

# PROMOTING BETTER PRACTICE PROGRAM

## CAMDEN COUNCIL

FEBRUARY 2015



Office of  
Local Government

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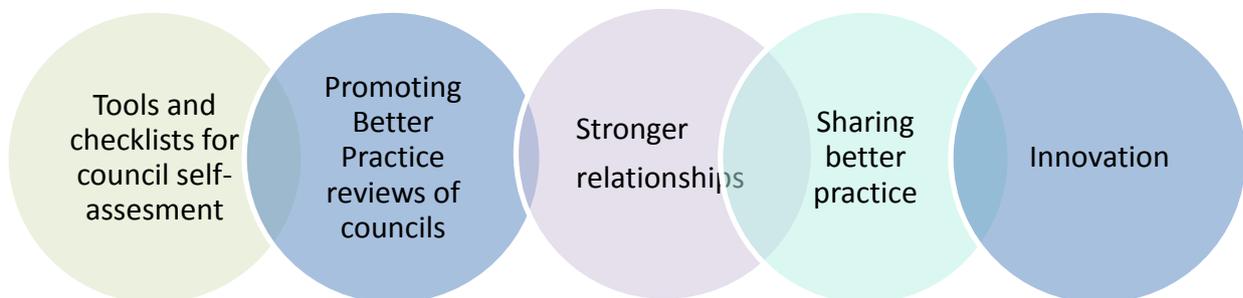
# 1. PROMOTING BETTER PRACTICE

## The Program

By promoting better practice, the Office of Local Government aims to assist in strengthening the local government sector by assessing performance and promoting continuous improvement.

The Program includes:

- working with councils to identify, share and promote better practice in key areas
- working cooperatively with councils to promote strong relationships within the sector.
- providing councils with feedback on areas requiring improvement or further development, and assisting them in developing solutions.
- identifying trends and issues arising from council reviews to support policy and legislative changes for the local government sector.
- encouraging and facilitating innovation within the NSW local government sector.



## Promoting Better Practice reviews

Reviews of individual councils are designed to act as a ‘health check’ to examine the extent to which there are appropriate strategies, policies, systems and procedures in place at the strategic and operational levels.

The reviews are conducted by a team from the Office of Local Government in collaboration with councils. During a visit to council key strategic areas are examined together. A key outcome is a report which reflects the findings of the review but most importantly contains a Review Action Plan with strategies to facilitate better practice and increase council’s overall capacity to deliver appropriate services to its community.

## Key strategic areas considered



Civic leadership and organisational governance examines how the elected body and the council organisation provide leadership within the local community, and considers all the means by which a council is directed and controlled to ensure effective decision making and ensure the organisation is meeting its legal and ethical obligations. The council's regulatory and enforcement framework is also considered.

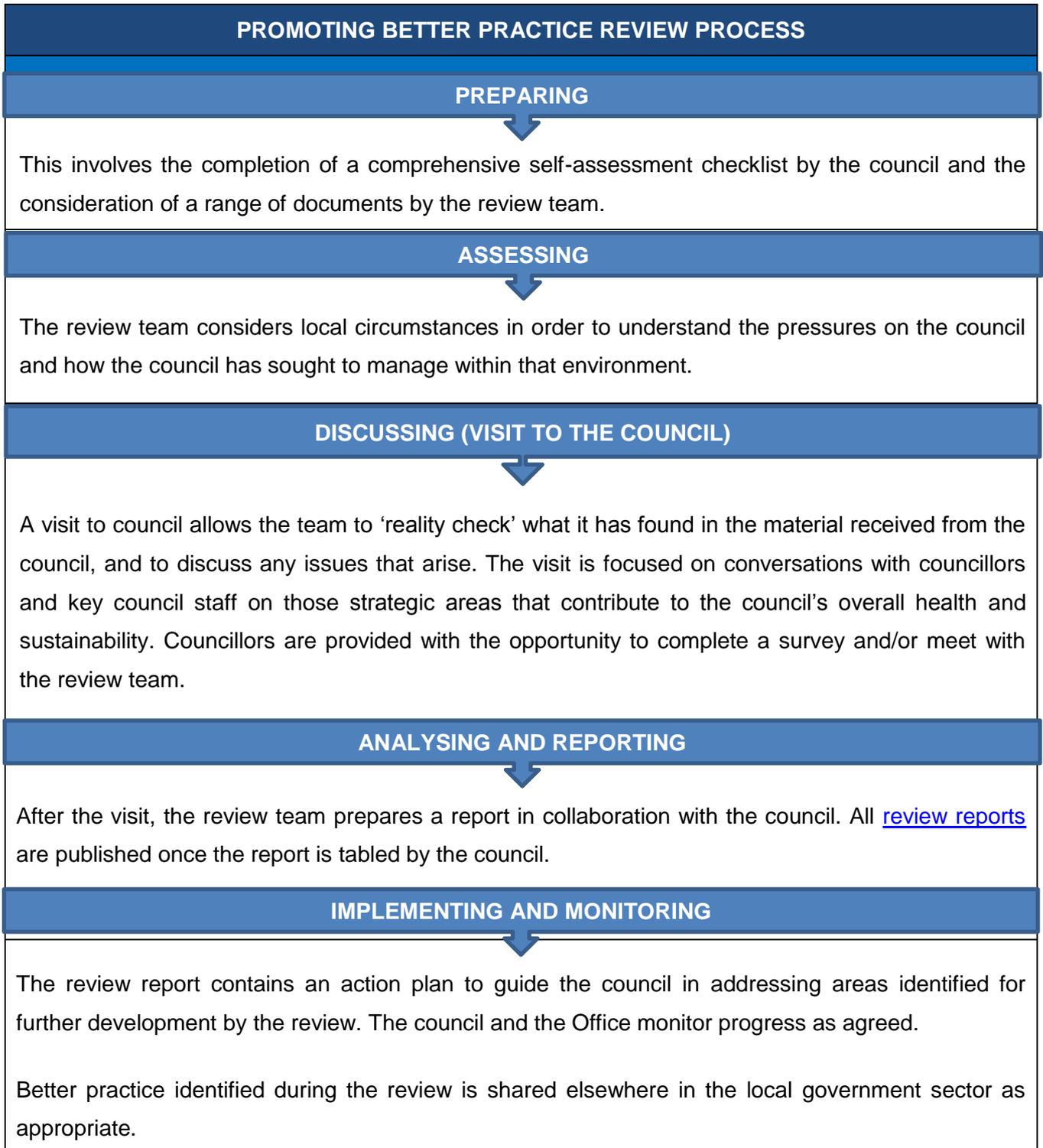
Strategic community planning focusses on the council's role in planning for the future in collaboration with its community. It considers how well the council engages its community in planning, and how well the Community Strategic Plan; Delivery Program, and Operational Plan capture the community's aspirations and goals. It also examines how strategic land-use planning matters are integrated into the council's implementation of the Integrated Planning and Reporting framework.

Resourcing the plans to achieve financial sustainability considers the current and future financial capacity of a council to maintain its operations and deliver appropriate services to the community. The council's financial and asset management position and practices are considered. The quality and utility of the council's long-term financial planning, asset management, and workforce planning is a key part of this assessment.

Delivering services to the community relates primarily to the extent to which the council translates the strategies and initiatives within its Community Strategic Plan, Delivery Program and Operations Plan into action. This includes how the council informs the

community of its performance in delivering services and facilities according to plan, and how it measures customer satisfaction or receives community feedback to inform ongoing planning.

### The review process



The Promoting Better Practice Review of Camden Council was undertaken in May 2014. The Council completed a self-assessment checklist prior to an on-site visit by Office of Local Government staff on 20 and 23 May 2014. The response to the checklist and supporting material provided by the Council was taken into account as part of the review.

Following the visit, the review team examined a range of information and assessed this material in line with applicable legislation, policy and guidelines where possible. The review team also called on the resources of a number of other agencies while drafting this report.

The review team would like to thank Camden Council's Mayor, Clr Lara Symkowiak and General Manager, Ron Moore, as well as the Directors and staff who participated in the review and provided valuable assistance.

### **About this report**

The Promoting Better Practice Review report is structured in the following way:

- Section 2 provides an overview of Camden Council and the local area, including a snap-shot of the key strategic challenges faced by the Council.
- Section 3 sets out the key findings of the Review, including an analysis of examples of better practice and areas for further development focussing on:
  - Strategic capacity, direction and service delivery
  - Financial sustainability
  - Governance.
- Section 4 summarises what is considered to be better practice by the Council.
- Section 5 summarises the areas for further development. This is set out in an Action Plan developed in consultation with the Council, which contains recommendations to assist the Council to increase its overall strategic capacity and its ability to deliver appropriate services to its community in the longer-term.

## **2. ABOUT CAMDEN COUNCIL**

Camden local government area is situated in the south-western suburbs of Sydney, approximately 60km from Sydney's CBD. The Camden area has a population of approximately 60,500 (NSW Planning & Environment).

The local government area has a total land area of approximately 201 km<sup>2</sup>, which includes established towns such as Camden and Narellan, green-field residential land release areas such as Oran Park and Gregory Hills, and tracts of semi-rural farmland.

NSW Planning & Environment has projected a population increase to 162,350 (168%) by 2031. Over this period the local government area's population is expected to increase at a rate of approximately 5% per year. The number of dwellings in the area will rise from approximately 25,000 in 2014 to approximately 58,500 in 2031.

The Council employs 304 full-time equivalent staff, including the General Manager and three Directors. This is projected to increase to more than 800 by 2031, in line with the expansion of Council services to meet the needs of the growing community.

A summary about the Council is provided on the following pages:

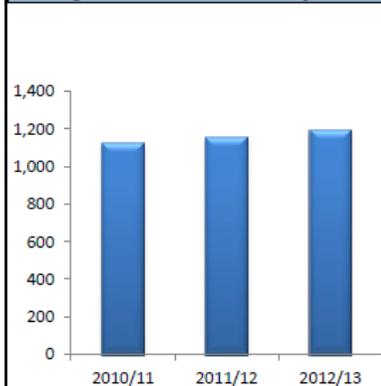
## Camden Council



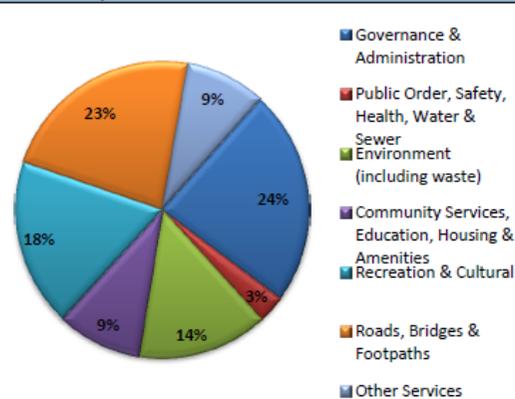
Camden has an area of approximately 201.3 km<sup>2</sup> with a population of 60,546. Located in the heart of Macarthur region, Camden is a semi-rural area with wool and cattle farming. The area is home to the Australian Botanic Gardens at Mount Annan. It is an area steeped in heritage, arts and culture, and sports and recreation.

Your Local Population	LGA	Group Avg	Your Council	LGA	Group Avg
Five year population change (%)	16.0	9.6	Councillors (No.)	9	10
Population aged 19 or less (%)	31.1	29.8	Population per Councillor (No.)	6,727	5,715
Population aged between 20 & 59 (%)	54.3	54.0	Equivalent Full Time Staff (EFT) (No.)	304	262
Population aged above 60 (%)	14.6	16.2	2012/13 Revenue (\$'000)	129,517	83,811
Aboriginal & Torres Strait Islanders (%)	2.0	2.3	2012/13 Expenses (\$'000)	71,414	60,347
Language Spoken Other than English (%)	8.4	6.5	Residential Pensioner Rebates (%)	12	14
Socio-Economic Index Rank (1 low, 152 high)	133	n/a	Population Density (residents per km <sup>2</sup> )	300.77	113.92
Your Local Economy	LGA	Group Avg	Your Public Facilities	LGA	Group Avg
SALM Unemployment Rate (%)	3.4	3.8	Public Swimming Pool Complexes (incl rock pools) (No.)	2	2
Avg Taxable Income (\$)	47,896	45,916	Public Halls (No.)	14	18
Avg Household Family Size (No.)	3.3	3.2	Public Libraries (No.)	2	2
Largest Industry Employer	Manufacturing		Open Public Space (ha)	419	392
Value of DAs determined (\$'000)	463,090	231,964	Total Road Length (km)	480.5	782.9
Active Businesses in LGA (No.)	4,712	5,132	Access to Internet at Home (%)	81.3	78.1

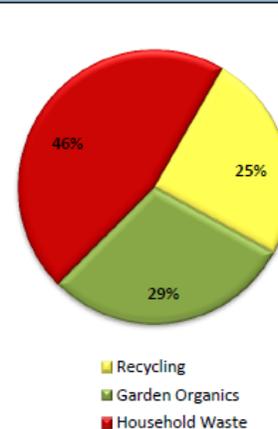
### Average Residential Ordinary Rates



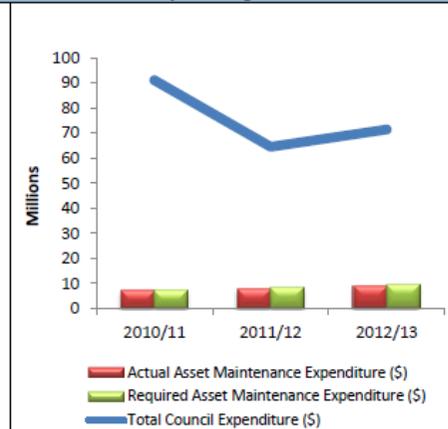
### Expenditure on Services



### Council's Waste Services



### Council's Spending on Assets



In 2013 TCorp assessed your Council's current Financial Sustainability Rating as Moderate with a Neutral outlook.

In 2013 the Infrastructure Audit assessed Council's infrastructure management to be Strong.

Contacting Council	Your Council's Finances	LGA	Group Avg	Your Council's Services	LGA	Group Avg		
<b>37 John Street</b> <b>Camden NSW 2570</b> <b>Postal Address:</b> <b>PO Box 183, Camden NSW 2570</b> <b>Phone: 02 4654 7777</b> <b>Fax: 02 4654 7829</b> <b>Email:</b> <b>mail@camden.nsw.gov.au</b> <b>Web:</b> <b>www.camden.nsw.gov.au</b>	Avg Ordinary Residential Rate (\$)	1,191.22	1,102.36	Governance & Administration Expenditure per capita (\$)	271.69	152.17		
	Avg Ordinary Business Rate (\$)	4,490.30	2,603.25	Environmental Expenditure (including waste) per capita	166.77	106.73		
	Avg Ordinary Farmland Rate (\$)	2,414.23	2,324.66	Water & Sewer Services Expenditure per capita (\$)	n/a	113.84		
	Avg Ordinary Mining Rate (\$)	n/a	19,808.51	Community Services, Education, Housing, Amenities Expenditure per capita (\$)	111.06	156.65		
	Total Land Value / Total Rate Revenue (\$)	222.23	265.38	Recreational & Culture Expenditure per capita (\$) *	218.81	209.69		
	Typical Residential Water and Sewer Bill (including usage) (\$)	n/a	570	Public Order, Safety & Health Expenditure per capita (\$)	36.24	56.87		
	Avg Domestic Waste Charge (\$)	290.08	330.54	Other Services Expenditure per capita (\$)	105.41	81.57		
	Own Source Revenue (%) (TCorp Benchmark 60%)	39	55	Library Services Expenditure per capita (\$)	36.55	34.76		
	Grants & Contributions Revenue (%)	57	38	Library Circulation per capita (Items)	4	4		
	Operating Performance Ratio (%) (TCorp Benchmark >4.0%)	-13.8	-10.5	Domestic waste not going to land fill (%)	69	54		
	Unrestricted Current Ratio	2.9	3.4	Development Applications (mean gross days)	49	80		
	Outstanding Rates & Annual Charges (%)	6.1	6.7	Development Applications determined (No.)	1,102	783		
	Debt Service Cover Ratio (TCorp Benchmark >2.0)	2.4	9.3	Companion Animals microchipped (No.)	23,287	28,355		
	Cash Expense Cover Ratio (Mths) (TCorp Benchmark > 3 mths)	0.4	1.0	Companion Animals microchipped and registered (%)	68	64		
<b>Demographics of Population of LGA</b>								
<b>Your Council's Community Leadership</b>			<b>Your Council's Assets</b>					
Development Applications determined by Councillors (%)			3	1	Roads, Bridges and Footpath expenditure per capita (\$)		269.53	255.80
Audited Financial Reports submitted by due date (Y/N)			Y	n/a	Building & Infrastructure Renewal Ratio (%)		31.7	60.1
Code of Conduct Complaints (No.)			5	7	Infrastructure Backlog Ratio (%) (TCorp Benchmark <20%)		2.2	10.7
Complaints investigated requiring action (No.)			0	0	Road Length per '000 capita (metre)		7.9	14.1
Cost of dealing with Code of Conduct Complaints (\$)			6,919	12,660	Asset Maintenance Ratio (TCorp Benchmark >1.0)		0.9	0.8
Population per EFT Staff (No.)			199	218	<b>Comparative Information on NSW Local Government</b> Measuring Local Government Performance 2012-13			
See Appendix 1 for definitions, calculations & benchmarks See Appendix 3 for Council Groups								

## **Challenges facing Camden Council**

The most significant challenge the Council faces over the coming decade is the population growth and associated development forecast for the local government area, which places pressure on it to:

- ensure that the needs and priorities of a rapidly growing and increasingly diverse population are adequately identified through the Community Strategic Plan process, by way of comprehensive community engagement.
- reflect the expectations of external stakeholders, including developers and State Government agencies, in long-term strategic and land-use planning processes, and balance these against the priorities of the community.
- ensure that agreed development application approval targets are met, including by employing a sufficient number of appropriately qualified staff.
- ensure that land developers appropriately contribute to the construction and maintenance of infrastructure for local communities, within regulatory constraints.
- ensure that the Council itself grows in a sustainable manner, to meet increased demand for services from a larger population, including addressing staff accommodation issues.

Like many councils in NSW, achieving long-term financial sustainability is also major challenge for Camden Council. These challenges are amplified by the abovementioned growth pressures. However, growth also presents an opportunity to improve the Council's financial sustainability through:

- increased revenue raising options, including a larger rate base for residential and commercial land, and increased use of user charges and fees.
- increased efficiencies associated with economies of scale in certain operations, such as the purchase of plant and equipment.
- the funding of vital community infrastructure through developer contributions.

Camden Council has benefited from a number of detailed reviews of its strategic capacity in recent years. In 2012, the Council was subject to a comprehensive audit of its asset management systems by consultants Morrison Low, as part of the State-wide Local Government Infrastructure Audit program. This concluded that the Council had a

'Core' level of competence in asset management, and identified key areas for improvement.

In 2013, the NSW Treasury Corporation (TCorp) undertook an assessment of the Council's financial capacity and its future sustainability. Based on the review of the information provided by the Council, TCorp assessed it to be in a moderate financially sustainable position. However, TCorp forecasted that this position would deteriorate if careful management of internal organisational growth and the Council's rapidly expanding asset base was not prioritised.

In early 2014, the Council commissioned Elton Consulting to develop an *Organisational Development/Business Improvement Plan (OD/BIP)* to guide organisational change and growth in Camden Council, and to support the implementation of its Integrated Planning and Reporting suite of documents. The Plan contains 57 recommendations for implementation over the short- to medium-term, including an organisational restructure.

These documents, which are discussed in detail later in this report, and the Community Strategic Planning process, have provided the Council with a solid foundation to inform its strategic development over the coming decades. It is evident that the Council has embraced the findings of these reviews and is progressing with addressing many of the issues they have raised.

### 3. KEY FINDINGS

#### STRATEGIC CAPACITY, DIRECTION AND SERVICE DELIVERY

The Integrated Planning and Reporting (IP&R) framework is designed to guide how a council, in conjunction with its community, undertakes long-term strategic planning.

Camden Council has been operating under the IP&R framework since 2010 and updated its suite of documents in 2013, in-line with statutory requirements.

The Council utilised a cross-organisational working group to develop and review its IP&R documents. The Council continues to use this group to reinforce understanding of the integrated and ongoing nature of planning and reporting across the organisation.

A desktop review of the Council's IP&R documents found that the legislative requirements of the framework are being met. The Council has displayed good practice in certain areas of IP&R, including ongoing reporting to the elected council.

While most aspects of the Council's IP&R activities are of a high standard, some require further development, including in the areas of community engagement, asset management planning, performance measurement and workforce planning. It is acknowledged that the Council has identified many of these issues, and defined clear actions to address them, through the recently completed organisational development/business improvement process, described in further detail in the Governance section of this report.

#### Community Engagement

Camden Council undertook wide-ranging community engagement in the development of its initial IP&R documents in 2009 -10. It built on this during the review of its IP&R documents in 2012, engaging with over 1,300 community members through a variety of mediums including: phone surveys, written and face to face surveys (including a survey of local high school students), focus groups, open sessions at local libraries, and postcards encouraging written feedback. This was supported by advertising in local newspapers, and at various local events and Council service points (eg: front counter).

The Council's IP&R-related community engagement activities were informed by a Community Engagement Strategy adopted in August 2009. This set out key principles for engagement and identified a variety of engagement mechanisms and processes. During both rounds of IP&R, the Council prepared a report on community consultation to inform councillors and the community of the outcomes of the engagement undertaken.

An initial action of the Community Engagement Strategy was the development of the *Camden 2040* website. This stands apart from the Council's main website and provides a centralised location for all of the Council's IP&R-related documentation and key supporting data, including interactive demographic data and sustainability indicators.

The review team acknowledges that the Council has undertaken its community engagement in an environment of limited resources, coordinated in-house by staff. This appears to have been effective from a strategic planning perspective and has also helped entrench a strong culture of community engagement across the organisation.

The Council advised that its staff have developed productive relationships with local developers, evidence of which can be seen in the favourable outcomes for the Council in negotiated Voluntary Planning Agreements. Staff also reported strong relationships with key NSW Government agencies, including the Department of Planning and Environment, and Roads and Maritime Services. Anecdotal evidence also suggests that the Council has strong relationships with local State and Federal MPs at a political level.

Other examples of the Council's commitment to ongoing community engagement include the development of exit strategies for the Camden and Narellan centres which aim to lessen the impact on the local business community arising from the Council's planned transition to a new administration building in Oran Park Town Centre. In November 2013, the Council also resolved to establish a Business Alliance/Economic Development Taskforce to improve opportunities and diversity in employment within the local government area.

#### **Action item #1**

*The Council should build on its successful approach to community engagement by expanding the use of engagement mechanisms to ensure that more members of the*

*community are able to contribute to discussions about community priorities. This could include the development of interactive tools providing high impact visuals about future trends in development and population growth, similar to those used in the Oran Park Town website*

## .Communications framework

### **Better Practice**

*The Council's draft Communications Framework articulates its communications priorities in a clear and accessible manner for staff, and aims to embed a culture of community engagement across the organisation.*

Coinciding with the recent organisational review process, the Council is in the process of finalising a framework to guide staff in their communications both internally and with the community and other external stakeholders, which includes:

- *Council Communications Strategy*, which identifies the communication objectives of the Council, defines key audiences and identifies key messages based on the themes of the Community Strategic Plan.
- *External Communications Policy*, which is a sub-set of the broader Communications Strategy and sets out requirements in relation to communicating effectively with external stakeholders.
- *Communications toolkit*, which provides detailed information about the nature and use of specific methods of communication (brochures, fact sheets etc).

At the time of the Promoting Better Practice Review, these documents were in draft form. However, the Council advises that they will be finalised in the near future.

## Planning and reporting

### **Better Practice**

*The Council's ongoing six-monthly reporting on the Delivery Program/Operational Plan supports effective decision-making by councillors and informs the community of progress in a clear and effective manner.*

The quality of the Council's Integrated Planning and Reporting (IP&R) documents is generally very good, with clear integration between the Community Strategic Plan, Delivery Program and Operational Plan, and between the Delivery Program/Operational Plan and the Resourcing Strategy. However, as discussed later in this section, the Council needs to undertake further work in relation to integrating its Asset Management Plans with its Long-Term Financial Plan.

The Delivery Program and Operational Plan contain clear performance indicators. Since the Council adopted its IP&R documents in 2010, the data sources on which these indicators are based has improved substantially. This has greatly enhanced the reliability of the Council's reporting against performance indicators.

However, the Council acknowledges that more work can be done on making performance indicators more relevant and easier to measure. When doing so, the Council is encouraged to take into consideration the Office of Local Government's forthcoming Performance Measurement Framework.

The ongoing six-monthly reporting to the elected council on the implementation of the Delivery Program/Operational Plan is of a very high quality. This reflects the high quality of general reporting to council meetings, which is discussed in further detail in the Governance section of this report.

Particular areas of strength in the six-monthly Delivery Program/Operational Plan reporting include:

- the use of plain English to explain the intent of IP&R, and the Council's progress on implementing key activities within the timeframe.
- The use of a traffic light system to reflect achievement of specific targets, as well as a summary of key movements in indicators (both those that have moved towards and away from targets).

The Council advises that it intends to further refine the process of compiling these reports, by way of the implementation of a corporate planning software platform, which has commenced.

## Resourcing Strategy

### **Better practice**

*The Council's Resourcing Strategy document provides a sound foundation for the Council to undertake community engagement in relation to priorities and expected service levels. The Council is encouraged to use this document when reviewing its approach to community engagement, particularly in relation to asset service levels.*

Under the Integrated Planning and Reporting framework of the *Local Government Act 1993*, the Resourcing Strategy contains three essential elements: long-term financial planning, asset management planning and workforce planning.

Camden Council's Resourcing Strategy document acts as an overarching summary document, linked to the three individual component parts of the Strategy. It contains very clear information about:

- the manner in which the Council intends to deliver the community's priorities over the four-year period of the Delivery Program, by way of a summary table.
- the key challenges facing the Council over the course of the Delivery Program period, with commentary on the impact of these challenges on the Council's resources
- the Council's projected budget over the ten years of the Long-Term Financial Plan.

### Long-term financial planning and asset management planning

The Council's Long-Term Financial Plan meets legislative requirements and integrates well with the Delivery Program and Operational Plan. In separate reviews, the NSW Treasury Corporation (TCorp) and the Independent Pricing and Regulatory Tribunal (IPART) have assessed the financial assumptions contained in the Long-Term Financial Plan as realistic. However, TCorp notes that even the conservative financial modelling outlined in the Plan is based primarily on the achievement of forecast population growth.

The Council acknowledges that the information contained in its Long-Term Financial Plan in relation to asset valuations requires further development. This is critical to the Council having a fully accurate picture of its financial sustainability position.

Comprehensive asset management planning is a key challenge facing the Council both in relation to delivering essential infrastructure for the expanding community and in managing the costs of depreciation and asset maintenance in a financially sustainable manner.

The Council has developed an overarching Asset Management Strategy and stand-alone asset management plans for its buildings, open space, roads and transport, and stormwater asset classes. The plans link clearly to the Community Strategic Plan with financial summaries in each category.

While the Council's existing asset management framework meets legislative requirements, it has expressed a desire to progress from this core level of planning, including by engaging the community and other stakeholders on agreed levels of service for its assets. However, no specific timeframe for this process is provided.

The Council's approach to asset management planning is discussed in further detail in the Financial Sustainability section of this report.

#### **Action item #2**

*The Council should engage the community and other stakeholders to define agreed asset service levels and reflect these in asset management plans, to progress from the basic core level of planning. This should be prioritised to ensure the best estimates of costs for asset maintenance and replacement is reflected in the Long-Term Financial Plan.*

#### Workforce Planning

The Council's existing Workforce Plan complies with legislative requirements and clearly outlines how it intends to address its workforce challenges over the course of the Delivery Program. The Council recognises that its people are its largest and most important asset, and recognises that through them it will achieve its goals and meet the challenges that come with the magnitude of population growth occurring now and in the future.

The Council has demonstrated a strong commitment to the ongoing development of its employees, which is particularly important in a growing organisation facing significant structural change. Key initiatives include:

- a traineeship program for up to 15 participants per year, available to staff in a range of Council functional areas.
- the provision of education assistance for staff (including financial assistance of up to 60% of course fees in some cases).
- participation in the Local Government Research and Practice Development Consortium through the University of Wollongong. Under this program the Council contributes \$10,000 per year with a number of other local councils, to fund masters and doctorate level studies for staff members in local government related fields.

In 2009, the Council went through a process of developing a set of organisational values in conjunction with the development of its first round of Integrated Planning and Reporting documents. These values are embedded across the organisation through a performance management framework, where staff members are assessed on their ability to demonstrate the values. Staff are also rewarded for their demonstration of organisational values, primarily through the use of incentives such as gift vouchers.

The Council also uses a cash bonus system to reward high performing staff as part of their annual performance reviews. This assists the Council to attract and retain high performing staff within the salary limitations imposed by the Local Government Award.

The Council has recently developed an Organisational Development/Business Improvement Plan (OD/BIP) to guide organisational change and growth in support of the implementation of the Community Strategic Plan, *Camden 2040*, and accompanying plans and programs, which is discussed in further detail in the Governance section of this report.

A report is provided to the Council annually which discusses the progress in implementing the Workforce Plan.

### **Action item #3**

*The Workforce Plan should be updated in the next cycle of IP&R to reflect the actions outlined in the recent OD/BIP, as these build on those included in the Workforce Plan. This will ensure that the Workforce Plan more thoroughly documents the Council's strategies to address the significant organisational growth and human resource demands it will face in responding to increasing community needs in the coming decade.*

### **The Council's response – Strategic Capacity, Planning and Service Delivery**

Council has no additional comments for this section.

## FINANCIAL SUSTAINABILITY

This section examines Camden Council's overall financial position and how it is managing its finances and assets in order to deliver the outcomes of the Community Strategic Plan.

The NSW Treasury Corporation (TCorp) has noted that local government will be financially sustainable over the long term when it is able to generate sufficient funds to provide the levels of service and infrastructure agreed with its community.

**TCorp rating for Camden Council – Moderate**

**TCorp assessment outlook – Neutral**

**OLG Infrastructure Audit/TCorp Infrastructure Management Assessment – Strong**

### ***Key observations***

- *The Council has recorded operating deficits before capital grants and contributions in four out of the last five financial years.*
- *The Council's Long-Term Financial Plan is forecasting deficits for the next ten years.*
- *The Council's depreciation charges increased by more than 75% between 2008/09 and 2012/13 (to \$14.3m), due largely to asset revaluations and growth in the asset base.*
- *The Council reported a small infrastructure backlog of \$13.130 million in 2012/13, which is 1.5% of its total Infrastructure value (\$860.412 million).*
- *In 2012/13, the Council's asset renewal ratio was 31.7%, which is well below the benchmark of 100%.*
- *A large portion of the Council's income is sourced from developer contributions, due to the substantial rate of residential development in the local government area. This is forecast to continue into the foreseeable future.*
- *The Council's employer costs are set to rise significantly due to substantial increases in staff numbers.*

### Overall financial performance and outlook

The 2013 TCorp review of Camden Council's financial sustainability found that the Council is currently financially sustainable and is likely to continue to be, with careful

management. However, the TCorp report also highlighted a number of significant pressures on the Council's long-term financial sustainability outlook, primarily relating to the Council's ability to control and respond to forecast ongoing operating deficits.

While the Council currently has a small infrastructure backlog, this will be compounded as a large number of new assets are transferred to the Council from land developers in the coming decades. The Council's proactive response to asset management planning is discussed in further detail later in this section.

The Council has advised that it considers income security to be the main challenge for it to manage over the coming decades, including the prudent management of 'windfall revenue' (ie: from higher than budgeted rating income on completed properties or developer contributions to infrastructure projects).

Grant funding forms a substantial portion of the Council's current and projected income (approximately 58% of total revenue in 2012/13). However, a large portion of this comprises developer contributions made by way of Voluntary Planning Agreements (VPAs) and section 94 contributions. Due to the substantial growth in residential land development, the Council has been proactive in maximising both section 94 contributions and VPA income, as discussed in a separate section of this report.

All forms of grant funding can be variable, meaning a council that is reliant on such funding can be highly susceptible to external shocks. However, the Council advises that, in undertaking long-term financial planning, it routinely underestimates revenue from variable factors such as Financial Assistance Grant funding, as a means to reduce the potential impact of unexpected shortfalls.

The Council will also face pressure in relation to rising expenditure costs over the coming decades. Primarily, these will relate to a substantial increase in demand for services from the rapidly expanding community, and the funding of infrastructure maintenance and renewal. This will also be reflected in significant increases in employee-related costs, as Council full-time equivalent staff numbers are forecast to more than triple in size by 2031.

Another major cost arising from the expansion of the Council is the need to accommodate staff in appropriate facilities. To address this, the Council has begun the

process of transitioning to a new administration building at Oran Park Town Centre. The new building will house staff currently located in the Council's existing administration buildings in Camden and Narellan, with accommodation for up to 1,000 staff. It will also include a civic centre and library, which will incorporate multi-function design principles, to improve usability and increase usage by members of the public.

The Council plans to complete the project by 2016 at an expected cost of approximately \$35 million. The Council will fund the new building through a combination of asset sales, loans and general income. However, the project's reliance on loan funding has lessened due to establishment of the Central Administration Building Reserve within the Council's budget, to which General Fund surpluses have been directed in consecutive quarters.

#### Financial systems and staff capacity

##### **Better practice**

*The Council has strong financial planning, analysis and reporting practices which exceed minimum requirements and support effective decision-making.*

There is evidence of strong financial management and planning expertise and processes at Camden Council. The cross-section of staff who met with the review team displayed an understanding of how initiatives they are responsible for fit with the Council's overall vision, Community Strategic Plan and Long-Term Financial Plan.

This is reflected in the quality of the Long-Term Financial Plan and:

- the detailed financial analysis and forecasting undertaken by the Council, including monthly budget reviews to ensure that budgeted income accurately reflects what is being generated. Staff advised that the budget and forecasts are continually updated as part of this process to reflect fluctuations in income and expenditure. Monthly reviews feed into the quarterly budget review process. Council annually adopts and maintains a balanced budget position and does not spend beyond its means.
- Council has a 10 year Long Term Financial Plan (LTFP) which is updated quarterly. The LTFP is critical to Council's planning and monitoring of its immediate and future financial sustainability. It is central to correcting the reported operating deficit in the

Income Statement by containing expenditure and allowing natural growth in Council's income base to achieve a balanced or reported operating surplus. It allows Council to make informed decisions about sustainable levels of debt and reserves (liquidity) it also forms part of a suite of resourcing plans that support Council's Integrated Planning and Reporting Package.

- the use of internally restricted reserves to put aside money for key strategic challenges (eg: Information Technology Reserve, Asset Renewal Reserve, and Central Administration Building Reserve).
- strong financial reporting practices, as evidenced in the clear Quarterly Budget Review statements provided to the elected council. These reports guide councillor decision-making through clear, plain English explanations of key financial concepts, summaries of key performance indicators, and by linking movements in income and expenditure directly with the Community Strategic Plan goals to which they refer. The Council's better practice in relation to business paper reporting is discussed in further detail in the Governance section of this report.

While long-term financial management and planning appears to be appropriately resourced from a staffing perspective, it has been given increased focus as a result of the recent organisational restructure, with the establishment of a Finance and Corporate Planning team. Responsibility for financial management previously lay with the broader Corporate Services team, whose other responsibilities included corporate governance.

Council notes that an organisational improvement plan has been implemented that addresses all areas of the organisation, both financial and non-financial, that will allow Council to demonstrate a modern contemporary organisation that is financially sound and able to service its community now and into the future.

#### Addressing the infrastructure backlog

##### **Better practice**

*The Community Infrastructure Renewal Program is a comprehensive and innovatively funded approach to addressing the Council's infrastructure backlog.*

In 2009, the Council established a \$6 million Community Infrastructure Renewal Program (CIRP). This is a six-year program of infrastructure renewal works across a range of asset classes including road reconstruction, buildings, bridges, kerb and gutter, parks and reserves, and footpath and cycle-ways.

\$4 million of the CIRP was funded through internal reserves and a 4.5% over three years Special Rate Variation (SRV) obtained in 2011/12. In developing the SRV application, the Council undertook research which determined that an 11% increase would be necessary to fund community expectations across all Council services. However, the elected council resolved that 4.5% was more acceptable to community.

The remaining \$2 million cost of the CIRP was funded by a 10 year loan. However, in 2012 the Council was successful in applying to the NSW Government for a \$2 million interest subsidy through the Local Infrastructure Renewal Scheme (LIRS) to reduce the cost of servicing this loan. Under the arrangement, the LIRS funded component was to be used specifically for road reconstruction and resealing projects.

In 2012/13, the Council was successful in obtaining a further one-off SRV of 1.1% to continue to fund the CIRP (meaning a total rate rise for the 2012/13 of 4.5%, including the rate peg amount of 3.4%, to be retained in its rating base for 6 years).

In December 2013, the Council made a further application to LIRS Round 3 to subsidise a \$2.25 million loan to part fund a total infrastructure works package of \$4.7 million over two years. This application was successful and is expected to save the Council approximately \$382,000 in interest payments over the life of the loan. This is being directed back into an Asset Renewal Reserve established by the Council to put aside funds to specifically address its infrastructure backlog.

The Council also intends to engage the community about potential asset rationalisation following the completion of its asset management planning program update and the transition to the new administration centre in Oran Park.

This is considered a positive step, as asset sales can generate much-needed income to address community priorities. However, the Council's building asset portfolio is limited and the income generated from the sale of such assets alone will not substantially address its infrastructure backlog.

Council notes that as part of its recently-adopted organisational framework and Organisational Improvement Plan, a new asset management section has been created dedicated to understanding the financing and resourcing needs of its current and future asset base. This will enhance Council's decision-making and longer-term forecasting.

### Management of developer contributions

#### **Better practice**

*The Council effectively uses developer contributions to fund community infrastructure needs.*

Under the *Environmental Planning and Assessment Act 1979 (EP&A Act)* a council has the power to require a developer to make contributions towards the cost of providing services and facilities to meet demand generated by the development. For Camden Council, such funds are critical, given the scale of residential development planned for the local government area, and the associated infrastructure requirements arising from development in new land release areas.

The majority of Camden Council's new land release areas are covered by the *Oran Park and Turner Road Precincts Section 94 Contributions Plan*. The Council has also adopted a *Works in Kind Policy* which guides agreements with developers in relation to works-in-kind in lieu of monetary contributions. These documents form the Council's overarching developer contributions policy framework.

Councils may also require a development levy on individual property owners under section 94A of the EP&A, Act through the development approval process. However, there is a \$30,000 cap on such levies for each property in new land release areas. The section 94A process is also resource-intensive in terms of administration, particularly in large-scale land release areas such as those in the Camden local government area.

To streamline the developer contribution process and to maximise benefit for the local community, Camden Council has prioritised the use of large-scale Voluntary Planning Agreements (VPAs). While VPAs are also established under the EP&A Act, they allow councils and developers greater flexibility in relation to the value and scope of agreements.

The Council advises that approximately 60 to 70% of its total new infrastructure works are funded through developer agreements of varying types. In its 2012/13 Annual Report, the Council reported that six VPAs were in the process of being implemented in the local government area.

An example of the scope of such agreements in Camden is the Gregory Hills VPA, which is valued at approximately \$64 million. It comprises various works, land dedication and monetary contributions. Gregory Hills will eventually be home to about 7,000 people, and will include 2,375 dwellings, a local shopping centre, and community and recreation facilities. The works covered under the VPA include sports fields, a multi-purpose community centre, a bridge, parks and playgrounds.

The Council has trained its staff in developer contributions legislative requirements and has also implemented a Development Contributions Management Committee to review and endorse or reject developer agreements prior to them going to Council for adoption. This process aims to ensure that the best outcomes are generated for the Council and the community through developer agreements.

In the recent organisational restructure, the Council has also improved the strategic capacity of the team responsible for the management of developer contributions (as discussed in further detail in the Governance section of this report).

#### Asset management systems and practices

A detailed review of the Council's Asset Management Systems was undertaken in 2012 as part of the Local Government Infrastructure Audit program. This review found that the Council had a 'Core' level asset management framework, and noted that the Council had reasonably good quality asset data, a well-functioning asset management software system and a well-documented asset valuation process.

However, the review also expressed concerns about the:

- limited understanding of some staff about the Council's asset systems.
- lack of information in the Council's Asset Management Plans in relation to lifecycle analysis and performance measures

- lack of community consultation about the cost of asset maintenance and renewal and its impact on service delivery outcomes.

These findings were reiterated in the Council's recent Organisational Development/Business Improvement Plan (OD/BIP), which highlights that infrastructure planning and management was frequently identified by staff as an area for improvement in terms of systems and processes. The OD/BIP observes that the Council's Asset Management Strategy includes a "proposed asset management improvement program" which, to date, has not been implemented.

The OD/BIP sets a clear strategy to address these issues. It recommends the Council establish a specific team, a new manager-level position and a cross-organisational Infrastructure Coordination Group (ICG) to oversee asset management planning. All of these initiatives have commenced.

The OD/BIP also recommends that the ICG play a stronger role in relation to the management of developer-generated assets which are ultimately handed over to the Council.

At present there is limited oversight of such assets within the organisation, meaning that their management over the long-term has not been well coordinated. This can lead to inefficiencies in the longer-term, such as the increased likelihood of unexpected costs arising from unplanned maintenance and renewal.

#### **Action item #4**

*Given the significant financial sustainability risk the Council faces in relation to the funding of maintenance of assets dedicated to council under Developer Agreements the Council should prioritise the finalisation of its asset management life-cycle tracking processes prior to the next round of IP&R in 2016/17.*

#### **The Council's response – Financial Sustainability**

Council's comments have been incorporated into the text above.

## GOVERNANCE

This section examines the effectiveness of Camden Council's decision-making processes, as well as the key structures, systems and processes involved in administering its strategic operations.

### Organisational structure review and Organisational Development and Business Improvement Plan

#### **Better practice**

*The Organisational Development/Business Improvement Plan highlights the Council's strong culture of self-reflection and commitment to continuous improvement. It has also provided the Council with a wide-ranging review of its broader governance and service delivery systems and a clear plan to prioritise areas for development.*

In May 2014, Camden Council adopted an Organisation Development/Business Improvement Plan (OD/BIP). The primary driver for this was to provide a framework for the Council to manage its expected significant organisational growth and to guide the evolution of a flexible and collaborative, high-performance work culture.

The OD/BIP contains 57 recommendations across seven key strategic areas and proposed a revised organisational structure to deliver these strategic recommendations, which was adopted by the Council in May 2014. The OD/BIP contains three levels of prioritisation for these recommendations: immediate-term (completion within one year), short-term (two years) and medium-term (five years), reflecting the key strategic pressures facing the Council, as well as the goals and actions of its Integrated Planning and Reporting documents.

A key feature of the OD/BIP development process was a strong commitment to collaboration with staff, which included the use of a respected external contractor to engage employees on key organisational priorities. Approximately 120 staff (or one-third of the then workforce) had direct input into the development of the OD/BIP through a variety of mechanisms including interviews, discussion groups and workshops.

The Council's commitment to communicate clearly and effectively with staff is also evident in the Executive Team's approach of providing updates to all staff on the implementation of the OD/BIP, once every two weeks in its first 100 days.

A key outcome of the OD/BIP was the fast-tracking of planned recruitment to address shortages in key service areas. The Council advises that it plans to increase its workforce by approximately 12 staff per year to meet increased demand for services. However, coinciding with the organisational restructure in May 2014, 24 positions across a range of levels were advertised for recruitment. These positions were based in a variety of functional areas, including team leader positions in organisational development and communications, as well as a Business Assurance Officer position.

Notably however, positions in the Council's Development Team were not included in the 2014 round of recruitment, as this team had been sufficiently resourced as a result of a specific review undertaken in 2012/2013. This was driven by the need for the Council to improve its systems to ensure that it was able to meet development application processing targets crucial to supporting rapid growth in the local government area.

To fund the necessary growth in relevant positions, the Council sourced development assessment funding from the then NSW Department of Planning and Infrastructure for 12 town planner positions. This was managed in such a way as to ensure that when the funding expired, the Council could afford to keep the town planners employed through expanded income derived from rates from newly developed properties.

As part of the Development Team review process, the Council also strengthened its developer contribution management processes. This included transferring relevant staff to the Strategic Planning Team, and providing professional development opportunities to up-skill officers to negotiate better financial outcomes for the community through Voluntary Planning Agreements with developers. This process has been consolidated in the recent organisational restructure arising from the OD/BIP, which moved the Strategic Planning Team from the Governance directorate to the Planning and Environmental Services directorate.

The review of the Development Team also appears to have informed the development of the OD/BIP, particularly in terms of staff engagement practices.

## Business assurance and risk management

Council has not had an internal audit program. However, key recommendations of the OD/BIP were the establishment of a Business Assurance Officer position and a Business Assurance & Risk Committee to which the Business Assurance Officer would be responsible. This has now been implemented.

This is considered to be a positive action as it will support sound internal governance, improve the effectiveness of risk management and control processes, and help instil public confidence in the Council's ability to operate effectively.

The Council advises that it has commenced work in identifying key areas for review as part of the business assurance process. The self-assessment checklist completed by the Council as part of the Promoting Better Practice Review indicates that the Council does not currently have documented policies and procedures in the following key governance areas:

- Risk Management
- Fraud control
- Reporting on legislative compliance and regulatory obligations
- Disposal of assets
- Monitoring of contractor performance.

### **Action item #5**

*The Council should review the key governance areas identified above as a matter of priority when the business assurance process commences.*

## Effective council decision-making

### **Better practice**

*The Council has strong policies and processes in place to ensure effective decision-making by the elected Council.*

The knowledge and skills of councillors has a significant impact on the organisation's capacity to make sound and transparent decisions. Similarly, consistent and proper meeting practices contribute to good public decision-making and increase a council's accountability to the community.

Camden Council has in place a number of practices to encourage effective councillor decision making, including:

- A comprehensive councillor induction program, which includes a Councillor Induction Manual covering the roles and responsibilities of councillors, local contextual information and detailed information about the Council's policies and processes.
- Holding workshops on upcoming issues on which councillors will be required to vote. These normally include presentations by Council staff. Council staff report that these workshops are well received by councillors, with all councillors normally attending sessions. They ascribe this to the workshops being limited to one or two hours (depending on the topic) and held immediately after ordinary council meetings.
- High quality meeting business paper reporting, including:
  - very clearly written financial reporting (in plain English language, demonstrating clear links between recommendations and Delivery Program actions)
  - clear progress reporting on the implementation of the suite of Integrated Planning and Reporting documents. Business papers are supported by a comprehensive internal review and development process, which ensures consistency.
- The relatively short length of Camden Council meetings (typically two to three hours maximum) indicates effective decision-making. The Council also advises that the

frequency of its meetings (every two weeks) allows for rapid turnaround on key decisions, which is viewed positively by the community.

- Effective use of delegations, which allows councillors to focus on key strategic issues. For example, the Council has two section 355 committees, which have delegated decision-making powers.
  - The Council has developed a comprehensive user manual for section 355 committee members and provides members with relevant training (eg: procurement processes). This develops the understanding of committee members about their roles.
  - The Council also employs a specific coordinator to manage these committees.
  - Committee activities are audited by the Council on a quarterly basis.

### **The Council's response – Governance**

The Council notes that it does have a Complaint Management Policy currently in place.

## 4. BETTER PRACTICE EXAMPLES

The Office of Local Government defines Better Practice as that which:

- Is beyond or above minimum compliance requirements, published guidelines or in some way better than standard industry practice.
- Is innovative and/or very effective.
- Contributes to continuous improvement within the local government sector.

<b>BETTER PRACTICE EXAMPLES</b>	<b>DESCRIBE THE INITIATIVE AND WHY IT IS CONSIDERED BETTER PRACTICE</b>	<b>IS THE COUNCIL WILLING TO SHARE INFORMATION ABOUT THE INITIATIVE WITH OTHER COUNCILS?</b>
1 Draft Communications Framework.	<p>The Council's draft Communications Framework articulates its communications priorities in a clear and accessible manner for staff, and aims to embed a culture of community engagement across the organisation. The framework includes:</p> <ul style="list-style-type: none"> <li>a. Council Communications Strategy.</li> <li>b. External Communications Policy.</li> <li>c. Communications toolkit.</li> </ul>	Yes

<p><b>2</b> Six-monthly reporting on the implementation of the Delivery Program/Operational Plan.</p>	<p>The Council's ongoing six-monthly reporting on the DP/OP supports effective decision-making by councillors and informs the community of progress in a clear and effective manner</p>	<p>Yes</p>
<p><b>3</b> Resourcing Strategy document.</p>	<p>The Council's Resourcing Strategy document provides a sound foundation for the Council to undertake community engagement in relation to priorities and expected service levels. The Council is encouraged to use this document when reviewing its approach to community engagement, particularly in relation to asset service levels.</p>	<p>Yes</p>

<p><b>4</b> Financial planning, analysis and reporting practices.</p>	<p>The Council has strong financial planning, analysis and reporting practices, which exceed minimum requirements and support effective decision making. These include:</p> <ul style="list-style-type: none"> <li>• Monthly budget reviews that allow for proposed vote variations and feed into the quarterly budget review process.</li> <li>• Use of internally restricted reserves to put aside money for key strategic challenges.</li> <li>• Quarterly Budget Review reports to the elected council include plain English explanations of key financial concepts, summaries of key performance indicators, and link movements in income and expenditure directly with CSP goals.</li> </ul>	<p>Yes</p>
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<p><b>5</b> The Community Infrastructure Renewal Program.</p>	<p>The CIRP is a comprehensive and innovatively funded approach to addressing the Council's infrastructure backlog.</p> <p>The CIRP is:</p> <ul style="list-style-type: none"> <li>• a six year, \$6 million program of infrastructure renewal works across a range of asset classes.</li> <li>• funded by a combination of Special Rate Variations and loan borrowings (partly funded by LIRS interest reduced loan)</li> <li>• Supported by the creation of an internally restricted Asset Renewal Reserve.</li> </ul>	<p>Yes</p>
<p><b>6</b> Use of developer contributions to fund community infrastructure needs.</p>	<p>The Council effectively uses developer contributions to fund essential community infrastructure.</p> <p>Approximately 60 - 70% of the Council's new infrastructure works are funded through Developer Agreements.</p> <p>The Council ensures the best outcomes are generated for the community through relevant staff being provided developer contributions training and have implemented a Development Contributions Management Committee..</p>	<p>Yes</p>

<p><b>7</b> The Organisational Development/ Business Improvement Plan.</p>	<p>The Council's OD/BIP:</p> <ul style="list-style-type: none"> <li>• Highlights the Council's strong culture of self-reflection and commitment to continuous improvement.</li> <li>• Used a collaborative approach founded on good communication with staff.</li> <li>• Provides a clear plan for future expansion, allowing flexibility to fast-track recruitment in-line with service delivery demands.</li> <li>• Built on the previous review of the Council's Development Team.</li> </ul>	<p>Yes</p>
<p><b>8</b> Policies and processes to ensure effective councillor decision making.</p>	<p>The Council has strong policies and processes to ensure effective decision making by the elected council, including:</p> <ul style="list-style-type: none"> <li>• Comprehensive councillor induction material and ongoing use of councillor workshops to inform them of key strategic issues.</li> <li>• High quality reporting to council, including strong links to IP&amp;R and very clear financial reporting.</li> <li>• Streamlined meeting practices, including the effective use of delegations to allow councillors to focus on strategic issues.</li> </ul>	<p>Yes</p>

## 5. ACTION PLAN

The following Action Plan to guide the implementation and monitoring of the recommendations of the Review was prepared by the Office of Local Government in cooperation with Council.

<i>AGREED ACTION</i>	<i>PRIORITY</i>	<i>ACTION PROPOSED</i>	<i>TIME FRAME</i>	<i>RESPONSIBILITY</i>	<i>PROGRESS REPORT</i>
<p>1. Expand the use of engagement mechanisms to ensure that more members of the community are able to contribute to discussions about community priorities (eg: through the development of high-impact, interactive visual engagement methods about future trends in development and population growth, similar to those used in the Oran Park Town website).</p>	<p><i>Medium</i></p>	<p>Develop a Communications Strategy.</p> <p>Develop a Social Media Strategy.</p> <p>Research options for interactive and visual engagement methods.</p> <p>Develop workshops on community engagement for staff across Council.</p>	<p>End of 2014</p> <p>March 2015</p> <p>April 2015</p> <p>July 2015</p>	<p>Team Leader Community Engagement</p>	<p>Work has commenced and is expected to be completed by July 2015.</p>

AGREED ACTION	PRIORITY	ACTION PROPOSED	TIME FRAME	RESPONSIBILITY	PROGRESS REPORT
<p>2. Engage the community and other stakeholders to define agreed asset service levels and reflect these in asset management plans, to progress from the basic core level of planning. This should be prioritised to ensure the best estimates of costs for asset maintenance and replacement is reflected in the Long-Term Financial Plan.</p>	<p><i>High</i></p>	<p>As part of its Business Improvement Plan, allocate additional resources into a dedicated Asset Team to progress the development of new Asset Management Plans, including better identification of current service levels, in order to engage with the Community on agreed service levels.</p>	<p>Dec 2015</p>	<p>Manager Infrastructure Planning</p>	<p>New team has been established with 3 staff and a further staff member currently being engaged.</p> <p>Gap analysis of systems and data completed, while new inventory and condition data is being progressed.</p> <p>Asset Management Plans to be reformatted into the NAMS PLUS (IPWEA) standard to improve cost analysis.</p>



<i>AGREED ACTION</i>	<i>PRIORITY</i>	<i>ACTION PROPOSED</i>	<i>TIME FRAME</i>	<i>RESPONSIBILITY</i>	<i>PROGRESS REPORT</i>
		<ul style="list-style-type: none"> <li>• Review staff levels and structures in consultation with Manager and Team Leaders to ensure identification of key positions and appropriate planning to ensure Council is fit for the future.</li> <li>• Develop a succession planning strategy to ensure current skill base is meeting future needs.</li> <li>• Develop and implement Council's visions statement and Core Values, and further incorporate vision and values into the Workforce Plan.</li> </ul>	<p>May 2015</p> <p>Sept 2015</p> <p>Sept 2015</p>	<p>Manager Employee Services and Community Engagement</p> <p>Manager Employee Services and Community Engagement</p> <p>Manager Employee Services and Community Engagement</p>	<p>To be undertaken as part of budget preparation early in new year.</p> <p>Critical positions for succession planning to be identified early in the new year.</p> <p>Work has continued with the BIP Plan Steering Group and further staff consultation to commence.</p>

AGREED ACTION	PRIORITY	ACTION PROPOSED	TIME FRAME	RESPONSIBILITY	PROGRESS REPORT
		<ul style="list-style-type: none"> <li>Implement a six-monthly reporting cycle on the strategies and actions within the Workforce Plan to monitor and ensure goals are being met.</li> </ul>	June 2015	Manager Employee Services and Community Engagement.	To be implemented as part of review process.
<p>4. Given the significant financial sustainability risk the Council faces in relation to the funding of maintenance of assets dedicated to council under Developer Agreements the Council should prioritise the finalisation of its asset management life-cycle tracking processes prior to the next round of IP&amp;R in 2016/17.</p>	<i>High</i>	<p>Utilise the internal Asset Coordination Group to Provide cross-organisational input into the asset management process.</p> <p>Engage an external consultant to assist council in reviewing the S94 and Voluntary Planning Agreements process, including responsibilities, decision points and handover.</p>	<p>Complete</p> <p>June 2015</p>	<p>Manager Infrastructure Planning</p> <p>Business Improvement Officer</p>	<p>Completed – Asset Coordination Group established.</p> <p>Quotation process in progress.</p>



<i>AGREED ACTION</i>	<i>PRIORITY</i>	<i>ACTION PROPOSED</i>	<i>TIME FRAME</i>	<i>RESPONSIBILITY</i>	<i>PROGRESS REPORT</i>
		<p>Implement a disposal of assets policy and procedure.</p> <p>Implement Tendering Guidelines (currently drafted), Tender Compliance Panel and contractor management training.</p> <p>Review Council's Complaint Management Policy and systems.</p>	<p>November 2015</p> <p>May 2015</p> <p>May 2015</p>	<p>Manager Customer Service and Governance</p> <p>Manager Customer Service and Governance</p>	<p>To be reviewed as part of Council's Policy Review Process.</p>