councillors, the councillor concerned simply said that there was a conflict of interest and left the chamber. In the other cases, the councillors again just declared that they may have a conflict and left the meeting. However, this was after the discussion on the matter before Council had commenced.

This is not good enough. The Act and the code of conduct are quite clear about what is required to be declared and how this is to be done.

A declaration of a conflict of interests in a matter has to be declared in the following way. It has to state:

- the type of conflict i.e. is it a pecuniary or non-pecuniary conflict of interests
- if it is a non-pecuniary conflict of interests, whether it is significant or less than significant
- the nature of the interest
- if it is a pecuniary or a significant non-pecuniary conflict of interests then the councillor must leave, and be out of sight of, the meeting
- if it is a less than significant non-pecuniary conflict of interests and the councillor decides to stay, then a brief explanation should be provided as to why no further action is required to manage the conflict.

All of this information is required to be recorded in the minutes. Again, it is not the chairperson's or minute taker's responsibility to guess what declaration a councillor has made. This is each councillor's responsibility. This topic was covered extensively in the councillor information session conducted by the (then) Department of Local Government in Brewarrina in November 2008. The majority of Brewarrina Shire councillors attended this session. In addition, Brewarrina Shire councillors have received specific training on the requirements of the code of conduct and their pecuniary interest obligations. Councillors are reminded of their obligations in

regards to the disclosure of interests. This is a matter that should be taken seriously and councillors must comply with their obligations.

Financial reports

It is suggested that staff review the format of the financial reporting to Council meetings. The format of the report does not allow councillors to compare expenditure and income to principal activity areas. Additionally, a comparison to budget would be useful for councillors. A review of the way other councils report should be undertaken.

Recommendation 15

Council should review the format of its meeting agenda and papers.

Following the receipt of Council's response to the draft report and a review of the meeting agenda and minutes, this recommendation is considered completed. See reviewer comments at the end of this section.

Recommendation 16

Councillors note the comments in this report in relation to Council resolutions and the declaration of conflicts of interests to ensure they comply with, and meet their obligations, under the Local Government Act.

Following the receipt of Council's response to the draft report and discussions with Council's General Manager, this recommendation is considered completed. See reviewer comments at the end of this section.

Recommendation 17

Council should review the format of the Council meeting financial reports.

5.1.14 Councillor training and development

Council does not have a structured induction program for new councillors, nor does it have an on-going training and development program. However, opportunities for training have been provided to councillors, such as the code of conduct training, and

a training record is kept. Adequate orientation and on-going development programs are important in ensuring that councillors are given the opportunity to learn and gain confidence in their role.

Recommendation 18

Council should develop a structured councillor training and development program.

5.1.15 Candidates campaign donation returns

Section 328A of the Act requires Council to keep a register of all current donations and expenditure declarations lodged by councillors with the Election Funding Authority of NSW (EFA). The former Department issued circular 08-45 in August 2008 advising councils that providing a link from council's website to the EFA website will satisfy this requirement.

Recommendation 19

Council should establish a link on its website to the returns of candidates' campaign donations on the Election Funding Authority website.

Following the receipt of Council's response to the draft report and a review of the Council's website, this recommendation is considered completed. See reviewer comments at the end of this section.

5.1.16 Information technology

Council does not have a plan to manage its current or future information and communication technology requirements. This aspect of Council's operations should be considered when developing the community strategic plan.

Recommendation 20

Council should consider the information and communication technology requirements needed to deliver its programs when developing the community strategic plan.

Council response

Council agrees with recommendations numbered 2 -18 and will allocate resources to achieve the key outcomes required.

Councillors recognise that some change is necessary with respect to the way that council business is conducted and are committed to understanding and effectively carrying out their councillor roles as per the Local Government Act and charter. Councillor training is to be scheduled.

Council meeting procedures, business papers and minutes have been reviewed and streamlined since the DLG visit in June 2009.

Reviewer comment

A review was conducted of Council's agendas and minutes following the receipt of Council's response to the draft review report. As a result of this review, recommendation 15 is now considered completed.

Recommendation 16 was discussed with Council's General Manager following the receipt of Council's response to the draft report. There is evidence that indicates that councillors have noted the comments made in the report, have participated in further training and made efforts to ensure that they comply with their obligations. Councillors should continue to ensure they are mindful of the correct procedures when dealing with matters in which they have a personal interest. The implementation of recommendation 16 is now considered completed.

A review of Council's website following receipt of Council's comments on the draft report shows that Council has established a link on its website to the returns of candidates' campaign donations on the Election Funding Authority website. The implementation of recommendation 19 is now considered completed.

5.2   PLANNING AND OTHER REGULATORY FUNCTIONS

Council exercises regulatory functions in relation to a range of activities within its area. The efficiency and probity of council's regulatory functions is important for effectively managing council's responsibilities and for preserving public trust in council and its staff. Regulation is important to achieve a wide range of social, economic and environmental goals.

5.2.1.   Scope of review

The review focussed on the areas in Council's action plan that it had identified required work to meet the required practices set out in the (then) Department's checklist. Council has completed, or substantially commenced, an enormous amount of work in the area of its planning and regulatory practices. It is to be congratulated on the amount of work undertaken.

Completed actions

5.2.2   Council Local Environmental Plan (LEP)

Council is a partner in a joint LEP process with Bourke and Central Darling councils for the development of their LEPs in accordance with the new template. Council is acting as the project manager for this process. The Brewarrina LEP is due to be completed in March 2011 and it is expected to meet this timeframe.

5.2.3   Notification of development applications and determinations

Council has provided information on its website for the notification and determination of development applications. All applications are notified to the public in accordance with the provisions of the LEP.

5.2.4   Section 94A development contributions plan

Council has adopted a section 94A development contributions plan that commenced on 1 April 2009. The works schedule in the plan identifies the works to which levies will be applied. The plan proposes no levy on development of less than $100,000 in value.

5.2.5   On-site sewage management

An on-site sewage management policy has been drafted and is expected to be presented to Council at its September 2009 meeting to then be placed on public exhibition. The policy is consistent with the guidelines issued by the (then) Department. Council will need to ensure that it develops a program of inspections following the implementation of the policy.

5.2.6   Swimming pools

Council has a register of swimming pools in its area. A compliance program is to be developed.

Areas for improvement

5.2.7   Companion animals

Council has undertaken community education programs in conjunction with the RSPCA and NSW Public Health Unit. Council reports that the programs resulted in approximately 200 dogs being de-sexed and micro-chipped. Council should continue this practice. Council has not developed a companion animals management plan which would give a framework for activities relating to companion animals issues.

Council has met its responsibilities in submitting its pound data to the Division of Local Government in a timely manner. Council needs to ensure that it has procedures in place to comply with all the requirements of the Companion Animals legislation, including the entering of breed and temperament assessment data in relation to restricted dogs.

Recommendation 21

Council should develop a companion animals management plan.

5.2.8   Compliance program

Council undertakes programs for checks on food premises in conjunction with neighbouring councils. Staff from Brewarrina will do inspections in other local council areas and staff from those councils will do inspections in Brewarrina. This is good practice given that Brewarrina is a small town and it could be difficult for local staff to undertake these compliance inspections.

Council needs to ensure that it develops an overall program that identifies all its monitoring responsibilities such as on-site sewage systems, food premises, swimming pools etc.

Recommendation 22

Council should develop a compliance inspection program to manage all its compliance monitoring obligations.

5.2.9   Waste management

Council does not have a waste management strategy to give guidance to its decision making in this area. Currently Council is looking at the need to extend or move its waste site. This is an opportune time to develop a longer term strategy to guide decisions on waste management.

Recommendation 23

Council should develop a waste management strategy.

Council response

Council is most satisfied with the considerable progress it has made in this area and is confident that the few remaining outstanding tasks in this responsibility area will be accomplished within a reasonable time frame.

5.3   ASSET AND FINANCIAL MANAGEMENT

Under its charter, Council has a responsibility to raise funds for the purposes of carrying out its functions. This can be achieved by the fair imposition of rates, charges and fees, borrowings and grants. The Council is also the custodian and trustee of public assets and must effectively account for and manage these assets.

5.3.1   Scope of review

The review focussed on the areas in Council's action plan that it had identified required work to meet the required practices set out in the (then) Department's checklist. Council still has some major areas of work to complete in the area of asset management and financial planning. It is acknowledged that Council has commenced a lot of work in this area and continues to focus its attention on this.

5.3.2   Overview of financial position

Council's overall financial position, when taking into account its financial indicators is, in the auditor's opinion, considered sound.

However, it should be noted that Brewarrina Shire Council has the highest percentage of rates and charges outstanding of all councils in NSW. This is a major financial risk to Council and the percentage is rising. While it is recognised that Council has developed policies in this area and taken actions to address this problem, it should continue with these and put in place robust and targeted strategies to address the problem.

Completed actions

5.3.3   Plant replacement and capital works

Council has developed a 10 year plant and equipment plan. The plan is provided in Council's 2009/10 management plan. The cost for replacing plant in 2009/10 is also included in the capital works program for the year. The sources of funds to undertake the planned works are also identified.

5.3.4 Registers of land assets, leases and licences

The review team inspected Council's registers. The registers were in good order, up to date and contained the information required. Council should consider upgrading its registers and manage them electronically in the TR@cer document management system when it is implemented.

5.3.5 Plans of management for community land

Council has developed plans of management for various categories of its community land. Staff advised that there are still some site specific plans to be developed. However, it is recognised that Council has completed a lot of work in this area.

5.3.6 Finance policies

Council has reviewed, and is updating, a number of finance policies. This includes the debt management policy, pensioner rates and charges reduction policy and a hardship policy. It is important that finance policies are reviewed on a regular basis and a program for this review should be developed.

5.3.7 Water and sewer business plans

Council has joined the Lower Macquarie Water Utilities Alliance. Staff report that they are getting assistance from members of this alliance in developing the business plans for the water and sewer services. The plans are due for completion in the 2009/10 financial year. This activity is identified in Council's 2009/10 management plan and has been resourced.

Areas for improvement

5.3.8 Asset management and maintenance

It is evident that Council is undertaking a large amount of work in this area. As previously discussed in this report, Council will be required to develop an asset management strategy as part of its strategic planning process. Council has an asset management policy and is in the process of developing an asset management plan/strategy.

Council has only identified the activity in developing an asset management strategy for its roads in its 2009/10 management plan. Council should ensure that it properly resources the development of an area-wide asset management strategy for all of the assets under its care and control. This has been recommended in the strategic planning section of this report.

Council advises that it is on time in completing the work required for revaluation and undertaking condition assessments of its assets. Council has developed a spreadsheet register of assets that contains most classes of assets. Council is using Imagis and GPS technology. Once this work is completed it will be important to develop an asset maintenance program and make provision for funding this. Additionally, Council should consider making provision for unplanned maintenance in its budget.

Recommendation 24

Council should develop and make provisions for funding a total asset management strategy, including an asset maintenance program, for all of the assets under its care and control.

Recommendation 25

Council should make provision for unplanned maintenance in its annual budgets.

5.3.9   Long term financial planning

Council does not have a long term financial plan. This has been discussed, and a recommendation made, in the *strategic planning* section of this report. Council must allocate resources to the development of a long term financial plan as part of developing its community strategic plan. The financial plan should also address the issue of future capital works funding.

Council response

Council is entering into a friendship agreement with another rural shire and is building a support base. It is a member of the ORANA Regional Organisation of Councils (OROC). OROC has recently engaged an Executive Officer to assist

member councils to partner together to achieve positive outcomes across the western region.

Council has recently joined the Lower Macquarie Water Utilities Alliance. Council's water and sewer plans are underway, with significant progress being made in relation to other issues raised.

Council has commenced its community strategic planning process and is committed to achieving its integrated planning and reporting goal by 2012. This includes development of its business and long term financial plans.

In relation to the DLG comment at 5.3.2, "…it should be noted that Brewarrina Shire Council has the highest percentage of rates and charges outstanding of all councils in NSW.", Council advises that, after analysis of its overdue rates percentage and adjustment to reflect the continual late payment by one large ratepayer organisation, its outstanding rates percentage reduces to 6-7% per annum. Council believes this is within the acceptable range, given the extended drought conditions throughout western NSW.

Reviewer comment

Council's advice in relation to its percentage of outstanding rates and charges is noted. Council should continue to implement its strategies to collect these outstanding rates as outlined to the reviewers. In essence, by not paying its rates on time, the large organisation is paying more money in rates, as interest charges are applied to outstanding monies. Additionally, Council is placed in a position where it is foregoing short term investment opportunities as well as impacting on its cash flow, as a result of these outstanding rates and charges. It would be in the interests of all ratepayers generally for ratepayers to pay their rates on time.

5.4   COMMUNITY AND CONSULTATION

A council's charter requires that a council:

- Provides services after due consultation

- Facilitates the involvement of councillors, members of the public, users of facilities and services and council staff in the development, improvement and coordination of local government

- Actively promotes the principles of multiculturalism

- Plans, promotes and provides for the needs of children, and

- Keeps the local community and State government informed about its activities

5.4.1   Scope of review

The review focussed on the areas in Council's action plan that it had identified required work to meet the required practices set out in the (then) Department's checklist. Council has undertaken considerable work in its community and consultation area of responsibilities. Council has a comprehensive social and community plan and its activities in this area are well documented in the 2009/10 management plan.

Completed actions

5.4.2   Community engagement and communication

Council has a 'service and communication policy'. This document includes aspects of guarantee of service, communication and community consultation. Council has recently prepared a community engagement strategy as part of the program to develop a community strategic plan. The community engagement strategy is an excellent document and identifies a range of strategies to involve specific groups in the community.

The engagement strategy and Council's existing policy should be reviewed and brought together to provide an overall community engagement and communication policy for the Council. The existing policy provides some general strategies for informing and communicating with the community generally that the community engagement strategy does not contain. The community engagement strategy has

identified the target group and engagement strategies for these groups. However, general strategies to encourage the involvement of members of the public are not included. Together, these documents provide Council with a comprehensive approach to community engagement and communication.

5.4.3 Cultural planning

Council is well underway in developing a cultural plan for the area. Council is proposing to conduct 'cultural conversations' with groups and in communities throughout the Shire in the latter part of 2009. The scope of the cultural planning exercise has been widely defined. This is an exciting project which is "walking the talk" of community engagement.

Areas for improvement

5.4.4 Customer service standards

Council has clearly identified complaint handling standards in its complaint policy. There appear to be standards of service in other areas, such as roads, water and sewer. However, these are not clearly articulated to the community. Council should identify its customer service standards for the services it provides and inform the community of these.

Recommendation 26

Council should identify its customer service standards for the services it provides.

Recommendation 27

Council should inform the community of the standards of services it can expect.

Council response

Council recognises that improvement is needed and is committed to provision of excellent customer service and is continuously working to improve its customer service. Community consultation strategies recently employed have proven and are proving effective.

5.5 WORKFORCE RELATIONS

Councils have a number of legislative responsibilities in relation to their role as an employer. Council is required to conduct itself as a responsible employer.

5.5.1 Scope of review

The review focussed on the areas in Council's action plan that it had identified required work to meet the required practices set out in the (then) Department's checklist. A substantial amount of work has been completed or commenced in the area of workforce relations. There are still some significant areas that require attention.

5.5.2 Overview of the organisation

Council needs to monitor the implementation of the recommendations identified in the organisational review report (as discussed in the *review of organisation structure* section of this report). The concerns raised in that report in relation to the culture of the organisation are serious and need to be addressed.

However, the reviewers need to emphasise that councillors should not be "taking sides", but should be supporting initiatives to improve the morale and work practices in the organisation. The General Manager is responsible for directing and managing the workforce. If councillors have concerns about any aspects of the General Manager's approach to managing the workforce then the correct place to raise those concerns is during the General Manager's performance review process.

Councillors are reminded of their obligations under the code of conduct in relation to their interaction with staff. If staff inappropriately raise concerns with councillors, councillors should advise staff to use the mechanisms that are available in the workplace to raise these concerns. These mechanisms include, but may not be limited to, the grievance policy and procedures, union representation and the consultative committee processes.

The reviewers are mindful that Brewarrina is a small Shire and it is likely that councillors will have close relationships with some staff. It is incumbent on all councillors and staff to manage any conflict between their private interests and their

public duty appropriately. Again, councillors should not be 'taking sides' but should be ensuring that the correct policies and procedures are in place to manage workplace issues.

Staff need to ensure that they conduct themselves in a professional manner when carrying out their public duties despite any close relationships they may have with other staff or councillors. The General Manager should ensure that councillors are kept informed of the progress in implementing the recommendations from the organisational review and changes in the culture of the workforce.

<u>Completed actions</u>

5.5.3   Employee attitude survey

An employee satisfaction survey was conducted in October 2008 using an industry recognised survey tool. The response to this survey was disappointing with only 35% of the staff taking the opportunity to provide their feedback. The information from the survey was used by Employment Solutions during their organisational review (as previously discussed in the *review of organisation structure* section of this report).

It will be important for Council to conduct surveys on a regular basis. This will be an important tool to gauge the success of the implementation of the recommendations from the organisational review.

5.5.4   Occupational health and safety

This is an area where Council has made major achievements. As previously discussed in the *risk management and internal controls* section of this report, Council has reduced its workers compensation costs considerably. In addition, a safety management system (OH&S management plan and system) is in its final stages of drafting for implementation across the workforce. A significant amount of training has been undertaken with staff in relation to their responsibilities in occupational health and safety in addition to the completion of risk assessments. Council should ensure that it continues these good practices.

Areas for improvement

5.5.5   Workforce planning

Council does not have a strategic workforce plan. This has been discussed, and a recommendation made, in the *strategic planning* section of this report. Council must allocate resources to the development of a workforce strategy as part of developing its community strategic plan. Council should ensure that the workforce strategy deals with the issue of succession planning for key positions.

5.5.6   Human resources policies and procedures

Council has a raft of policies to provide guidance on human resources matters. Most of these policies contain version control. Some have not been reviewed for some time. Council should develop a program for the regular review of its human resources policies. Council's 2009/10 management plan has identified this as a human resource activity for the year.

The recruitment policy should be reviewed as a priority and EEO requirements incorporated into it. Council's 2009/10 management plan has identified the implementation of EEO practices in its recruitment activities as work to be undertaken.

Recommendation 28

Council should develop a program for the regular review of its human resources policies.

Recommendation 29

Council should review its recruitment policy with a view to incorporating EEO requirements, as a priority.

5.5.7   Job descriptions and salary system

Council has engaged Employment Solutions to undertake a review of its job descriptions and salary systems. The review team viewed the job descriptions folder

which is located on Council's computer system. Employment Solutions has drafted job descriptions for the new positions identified in Council's newly adopted organisation structure. The format for these job descriptions should be applied to the job descriptions for all positions.

Employment Solutions is also reviewing the salary system as part of this process. This work should continue with a view to completion as soon as possible.

5.5.8 Performance appraisal/review

The review team was advised that Council is intending to engage Employment Solutions to document a performance appraisal system across the organisation. This is the next step following the review of all job descriptions in conjunction with the review of the salary system. This work is identified in Council's 2009/10 management plan.

Recommendation 30

Council should ensure that it completes the review of job descriptions and the salary system.

Recommendation 31

Council should implement a performance appraisal system across the organisation.

5.5.9 Employee grievance system

Council has an employee grievance policy and procedures in place. However, there is no review of the use of this system. Given the discussion in this report on the culture of the organisation and that staff should be encouraged to use the systems that are in place to air any grievances, the monitoring of these grievances is imperative.

Council should actively inform staff of the systems in place to raise grievances and encourage their use of these systems.

Council should develop a program for the monitoring and reporting on the grievance system. Additionally, Council should implement a process to encourage feedback from staff who leave the organisation.

Recommendation 32

Council should develop a program for the monitoring and reporting on the grievance system.

Recommendation 33

Council should actively inform staff of the systems in place to raise grievances and encourage their use of these systems.

Council response

Council agrees that considerable work needs to be undertaken in the human resources area. It has already started to address the major issues and has recently employed a Human Resources Officer with the capability and capacity to undertake the outstanding tasks and complete them within a reasonable time frame. Training has already been and is being provided on a continuous basis to ensure that progress happens. An additional part time position has been identified in Council's revised organisational structure (June 2009) as an additional resource.

Performance appraisals will be carried out for all employees who are due for review, by 30th June 2010.

6. RECOMMENDATION RISK RATING ANALYSIS

The recommendations made in this report have been assessed for a priority ranking based on the following risk analysis.

		CONSEQUENCE		
		Significant *Significant risk to the operations of council and if not addressed could cause public outrage, non-compliance with council's statutory responsibilities, severe disruption to council's operations and council's ability to meet its goals.*	**Moderate** *Moderate risk to the operations of council and if not addressed could cause adverse publicity, some disruption to council's operations and council's ability to meet its goals.*	**Minor** *Minimal risk to the operations of council, little disruption to council's operations and will not limit council's ability to meet its goals.*
LIKELIHOOD	**Almost certain**	High	High	Medium
	Possible	Medium	Medium	Low
	Rare	Medium	Low	Low

Priorities for recommendations: *(based on application of risk analysis)*	**Risk categories could include:**
• **High** • **Medium** • **Low**	• Reputation • Compliance with statutory requirements • Fraud/corruption • Financial • Legal liability • OH&S

7. ACTION PLAN

The Action Plan is to be completed and adopted by Council to guide Council and the Division of Local Government in the implementation and monitoring of the recommendations in this report. The review team have allocated notional priority rankings using the recommendation risk rating analysis on the previous page.

RECOMMENDATION	PRIORITY RATING	TIME FRAME	RESPONSIBLE DIVISION	COUNCIL RESPONSE AS AT ……..	CURRENT STATUS
1. Council should ensure that it allocates the necessary resources for the development of its asset management plan, long term financial plan and workforce strategy as part of the community strategic planning process.	High	Council has identified/allocated resources	Assistant GM Engineering Finance Human Resources	29 Oct 2009	Council has identified resources that it needs to complete Asset management Plan will provide works programmes Asset and Contracts Manager position filled Water and Sewer Strategic Plans underway Community Strategic Plan to be received by Council by Feb 2010 Human Resources allocated – Manager has attended workforce planning training
2. The General Manager should develop an implementation plan for the recommendations from the Employment Solutions organisational review report.	High	February 2010	GM	29 Oct 2009	Some recommendations currently being implemented

	RECOMMENDATION	PRIORITY RATING	TIME FRAME	RESPONSIBLE DIVISION	COUNCIL RESPONSE AS AT ……..	CURRENT STATUS
3.	The General Manager should regularly inform the governing body of Council about the progress in addressing the issues raised in the organisational review report.	High	Nov 2009		29 Oct 2009	Report to go to Council in November 09
4.	Council should ensure that contracts entered into with Council require a commitment to the statement of business ethics.	Medium	Dec 2009	GM AGM Assets & Contracts Manager	29 Oct 2009	Assets & Contracts Manager to prepare statement and advise all managers
5.	Council should develop a program for the regular review of its policies.	Medium	Feb 2010	GM Personal assistant	29 Oct 2009	Resource identified
6.	Council should undertake work on determining the values of the organisation.	High	December 2009	GM	29 Oct 2009	Indoor staff consulted. Councillors and outdoor staff workshops required

	RECOMMENDATION	PRIORITY RATING	TIME FRAME	RESPONSIBLE DIVISION	COUNCIL RESPONSE AS AT ……..	CURRENT STATUS
7.	Council should complete, as a priority, its overarching risk management plan to bring together its current risk management practices and manage all significant risk issues facing Council.	High	June 2010	GM AGM Risk Officer	29 Oct 2009	Risk Management Plan still to be developed having regard to RTA risk strategies already developed
8.	Council should develop an internal audit function and an internal audit program.	High	Dec 2010	GM and Managers	29 Oct 2009	GM appointed OROC (Orana Regional Organisation of Councils) Internal Audit program team leader (Oct 2009) to investigate adequate and cost effective internal options available for OROC members and report to the OROC Board & council in Feb/March 2010
9.	Council should develop an organisation-wide disaster recovery/business continuity plan that is inclusive of all business continuity risks that the organisation may face.	High	Dec 2010	GM & All Managers	29 Oct 2009	No progress to date

RECOMMENDATION	PRIORITY RATING	TIME FRAME	RESPONSIBLE DIVISION	COUNCIL RESPONSE AS AT ……..	CURRENT STATUS
10. Council should review its current Privacy Management Plan.	Medium	Jun 2011	Admin/GM	29 Oct 2009	Training to be arranged Consult Privacy Commissioner on plan
11. Council should provide training to councillors and staff in the requirements of the privacy legislation.	Medium	Dec 2011	GM/Admin Supervisor	29 Oct 2009	Refer above
12. Council should review its records management policy as a priority.	High	Jun 2010	GM/Admin Supervisor	29 Oct 2009	No progress to date
13. Council should develop procedures to support the records management policy as a priority.	High	Dec 2010	GM/Admin supervisor	29 Oct 2009	No progress to date
14. Council should conduct staff training on records management as part of the implementation of the TR@cer program.	High	Dec 2009	GM/Admin	29 Oct 2009	Install & associated training organised for early Dec 2009
15. Council should review the format of its meeting agenda and papers. THIS RECOMMENDATION IS COMPLETED	High	Completed	GM/Admin Supervisor	Sep 2009	Business paper streamlined Minutes format changed No general business Councillors receive weekly information updates where required

RECOMMENDATION	PRIORITY RATING	TIME FRAME	RESPONSIBLE DIVISION	COUNCIL RESPONSE AS AT ……..	CURRENT STATUS
16. Councillors note the comments in this report in relation to Council resolutions and the declaration of conflicts of interests to ensure they comply with, and meet their obligations, under the Local Government Act. THIS RECOMMENDATION IS COMPLETED	High	Completed	GM	Sep 2009	Information session – five councillors attended. Material covered as part of Councillor review and comment of Better Practice Review Report. Nature of pecuniary/non-pecuniary interests identified in council meeting minutes
17. Council should review the format of the Council meeting financial reports.	High	June 2010	Finance Manager	29 Oct 2009	Instruction provided. Finance manager considering formats
18. Council should develop a structured councillor training and development program.	High	Feb 2010	GM	29 Oct 2009	Some training organised but needs/skills assessment still to be undertaken
19. Council should establish a link on its website to the returns of candidates' campaign donations on the Election Funding Authority website. THIS RECOMMENDATION IS COMPLETED	Medium	Completed	Admin supervisor	Sep 2009	completed

RECOMMENDATION	PRIORITY RATING	TIME FRAME	RESPONSIBLE DIVISION	COUNCIL RESPONSE AS AT ……..	CURRENT STATUS
20. Council should consider the information and communication technology requirements needed to deliver its programs when developing the community strategic plan.	High	Jun 2012	GM, AGM, Managers, Admin supervisor	29 Oct 2009	No progress to date
21. Council should develop a companion animals management plan.	Medium	Sep 2010	MEHB	29 Oct 2009	No progress to date
22. Council should develop a compliance inspection program to manage all its compliance monitoring obligations.	High	Sep 2010	MEHB	29 Oct 2009	Compliance officer required – some assistance available through organisational structure
23. Council should develop a waste management strategy.	High	June 2011	MEHB	29 Oct 2009	No progress to date
24. Council should develop and make provisions for funding a total asset management strategy, including an asset maintenance program, for all of the assets under its care and control.	High	June 2012	GM AGM Finance manager Assets & Contracts manager Economic Development/grants Officer	29 Oct 2009	No progress to date

RECOMMENDATION	PRIORITY RATING	TIME FRAME	RESPONSIBLE DIVISION	COUNCIL RESPONSE AS AT ……..	CURRENT STATUS
25. Council should make provision for unplanned maintenance in its annual budgets.	High	Nov 2009, May 2010	Finance manager/AGM	29 Oct 2009	Contingency fund to be included in budget Budget review, Nov 2009
26. Council should identify its customer service standards for the services it provides.	High	June 2012	GM/Admin	29 Oct 2009	No progress to date
27. Council should inform the community of the standards of services it can expect.	High	Ongoing – completed by Jun 2012	GM/Admin/Newspaper Editor	29 Oct 2009	Advertising campaigns required while standards being developed
28. Council should develop a program for the regular review of its human resources policies.	Medium	Dec 2010	HR/ GM	29 Oct 2009	No progress to date
29. Council should review its recruitment policy with a view to incorporating EEO requirements, as a priority.	High	Feb 2010	HR/GM	29 Oct 2009	
30. Council should ensure that it completes the review of job descriptions and the salary system.	High	June 2011	HR/GM	29 Oct 2009	Job descriptions finalised (subject to consultative committee) for new structure positions. All other positions to be reformatted. Salary system to be reviewed by LGSA

RECOMMENDATION	PRIORITY RATING	TIME FRAME	RESPONSIBLE DIVISION	COUNCIL RESPONSE AS AT ……..	CURRENT STATUS
31. Council should implement a performance appraisal system across the organisation.	High	June 2010	HR/GM	29 Oct 2009	Nil to date
32. Council should develop a program for the monitoring and reporting on the grievance system.	High	June 2010	HR/GM	29 Oct 2009	Nil to date
33. Council should actively inform staff of the systems in place to raise grievances and encourage their use of these systems.	High	June 2010	HR/GM	29 Oct 2009	Staff aware of grievance processes. GM and HR facilitate