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# Promoting Better Practice Program

## REVIEW REPORT

### UPPER LACHLAN SHIRE COUNCIL

AUGUST 2012



**Division of Local Government**  
Department of Premier and Cabinet

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## EXECUTIVE SUMMARY

The review of Upper Lachlan Shire Council involved focussing on areas of better practice, areas requiring improvement and otherwise noteworthy practice. In this regard, the report does not focus on every aspect of Council's practices.

Council was a Group 2 Council for the implementation of the Integrated Planning and Reporting Framework and was able to meet the timeframe set for implementation of the framework. In developing the required plans and strategies, Council has included some good practice elements and ensured that community aspirations are reflected in the documents. This will assist Council in ensuring that it is well placed to meet the needs of the community into the future.

Council's systems and processes as they relate to meeting its legislative obligations are satisfactory. However, there are some important areas of Council governance that Council should review and improve, particularly in the areas of complaints handling, meetings and internal controls.

Council has a sound approach to the processing of development applications. In its Local Development Performance Monitoring: 2010-11 report, the Department of Planning and Infrastructure noted Council as being one of the top ten improvers of rural and regional councils, achieving the greatest reduction in its mean gross development application determination time.

Overall, Council's financial position is strong, including good liquidity and consistent and effective debt collection. Council has low borrowings and is replacing its assets as they are being consumed. The only area of concern is asset maintenance spending which will have to eventually be addressed.

In summary, the review identified no practices beyond or above minimum compliance requirements, some noteworthy practices and several issues that Council will need to address and improve on. The report provides details of these and recommends how they should be addressed.



## **PART I. BACKGROUND**

### **1 ABOUT THE REVIEW**

#### **Review objectives**

Promoting Better Practice Reviews have a number of objectives. The objectives include generating momentum for a culture of continuous improvement and the promotion of good governance and ethical conduct. The reviews are designed to act as a "health check", giving confidence about what is being done well and helping to focus attention on key priorities.

#### **Review process**

The process involves a review team from the Department of Premier and Cabinet's Division of Local Government (the Division) evaluating the effectiveness and efficiency of the council's operations and giving feedback.

There are essentially five steps in a typical review - preparing, assessing, checking, analysing and reporting. The completion of a comprehensive self assessment checklist by the council is a key element in all PBP reviews.

The review team takes a risk based approach targeting its resources to areas identified as core matters to be examined as part of a PBP review and those matters considered to be important having regard to the circumstances of an individual council. It does not examine every aspect of a council's operations.

All reviews involve checking compliance with a range of statutory requirements, examining appropriate practices and ensuring that council has frameworks in place to monitor its performance. All reviews seek to identify better and noteworthy practices and areas requiring improvement or further development.

The review team examines local circumstances in order to understand the pressures on council and how the council has sought to manage that environment.

The scope of the review report is limited to documenting those areas the review team identified as:

- exceeding good practice (referred to as better practice)
- in need of improvement or further development



- otherwise noteworthy for the reasons detailed in the body of the report.

SIGNIFICANT OBSERVATIONS	DESCRIPTION
<b>Better practice</b>	<ul style="list-style-type: none"> <li>• Beyond or above minimum compliance requirements and good practice indicators.</li> <li>• Innovative and/or very effective.</li> <li>• Contributes to continuous improvement within the sector.</li> </ul>
<b>In need of improvement or further development</b>	<ul style="list-style-type: none"> <li>• Does not satisfactorily meet minimum compliance and good practice indicators and may impact negatively on council operations.</li> <li>• Significant improvement initiatives that are in progress and which need to be continued.</li> </ul>
<b>Otherwise noteworthy</b>	<ul style="list-style-type: none"> <li>• May include successful initiatives which respond effectively to local circumstances or practice that is in other ways significant for the council/community.</li> <li>• Practice which in general exceeds good practice but may have some aspects that require fine tuning.</li> </ul>

### Upper Lachlan Shire Council Review

Upper Lachlan Shire Council was asked to complete a comprehensive checklist/questionnaire about key Council practices. The review team comprised of Senior Investigator, Katrina Annis-Brown and an intern from the University of Wollongong, Dean Austin who examined the checklist and a range of other source documents prior to visiting Council, in order to gain a preliminary understanding of the circumstances of Council and how the Council is responding.

The on-site component of the review took place in October and November 2011. It involved initial interviews with the Mayor and the General Manager, interviews with a cross section of staff, a review of Council policies and other documents.

### Implementation and monitoring of recommendations of final report

The Division has developed an action plan to assist Council with the implementation and monitoring of the recommendations from the review report. The Division does



not propose to monitor the implementation of the recommendations of this report. This responsibility will rest with the elected body and senior management of Council.

In monitoring the implementation of the outcomes of the review, Council should ensure that the PBP review remains a standing item on the Executive agenda to review Council's response to the recommendations. Council should also be provided with quarterly reports advising on the progress of implementing the PBP actions.



## 2 ABOUT THE COUNCIL AND THE AREA

### Location and demographics

The Upper Lachlan Shire local government area is located approximately 240 kilometres south west of Sydney and 115 kilometres north of Canberra. It comprises three main centres, Crookwell, Gunning and Taralga and nine smaller centres, Bigga, Binda, Breadalbane, Collector, Dalton, Grabben Gullen, Jerrawa, Laggan and Tuena. The total area of the Shire is just over 7,200 square kilometres with a population of about 7,500.

### Local issues

Following an inquiry, Upper Lachlan Shire Council was proclaimed and commenced operations in February 2004. The new Council comprised part of the former Gunning Shire, part of the former Mulwaree Shire and all of the former Crookwell Shire. The first election of the Council was held in May 2004. Following a further inquiry, the Kangiara locality was subsequently transferred from Upper Lachlan Council to Yass Valley Council.

### Current Council

Council consists of 9 councillors including the Mayor. The Mayor is elected by the councillors. The current Council has one female councillor. Council meets on the third Thursday of every month.

### Council staffing

Upper Lachlan Shire Council employs 132 equivalent full-time staff. Council has 1 senior staff position as defined by the *Local Government Act 1993* (the Act), being the position of General Manager who was appointed to the role in November 2004. The organisation is divided into 3 business units: Finance and Administration, Environment and Planning Services and Works and Operations. The General Manager and the Directors of each business unit form the senior Executive team. Council's organisation structure was last reviewed in August 2010, which saw a number of changes made.



### 3 SUMMARY OF KEY FINDINGS

Better practices/Other noteworthy practices	Areas for improvement
<b>STRATEGIC POSITION</b>	
<p><i>Council's Integrated Planning and Reporting documents meet legislative requirements and include some good practice elements</i></p>	
<b>GOVERNANCE</b>	
	<p><i>Provide further training to assist in completion of disclosure of interests return</i></p>
	<p><i>Review and update Complaints Handling Policy</i></p>
	<p><i>Provide training in managing code of conduct complaints</i></p>
	<p><i>Review and update Interaction Between Councillors and Staff Policy</i></p>
	<p><i>Review and update Expenses and Facilities Policy</i></p>
	<p><i>Review and update Disclosure of Interests at Meetings Policy</i></p>
	<p><i>Provide training to councillors about making disclosures</i></p>
	<p><i>Develop protocols for effective capture and retention of electronic records</i></p>
	<p><i>Review and update Records Management Policy</i></p>
	<p><i>Conduct a fraud risk assessment</i></p>



Better practices/Other noteworthy practices		Areas for improvement	
			<i>Develop a compliance register for legislative and regulatory obligations</i>
			<i>Review membership of Audit and Investment Committee</i>
PLANNING AND REGULATORY			
	<i>Excellent use of delegated authority</i>		<i>Develop program for identification of high-risk activities</i>
	<i>Reduction in 'DLG Group Averages' mean gross DA determination time</i>		<i>Develop compliance and awareness program for swimming pools</i>
ASSET AND FINANCIAL MANAGEMENT			
	<i>Long Term Financial Plan meets legislative requirements, is informative and easy to read</i>		<i>Develop asset management plans for each class of assets</i>
			<i>Include financial projections for asset maintenance and replacements for ten year period</i>
			<i>Revisit long term financial plan to incorporate changes in asset renewal</i>
			<i>Develop register of leases/licences</i>
COMMUNITY, COMMUNICATION AND CONSULTATION			
			<i>Develop and implement plan/strategy to deal with ageing population</i>
			<i>Incorporate ageing plan/strategy into Community Strategic Plan</i>



Better practices/Other noteworthy practices	Areas for improvement
<b>WORKFORCE RELATIONS</b>	
	<i>Review Workforce Plan to be able to respond to strategic priorities and challenges in attracting/sustaining workforce</i>



## **PART II. PLANNING A SUSTAINABLE FUTURE**

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. The review assessed the clarity of Council's strategic direction, whether its plans reflect a shared and realistic vision and its overall approach to corporate planning. Monitoring and reporting progress to promote continuous improvement was also an integral consideration in regard to Council's performance in this area.

### **4 STRATEGIC PLANNING AND REPORTING**

A new planning and reporting framework for NSW local government has been 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. The community strategic plan is supported by a resourcing strategy that includes long term financial planning, asset management planning and workforce management planning. The framework is set out in the following diagram.





## ***Noteworthy practices***

### *Council's strategic approach*

Council nominated itself to Group 2, which means that the provisions of the *Local Government (General) Amendment (Planning and Reporting) Regulation 2010* applied from 1 July 2011. From that time, Council has been required to comply with the requirements of the *Planning and Reporting Guidelines for Local Government in NSW*. A supporting manual has been made available to assist councils in implementing the new requirements.

Development and successful implementation of the components of the framework require effective leadership and commitment from the Mayor, General Manager and all councillors. The specific roles of each of these officials are highlighted in the *Integrated Planning and Reporting Manual*.

Upper Lachlan Shire Council has prepared the plans required to comply with the integrated planning and reporting framework. The Community Strategic Plan (*Community Strategic Plan Vision 2021*), Delivery Program and Operational Plan meet legislative requirements and include some good practice elements. For example, Council has utilised colour coding to demonstrate the links between the Community Strategic Plan, Delivery Program and Operational Plan. In addition, Council has ensured that community aspirations are reflected across the three documents.

However, during discussions with staff, it appeared to the review team that a number of staff lacked an understanding of Council's strategic direction and have not been sufficiently engaged in preparation of the plans. In order to ensure successful implementation of the integrated planning and reporting framework, Council should ensure that staff understand and are able to participate in Council's strategic direction in a meaningful way.

### *Community strategic plan*

The Upper Lachlan Shire Council *Community Strategic Plan Vision 2021* is easily understood and uses images and graphs to enhance understanding of the document. It describes the consultation undertaken by Council prior to and during the development of the plan. It also identifies key stakeholder groups and the various



consultation methods used. The community's aspirations have been described in the plan according to the quadruple bottom line and the additional theme of 'Infrastructure, Access and Transport'.

However, it is noted that while there is a page dedicated to the NSW State Plan and another to the Sydney-Canberra Corridor Regional Strategy, links to the strategic objectives of the plan are not clear.

#### Delivery program

Council's Delivery Program makes good use of colour coding to reference the expanded quadruple bottom line and there are clear links between this document and the Community Strategic Plan. Performance measures, timeframes and responsibilities are identified for each Delivery Program action. The plan also includes estimated capital income and expenditure budgets and an analysis of how Council's strategic objectives support the State Plan priorities.

The Delivery Program would be enhanced by the inclusion of information about the service levels expected by the community.

#### **Areas for improvement**

##### Community engagement strategy

The Community Engagement Strategy contained within the Community Strategic Plan appears as a statement of policy, rather than a strategy as to how Council will engage with its community, stakeholders and groups which may be difficult to reach. Further, it does not appear that social justice principles underpin the strategy. There is further discussion about community engagement and participation in the 'Community and Consultation' section of this report.

##### **Reviewers' comment**

*Council advised that its revised Community Engagement Strategy was adopted at Council's meeting on 19 April 2012. As a result, the recommendation relating to the methods of engagement to be utilised in the Strategy, has been removed.*



## **PART III. DELIVERING AND ACHIEVING**

This part of the review focussed on examining key structures, systems and processes involved in delivering the stated outcomes of Upper Lachlan Shire Council's Community Strategic Plan. This included considering the means by which Council:

- governs its day to day operations;
- undertakes its planning and regulatory obligations;
- manages its assets and finances;
- involves the community; and
- recruits and retains its workforce.

### **5 GOVERNANCE**

#### **5.1 OVERVIEW**

“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**

- *Ethics and values*
- *Management planning*
- *Procurement, disposal & tendering*
- *Privacy management*
- *Code of conduct*
- *Communication devices*
- *Council's decision-making processes, including delegations and conduct of meetings*
- *Support for councillors*
- *Records management*
- *Access to information*
- *Complaints handling*



- *Disclosure of pecuniary interests*
- *Information technology*
- *Risk management, legislative compliance and internal control*

### **5.1.2 Overview of Upper Lachlan Shire Council's governance practices**

Upper Lachlan Shire Council has satisfactory governance systems and processes in place. However, there are some important areas where Council should improve its practices.

### **5.1.3 Significant Observations**

#### ***Areas for improvement***

##### *Pecuniary interest returns*

Under section 449 of the Act councillors and designated persons are required to complete and lodge disclosure of interest returns. It is important that councillors and staff observe these requirements. Otherwise, this has the potential to seriously undermine the community's confidence in the integrity of local government and the decision-making processes.

The review team conducted a review of disclosure of interest returns for councillors and a number of returns of Council's senior managers. The returns require greater attention in the following areas:

- The nature of interest in real property in some returns was not disclosed or described as "home" or "investment", rather than owner, lessee or beneficiary. The nature may also be in whole or part of the property and this must be specified.
- Including the full name and address of employers or corporations.
- Where there are no interests to be disclosed, the word 'Nil' is to be placed in the space under the appropriate heading, rather than placing a line through the section, leaving it blank or placing 'N/A' or 'not applicable' in the space.
- Disclosing debts at section G which are not required to be disclosed, for example, mortgages to banks.



The Division has issued various circulars to assist council officials to comply with their obligations relating to disclosure of interests and to ensure the accurate information is recorded.

### **Recommendation 1**

*Further training should be provided to assist in the completion of disclosure of interests returns and ensure that accurate information is recorded.*

### **Council response**

*Council advised that it will commence training on 1 October 2012.*

### Complaints handling

An effective complaints handling system is an essential part of the provision of quality council services. It is one method of measuring customer satisfaction to provide a useful source of information and feedback for improving council's services.

Council's current Complaint Handling Policy & Procedure was adopted on 17 March 2011. A review of the policy has revealed a number of areas requiring improvement as follows:

- Appendix 2 is a flow chart which refers to 'Complaints received against Councillor'. It provides that following the General Manager's receipt and assessment of the complaint, an initial investigation is undertaken. A determination is then made as to whether further investigation is required. If so, this may involve researching files, informing the councillor and conducting interviews. If the investigation indicates a breach of the code of conduct, then the General Manager will refer the matter to the conduct review committee (the committee) or sole reviewer. The flow chart provides further that the committee will report its findings to an "independent person" and that this person provides advice to the committee. This is inconsistent with the Model Code, in that the Mayor or the General Manager is responsible for assessing complaints and determining whether to refer a complaint to the committee or sole reviewer. The committee or sole reviewer is responsible for conducting enquiries and making findings on whether the conduct referred to comprises a



breach of the code of conduct. Further, any findings made by the committee/sole reviewer together with any recommendations should be reported to Council. Where the matter is not the subject of a referral to the committee or sole reviewer, then the General Manager or the Mayor is to advise the complainant of the outcome of the assessment in writing.

- At its meeting on 20 May 2010, during closed session, Council considered a report by the Mayor regarding a staff matter, involving complaints about the General Manager and the Director of Environment and Planning. Similarly, at its meeting on 21 April 2011, during closed session, Council considered a report by the Mayor regarding a staff matter, involving alleged breaches of the code of conduct by the General Manager. In both instances, it appears that the Mayor made enquiries and determined the complaints. This is inconsistent with the Model Code as follows:
  - The Mayor is responsible for assessing complaints alleging breaches of the code of conduct by the General Manager, in order to determine whether to take no further action and give the complainant reasons in writing, resolve the complaint by use of alternative and appropriate strategies, discontinue the assessment, or refer the matter to the conduct review committee (the committee) or sole reviewer.
  - The General Manager is responsible for making enquiries, or causing enquiries to be made, into complaints alleging breaches of the code of conduct regarding members of staff of Council.
  - The committee or sole reviewer is responsible for conducting enquiries or causing enquiries to be conducted and make findings on whether the conduct comprises a breach of the code of conduct. Any findings made together with any recommendations should be reported to Council.
- Further, the minutes from Council's meeting on 20 May 2010 record that Council resolved that *".....Council receive the report and note the information and that Council declare the complainant as a vexatious person and that Council Staff are directed not to deal with the complainant in the future."* This is inconsistent with Council's policy which appears to incorporate the Practice



Manual developed by the NSW Ombudsman titled *Managing Unreasonable Complainant Conduct – 1<sup>st</sup> edition (June 2009)*. This manual advocates the need to focus on the conduct of the complainant, rather than on the complainant as a 'difficult' or 'vexatious' person. In addition, it is the role of the General Manager, after considering any representations, to advise the customer of any limitations that will be placed on the customer's access to Council's services. There is no role in this process for Council's elected body.

- Reference to the *Protected Disclosures Act 1994* should be changed to reflect the new regime under the *Public Interest Disclosures Act 1994*.

### **Recommendation 2**

*Council should review and amend its Complaints Handling Policy in line with the comments made in this report.*

### **Council response**

*The Complaints Handling Policy is to be reviewed and adopted at Council's meeting on 20 September 2012.*

### **Recommendation 3**

*Council should provide training in the management of code of conduct complaints.*

### **Council response**

*Council will arrange a specific course on code of conduct complaint handling when the new code of conduct is adopted.*

### **Councillor/staff interaction**

Based on discussions with a cross section of staff and the Mayor, it was apparent to the review team that relationships between councillors and Council staff are well managed. Councillors appear to understand their role when it comes to raising concerns or issues on behalf of constituents and do not delve into operational matters.



Council adopted an 'Interaction between Councillors and Staff' policy in August 2005. The policy was last reviewed in February 2011. However, the policy contains sections relating to complaint procedures and non-compliance with the policy which are inconsistent with the Model Code and Council's code of conduct. This includes the following provisions:

- That on receipt of a complaint, the General Manager and/or the Mayor *"must, if of the opinion that the complaint has substance and seriousness, investigate the complaint and report findings to Council without recommendation for the Council's decision."*
- That complaints by councillors about a councillor should be addressed in writing to the Mayor or the General Manager.
- That complaints by staff about a councillor be investigated by the General Manager with the findings reported to the Mayor.

#### **Recommendation 4**

*Council should review and update its Interaction between Councillors and staff policy to ensure that it is consistent with the complaint handling procedures outlined in the Model Code.*

#### **Council response**

*The policy will be put before Council's meeting on 20 September 2012 for public exhibition, and then adoption at Council's meeting on 15 November 2012.*

#### Councillor expenses and facilities policy

A policy on the payment of expenses and facilities to the Mayor and councillors is a requirement under section 252 of the Act. Councillors are required to submit their expenses and facilities policies to the Division by 30 November each year. Policies are required to comply with the provisions of the Act, the *Local Government (General) Regulation 2005* (the Regulation) and relevant guidelines issued under section 23A of the Act.



The Division issued updated guidelines for the preparation of policies under section 252 in October 2009. Council's policy indicates that it was approved in August 2011. Aspects of the policy considered to be good practice are:

- The legal assistance provisions of the policy are well written and clearly outline the circumstances in which claims for reimbursement can be made, including limits on hourly rates,
- There are clear reporting requirements relating to seminars and conferences,
- The dispute resolution process is independent, open and transparent.

However, the policy is inconsistent with the Guidelines issued by the Division in a number of respects, including:

- Clear limits for all expenses and facilities,
- A suitable rate and/or mechanism for the reconciliation and reimbursement by councillors of private use of Council facilities (other than incidental use),
- A telecommunications allowance which appears to be in the nature of a general expense allowance.

In addition to the above, Council appears not to be complying with the requirement to place its policy on public exhibition each year prior to annual adoption. Council's annual report does not include a breakdown of each expense incurred as required by clause 217 of the Regulation.

### **Recommendation 5**

*Council should review and update its Expenses and Facilities policy to ensure that it is consistent with the Act, the Regulation and the Division's guidelines.*

### **Council response**

*The policy will be put before Council's meeting on 20 September 2012 for public exhibition, and then adoption at Council's meeting on 15 November 2012.*

### Meetings

Consistent and proper meeting practices contribute to good public decision-making and increase councils' transparency and accountability to their communities. The review team inspected a sample of Council's minutes. Some observations about meetings and areas for improvement are as follows:



- Upper Lachlan Shire Council has adopted a code of meeting practice to guide the conduct of its meetings. Under section 360 of the Act, councils can adopt a code of meeting practice that incorporates the provisions in the Regulation and supplements those provisions with ones that are not inconsistent with them. Council's minutes reveal that Council appears to make provision for 'Business Without Notice'. However, this is not reflected in Council's code of meeting practice and it is unclear whether Council does transact business without notice at its meetings. The general provision is that a council must not transact business at a meeting unless a councillor has first given notice of the business in writing within the period fixed by the council's code of meeting practice or by council's resolution (clause 241 of the Regulation). The Regulation provides limited exceptions to the general provision. Council should ensure that business without notice is not transacted at its meetings and that the reference to this item is removed from future Council minutes.
- While there is no requirement to do so, a better practice approach to managing and recording conflicts of interests disclosures, is for a record of disclosures to be made at the beginning of Council's meeting and recorded in the minutes. This should include the type of interest (pecuniary or non-pecuniary; and if non-pecuniary, whether or not the interest is significant or less than significant), the nature of the interest and the action proposed to be taken by the councillor to manage the conflict.

A review of the minutes from Council's meetings reveals that disclosures of non-pecuniary conflicts of interests fail to comply with the requirements of the Model Code, as there is no record of whether the interest is significant or less than significant. Further, where the interest is less than significant and the councillor determines that no further action is required, an explanation must be provided of why the conflict does not require further action in the circumstances (section 7.18 Model Code).

In addition, Council has adopted a 'Disclosure of Interests At Meetings' policy. The current version of the policy, adopted in May 2011, states that: "*If you have disclosed a non-pecuniary conflict of interest you have a broad range of options for managing the conflict.*" This is inconsistent with the Model Code and Council's adopted Code which stipulates different ways to manage non-



pecuniary conflicts of interests depending on whether or not they are significant (section 7.15 Model Code).

- As a general rule, meetings of the Council and its committees are required to be open to the public. Where Council determines that a matter should be dealt with in confidential session, section 10 of the Act outlines the requirements for this determination. Where Council determines that a matter should be dealt with in closed session, sections 10A to 10D of the Act outline the requirements for this determination. The Regulation requires that Council make available to the public the resolutions made in its closed meetings as soon as practical after the closed part of the meetings has ended, but without revealing confidential information. A review of the minutes reveals that in relation to some matters, Council is providing insufficient detail, for example by resolving that “*Council receive the report and note the information.*” This is not sufficient information for the public to know the decision that was made by Council.

#### **Recommendation 6**

*Council should review and update its Disclosure of Interests at Meetings policy.*

#### **Council response**

*The policy will be put before Council's meeting on 20 September 2012 for public exhibition, and then adoption at Council's meeting on 15 November 2012.*

#### **Recommendation 7**

*Councillors should be provided with training to ensure they fully understand their obligations when making disclosures.*

#### **Council response**

*Disclosure training to commence on 1 October 2012.*

#### **Records management**

Council is required to make and keep full and accurate records of its activities in accordance with section 12 of the *State Records Act 1998*. Council must establish



and maintain a records management program that conforms to best practice standards and codes.

Council's records area is housed in the Gunning office with all mail being processed through that office. The records area is primarily staffed by a Records Coordinator, who operates and manages Council's records system. At the time of the review, Council's electronic document management system, TRIM, had been in place for approximately one year.

The introduction of a new records system has naturally required a cultural change in records handling and management. In order to ensure that all electronic records are effectively captured and retained, Council will need to ensure that effective protocols are developed and that staff receive adequate training in the use of the system. At the time of the review, Council advised that staff had been provided with 2 rounds of TRIM training, with refresher training planned for November 2011.

Council has in place a Records Management Policy which was adopted in December 2007. It appears that the policy has not been reviewed or updated since that time, for example, the outdated reference to access to documents under section 12 of the Act (since replaced by the *Government Information (Public Access) Act 2009*).

### ***Reviewers' comment***

*Council advised that TRIM refresher training was completed in November 2011 and provided copies of the TRIM EDM User and Administrator Manuals. As a result, the recommendation relating to protocols for capture and retention of electronic records has been removed.*

*Council also advised that its revised Records Management Policy was adopted by Council at its meeting on 17 November 2011. As a result, the recommendation relating to updating the policy has been removed.*

### ***Internal controls (risk management, fraud control, internal audit)***

Internal control processes such as internal audit, fraud control, risk management and legislative compliance provide for systemic assessment of the adequacy and weaknesses of Council processes and systems.



Council has a Fraud and Corruption Prevention Policy which was last reviewed in July 2011, but does not have a risk management plan. Further, Council has not undertaken a systematic fraud risk assessment. It is important that fraud risks are identified and managed effectively and that processes are put in place to ensure that staff are kept up to date on emerging risk areas.

At the time of the review Council advised that it had developed a draft risk management policy and had recently recruited a position with responsibility for risk management and public liability.

Council does not have a system or process in place to ensure its legislative and regulatory obligations are met. Nor has it established a system for internal reporting of legislative non-compliance.

Council has contracted an external provider, Internal Audit Bureau (IAB) Services, to undertake its internal audit function. IAB Services conducted a high level risk assessment in April 2010, which involved identifying key organisational risks and developing a 3 year audit program.

The Division's *Internal Audit Guidelines* issued in September 2010 under section 23A of the Act state that the structure and membership of an audit committee in the NSW local government environment will depend on the size of the council. Membership should have a majority of independent members and one or two councillors (excluding the Mayor), with between three and five members. Good practice in governance is that council staff should not be members of the committee. Further, the internal auditor and Chief Financial Officer should be invited to attend all meetings. The external auditor should also be invited to attend as an independent advisor.

While Council has established an Audit and Investment Committee, the committee is made up of three councillors (including the Mayor), three independent members and three staff members. This is inconsistent with the Division's *Internal Audit Guidelines*.



### **Reviewers' comment**

*Council advised that its Risk Management policy was adopted at Council's meeting on 20 October 2011. As a result, the recommendation that Council finalise and adopt a Risk Management policy has been removed.*

### **Recommendation 8**

*That Council conduct a fraud risk assessment.*

### **Council response**

*The fraud risk assessment is to be scheduled after adoption of the new code of conduct. IAB has been requested to undertake a fraud risk assessment as part of Council's internal audit procedures.*

### **Recommendation 9**

*That Council develop a compliance register to ensure all legislative and regulatory obligations are met and that relevant staff are kept informed of legislative and regulatory amendments.*

### **Council response**

*Development of compliance framework and register has commenced. Actions will be completed in line with the IAB action plan and presented for adoption at Council's meeting on 20 December 2012.*

### **Recommendation 10**

*Council should review the membership of its Audit and Investment Committee having regard to the Division's Guidelines, which it must take into account when exercising its internal audit function.*

### **Council response**

*Scheduled for review as part of section 355 and other Committee structures, when reported to Council's meeting on 20 September 2012.*



## **6 PLANNING AND OTHER REGULATORY FUNCTIONS**

### **6.1 OVERVIEW**

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.

#### **6.1.1 Scope of review**

A review was conducted of a range of aspects of Council's planning and regulatory practices, including:

- *Council's planning instruments and policies*
- *Development assessment*
- *Section 94 plans*
- *Companion animals*
- *Environmental management*
- *Compliance and enforcement practices*
- *Swimming pools*

#### **6.1.2 Overview of land use planning, development assessment and regulatory practices**

Overall, Upper Lachlan Shire Council has many effective planning and regulatory systems and processes in place.

Under amendments to the *Environmental Planning and Assessment Act 1979*, the Department of Planning and Infrastructure (formerly the Department of Planning) has sought to standardise planning instruments throughout the State by issuing a prescribed Local Environmental Plan (LEP) template that councils are required to use. Council received funding from the Department of Planning and Infrastructure enabling completion of its comprehensive LEP, involving the bringing together of 3 LEP's and a consolidated Development Control Plan (DCP).



Council evaluated its development application (DA) system for the period 2009/2010 through an internal audit process. The audit process produced a number of findings and recommendations relating to development assessment and determination, records management, and contributions plans. Council should continue with implementation of the findings and recommendations.

Council has a series of standard forms and checklists to assist applicants and staff with the development application process. In addition, Council operates a pre-lodgement service for applicants and has developed a brochure, available on its website, providing advice and information about the service.

However, the exercise of Council's development assessment functions is constrained by a number of factors including staff vacancies, lack of a comprehensive procedure manual, lack of formal record keeping and the maintenance of staff in separate locations. In addition, Council appears to perform many of its environmental compliance functions in an ad hoc manner, mainly due to resource constraints.

### **6.1.3 Significant Observations**

#### ***Noteworthy practices***

##### *Use of delegated authority*

Council reported that 91% of DAs are determined by staff under delegated authority. The Department of Planning and Infrastructure's Local Development Performance Monitoring: 2010-11 report indicates that this figure is 97.4%. This is an excellent use of delegation.

Council's turnaround times for DAs are also excellent. The Department of Planning and Infrastructure's Local Development Performance Monitoring: 2010-11 report states that the 'DLG Group Averages' mean gross time for determining DAs was 68 days and the 'DLG Group Averages' mean gross time for processing section 96 applications was 52 days. This compares favourably to Council's mean gross time for determining DAs of 73 days and for processing section 96 applications of 32 days. Noteworthy is that Upper Lachlan Shire Council was one of the top ten improvers of rural and regional councils, achieving the greatest reduction in its mean gross DA determination time, down from 110 days in 2009-10.



## ***Areas for improvement***

### ***Register of planning decisions***

Section 375A of the Act requires a General Manager to record which councillors vote for and against each planning decision of a council, and to make this information publicly available. In order to meet the requirements of this section of the Act, councils were advised to establish a register that contains:

- A description or identifier of the development or planning matter considered by council
- The decision in relation to the matter or a reference to the minutes of the meeting where the decision is recorded
- Names of the councillors who supported the decision
- Names of the councillors who opposed the decision.

While Council is calling a division in its meetings in relation to planning matters and recording the votes on these matters, it is not keeping a register of these decisions in accordance with the requirements of the Act. The Division's circular 08-45 will provide Council with relevant guidelines in this regard. This register could be kept electronically and made available on Council's website.

### ***Reviewers' comment***

*Council provided copies of its Register of Planning decisions and advised that the register is available on Council's website. As a result, the recommendation relating to establishing a register of planning decisions, has been removed.*

### ***Enforcement and compliance activities***

In the exercise of their functions under the Act and various other Acts, councils are required to ensure compliance, and where necessary, take enforcement action.

Councils must properly deal with allegations about unlawful or non-compliant activities. This includes activities that are prohibited or unauthorised, or contrary to the terms of consent, licence or approval or other instrument of permission issued



pursuant to lawful authority. Failure to properly deal with such allegations could expose council to liability for compensation and the expense of litigation.

Council adopted an Enforcement Policy in June 2009 that is consistent with the model policy recommended by the NSW Ombudsman. Notwithstanding this, Council's enforcement action appears to be largely reactive and complaint driven. The review team was advised that Council lacks sufficient resources to undertake a proactive approach to compliance activities.

While Council's resource constraints are acknowledged, Council is encouraged, at the very least, to ensure that it develops a program to routinely investigate high risk compliance areas.

**Recommendation 11**

*Council should develop a program for the identification and investigation of high risk activities within its area.*

**Council response**

*Council advised that this has been completed and was reported to Council's meeting on 16 December 2010 under resolution 485/10.*

**Reviewers' comment**

*A review of resolution 485/10 relates to the adoption of recommendations submitted to the Audit and Investment Committee meeting held on 7 December 2010. It appears that Council is yet to develop a program to investigate high risk compliance areas, therefore this recommendation has been left in the report.*

Swimming pools

Under the *Swimming Pools Act 1992* councils have a responsibility to take such steps as are appropriate to ensure they are notified of the existence of all swimming pools within their area. This Act also requires councils to promote awareness within their area of the requirements of the Act in relation to swimming pools.

Council does not currently undertake any activities in this area, citing resource constraints. Council is encouraged to promote water safety in its area. This could include conducting pool safety campaigns, dissemination of existing education materials emphasising key issues such as supervision of children near water and



fencing requirements for swimming pools. Council should develop a compliance and awareness program for its area.

***Recommendation 12***

*Council should develop a compliance and awareness program for private swimming pools.*

***Council response***

*Current examples of best practice are being sources and program will be developed prior to 1 November 2012.*



## **7 ASSET AND FINANCIAL MANAGEMENT**

### **7.1 OVERVIEW**

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.

#### **7.1.1 Scope of review**

A review was conducted of a range of aspects of Council's asset and financial management practices, including:

- *Financial management*
- *Asset management, including land assets, plant replacement and capital works*
- *Management of community land*

#### **7.1.2 Overview of asset and financial management practices.**

Overall, Council's financial position is strong, including good liquidity, low borrowings and consistent and effective debt collection.

Council is generally recording operating surpluses before and after capital contributions, with all business ventures (water, sewerage and waste management) recording operating surpluses. The only area of concern is that Council is not maintaining its assets to a satisfactory level and the amount of shortfall each year will eventually need to be addressed. If not, it may result in Council not being in a position to replace its assets, therefore limiting its ability to provide services to the community.

#### **7.1.3 Significant Observations**

##### ***Noteworthy practices***

##### **Long term financial planning**

The Integrated Planning and Reporting framework opens the way for councils and their communities to have important discussions about funding priorities, service



levels and preserving local identity and planning in partnership for a more sustainable future.

This requires that councils review their revenue and expenditure to be in a position to meet these objectives. In some instances a council may need to request a special rate variation, or reduce current or planned services. Council advised that it has not sought any special rate variation in at least the last five years. This, coupled with Council's small rate base, is proving to be a challenge for Council in generating sufficient revenue to meet the needs of the community and enabling Council to achieve financial sustainability into the future.

The focus for Council in respect of its financial sustainability needs to be on its Resourcing Strategy and in particular the Long Term Financial Plan (LTFP).

Council has developed a LTFP which adequately meets the legislative requirements of the Integrated and Planning and Reporting Framework. The LTFP includes commentary on various elements of the plan, which makes it informative and easy to read. Council has budgeted for operating losses, increasing each year, for the ten years of the plan.

### ***Areas for improvement***

#### ***Asset management plans***

To accurately forecast the financial position of Council over a ten year period is a difficult task. It requires accurate information in relation to a number of areas, one of which includes Council's assets and the condition of those assets.

Council has developed an Infrastructure Plan, containing an Asset Management Policy and Strategy, and including information about condition ratings and levels of service. However, the Infrastructure Plan does not include financial projections of asset maintenance and replacements over a ten year period, nor have critical assets or risk management strategies been identified. In addition, Council has yet to develop asset management plans for each class of assets.

### ***Recommendation 13***

*Council should develop asset management plans for each class of asset in order to comply with the Integrated Planning and Reporting requirements.*



**Council response**

*Asset Management Plan to be reviewed, revised, updated and presented at Council's meeting on 30 March 2013.*

**Recommendation 14**

*Council should include financial projections for asset maintenance and replacements for a ten year period.*

**Council response**

*Ten year Capital Works program completed. Maintenance inspection requirements are being assessed and costed and will be completed by 1 December 2013.*

**Recommendation 15**

*Council should revisit its Integrated and Planning Reporting documents to incorporate any changes in asset renewal in its LTFP.*

**Council response**

*To be reviewed 1 October 2012.*

Land assets

The Act stipulates how Council is to record and manage land that it owns or is under its care and control. Section 53 of the Act requires Council to keep a register of all land it owns or is under its control.

Council advised that it is still in the process of finalising its register of land assets, for community and operational land, following the amalgamation. Council also advised that it does not keep a register of leases and licences over its land and estimates that approximately one third of the total leases and licences have yet to be recorded. In particular, there is currently no record of graziers' licences over Council land.

**Reviewers' comment**

*Council advised that it has completed its register of land assets. As a result, the recommendation relating to finalising the register of land assets has been removed.*



**Recommendation 16**

*Council should develop a register of leases and licences over its land.*

**Council response**

*Draft register to be completed by 1 September 2012.*



## **8 COMMUNITY AND CONSULTATION**

### **8.1 OVERVIEW**

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

#### **8.1.1 Scope of review**

A review was conducted of a range of aspects of Council's community and consultation practices, including:

- *The methods council uses to involve and determine the views of its community*
- *Ageing Population*
- *Social and community functions of council*
- *Annual reporting*
- *Customer service standards*

#### **8.1.2 Overview of community and consultation practices**

Upper Lachlan Shire Council's performance in this area appears reasonably sound. Council successfully manages a range of local services to support the needs of its community.

Council keeps the community informed of its activities and services by way of newsletters, weekly newspaper items, television and radio announcements, direct mail outs, Council Advisory Committees and Working Groups.



### **8.1.3 Significant Observations**

#### **Areas for improvement**

##### Community engagement and participation

Community engagement is an important element of Council's operations and planning processes. Effective community engagement can mean greater community support for the planned directions and resultant actions that are taken.

A Community Engagement Strategy was developed and implemented during the Community Strategic Plan development process. However, the Strategy does not link to Council's Community Engagement Policy, adopted in September 2009. Further the Strategy does not provide guidance to staff about the types of engagement appropriate in each circumstance, nor does it outline the various roles and responsibilities of councillors and staff in the engagement process.

The review team noted that Council appears to lack an inclusive and targeted approach to community engagement. This could be achieved by establishing and implementing community advisory groups and reference panels. The benefits of such an approach include:

- that Council is in a better position to provide information to the community and to encourage input from residents and ratepayers into Council's decision making processes,
- that Council has a greater understanding as to the level of services the community requires,
- that the community is clear about the services Council provides.

#### **Reviewers' comment**

*Council advised that its revised Community Engagement Strategy was adopted at Council's meeting on 19 April 2012. As a result, the recommendation relating to expanding the Strategy to ensure an inclusive and targeted approach to community engagement has been removed.*



### Ageing population

The *Local Government and Ageing Report*, launched by Ageing, Disability and Home Care (ADHC) in the Department of Family and Community Services in August 2011, explores the implications of an ageing population for local government and the future provision of infrastructure services in NSW. The report notes that until recently, ageing and aged care has been very much in the Federal and State government domain. However, the issue will increasingly develop as the focus of local government, particularly for those councils attracting large inflows of older people.

Between 2006 and 2016, Council estimates that the aged population for Upper Lachlan will increase by 52% for those aged 65 and over. Council has not developed any plans or strategies to deal with and respond to the needs of older people in its area. Given the predicted increase of older people, Council will need to develop a comprehensive understanding of the impact of population ageing on its costs and revenues. Further, in order for Council to be in a position to facilitate a proactive and timely response to ageing, it will need to work towards improving its data as it relates to the provision of infrastructure and services for older people.

#### **Recommendation 17**

*Council should develop and implement a plan/strategy to deal with its rapidly expanding ageing population.*

#### **Council response**

*The development and implementation of an Ageing plan/strategy will be included in the review of the Social and Community Plan to be conducted in January 2013.*

#### **Recommendation 18**

*Council should ensure that its ageing plan/strategy is incorporated into its Community Strategic Plan, to allow a clearer understanding of the way Council intends to address ageing.*

#### **Council response**

*This will be addressed as part of the review of the Social and Community Plan to be conducted in January 2013.*



## 9 WORKFORCE RELATIONS

### 9.1 OVERVIEW

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.

#### 9.1.1 *Scope of review*

A review was conducted of a range of aspects of Council's workforce relations practices, including:

- *Human resources strategy and workforce planning*
- *Employee attitude surveys*
- *Job descriptions and job evaluation*
- *Recruitment and selection processes*
- *Equal employment opportunity*
- *Occupational health and safety*
- *Secondary employment*

#### 9.1.2 *Overview of the organisation*

Council employs approximately 132 full-time equivalent staff, comprising:

- 31% female,
- 18% aged 55 years or over,
- 1% are of culturally and linguistically diverse origin, and
- no staff identifying as being of Aboriginal and Torres Strait Islander origin.

Council makes use of traineeships and apprenticeships. Council currently employs 5 trainees and apprentices in various areas of Council. This is funded through the Federal Government's Australian Apprenticeships funding program.

Due to its size and location, being one hour travelling distance from Canberra, Queanbeyan and Goulburn, Council has and will continue to experience difficulties in attracting and retaining staff. At the time of the review, a number of positions were vacant, with some being positions having to be readvertised due to a lack of



applicants. In addition, in 2011, Council experienced a staff turnover rate of 13%. The review team noted that senior managers are required to fill the gaps caused by staff shortages by undertaking basic operational tasks themselves. This inevitably prevents them from attending to the strategic needs of the organisation. Notwithstanding this, the Council staff interviewed by the review team demonstrated a strong commitment to the performance of their roles in the face of these challenges.

In addressing the staff shortages, Council may wish to consider undertaking a review of its salary system.

### **9.1.3 Significant Observations**

#### ***Areas for improvement***

##### *Employee attitude surveys*

An employee survey is a useful tool in identifying what is working well at Council, areas of concern to employees or areas that require improvement.

The survey will provide a realistic assessment of the climate of its workforce. In particular, the information gathered would identify areas where intervention might be needed and allows Council to develop proactive strategies to create a positive and highly motivated workforce.

Council advised that it does not conduct employee attitude surveys. Noteworthy is that during discussions with staff, it became apparent to the review team that there is still division among staff, particularly relating to staff being located in separate offices, since the amalgamation. This perhaps goes some way to explaining why the organisation has found it difficult to move forward and achieve necessary changes and improvements. In this regard, it is considered an opportune time for Council to conduct an employee attitude survey to assist in identifying staff sentiment and determine areas requiring improvement.

#### ***Reviewers' comment***

*Council advised that an Employee Survey was forwarded to staff, via their payslips, on 20 June 2012. As a result, the recommendation relating to conducting an employee survey has been removed.*



### Workforce planning

As part of the Integrated Planning and Reporting Framework, councils are required to develop a Workforce Management Strategy to address the human resource requirements of the council's Delivery Program. The Workforce Management Strategy must be for a minimum timeframe of four years.

Council has prepared a Workforce Plan to comply with the requirements of the Integrated Planning and Reporting Framework. The Workforce Plan identifies objectives and strategies against six key areas and provides performance indicators for each key area. The six key areas are as follows:

- employee attraction and retention,
- employee training, learning and development,
- organisational development,
- performance management,
- work, health and safety, and
- employee relations.

Although there is an attempt to link the key areas to the quadruple bottom line, there appears to be no link between the Workforce Plan and Council's Delivery Program. Further, no indicative timeframes to support the implementation of the Workforce Plan have been provided.

In order to fully comply with the requirements of the Integrated Planning and Reporting Framework, Council will need to ensure that the following strategic issues are incorporated into its Workforce Plan:

- an analysis of Council's workforce requirements based on the commitments in Council's Community Strategic Plan and Delivery Program,
- developing an appropriate workforce structure to meet those objectives,
- using workplace equity and diversity as a tool to benefit Council,
- strengthening Council's workplace governance, and
- supporting and developing Council staff.



**Recommendation 19**

*That Council review its Workforce Plan to ensure that the organisation is able to respond to its strategic priorities and the challenges that Council will face in attracting and sustaining its workforce.*

**Council response**

*To be revised after the local government elections in 2012 and scheduled for completion and endorsement at Council's meeting on 21 March 2013.*

Succession planning

Succession planning assists Council in developing a proactive approach to meeting the potential loss of knowledge and expertise. It also provides a transition period for new officers to reach an adequate level of competence and minimise the potential loss of skill base, particularly in critical operations.

Council has identified 26% of its employees as being aged 51 years and over, with the majority of these positions being supervisory or management positions. Further, Council has identified one key executive position that is likely to retire in the near future. Although, Council has identified the need for a succession plan in its Workforce Plan, Council currently does not have a formally documented succession plan.

**Reviewers' comment**

*Council advised that its succession plan has been reviewed and will be put to Council's meeting on 6 August 2012. Further, that the plan will be annexed to Council's Workforce Plan. As a result, the recommendation relating developing a succession plan has been removed.*



**PART IV. RISK RATING OF RECOMMENDATIONS**

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

		CONSEQUENCE		
		Significant <i>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.</i>	Moderate <i>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.</i>	Minor <i>Minimal risk to the operations of council, little disruption to council's operations and will not limit council's ability to meet its goals.</i>
LIKELIHOOD	Almost certain	High	High	Medium
	Possible	Medium	Medium	Low
	Rare	Medium	Low	Low

Priorities for recommendations: <i>(based on application of risk analysis)</i>	Risk categories could include:
<ul style="list-style-type: none"> <li>• High</li> <li>• Medium</li> <li>• Low</li> </ul>	<ul style="list-style-type: none"> <li>• Reputation</li> <li>• Compliance with statutory requirements</li> <li>• Fraud/corruption</li> <li>• Financial</li> <li>• Legal liability</li> <li>• OH&amp;S</li> </ul>



**PART V. ACTION PLAN**

The Action Plan is to be completed and adopted by Council to guide the implementation and monitoring of the recommendations in this report. The reviewers have allocated notional priority rankings using the risk rating analysis in the previous section. Council is encouraged to review and revise these, if necessary.

RECOMMENDATION	PRIORITY	ACTION PROPOSED	TIME FRAME	RESPONSIBILITY	PROGRESS REPORT
1 Further training should be provided to assist in the completion of disclosure of interests returns and ensure that accurate information is recorded.	Medium				
2 Council should review and amend its Complaints Handling Policy in line with the comments made in the review report.	Medium				
3 Council should provide training in the management of code of conduct complaints.	Medium				
4 Council should review and update its Interaction between Councillors and staff policy to ensure that it is consistent with the complaint handling procedures outlined in the Model Code.	Medium				



RECOMMENDATION	PRIORITY	ACTION PROPOSED	TIME FRAME	RESPONSIBILITY	PROGRESS REPORT
5 Council should review and update its Expenses and Facilities policy to ensure that it is consistent with the Act, the Regulation and the Division's guidelines.	Medium				
6 Council should review and update its Disclosure of Interests at Meetings Policy.	Medium				
7 Councillors should be provided with training to ensure they fully understand their obligations when making disclosures.	Medium				
8 That Council conduct a fraud risk assessment.	High				
9 That Council develop a compliance register to ensure all legislative and regulatory obligations are met and that relevant staff are kept informed of legislative and regulatory amendments.	Medium				
10 Council should review the membership of its Audit and Investment Committee having regard to the Division's Guidelines, which it must take into account when exercising its internal audit function.	High				



RECOMMENDATION	PRIORITY	ACTION PROPOSED	TIME FRAME	RESPONSIBILITY	PROGRESS REPORT
11 Council should develop a program for the identification and investigation of high-risk activities within its area.	Medium				
12 Council should develop compliance and awareness program for private swimming pools.	Medium				
13 Council should develop asset management plans for each class of asset in order to comply with the Integrated Planning and Reporting requirements.	Medium				
14 Council should include financial projections for asset maintenance and replacements for a ten year period.	Medium				
15 Council should revisit its Integrated Planning and Reporting documents to incorporate any changes in asset renewal in its LTFP.	Medium				
16 Council should develop a register of leases and licences over its land.	Low				
17 Council should develop and implement a plan/strategy to deal with its rapidly expanding ageing population.	Medium				



RECOMMENDATION	PRIORITY	ACTION PROPOSED	TIME FRAME	RESPONSIBILITY	PROGRESS REPORT
<p>18 Council should ensure that its ageing plan/strategy is incorporated into its Community Strategic Plan, to allow a clearer understanding of the way Council intends to address ageing.</p>	<p>Medium</p>				
<p>19 That Council review its Workforce Plan to ensure that the organisation is able to respond to its strategic priorities and the challenges that Council will face in attracting and sustaining its workforce.</p>	<p>Medium</p>				