

Corporate Peer Challenge – Six Month Progress Review

Wirral Metropolitan Borough Council

December 2022



1.0 Executive summary:

Wirral Metropolitan Council (WMBC) undertook a Corporate Peer Challenge (CPC) in March 2022. This review took place shortly following the publication of two external assurance reports on the Council (November 2021) which highlighted several significant shortcomings with regards to finance, governance, and culture. These reports also required the Council to establish an Independent Assurance Panel to support and scrutinise their financial recovery and wider approach to improvement.

Given this context, it is important to note that this progress review has been completed just six-months since the publication of the full CPC Report, and the corresponding Improvement Plan which has been developed by the Council. The team found that many of the significant challenges facing the Council, most notably their financial context, are still live and present issues within the organisation. These challenges have been exacerbated by national inflationary pressures and pay awards. This has worsened the Council's in-year position and has created further pressure on the medium-term financial plans of the Authority. However, it is also apparent that the Council has made progress, including improvements to the operation of the Committee System and improved alignment of corporate resources to support the Council's regeneration ambitions.

This scope for this six-month progress review was focused on the original 13 recommendations which were presented to the Council through their CPC. It was not intended duplicate the more in-depth and detailed work which the Council is completing with the support and challenge of Independent Assurance Panel. The Peer Team recognise that the Council is benefiting from the input and expertise afforded to them through the Improvement Panel.

The political make-up of the Council remains No Overall Control following the 2022 electoral thirds, with Labour as the biggest group with 26 Councillors, and the Conservative, Green and Liberal Democrat groups having 23, nine and six respectively. In this context and given the collective leadership responsibilities created by the Council's Committee governance system the peer team noted, as in their initial visit, that it is essential that there is mature cross-party working between groups to take forward the Council's improvement. This issue applies most notably on the development of proposals to support financial recovery.

The ability for groups to work collectively towards will naturally be tested by the move to an all-out election cycle from May 2023. Whilst there will naturally be political differences across groups on key issues, it is important that the Council's financial recovery and improvement are not delayed or hindered over the coming months. To support this, it is essential that Officers provide Members with a clear framework that creates space for political debate. This will include the provision of the appropriate information to facilitate

political discussions and mitigates the risk of shared and collective positions across groups being 'undone'. It is recognised that both officers and members have given a lot of time to key meetings to develop budget proposals, but the team would reiterate to the Council that this process needs to extend beyond formal meetings.

The Team appreciate that the Council have engaged positively with the findings of the CPC, including delivering an 'all-member' briefing on to share the findings. Importantly, WMBC has responded to many key findings, including that *"the council's regeneration ambitions will not address the council's financial challenges and creates further risks regarding deliverability and security"*. It was apparent to the team through this progress review that the Council is viewing regeneration through a broader lens, and that there is now more corporate engagement and support on these issues. This also includes the Council adopting a more realistic, longer-term narrative regarding the contribution of regeneration to the Council's financial challenges.

The Team was also pleased to see many of the positive responses that the Council has made to recommendations, particularly through the work of Democratic and Member Services. This includes the practical reforms that the Council has made to their committee system in reducing the number of forums, reviewing the previous inconsistent approaches to scrutiny, and bolstering the role of Policy and Resources Committee to provide more financial grip. This team have also supported the development of a new Member Development Strategy for 2023-2027 which will be invaluable following the all-out elections and the potential for a significant cohort of new Councillors. These improvements are encouraging. However, it is important that they are used to build momentum for the organisation to continue to address bigger and more challenging historic issues which have existed, particularly on the delivery of financial savings, rather than being seen as the completed milestones. It is also important that the Council recognises that Member development and Member relationships are live issues which will require further time, input and attention over coming years.

Since the Peer Team were last with the Council there have been several new appointments made to key posts, including Section 151 Officer, Monitoring Officer, and Director of Regeneration. The recruitment of a new cadre of officers to these roles presents both the opportunity for new ideas, as well as the risk of new individuals appreciating local issues and nuances in the live environment of budget setting and elections. Therefore, it is essential that the Council considers the support required for individuals in these roles, as well as the approach to working collectively which they want to embed as the new organisational norm.

The Peer Challenge Report from March stated that *"of the challenges which are facing Wirral council, the most significant and urgent are those relating to the Council's finances"* this remains true, with the council's financial position worsening in-year due to inflationary

pressures. Whilst the Council has made good progress in the delivery of saving proposals for 2022-2023, the forecast financial gap for 2023-2024 has grown significantly from £14 million at the start of the year. This figure increased during 2022 because of inflationary pressures to £49 million which was publicly reported in September but was not accompanied by appropriate savings proposals to address the full amount. Since September, this figure has since been revised down to £38.4 million following the revision of assumptions and input of the Independent Panel. The timing of this progress review means that the Council is still working through the development of proposals to bridge this gap, and the accompanying public consultation which needs to be completed at pace. Whilst the scale of this challenge is significant, it is important to note that this is the start of the process for creating a medium-term financial recovery and will only provide headroom for the coming 15 months. The Council will need to maintain this approach and rigour to move towards a sustainable medium-term financial recovery for the organisation from April 2024 onwards, recognising their continued vulnerability in this context due to low levels of financial reserves.

In the context of the scale of the challenges presented at the time of the original Peer Challenge, it is natural that the immediate priorities of the organisation were to review governance, set an appropriate budget, and manage the requirements of all-out elections. As the Council moves forward, the four-year election cycle will provide opportunity to change relationships across Members, improve organisational culture, and move towards a robust medium-term financial plan. With this in-mind, much of the Council's improvement work is still to come, and continued planning, preparation, and commitment is required to take this forward over the coming months and years.

2.0 Background:

The six-month progress review is an essential part of the LGA Corporate Peer Challenge (CPC) process. These reviews are designed to take place approximately six-months from the Council's publication of their original CPC report and supporting action plan. It is appreciated that WMBC's Action Plan was incorporated into their wider Strategic Improvement Plan, alongside the Council's response to recommendations delivered by external reviews commissioned by DLUHC.

It is the intention that this will provide opportunity for feedback on the early progress of the Council and consideration of next steps. It is not proposed that these six-month progress reviews will revisit previous findings or incorporate new lines of enquiry beyond the original CPC.

3.0 Peer team, Scope, and Context:

The original CPC in March 2022 was originally supported by eight Officers and Councillors from across. The full report from this Peer Team is available on the LGA Council website [here](#). This revisit was completed by the following four members of the original team on Wednesday 30 November:

- **Jacqui Gedman** (Lead Peer): Chief Executive (Kirklees Council).
- **Cllr Sir Steven Houghton**: Leader (Barnsley Council).
- **Cllr Mike Wilcox**: Conservative Peer (Staffordshire County Council).
- **Matt Dodd**: Peer Challenge Manager (Local Government Association).

This review included the Council developing a self-assessment of their progress to-date and the development of an agreed timetable to maximise the Team's input whilst on site. This included a small number of 1-2-1 interviews, focus groups across key themes, and a facilitated discussion of key findings and feedback with senior political and managerial leadership of the Council.

The original Corporate Peer Challenge made a series of 13 recommendations to support the Council's ongoing improvement journey (these are contained in full in Appendix 1.0 to this report). For the purposes and structure of this report, these have been clustered under the following themes and headings:

- Governance, Finance, and Audit.
- Clarity of Improvement Proposals and Cross-Party Engagement on Process.
- Transformation and Organisational Culture.

Whilst this six-month review focuses on the progress made against the Council's Action Plan, it also allows consideration of changes in the Council's operating environment over this time. This can often mean new opportunities or challenges, or wider changes in context since the team were last onsite. As part of this review the Council provided further information on this context, including the impact of inflation on the organisation and the appointment to several senior officer roles. The team was also made aware of the increased demand that the Council was experiencing for services in response to the cost-of-living crisis, with more residents coming forward for support. The Team also appreciate that the Council has delayed the implementation of a new financial system (ERP) which had previously been due to 'go-live' in summer 2022 but has been delayed 12 months following testing and the recruitment of a new implementation partner. Finally, it was pleasing to hear that the Council has continued to make progress with the development of the Local Plan

which is now with the Secretary of State for review and testing. This is a significant milestone and achievement given that the Council has not had a Local Plan in place since 2000 and it took a concerted effort, prioritisation, and extra resource to ensure its development.

4.0 Governance, Finance, and Audit:

Under this theme, consideration was given to the activity and progress of the Council against the following recommendations. These recommendations are listed in full in Appendix 1.0, but are summarised below at a headline level:

- Implement proposed governance reforms to support increased effectiveness of the committee system.
- Realign the council's corporate core to support financial transformation and wider improvement.
- Develop a corporate approach to the management of reserves.
- Review the resources, capacity and capability required to support the council's regeneration ambitions.
- Proactively engage with external audit to support financial improvements across the council and the management of risk.

The Peer Team recognises the progress that has been made by the Council with regards to improving the effectiveness of their Committee System, with the Council approving a new Constitution in May 2022. This saw the reduction in the number of Policy Committees from seven to six, as well as abolishing the Decision Review Committee and Partnership Committee which had previously presented an inconsistent approach to Scrutiny. The Team was told that this has resulted in the system working more effectively, particularly with the Policy and Resources Committee providing more leadership on budget issues. There will be a need for the Council to consider any wider iterative improvements that they will need to progress following the May 2023 elections. The team also appreciate that whilst this demonstrates progress against the technical issues of governance, there is still a need for the Council's culture of governance to improve, including issues of member / member relationships and conduct. This will be particularly important in the context of agreeing the Council's budget for 2023-2024, and the need for Groups to recognise the collective responsibility to deliver sustainable financial planning for the Council. This will require all Groups to take a shared "Wirral first" approach that prioritizes Council recovery and improvement, and builds on the shared recognition of the Council's context and avoids these issues being undermined by political discourse.

The Council is currently undertaking ongoing work to review and realign their corporate core through a 'strategic review of corporate services', however, the peer team note that the

delivery of savings identified for 2022-2023 are being reported as 'on-track' which is a key indicator. Given the financial context of the Council, it is important that the review of corporate services is not done solely from a cost perspective, as these corporate services will be essential in coordinating, sequencing, and delivering the wider savings required over the medium-term. Therefore, it is essential that the Council assures itself that it will have the necessary capacity for this work and avoids creating a risk for a short-term saving. This was originally highlighted in the full Peer Challenge: *“Central to delivering the necessary improvement for the council will be the corporate capacity of the council and the strength of corporate services.”*

Whilst the team were provided with information regarding corporate oversight of reserves, with the Section 151 officer being responsible for variations and virements, and oversight provided to Full Council. The Team believe that more could be done regarding the centralisation and control of these reserves, this includes them being reported at an Organisation level (rather than Directorate level) to further support control being held corporately, rather than at a service level.

Due to time constraints, it was not possible for the revisit to engage with external audit. However, noting the annual audit Letter (based on 2021) there are a number of significant issues that the Council needs to continue to manage and address, including specifics on regeneration companies and joint ventures. The interdependency between these issues and the Councils' regeneration ambitions is something which the Council will need to assure themselves are being appropriately managed through their Audit and Governance Committee.

Finally, the Peer Team appreciate that the Council's financial recovery remains the most challenging area of their improvement. The immediate challenges of developing a balanced budget for 2023-2024 within the context of all-out elections and inflationary pressure will naturally be a key area of focus for the coming months. However, it will be essential that the Council maintains this momentum into future years as part of the development and embedding of a meaningful MTFP that delivers against the full recommendations of the [CIPFA Assurance Report](#). The Peer Team deliberately did not duplicate the previous findings and recommendations from these assurance report but encourage the Council to quickly transition into their planning for the medium-term following the 2023-2024 budget process, and the central role that an evidence based and accurate MTFP will have in supporting planning over a longer-time period. The move to all-out elections provides an opportunity for this work to be aligned to the Council's four-year election cycle, and a consistent medium-term planning framework. It is important that the Council uses this medium-term timeframe to change the relationship between members, improve organisational culture, and improve financial planning. Therefore, it is important that the Council recognises the majority of this work will need to be completed following the all-out

elections in 2023, and has the appropriate plans, strategies, and processes in place to take this forward with pace.

5.0 Clarity of Improvement Proposals and Cross-Party Engagement on Progress:

Under this theme, consideration was given to the activity and progress of the Council against the following recommendations. These recommendations are listed in full in Appendix 1.0, but are summarised below at a headline level:

- Develop a clear and collective vision for the future of Wirral council and the borough.
- Develop a golden thread which cuts across tiers of the organisation regarding this vision.
- Work towards political consensus on shared priorities to engender cross-party support on key issues.

The Council have responded in a structured manner to the findings of the CPC. This includes the development of a Strategic Improvement Plan which was approved in Spring 2022. This Plan is supported with Directorate Business Plans, which have been informed through staff engagement, performance information, and the council's external assurance context. This Plan is designed around four key strands of financial stability, effective organisation, effective services, and resilient communities. The Wirral Improvement Plan can be accessed [here](#).

The Council is planning to update their borough plan following the 2023 elections to reflect the full four year-term of any new administration. This presents as a clear hierarchy of plans and strategies, and clear alignment on their content with a rationale for their future revisions. However, it is important that the refresh of the Wirral Plan in 2023 continues to be aligned with the necessary actions and milestones included in the Council's improvement plan and does not act to dilute focus or attention. The key challenge for the development of this plan will be to align the breadth of activity and ambition into a single and consistent narrative for the borough.

The political make-up of the Council was largely unchanged through the 2022 elections, with the context remaining no-overall control in the context of the committee system. There has been a great deal of time given by all groups towards supporting the Council's approach to budget setting for 2023-2024 and politicians deserve credit for their input and contributions, this must be maintained as the Council approaches the final stages of the budget setting process. This has included fortnightly leader and group leader meetings, and the attendance of Councillors at all member training and briefing sessions on finance and improvement issues. However, given the scale of the challenges facing the Council, it is important that all groups continue to work in-line with the recommendation from the Ada

Burns report “to engage constructively with the plan, and support dialogue with the public”. This will require members to continue to develop proposals collectively, and for officers to design and deliver a budget process that facilitates political discussion, debate, and choices. Finally, it is essential that there is maintained cross-party political focus and commitment to delivering the savings identified in the budget.

6.0 Transformation and Organisational Culture:

Under this theme, consideration was given to the activity and progress of the Council against the following recommendations. These recommendations are listed in full in Appendix 1.0, but are summarised below at a headline level:

- Consider additional capacity to support the political and managerial leadership of the council.
- Foster a culture of rigorous and constructive challenge within the organisation.
- Provide dedicated space and time for the council’s senior management team, committee chairs, and group leads to come together.
- Further the training and development provided to elected members and managers.
- Continue to work effectively with the Wirral improvement panel, considering the development work that is required over the coming two years.

Since the Corporate Peer Challenge there have been changes to the structure of political group support – with the introduction of a “Team around the Leader approach” and additional capacity being added to support group offices. This will add will additional capacity and resource to support group Leaders which will be helpful in the run up to and beyond all out elections in 2023. However as with the recommendations in the original peer challenge report the Peer Team believe that the Council would still benefit from additional capacity to support the managerial leadership of the Council. It is essential that there is dedicated capacity to identify and align strategic issues and to enable the timely movement of information across political groups and committees. This additional capacity will help with the facilitation of political discussion, debate, and decision making across the groups and will drive the change programme ensuring focus and attention on improved co-ordination of both political and managerial decision making

WMBC introduced a number of internal processes to support improved challenge within the Council. This has included the creation of a Committee Co-ordination and Oversight Group (including representation from Governance, Risk, Legal and Finance) to quality assure all key decision reports, prior to sign off by the Senior Leadership Team (SLT) and act as an important forum for sharing information. This is an encouraging development but will require further work and support with the appointment of new statutory officers. The Council should

consider the support available to these individuals through training, mentoring and development to support their success. Beyond individual support, further work could be completed to consider the working practice that WMBC want to embed in these relationships, looking at a sense of “Team”, and how officers will work collectively to support the Council’s improvement.

To further manage risk effectively, internal governance at the Council has been strengthened through the establishment of a Regeneration Programme Board, reporting through to the Investment and Change Board. This group, chaired by the Chief Executive has also been established to provide scrutiny of the delivery of the regeneration programme and to ensure that corporate input and support is provided to enable that delivery as part of the Improvement Plan priorities. This is a positive development, and an additional check in the system. This forum is important given the breadth of external funding which the Council has attracted for regeneration ambitions, including successful bids to the Future High Street Fund, Town Deal Fund, as well as from Liverpool City Region Combined Authority, and Homes England, and the risk of clawback which will be presented through non-delivery or slippage on key milestones.

There has been increased time and space for the Council’s Senior Leadership Team (SLT) to work collectively. This has included dedicated away days to develop the Strategic Improvement Plan, and strategic sessions focused on budget setting for 2023-2024. Below the ‘top tier’ of the organisation, this has been taken forward through a People Strategy which has been informed through staff conversations. There is now a need for the council to embed reporting processes against these plans, to develop an appropriate feedback loop regarding the impact and progress of the Strategy. There is also potential for the Council to supplement individual focused training and development with collective team development, bringing together key officers and Committee Chairs to consider ways of working and preferred styles. This will be crucial following the 2023 all-out elections.

There has also been a clear renewed focus on issues of Member development at the Council. This has included the development of a long-term Member Development Strategy for 2023-2027, as well as the delivery of dedicated sessions on finance, chairing, corporate parenting, and social media training since the team were on site. It is important that further work takes place to embed this way of working within the organisation’s culture, rather than it being seen as an individual instance or programme.

Finally, the Peer Team recognise that the structure, rhythm, and input of the Wirral Assurance Panel has supported the Council’s progress to-date. It is appreciated that the Panel’s second Assurance Letter has been drafted as a ‘holding position’ with Members seeking further detail on the Council’s 2023-2024 budget position and proposals which remains the central issue to the Council’s challenges.

6.0 Summary, Recommendations and Next Steps:

The LGA continues to have a strong and open relationship with Wirral Council, and the council is clearly committed to engagement with sector-led-improvement. This is best illustrated through the input of the Wirral Assurance Panel which includes expertise from across the sector, as well as LGA Peers and Officers. It is hoped that the process for this progress review will support the Council in structuring and presenting information to the Panel.

Given the limited time on-site with the Council through this progress, the primary aim is to consider progress against previous recommendations, however, the Peer Team would encourage the Council to consider the following issues as they continue to move forward:

- **Political Relationships:** The Members of WMBC need to consider and manage councillor / councillor relationships, especially in the context of all-out-elections. This includes ensuring that conduct reflects positively on the Council's reputation, but also appreciating the need for cross-party working to support priority issues including budget setting. This is especially true in the context of the Committee System.
- **Clear Political Leadership:** Group Leaders should ensure that they are visible in their support for cross-party working. This will be central to the 2023-2024 budget being well developed and agreed across groups. This includes maintaining a cross-party commitment to a "Wirral first" approach that prioritises the borough and organisation ahead of political groups.
- **Continued focus on external recommendations:** The Council needs to ensure that there is a maintained focus on the findings and issues identified through the Ada Burns / CIPFA Assurance Reports of 2021. Importantly, this includes the need for further work on the medium-term financial recovery of the Council, following the conclusion of the 2023-2024 budget process.
- **Support New Appointments:** Dedicated support and structure should be given to new appointments in senior roles. This includes making sure that there are working practices to support relationships between these roles, as well issues of personal development for individuals. This should also include consideration of developing a sense of team across these roles, recognising the importance of working relationships to the Council's progress.
- **Post-Election Priorities:** Whilst it is understandable that much of the Council's capacity and resources will be focused on the immediate management and delivery of short-term

issues ahead of the 2023 elections. It is important that the Council takes the opportunity afforded to them by the new election cycle to move towards a more medium-term and structured approach towards improvement beyond their current annual cycle.

It is recognised that senior political and managerial leadership will want to consider, discuss, and reflect on these findings. To support transparency, the council is advised to publish this note. Claire Hogan is the LGA's Principal Adviser for the North West and can be contacted on Claire.Hogan@local.gov.uk

Appendix 1.0. Full list of previous recommendations from Corporate Peer Challenge:

Listed below are the full recommendations from the Wirral Corporate Peer Challenge, beyond the descriptions used in the chapters above:

- 1. Develop a clear and collective vision for the future of Wirral council and the borough:** The council revised the Wirral plan (2021-2026) in July 2021 setting out the priorities for the council for the coming years in a post-covid context. However, the subsequent publication of assurance reports has changed the context of the council. Therefore, there is a need for WMBC to articulate a vision and priorities that brings together the council's budget, strategic improvement plan, organisational structure, culture, regeneration ambitions, and relationship with partners into a single narrative and framework.
- 2. Develop a golden thread which cuts across tiers of the organisation regarding this vision:** There is need to further develop the golden thread associated with this vision into service plans, team plans, and staff appraisals (known locally as "*check ins*"). This will support with the identification of SMART outcomes, and for staff across the organisation to understand the contribution that their teams and roles can make towards them.
- 3. Review the resources, capacity and capability required to support the council's Regeneration ambitions:** The peer team recognise the exciting opportunities that exist within the borough through regeneration. However, WMBC need to assure itself that it has the appropriate skills and resources across the organisation to deliver on its scale of ambition. This includes particular focus on the finance support required to support delivery and manage risk on the council's behalf as a '*client function*'. It is also essential that the council maximises the opportunities to improve outcomes for residents through this work, making sure that this is not just viewed as '*physical regeneration*'.
- 4. Realign the council's corporate core to support financial transformation and wider improvement:** A strong corporate core is essential to coordinating, managing, and monitoring, the council's financial recovery. This core is currently dispersed across a number of directorates, and the council should look to bring this resource into a centralised team as far as possible. The council needs to consider the most appropriate

place for this to sit in the organisation, ensuring that it is aligned to delivering the council's strategic improvement plan and financial recovery, but does not act to dilute the attention required of statutory officers.

- 5. Foster a culture of rigorous and constructive challenge within the organisation:** A key feature of successful organisations is robust internal challenge. This is essential in the development of saving proposals, regeneration propositions, and policy implementation. Wirral needs to ensure that this challenge is a central feature of the organisation's culture, whilst mitigating the risk that challenge escalates into inappropriate behaviours. This can be supported through improved movement of information across the council, and better engagement with councillors through the decision-making process (including improved reports).
- 6. Develop a corporate approach to the management of reserves:** Reserves are currently held at a directorate level which creates challenges of oversight and limits the strategic opportunities regarding their use. The use of earmarked reserves should not be seen as an in-year contingency. The peer team feel that reserves should not be managed within directorates and should be managed corporately and maintained at the appropriate level. This centralisation of reserves is essential for sound budget management and supports their use strategically rather than reactively. This work needs to link the management of reserves to the council's medium term financial strategy and the delivery of the existing budget framework.
- 7. Proactively engage with external audit to support financial improvements across the council and the management of risk:** The delivery of the council's financial recovery and strategic improvement plan should address the statutory recommendations from external audit. However, it is important that the council engages beyond this to support an improved culture of financial reporting and good governance through proactive and regular dialogue on emerging issues.
- 8. Work towards political consensus on shared priorities to engender cross-party support on key issues:** Given WMBC is 'no overall control' there is a need for shared political approaches on priority issues. Therefore, to strengthen the stability of decision-making, the council should work towards political consensus across parties on issues of strategic importance. This should include an ongoing shared understanding of the financial context of the council.
- 9. Implement proposed governance reforms to support increased effectiveness of the committee system:** The council undertook a review of its committee system in December 2021, which included specific recommendations such as reducing the number of committees, refining scrutiny, and reviewing schemes of delegation. The improvement of delegations within the council will both support the pace of decision making but will also act to empower officers across the organisation. The council needs to implement these reforms at the earliest instance and continue to be live to the culture of good governance to support ongoing improvement.

- 10. Consider additional capacity to support the political and managerial leadership of the council:** Within the framework of no-overall control and the committee system it is essential that the leadership of the council is well supported to ensure that their capacity is protected for strategic issues and to enable the timely movement of information across political groups and committees in-line with wider sectoral norms.
- 11. Provide dedicated space and time for the council's senior management team, committee chairs, and group leads to come together:** It is important that the council recognises the collective teamwork required across members and officers to support improvement. To this end, the peer team would recommend that further 'top-team development' work takes place at pace to support key roles both collectively and individually.
- 12. Further the training and development provided to elected members and managers:** Whilst this is being delivered currently, and there are plans for this to be extended, this needs to move to new levels to include a comprehensive plan for elected members covering roles and responsibilities, being a councillor in the 21st century, and increased learning from across the sector. This should be mirrored with a comprehensive management development programme, but it is essential that these are viewed as ongoing and continuous processes.
- 13. Continue to work effectively with the Wirral improvement panel, considering the development work that is required over the coming two years:** Wirral have made good progress working with the Improvement and assurance panel since December 2021, and this relationship is central to the council's journey. However, it is important that over the coming two-years the council does not become dependent upon the advice and direction of the panel, and instead fully owns and understands the actions required. This is especially pertinent for ensuring that there is clarity regarding the requirements and milestones that the council must meet to ensure that the panel has confidence that they are committed to and capable of continued improvement without external oversight.