

Report to	BRECON BEACONS NATIONAL PARK AUTHORITY
Date	21 July 2022
By	Chief Executive
Title of Report	Brecon Beacons National Park Authority: Audit Wales Action Plan
Item 14	For Decision

Recommended decision: To approve the Brecon Beacons National Park Authority - Audit Wales Action Plan, in response to recommendations made in Audit Wales reports:

- *Brecon Beacons National Park Authority – Delivery of the Change Programme - issued February 2021*
- *Progress in delivering Statutory Recommendations – Brecon Beacons National Park Authority – issued March 2022*

1. Background

- 1.1. Brecon Beacons National Park Authority has two outstanding statutory audit recommendations from the Audit Wales report issued in February 2021.
- 1.2. A further report to assess our progress in delivering these recommendations was issued in March 2022 and concluded that their implementation was being hindered by significant governance issues and a lack of capacity and recommended that BBNPA should urgently seek the assistance of Welsh Ministers to address them.
- 1.3. The Authority agreed to this course of action and the Minister agreed to provide support. I have since been working closely with Welsh Government officials to define that support and there has been close coordination between BBNPA, Welsh Government and Audit Wales to agree an appropriate action plan.

2. Latest position

- 2.1. The actions for Welsh Government have been agreed by the Minister. These appear in the attached version of the action plan together with the actions we will need to complete.
- 2.2. Good progress has been made so far with a number of actions however, it is vitally important that momentum is maintained.
- 2.3. The plan presented for your approval includes the recommendation that close monitoring of progress is delegated to the Audit and Risk Committee. The plan is with Audit Wales for their agreement. They will also attend the NPA meeting.

3. Consideration – Financial

- 3.1. Whilst there are no immediate financial considerations, NPA should note that there will be financial implications arising from the need to address the capacity issues within the organisation. (ref note 1 page 7 of the action plan).

4. Legal and Governance

- 4.1. In February 2022 BBNPA adopted a new Scheme of Delegation and the AGM on 1 July saw Members populating a new Committee Structure.

5. Risk and policy

- 5.1. The action plan seeks to address a number of key risks to the Authority and failure to implement it will severely impair our ability to both deliver our core business and shape ourselves to deliver on an ambitious National Park Management Plan which will come to NPA for adoption in December 2022.

6. Next steps

- 6.1. If approved the Action Plan should be considered at the first Audit and Risk Committee and an approach to closely monitoring the plan will need to be agreed.
- 6.2. Part of the assistance from Welsh Government is the identification of an expert to work with BBNPA to support delivery of the plan, they are likely to be available from September.
- 6.3. Officers will continue to work on all aspects of the plan including those around organisational capacity and resilience
- 6.4. Audit Wales will conduct a further review of progress with the statutory recommendations with their report likely to be issued in the February / March 2022 timeframe.

Brecon Beacons National Park Authority - Audit Wales Action Plan

In response to recommendations made in Audit Wales reports:

- *Brecon Beacons National Park Authority – Delivery of the Change Programme - issued February 2021*
- *Progress in delivering Statutory Recommendations – Brecon Beacons National Park Authority – issued March 2022*

Recommendation	Actions agreed with Audit Wales	Status	Welsh Government Assistance Required	Milestones
Vest scrutiny of delivery of the Action Plan in the Audit and Scrutiny Committee	Has been regularly monitored by Audit and Scrutiny Committee and will now be monitored by the Audit and Risk Committee under the new scheme of delegation.	Ongoing	<p>Ministerial agreement to Welsh Government actions in the 2022 plan</p> <p>Welsh Government to identify a suitable consultant to work alongside the Audit and Risk Committee and who can work with BBNPA to address the key issues</p>	<p>2022 Plan to be agreed by all by end July 2022. Monitoring by Audit and Risk Committee quarterly and in detail by the Audit and Risk Committee Working Group (to be set up following the AGM on 1 July).</p> <p>CEO to develop a consultancy specification by 22 July 2022</p> <p>Consultant in place by September 2022</p>
Review and clarify roles and responsibilities of members and officers to ensure standards for conduct and required	<p>Implement the new Scheme of Delegation and Committee Structure</p> <p>Ensure regular monitoring of how these are working through pre meetings and</p>	Ongoing - New scheme approved and beginning to be implemented. Committee structure commences from AGM 1 July'22.		<p>AGM consideration 1 July</p> <p>Monitoring by Audit and Risk Committee Quarterly</p>

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behaviour are clear and unambiguous, including what to do if things are not working;	structured lessons learned / meeting reflection			
	Review key documents – Member/officer protocols, code of conduct, standing orders etc	Scheme of Delegation and committee structure already reviewed.		Remaining key documents to be reviewed by AGM 2023
	CEO to review the Monitoring Officer / solicitor role with a view to making the role a permanent part of the establishment	Paper being prepared by CEO for decision by BBNPA.		To be presented for agreement by BBNPA on 29 July 2022
	Amendment of terms and conditions of Welsh Government appointed members	Completed May 2022	<p>Amendment of terms and conditions of Welsh Government appointed members</p> <p>BBNPA Chair to be part of the recruitment process for the new Welsh Government Members.</p> <p>Financial support to BBNPA to run outreach events for new members.</p>	<p>Complete</p> <p>Autumn 2022</p> <p>September- December 2022</p>

Recommendation	Actions agreed with Audit Wales	Status	Welsh Government Assistance Required	Milestones
				September 2022
	Support for local authority appointments		Advice to local authorities on appointment members	Complete
<p>Develops a programme of training and support to ensure all members and officers understand their responsibilities and their expected behaviours;</p>	<p>Induction programme for Members to ensure these aspects are appropriately covered.</p> <p>Regular review and lessons learned processes to be embedded.</p> <p>Senior officers to be part of induction process and ongoing training so mutually understood standards are set.</p> <p>Authority to ensure that officers understand the scheme of delegation in respect of responsibilities and that behavioural standards are embedded in staff appraisal systems.</p>	<p>Initial induction programme for new Members has completed. Mop up sessions being arranged and evaluation also in progress.</p> <p>Induction programme includes attendance of key officers.</p> <p>Initial conversation held with Academi Wales re longer term support.</p> <p>WLGA training modules identified as possible option 9 June 2022</p>	<p>Assistance to identify suitable training for members. This would need to cover key aspects such as respect, equality and diversity, micro behaviours bullying and harassment.</p>	<p>Implement induction programme from June 2022 with senior team involvement - Complete</p> <p>Review and lessons learnt of induction programme by end July</p> <p>Staff training on scheme of delegation by December 2022</p> <p>Review Scheme of Delegation by end 2022</p>

Recommendation	Actions agreed with Audit Wales	Status	Welsh Government Assistance Required	Milestones
<p>Ensures that all key policies for standards of conduct and required behaviours are strictly adhered to;</p>	<p>Support has been in place for appropriate action being taken when required standards are not met.</p> <p>Emphasis on standards and conduct as part of induction of new Members</p> <p>Ensure new members are provided with relevant policies and understand the NPA procedures for raising concerns about conduct and behaviour</p>	<p>Closer involvement of Chair of Standards Committee in other Authority meetings.</p> <p>Authority has tackled and sought assistance with Members whose behaviours were not meeting required standards.</p>	<p>Amendment to terms and conditions for Welsh Government members to emphasise zero tolerance approach to bullying, harassment, appropriate language/behaviour</p>	<p>Terms and conditions for new WG members - complete</p> <p>For new local authority members from induction in June 2022</p> <p>For new Welsh Government members from appointment end 2022</p>
<p>Review how changes to members and officers responsibilities and roles are working in practice within the next 12 months</p>	<p>Process of regular review and lessons learned.</p> <p>Build into internal audit programme for review.</p>	<p>To commence from BBNPA EGM 1 July</p> <p>Included as advisory review in BBNPA Internal Audit Plan 2022/23</p>		<p>Review of implementation and understanding of the scheme of delegation by December 2022 (as part of Audit Wales follow up).</p> <p>Internal audit by March 23</p>
<p>Ensuring all relevant papers to Authority meetings are written in plain, simple and</p>	<p>Authority approach to papers to be reviewed.</p>	<p>Aim is to embed this during 2022</p>		<p>Complete review by end 2022. Design new approach by end October 2022</p>

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clear language that explains technical terms, avoids 'jargon' and clearly sets out the rationale for recommendations	<p>New Executive Board to operate as a clearing step for any papers going to the Authority.</p> <p>Feedback to be sought on papers as a matter of routine.</p>	Designing feedback process over summer 22 to include staff, EB and members.		<p>Implement EB clearance process by end October 2022.</p> <p>Implement feedback loop by end October 2022.</p>

Recommendation	Actions agreed with Audit Wales	Status	Welsh Government Assistance Required	Milestones
Recommend that the Authority urgently requests the assistance of Welsh Ministers to address the significant governance problems.	Given the changes in Membership at the Authority CEO BBNPA to develop a refreshed action plan to address both the statutory recommendations from Feb 21 and the issues raised in Mar 22 AW reports.	<p>Ongoing -</p> <p>CEO wrote to Minister for Climate Change on 15 March. Minister offered assistance 20 April BBNPA is now working closely with both Welsh Government and Audit Wales.</p>	<p>Respond to request to provide assistance</p> <p>Respond to request for termination of appointments</p> <p>Support to develop an appropriate plan and ensure that it is acceptable to Ministers.</p>	<p>Ministerial agreement to assist – April 2022</p> <p>WG assigned an official to work with BBNPA and AW to support delivery of the plan – April 2022</p> <p>WG action on request to terminate appointments – March - July 2022</p> <p>BBNPA Executive Board reviewed draft plan 19 May 22</p>

Recommendation	Actions agreed with Audit Wales	Status	Welsh Government Assistance Required	Milestones
		Discussion of success criteria has been initiated. Likely to be based around Audit Wales follow up review before end March 2023.	WG assistance to define some success criteria to signal completion of the plan from a BBNPA / AW / WG perspective	<p>BBNPA CEO share draft plan 1 with WG and AW 20 May 22</p> <p>Draft plan 2 shared WG 7 June</p> <p>Draft plan 3 to WG/AW 14 June</p> <p>Complete plan and agree with Authority/ WG/ AW - July 2022</p> <p>Define and agree success criteria - July 2022</p>
Seek assistance that enables clarification of the roles and expectations of all Members and corresponding help in addressing the development and support needs of Welsh Government-appointed members	Amendment of terms and conditions for new WG appointed members		Welsh Government amended terms and conditions for newly appointed WG members	Complete
	Recruit new WG members		WG recruitment of 3 new members and a reserve list	September – December 2022
	<p>New induction programme for new members</p> <p>Review and evaluation of new induction programme</p>		WG to consider relevant points arising from the review of the induction programme	<p>New induction programme rolled out from June 2022</p> <p>Review and evaluation of new induction programme by end July.</p>

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	Member appraisal and assessment of recommendations for an extension of term to be reviewed.			October 2022
	Embed the new Scheme of Delegation and NPA Committee Structure as a foundation of good governance in the Authority		Welsh Government to assist with consultancy support to the new Audit and Risk Committee for c.6 months to work with Members and the executive to support this action.	May - December 2022
	Progress with this plan to be regularly communicated to staff by CEO and senior team.			
Capacity	BBNPA Executive Board to develop a plan to address capacity issues ¹	BBNPA team are currently working to identify capacity gaps. New areas are coming to light	For discussion. Welsh Government to work with BBNPA to consider what support could be provided to address capacity gaps. The work is	Recruitment and induction of new senior team members – June 2022 Identification of capacity gaps – ongoing work likely to extend

¹ BBNPA capacity issues are wide and significant, from a need to urgently address our accommodation needs, an approach to how we to manage our sites – ie in terms of the site opportunities, commercial strategy development and gaps in the organisation around business development, ability to engage with stakeholders, in particular the agricultural community, ability to work in partnership around busy places and exploring possibilities to address our corporate services resilience and capability issues. BBNPA faces a number of capacity challenges related to its relative administrative complexity vs the other WNPs and this also needs to be surfaced and considered.

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		CEO and new management team (May 2022) in place, S151 officer now in post, options being explored for HR support	likely to extend beyond the terms of the action plan.	beyond the terms of the Action Plan
		Monitoring officer contract extended pending paper on longer term to NPA		Paper to NPA on extension of MO post scheduled for 29 July 2022 Permanency of MP post confirmed by end July.
	Agreed that diversification of income is a key element of building capacity in the organisation	BBNPA to initiate an income diversification advisory group and Develop a commercial strategy		Income diversification advisory group to be established by end October 2022. Commercial strategy by March 2023 Set up of charitable trust to be explored by end Dec 2022.
	Staff to be regularly engaged around the status of the plan.	Regular programme of internal comms designed.		

Recommendation	Actions agreed with Audit Wales	Status	Welsh Government Assistance Required	Milestones
		Wellbeing strategy placed at the heart of the business plan.		Delivery of the business plan by March 2023
<p>Re-build tourism staff capacity R2 We recommend that the Authority:</p> <ul style="list-style-type: none"> • review current tourism staff capacity in line with the aspirations of Future Beacons, its National Park Management Plan; • re-build tourism and staff capacity to allow delivery of the goals of Future Beacons; and • consider the need for additional staff capacity in appropriate specialisms eg communications and data analysis staff. 	<p>Whilst a separate Audit Action Plan to address the recommendations from the Sustainable Tourism Audit relating to capacity will also be picked up in this plan:</p>		<p>To discuss with BBNPA.²</p>	<p>Presentation of the audit report by AW to NPA on 29 July 2022</p>

² Eg WG to be sighted on some of the ambition eg partnership with Black Mountains College, potential developments of the GeoPark etc.

Annex A – completed actions

Recommendation	Actions agreed with Audit Wales	Status	Welsh Government Assistance Required	Milestones
Develop and agree an action plan with clear milestones for delivering the Change Programme;	Agreed change programme no longer appropriate for the authority. From the Mar '22 AW report <i>'the change programme noted in the Auditor General's report of February 2021, which the Authority has rightly moved on from'</i> ³	Closed	None	
Regularly monitor the implementation of the action plan (at least monthly) to ensure actions are progressed and the Change Programme concluded;	Monthly meetings in place.	Closed	Agreed Welsh Government presence at monitoring meetings with Audit Wales and that BBNPA / AW /WG will work together to a single plan.	
Reviewing the role of the Park Policy Forum, how it works in practice and in relation to the constitution and the proper decision	Agreed new scheme of delegation.	Closed? Policy Forum is not a formal part of the new committee structure. Fora and working groups are now formed at the discretion of the		CEO will stand up groupings as required. Likely to continue a regular more informal engagement with Members and officers on emerging issues and policy

³ March 22 report page 7 section 11

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making of the executive (Authority);		CEO and chaired as appropriate.		
Address poor morale amongst staff by ensuring officers have sufficient line manager and wider organisational support.	Wrap work on addressing poor morale into follow up to March '22 report.	Closed	None	