Governance Peer Challenge
Birmingham City Council

September 24th -27th 2019

Feedback Report

1.   Executive Summary

The peer team were impressed by the level of insight, ambition and scale of the Council's plans for Birmingham and its residents as expressed by members, officers and partners. There is also evidence of significant service and performance improvement in the context of a very challenging environment, which the Council should celebrate and seek to build on and replicate in terms of how the governance has been managed.

High turnover of senior leaders, budget and service challenges, a high profile industrial dispute and ongoing difficult union negotiations have all had an impact on how the council manages its governance and the level of organisational knowledge and experience of democratic decision-making.

There has not been a fundamental review of democratic services since 2012. A cross party scrutiny review in 2018 focused on the structure of committees and increased the number from five to eight including a new Co-ordinating Overview & Scrutiny (O&S) Committee. It also found that that whilst Executive/Scrutiny working was improving in some areas, parity of esteem for scrutiny from the Cabinet and Directors was not well established across the organisation. As a peer team we found that this is still an issue. A second phase of the scrutiny review is due to address two key issues – scrutiny and executive working and responding to new Government guidance. The recommendations from this peer challenge will also inform that review.

More broadly, Members have a lack of trust in the governance service because of problems with late reports, lack of confidence and skills of committee clerks, and lack of support for member casework. Despite a significant reduction in the number of democratic services staff in recent years we found that the Council is still well resourced in terms of officer support for governance and scrutiny. However, we felt that this resource is not currently being used to best effect due to amongst other things, lack of investment in staff skills, poor IT and inefficient processes. Relationships between scrutiny and committee services officers are good and there are opportunities for more collaboration and co-location which would enable some shared learning to take place and provide a level of flexibility of resources. Scrutiny has an opportunity to share its best practice with committee colleagues.

We have heard that the Council's decision making processes are difficult to navigate, slow, lengthy and an obstacle to efficient, effective and dynamic operations. Given the number of major projects and initiatives being undertaken by the Council this is a serious business risk which must be addressed as a matter of urgency. Whilst the new constitution and the new process for exempt information have been welcomed by the organisation, the governance process as a whole is overly bureaucratic, difficult to navigate, time consuming and reliant upon multiple sign-offs.

There is limited co-ordination of work planning across Overview & Scrutiny Committees and this has impacted on the strategic alignment of corporate priorities with scrutiny. There is too much variation between O&S committees, beyond what you would expect to see, and it is therefore not easy to see how scrutiny contributes to supporting the delivery of corporate projects. There are some examples of Scrutiny working well with Cabinet but this

is variable. There is also some evidence of effective working between the Scrutiny team and external stakeholders, particularly on Health and with the Children's Trust.

In general, there is a lack of understanding and appreciation of the role and purpose of scrutiny across the organisation. A strategic framework for scrutiny could improve this by setting out the role of scrutiny, its purpose and behaviours. In developing such a framework, the council should consider how scrutiny can support pre-decision activity, add value to decision making and improve performance. For a strategic framework to work, it needs to be a co-production between the Executive and scrutiny. This has to be about scrutiny's place in the governance structures and how others work with scrutiny and include it. Any review of scrutiny should also include the number and remit of each committee and the frequency of meetings. The current timetable of monthly meetings is driving a focus on meeting based scrutiny and for some committees this is too frequent and creates an unnecessary burden on the team and officers without impact evidence. A more creative approach to scrutiny with task and finish groups, visits and work groups could allow a reduction in the number of meetings and increase the amount of time for policy development. Some committees such as Children's scrutiny already do more of this type of work than others.

The work of the scrutiny team is valued by scrutiny Chairs and the contribution of the Head of Service was widely praised. However there has been a lack of investment in both governance teams over a number of years and this is affecting the quality of the service. It is now very basic and transactional. Higher level skills like advising Directorates and Committees have been lost or not developed in existing staff. There is an aging workforce across both teams and a number of staff are due to leave over the next few years. Succession planning needs to start now to look at opportunities for bringing in new people into the service with a combination of experienced professionals and apprentices. Members also need to better engage with their own learning and development.

The Committee management system is widely seen as clunky, slow and unreliable, although we also heard that where there is functionality it is not always being fully used. Members do not feel well served by the system. Without investment or review, it will not be able to adequately support decision making across the Council. We also found that there is insufficient support for Cabinet Members' policy development work. The lack of support for member casework is causing frustration amongst backbenchers.

2. Key Recommendations

1. **Develop a strategic framework for scrutiny which sets out its role, purpose and behaviours and a standard for evidence gathering, report content and impact measurement.** There is currently little understanding or appreciation across the wider council of how scrutiny benefits the Council. The way committees operate, are not consistent across the organisation. A strategic framework would help broaden appreciation of the scrutiny process and enable greater standardization across the committees.

2. **Conduct a root and branch review of decision making structures and processes, specifically focusing on compliance, streamlining and providing clarity of accountability.** The Council's decision making process is slow, bureaucratic and not conducive to an efficient operation. This is an organisational risk which needs to be addressed urgently.

3. **Review the process for Executive and scrutiny work planning to ensure earlier engagement with directors and Cabinet Members which will allow more pre-decision scrutiny.** Earlier conversations are needed about major proposals to avoid problems further down the process such as the need for call-ins. To enable more pre-decision scrutiny the Executive needs to keep scrutiny abreast of what it is working on as well as vice versa.

4. **Review the purpose of each scrutiny committee to assess impact, alignment with corporate priorities and significant projects and to avoid duplication. As part of this you should review the number of scrutiny committees and frequency of meetings.** Most core cities have an average of only 5 scrutiny committees compared to BCC's 8. The Council should consider other ways of conducting scrutiny without formal committees. This could include work groups, visits and task and finish groups. The role of the Co-ordinating committee in particular needs to be reconsidered. It could include monitoring the application of the new framework, looking for opportunities for cross-cutting work, overseeing an annual scrutiny work programme and having ownership of an annual scrutiny report.

5. **Tighten up on rules around call-in criteria in line with MHCLG guidance and develop a robust informal resolution process.** The number of call-ins are disproportionately high due to the fact that the criteria for call-ins are not rigorous enough. An informal resolution process at Director level might help to resolve an issue before it becomes a call-in.

6. **Undertake a restructure of Committee and Scrutiny Services, having regard to the efficient use of resources and the urgent need to address your workforce planning risk.** There are opportunities to co-locate staff to facilitate shared learning and some flexible working between these two teams. ███ ███████ succession planning is also an urgent need. Some additional temporary resources might be necessary during this process to free up the head of service to review structures.

7. **Review and invest in the committee management system and appropriate training and support. Consider what alternatives are on the market.** The system is not well regarded in the organisation. Staff who use it say it is slow and unreliable with poor functionality. There are other systems on the market which the Council could consider as an alternative.

8. **Invest in and empower your staff and scrutiny members through a comprehensive learning and development programme.** Lack of investment in staff training and development in recent years and a reduction in the number of staff has resulted in the loss of knowledge and some higher level governance skills such as advising members and officers at committee. This needs to be addressed by some formal training and informal learning and by encouraging staff to be responsible for their own learning. There is still a lack of understanding of the basics of governance amongst a number of Members, particularly around regulatory issues.

9. **Develop and communicate concise and accessible guidance on all aspects of scrutiny and the decision making process.** Knowledge of governance is an issue for the Council. Governance staff need to reach out to the organisation to help inform the new managers, report writers and decision takers. There also needs to be better signposting via the intranet.

10. **Review the scheme of delegation annually and communicate all changes to relevant stakeholders.** The Council should be rigorous in reviewing this on an annual basis.

11. **Celebrate success and share learning and best practice identified through your scrutiny processes**. There is currently no good mechanism for sharing the good practice that scrutiny committees learn about, with each other or with the rest of the organisation. The Council needs to find a way to do this better and celebrate its successes.

12. **Establish a more robust member casework system with appropriate support.** Currently there is no system or standard offer for casework support. Some members feel that they do not have enough officer support to carry out their case work properly .

Quotes

"We have a good ratio of Cabinet accepting recommendations from Scrutiny"

"Our service has a good working relationship with the Committee team. They're always professional and knowledgeable"

"Decision making processes are poorly understood. When I arrived there was no guidance or training."

"This is the most bureaucratic, process driven organisation I have ever worked for"

"Scrutiny is not playing its strategic role"

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3.   Summary of the Peer Challenge approach

The peer team

Peer challenges are delivered by experienced elected member and officer peers. The make-up of the peer team reflected your requirements and the focus of the peer challenge. Peers were selected on the basis of their relevant experience and expertise and agreed with you. The peers who delivered this peer challenge at BCC were:

- David Wilcock – Assistant Director of Legal, Governance and Workforce/ Monitoring Officer, Rochdale Borough Council
- Elaine Newsome – Head of Governance, Rochdale Borough Council
- Jacqui McKinlay - Chief Executive, Centre for Public Scrutiny
- Ben Mosley – Head of the Executive Office Bristol City Council
- Cllr Graham Chapman – Councillor, Nottingham City Council (Labour)
- Cllr Barry Anderson – Chair of the Environment, Housing and Communities Scrutiny Board , Leeds City Council (Conservative)
- Gill Elliott – LGA Review Manager
- Raj Khera – Membership Engagement Officer, LGA

Scope and focus

This peer challenge was commissioned by the Council as a bespoke project. It follows a peer challenge of its Legal Services which took place in June 2019. The scope and focus for this challenge was agreed with the Council and covered the following areas:

- How Committee and Scrutiny Services are playing a strategic role in the Council; supporting a One Council approach and contributing to council priorities.
- Ensuring that the processes of these services support this strategic role in a streamlined, efficient and modern way.
- Ensuring there is sufficient capacity and capability (including staff skills and knowledge) in these services now and in the future to enable Members to deliver their democratic decision making role.
- How scrutiny as part of the wider governance culture of the organisation can add value to the Council's core objectives

In addition, the Council asked the team to consider the balance of political, democratic and ward support for councilors.

The peer challenge process

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It is important to stress that this was not an inspection. Peer challenges focus on improvement and are tailored to meet individual councils' needs. They are designed to complement and add value to a council's own performance and improvement. The process is not designed to provide an in-depth or technical assessment of plans and proposals. The peer team used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material that they read.

The peer team prepared for the peer challenge by reviewing a range of documents and information in order to ensure they were familiar with the Council and the challenges it is facing. The team then spent 3.5 days onsite at BCC, during which they:

- Spoke to more than 50 people including a range of council staff together with councillors and external partners and stakeholders.

- Gathered information and views from more than 25 meetings, visits to key sites in the area and additional research and reading.

- Collectively spent more than 225 hours to determine their findings – the equivalent of one person spending nearly 6 weeks in BCC

This report provides a summary of the peer team's findings. It builds on the feedback presentation provided by the peer team at the end of their on-site visit (24-27 September 2019). In presenting feedback to you, they have done so as fellow local government officers and members, not professional consultants or inspectors. By its nature, the peer challenge is a snapshot. We appreciate that some of the feedback may be about things you are already addressing and progressing.

4. Feedback

4.1. How Committee and Scrutiny Services are playing a strategic role in the Council; supporting a One Council approach and contributing to council priorities.

The peer team acknowledges the fact that the Council has maintained support for a separate democratic service including committee management and scrutiny despite a very challenging period in which staff numbers in the teams have been significantly reduced. There is now a new Governance department which is bringing together overview and scrutiny, committee services and electoral and cabinet support. There are eight scrutiny committees covering the Cabinet portfolios (including the Co-ordinating Overview & Scrutiny Committee) plus two joint health scrutiny committees. Some Scrutiny committees are addressing strategic issues facing the council such as the climate emergency and the Commonwealth Games. There was good evidence that scrutiny activity did not "creep" and that the agreed terms of reference and timelines maintained focus. However, lack of a clear focus on corporate objectives, work planning and

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prioritisation with a strong link to scrutiny activity means that the focus of scrutiny inquiries can be rather adhoc. Some Members feel that topics are being sent for scrutiny as a way of "kicking issues into the long grass" e.g. the public space protection order and that scrutiny is used as a substitute for management reviews e.g. Enablement.

There is some evidence of effective working between the Scrutiny team and external stakeholders. The CCG's experience of the Health Overview and Scrutiny Committee was overwhelmingly positive. They reported good engagement with scrutiny officers who were experienced and responded well to queries. There was a reliable forward plan of meetings with no late papers going out. The Children's Trust said that the governance interface with the Council worked well. The Leader, portfolio holder and Director of Children's Services were all on the Children's Trust's Partnership Board. The Trust views the council scrutiny process as a way of enabling it to be democratically accountable to Council Members. They value the role of the Children's Social Care scrutiny committee as a critical friend. In the past it has examined the Trust's contractual performance, its corporate parenting strategy and its annual fostering report. They did feel however, that the level of interest from Committee Scrutiny Members in the Children's Trust was variable depending on members' areas of interest. The current Chair was seen as a real force for good who will move things forward.

Committee and Scrutiny Services staff understand and can articulate the importance of their work in supporting a One Council approach. They see their role as supporting democracy and part of the "checks and balances" of the democratic system. Despite this, there is limited evidence of the service being in a position to work strategically. Processes are long established but staff don't always know the most recent legislation or understand why things have to be done in certain ways. There is insufficient forward scanning and proactive management of major decisions. There have been problems of late agendas and papers for some meetings including Cabinet meetings. We found an inconsistency of approach across scrutiny and committee officers. Some reporting officers highlighted good notice of reporting deadlines, but there were also a number of examples where contact from lead committee/scrutiny officers was so last minute that reports were of substandard quality and didn't have time to be routed through required clearance processes. Where we saw evidence of dedicated governance link officers in directorates, generally engagement and working practices were effective, but there was almost an emphasis on the link officer being responsible for compliance with reporting deadlines for the directorate, rather than this being a shared responsibility.

The decision making process at the Council is widely seen by staff and Members as difficult to navigate and slow. The process is lengthy with reports going to EMT, the Corporate Clearance and sometimes Capital Board as well. Since this review took place Cabinet reports no longer have to go to CMT or EMT. Because of the large number of key decisions the Council is trying to get through, the system is unable to keep up and less experienced officers are not building in enough time to

navigate the decision-making process. The administrative practices and procedures for decision making are also poorly understood throughout the Council. The length of governance processes can be a risk to the organization, particularly in relation to contract management. One officer said "we build a 10 month minimum timeline around a 90 day consultation process to allow for the clearance process"

The high turnover of middle and senior managers has meant an influx of new managers, including some from outside local government who are either bringing their own governance practices to BCC or who have little understanding of the decision making process in a local authority. Training is not being provided to new directors and other relevant staff on the Council's key decision processes. There are sources of advice but they need to be better signposted and resources available such as a decision-making flowchart. This is a real missed opportunity for the team to engage corporately and raise the profile of governance.

There is an integrated forward planner for CMT which has provided improved transparency and the ability to track decisions. This could be improved to reflect organisational and reputational risks. In general though, forward scanning and management of major decisions is still insufficient. This leads to problems with the compliant and timely production of reports through the clearance process. The review and sign-off of Cabinet reports is also convoluted, bureaucratic and old-fashioned.

There also needs to be greater clarity on the expected outcomes of scrutiny work. There is insufficient and inconsistent forward planning for scrutiny committees. Directors feel that they are invited to contribute to forward planning on a very ad-hoc basis. Scrutiny space at Council meetings is not well programmed leading in some instances to no reports being presented to some full council meetings and a backlog later in the Council year. More proactivity is needed on policy work from Scrutiny Chairs and Members and time needs to be freed up for this, possibly by reviewing the frequency of scrutiny meetings.

4.2 Ensuring that the processes of committee and scrutiny services support this strategic role in a streamlined, efficient and modern way.

There are some examples of good practice within committee and scrutiny services. The review of the constitution and scheme of delegation has been well received and have the potential to improve governance once implemented and embedded. There is a collective commitment to decision making that is transparent, open and publicly accessible. Other examples of good practice included the standing invitation to opposition party leaders for all Cabinet Meetings. The Planning Committee we observed had good public engagement at the start of the meeting with a clear explanation of what would happen throughout. There were also appropriate, timely and relevant interactions over the course of the meeting to ensure that everyone present understood what decisions were about to be taken and also what the outcome of any vote was. The revised

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process for exempt information has been welcomed and is having an impact. The bi-monthly scrutiny newsletter is good practice and gives an overview of scrutiny activity across all the committees, setting out the timetable and location of meetings for the next two months. A cross organization governance working group has been established which is positively engaging key business support individuals from within the organisation. It has the potential to be a force for good if the momentum is maintained and there is a commitment from across the organization toward shared ownership and good governance practice. At the end of the day, governance is everyone's responsibility, not just the governance team.

In general, governance processes at the Council are over-engineered. There is evidence that this is historical and borne out of a lack of trust between Members and officers partly because of the high profile disputes like the waste dispute. Lengths of agenda are too long and the signoff process for Cabinet the completion of a checklist which is heavy handed and time consuming. Committee staff said that it can be difficult to get Members to attend meetings resulting in some meetings not being quorate. An example of this is Education Award meetings where a lot of preparation is needed beforehand only for the meeting not to be quorate on the day. This may be due to meetings being held on a monthly basis and also because they are day time meetings which can impact on member availability. The frequency and timing of meetings could be reviewed and tailored more closely to the needs of the organization rather than a one size fits all approach. There is little evidence of diary coordination for meetings which causes frustration for senior officers who are called to scrutiny meetings at short notice and are unable to attend. Committee clerks do not have access to Members' diaries and the committee management system does not enable them to book meetings.

There is a lack of consistency in the quality of scrutiny reports and how committee chairs operate. Workload management also varies considerably across scrutiny committees. Members feel that reports lack financial information to support them and that there has been reluctance within the Finance Department to engage with scrutiny. Committee report templates including scrutiny reports are not user friendly. Scrutiny reports would be more helpful if they contained a summary and there was more timely circulation of large volumes of information. Backbenchers felt that too much information was circulated, with poor presentation of statistics. Overall, they wanted more standardisation of report layout. With regard to Cabinet reports, we heard that Finance, HR and Legal Services do not always send their advice in a timely and appropriate manner which prevents report authors taking into account their information when developing reports for decision. Some reports are not completed even when going through Corporate Clearance.

The number of call-ins at the Council is disproportionately high, mainly because the criteria for call-ins are not rigorous enough to ensure that only serious concerns are reviewed. Backbenchers said that they lacked confidence that scrutiny recommendations would be followed up, hence their use of critical motions and call-in. Call-ins should be used to address cases when the decision making process has gone wrong and not when a member does not agree with a

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decision that has been made. To avoid this happening, Members should be expected to provide a written justification for their reasons for call-in which matches the statutory criteria. There is also evidence of Directors and Cabinet Members having to attend call-in meetings without knowing exactly why the call-in was instigated. The reasons for the call-in needs to be explained and witnesses briefed beforehand.

Scrutiny and committee staff said that they need more efficient and reliable equipment to cope with the move to paperless working. They are able to work from home and can access the Committee Management system from laptops. They did say that the system was slow and had no effective functionality to assist in drafting minutes. They also said that reports cannot be easily shared with HR and Legal Services and this has resulted in officers continuing to share versions of Cabinet reports via email leading to a loss of version control. This also limits options for more efficient single point collaborative working on reports – that would address some of the concerns re timely advice from finance, legal and HR.

More generally the committee management system was described by council officers who are familiar with it, as "clunky, slow and unreliable". Members said it was not easy to search for a report by topic. Recent training on how to use the system was unsatisfactory (carried out in large groups in the council chamber due to lack of resource to fund more appropriate training)

Although many committee meetings are available for the public to download, the webcasting technology is often unreliable and the equipment staff have to work with at their desks is outdated. Committee Services have developed and maintained effective working relationships with other teams in the Directorate such as Business Support and Member Services. These teams provide directorate specific governance support for their Directorates in support of corporate processes.

4.3 Capacity and Capability (including staff skills and knowledge) in these services now and in the future.

The change to a four-yearly election cycle offers continuity of membership on scrutiny committees and an opportunity to develop Members knowledge and skills further. There is still a lack of understanding of the basics of governance amongst a number of Members, particularly around regulatory issues. Member development in the Council is now a member-led programme, with a cross-party Member Steering Group responsible for learning and development. Support is available from a democratic services officer. There is a corporately agreed Member development strategy overseen by the Member Steering Group and chaired by the deputy leader. Attendance at Member training is generally low despite the fact that training is offered at different times of the day and there are evening sessions. A market style display of information from different directorates takes place each month before Council so that Members can "drop-in" and talk to officers about issues. Briefing sessions are also offered before full council

meetings. Political Groups should consider what measures might improve this low level of engagement with training and development.

The creation of the new Governance team presents an opportunity to create a cohesive Democratic Services function that could make a far more effective contribution to the organisation. A number of issues need to be addressed including technology, roles and responsibilities, staff development and location Currently, committee and scrutiny staff sit in separate rooms on the same floor. Co-location would provide more opportunities for them to learn from each other. There is a wealth of experience in both teams which should be captured and incorporated into learning and succession plans.

Senior officer flux in recent years has been de-stabilising for the Council. Both services now have an aging workforce profile and with a number of staff planning to leave the organization within the next few years there is an urgent need to undertake succession planning. An apprenticeship scheme for committee and scrutiny officers would bring in some new and younger people to help reinvigorate the service and provide a greater focus on training and development for staff more generally.

Within Scrutiny and Committee Services report writing skills and knowledge of democratic decision making processes have been lost as a result of a reducing workforce. The Council needs to develop and invest in committee and scrutiny services officers to ensure there is sufficient capacity and capability to support Members now and in the future. Individuals in the teams need to be empowered and encouraged to keep their technical knowledge and skills up to date by being accountable for their own learning and development. There is evidence of Committee officers being reluctant to offer guidance in meetings due to a lack of knowledge and fear of criticism. This means that officers are not using their skills and experience to its full potential. Increasing the skills of committee clerks, for example improving their understanding of the Constitution and decision making processes would help to build their confidence and add value to the wider organisation. There is also no reason why staff in the service could not attend some of the training sessions arranged for members particularly around regulatory services and legislation.

4.4 How can scrutiny as part of the wider governance culture of the organisation add value to the Council's core objectives?

There is some evidence that scrutiny focuses on corporate issues of strategic value. E.g enablement. There is generally a corporate understanding that decision making needs to be transparent and subject to scrutiny. Members spoke of a positive working relationship with the Scrutiny team and gave examples of good scrutiny research support. There is a corporate commitment to scrutiny which is evident through the level of resources and number of committees. Scrutiny engages positively with external partners and stakeholders e.g. the Health and Social Care Overview and Scrutiny Committee and Children's Trust.

The full value and impact of scrutiny is currently unknown within the Council and its purpose and benefits are not fully understood. Recognition of scrutiny's role in supporting the delivery of corporate priorities and being crucial to good governance is not evident. Whilst there are some examples of where scrutiny has made a positive impact this was not consistent across all committees and scrutiny committee performance was described in the organisation as variable.

The alignment of scrutiny with corporate priorities is not clear. Scrutiny's focus is currently very wide and there is a lack of prioritisation, coordination and focus on areas where this could value and make a difference to the citizens of Birmingham. There is a desire to conduct pre-decision/policy development scrutiny, however opportunities are currently limited. For scrutiny to work effectively, all Committee Chairs, Members, Cabinet Members and Directors need to be engaged with work planning, evidence gathering and effective questioning. To achieve this, Members must undertake the necessary training and development. Scrutiny Members should also be mindful that scrutiny is not a place to raise casework and parochial issues.

4.5 The balance of political/democratic/ward councillor support.

This issue was an addendum to the main scope of the review, hence our observations are brief.

Cabinet and Leadership support is well resourced but there may be better ways to deploy those resources. This is currently under review. There is scope for providing additional policy support for Cabinet Members casework and support for all Members generally should be strengthened. We believe that there is capacity within the broader governance staffing establishment to achieve this.

Ward Members have expressed concern that they no longer receive information and performance data of council services in their Ward.

5.   Signposting

Nottingham City Council's Member casework system

Leeds City Council Call-in resolution process

The LGA's Development offer for political leadership
www.local.gov.uk/sites/default/files/documents/LGA%20Highlighting%20Political%20Leadership_May%202014_v2.pdf

6. Next steps

Immediate next steps

We appreciate the senior managerial and political leadership will want to reflect on these findings and suggestions in order to determine how the organisation wishes to take things forward.

As part of the peer challenge process, there is an offer of further activity to support this. The LGA is well placed to provide additional support, advice and guidance on a number of the areas for development and improvement and we would be happy to discuss this. Helen Murray, Principal Adviser is the main contact between your authority and the Local Government Association (LGA). Her contact details are: Email helen.murray@local.gov.uk

The team would also be happy to provide insights and challenge on your new redrafted Constitution. In the meantime we are keen to continue the relationship we have formed with the Council throughout the peer challenge. We will endeavour to provide signposting to examples of practice and further information and guidance about the issues we have raised in this report to help inform ongoing consideration.