



CABINET – 1ST NOVEMBER 2017

SUBJECT: WALES AUDIT OFFICE REVIEW OF THE WHQS DELIVERY PROGRAMME

REPORT BY: CORPORATE DIRECTOR COMMUNITIES

1. PURPOSE OF REPORT

- 1.1 To present to Members the recommendations resulting from the Wales Audit Office (WAO) review of the Welsh Housing Quality Standard (WHQS) delivery programme together with officers' comments and to seek approval on the actions proposed in response to the findings resulting from the report.

2. SUMMARY

- 2.1 During March and April 2017, as part of the WAO performance audit plan, the WAO undertook a review of the Council's arrangements to deliver the WHQS by 2020.
- 2.2 At the time of the review, the WAO concluded that the "*majority of tenants homes remain below the WHQ Standard due to longstanding inefficient and ineffective programme management and the Council is unlikely to achieve the standard by 2020*".
- 2.3 Whilst officers accept the recommendations within the WAO report (Appendix 1), they do not agree with the overall conclusions made, as it does not reflect the current position of the programme and evidence to justify this view is provided throughout the report and specifically addressed within the Conclusion section.
- 2.4 This report sets out the individual recommendations resulting from the review together with officers' comments on how these recommendations have or will be addressed.

3. LINKS TO STRATEGY

- 3.1 This report links to the Single Integrated Plan 2013-2017 priority to "improve standards of housing and communities giving appropriate access to services across the county borough".
- 3.2 Improving Lives and Communities: Homes in Wales 2010 which sets out the national context on meeting housing need, homelessness and housing related support services.
- 3.3 The National Housing Strategy 'better homes for people in Wales' sets out the Welsh Government's vision 'We want everyone in Wales to have the opportunity to live in good quality, affordable housing'.
- 3.4 Corporate Plan 2016/17 sets out the Corporate Priorities which includes 'invest in our council homes and their communities to transform lives'.

3.5 This report links most closely to the following Well-being Goals within the Well-being of Future Generations Act (Wales) 2016:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities

4. THE REPORT

4.1 As part of the 2016/17 performance audit plan, the WAO, during March and April 2017, undertook a review of the Council's arrangements to deliver the WHQS by 2020. WAO sought to answer the question "*does the Council have effective arrangements in place to enable it to meet the WHQS by 2020?*".

4.2 The WAO Review resulted in a number of recommendations which are set out below, together with comments from officers in response:-

WAO Recommendations

4.3 *R1: By September 2017, develop a comprehensive, overarching, financial and operational programme, setting out how the Council will achieve WHQS by 2020. This programme should:-*

- i) *Establish the full scope of investment needed in the Council's housing stock based on accurate, comprehensive and up-to-date stock condition information.*
- ii) *Set out how the Council, by March 2018 will:-*
 - (a) *Review its procurement arrangements to ensure value for money.*
 - (b) *Provide clear and transparent information to members and tenants about the current position of the programme and a commitment to stakeholders with accurate projected completion dates, and*
 - (c) *Secure the resources needed to deliver the programme by 2020.*
- iii) *contain clear and measurable milestones and relevant performance measures for delivering the programme up to 2020*
- iv) *set out the programme management, governance and accountability responsibilities and arrangements so that urgent remedial action can be taken if further slippage occurs and those tasked with delivering the programme can be held to account at appropriate decision making levels*

4.4 *R2: Assure itself that it is meeting its statutory landlord responsibilities by ensuring that:*

- (i) *All properties have a valid gas safety certificate in place, or are having the Council's non-compliance arrangements applied to them fully*
- (ii) *Arrangements for undertaking asbestos surveys and recording the results of these surveys are robust.*

4.5 *R3: Ensure it has sufficient project management capacity to deliver the Council's WHQS programme effectively by 20210.*

Officers' Comments/Actions

- 4.6 R1 - By September 2017, develop a comprehensive, overarching, financial and operational programme setting out how the Council will achieve WHQS by 2020.

Response:

- 4.7 An exercise to establish the full scope of investment needed to meet WHQS by 2020, based on accurate and comprehensive information had already commenced at the time of the audit review and has recently been completed, which confirms that the housing business plan is financially viable and that the extent of work remains deliverable. The information has been used to compile a more detailed overarching programme but the timescales laid out in our existing programme have not changed. A holistic strategy, which captures all key information, policies, procedures and performance data relevant to the WHQS programme, has been developed and the data within it will initially be based upon current assumptions. In line with the recommendations relating to March 2018, this strategy will be further informed and refined through improvements made to Keystone (the central IT database), which will be used to provide robust data to provide a new detailed programme from 2018/19, which will be communicated to all stakeholders.
- 4.8 R1 (i) By September 2017 establish the full scope of investment, based on accurate comprehensive and up to date stock condition information:-
- 4.9 The Council's current WHQS programme was originally established in 2012 and adopted a community based approach whereby internal and external works are undertaken concurrently in different communities. The aim is for all housing communities to benefit from the WHQS works at an earlier stage in the programme rather than focussing on completing all WHQS works in one community at a time. To date, 85% of properties across the county borough have received either internal or external works.
- 4.10 The programme is based on the stock condition survey and estimated component costs provided by Savill's Consultants following a 15% survey of the housing stock. The information was used to inform the housing business plan and the ballot process by determining the financial viability of Castell Mynydd (the proposed delivery company if transfer took place) and CCBC delivering the programme within the timescales stipulated by WG.
- 4.11 Consideration was given to commissioning a new stock condition survey following the outcome of the ballot, but this was not progressed due to the need to procure such a service, the delays involved and the cost, which was estimated to be over £1m. Further consideration was made in 2015 but again it was decided that this would not be cost effective at the time.
- 4.12 More up-to-date condition information is in the process of being collated by utilising our own in-house surveyors to not only obtain condition information, but to also specify works for contract packages and tendering purposes. (To date approximately 80% of internals surveys have been completed and 50% of externals).
- 4.13 The investment programme for 2017/18 has already been compiled, agreed and communicated to members, tenants and other stakeholders and is in the process of being delivered. Having recently completed a full review of our costs and projecting these costs forward for the delivery of the programme up to 2020, it has been confirmed that the project remains financially viable and that there is therefore no requirement to revise the programme for cost or condition reasons at this stage. However, since the WAO review was undertaken, the contractor responsible for delivering the internal works in the lower Rhymney Valley area is no longer trading. Officers have implemented contingency arrangements to minimise the impact of this unforeseen event and this will result in the in house workforce undertaking the majority of work, supported by external contractors as and when required. Again, despite this unfortunate event, due to mitigation measures available to us and the fact there has been contingency built into the programme, the delivery of the internal works by 2020 remains achievable.

- 4.14 The current programme is reviewed on an annual basis to account for any slippage, which can be as a result of a variety of issues including contractor performance, weather, unforeseen work, access, refusals, tender returns, etc. This review will need to continue on an annual basis, as some of these issues are beyond our control, but due to improvements in surveying, work packages can be prepared at an earlier stage in the process which results in better planning and programme management. The review also takes into consideration improved performance. This has occurred where the in-house service provider has completed more properties than planned during a financial year and work has to be pulled forward from future years.
- 4.15 Surveys for both internal and external works are now being undertaken for the 2018/19 financial year, and this information, together with actual costs based on recent tender returns, has been collated to calculate detailed average property costs in order to provide a more accurate investment programme up to 2020. These revised costs have resulted in a projected increase in expenditure of approximately £10M, with overall costs remaining within our borrowing headroom. Therefore the programme is confirmed as still being financially viable. This information will be used to refine our 2018/19 programme and beyond. CCBC have therefore met the WAO stated deadline of September 2017 and developed a comprehensive, overarching, financial and operational programme to demonstrate how the Council will deliver WHQS by 2020 (Appendix 2).
- 4.16 R1(ii)(a) By March 2018, review its procurement arrangements to ensure value for money:-
- 4.17 The WHQS programme was seen from the outset as an opportunity to link housing and regeneration outcomes. The procurement strategy and process being a facilitator to bring social and economic regeneration through a dedicated supply chain.
- 4.18 The Council had a desire to reduce its carbon footprint and embed sustainable alternatives whilst providing job opportunities. Thus the procurement strategy had clear objectives and the overarching evaluation criteria for all procurements set at Quality 60% and Price 40%.
- 4.19 Furthermore the procurement strategy was developed to meet Welsh Government's improvements and efficiency targets which included sustainability, waste reduction, carbon reduction and community benefits (included employment and training opportunities).
- 4.20 All procurements meet the requirements of the Council's standing orders for contracts, financial regulations and the wider UK Public Contract Regulations 2015. This in itself demonstrates open, fair and transparent process and as a result "Best Value" achieved against a pre-established evaluation criteria.
- 4.21 Clearly there are a number of factors to consider when administering individual procurements in order to effectively manage the supply chain and financial risk in order to deliver against the desired outcomes. E.g. the anchor contract, supply partner for all goods and materials is a long term relationship for ten (10) years. The contract has been established utilizing the NEC 3 term service contract. This reflects the Council's wish to share the financial risk of delivery of services with the supply partner.
- 4.22 This allows the Council to work with the nominated contractor to ensure all parties meet the requirements of "best value" through prices paid, delivery of social value through community benefits such as job opportunities and community funds.
- 4.23 The wider supply chain benefits are significant as over the past four (4) years the Council and supply partner have worked to establish and develop the local supply chain in and around the Caerphilly borough.
- 4.24 Internal works contracts are predicated on a fixed contract basis using the JCT form of contract and national schedule of rates (SoRs). The SoRs are reviewed annually on 1st August and facilitates price adjustments in line with national market trends.

- 4.25 External works have been developed via various procurement routes in accordance with legislation and in order to manage the supply base, ensure capacity and encourage and grow local contractors. The external works programme is managed through a series of arrangements which include the use of the small lots exemption, frameworks and more recently a Dynamic Purchasing System (DPS). The flexibility in these arrangements allows for pricing per contract opportunity and in the case of the DPS different pricing strategies depending on the specific requirement.
- 4.26 All contracts/ arrangements have key performance indicators which are currently measured by the WHQS team.
- 4.27 Members will also be aware of the agreement, at the outset of this investment programme that approximately 50% of the internal works would be carried out by the in-house workforce. Whilst, as stated by the WAO, the in-house workforce have not been subject to any competitive tendering process, value for money is considered to be provided for the following reasons and is not purely considered on cost:-
1. Not claims focused/not trading for profit.
 2. High quality service with focus on meeting tenants needs
 3. Higher levels of customer satisfaction than external contractors.
 4. Reduced number of complaints, compared with contractors.
 5. Employment of local people and sustain existing jobs.
 6. No issues with contractual challenges or claims.
 7. Directly employed with reduced use of sub-contractors.
 8. Improved performance above external contractors.
 9. Reduced requirement for supervision.
 10. Preferred choice by our tenants.
 11. More direct control with in-house team.
 12. Availability of benchmarking data.
 13. Locally available workforce in the event of contractor default.
- 4.28 A benchmarking exercise comparing in-house costs against those of external contractors was undertaken in 2014 and identified that costs based upon typical elements of work were approximately 20% higher for the in-house team. A more recent exercise undertaken internally has also confirmed that the in-house workforce costs are approximately 20% higher than external contractors undertaking similar work. However there are additional supervisory and management costs associated with project managing external contractors which are already accounted for within the in-house costs. With the demise of Compulsory Competitive Tendering, there are added costs associated with in-house services which also need to be considered. These include superannuation, living wage, leave, sickness, overheads linked to support service costs and the end of bonus schemes or price work payments arrangements. However, value for money is not based upon costs alone and qualitative factors, such as those stated in 4.22 above should also be considered. In view of all of these factors, as well as the positive feedback received from our tenants, along with the excellent performance being achieved by the in-house team, we consider that value for money is being provided.

4.29 Additionally, an exercise to outsource the WHQS work to our sheltered housing was developed and tenders invited. The cost of providing this service was considered excessive and a decision was made not to progress with the process in favour of using an alternative business model that focused upon the use of the in-house team. This will result in financial savings over the option to outsource this area of work and when tenants were consulted, they were very supportive of the in-house team and indicated a preference for this approach.

4.30 It is however accepted that on occasions very few tenders were received for the north and east areas. As part of the review to ensure value for money, tenders are evaluated and if submitted costs are considered to be high, then contracts are considered for re-tendering. However costs will depend on the construction market, with increased demand in this sector leading to increased costs, so value for money must be considered based on market conditions at the time.

R1(ii)(b) By March 2018, provide clear and transparent information to members and tenants about the current position of the programme and a commitment to stakeholders with accurate projected completion dates;

R1(ii)(c) By March 2018 to secure the resources needed to deliver the programme by 2020;

R1(iii) Contain clear and measurable milestones and relevant performance measures for delivering the programme up to 2020 and

R1(iv) set out the programme management, governance and accountability responsibilities and arrangements so that urgent remedial action can be taken if further slippage occurs and those tasked with delivering the programme can be held to account at appropriate decision making levels

4.31 Officers have considered the information provided to members and tenants and accept the manner in which information is presented can be improved. As part of the exercise, officers have reviewed information contained within the programme and have already made amendments to ensure it is clear, accurate and meaningful for all stakeholders.

4.32 Performance measures will be reassessed based upon improved surveying information and procurement activity and this will be communicated to all stakeholders in a more clear and meaningful way. The revised performance information will be shared and consulted with tenant representatives of the Repairs and Improvements Group to gain feedback on the level of information being presented and to ascertain if it is easily understood and measures what actually matters (draft proposals are attached at Appendix 3). Up to date performance information is appended to this report (Appendix 4) which provides information on the overall programme position and demonstrates that we remain on target to deliver the programme by 2020.

4.33 There are already significant programme management, governance and accountability responsibilities defined, through the WHQS Board, the Caerphilly Homes Task Group (CHTG), the Repairs and Improvement Group (R&I), Corporate Management Team (CMT), Policy & Resources Scrutiny Committee (P&R) and Cabinet. The terms of reference of each of these groups will be reviewed to ensure that the respective groups are clear of their remit and purpose as well as ensuring that any urgent decision making required can be taken at the appropriate level.

4.34 Information contained within reports has also been reviewed to ensure they are presented in a clear and transparent way and contain all relevant details so that the current position of the overall programme is easily communicated to all stakeholders.

4.35 A resource plan was already being progressed and implemented by officers prior to the WAO Review and significant progress has already been made in this regard. This includes the recruitment of internal resources as well as increasing the availability of external resources.

4.36 In relation to internal resources a business case has been approved by Corporate Management Team (CMT) to appoint additional internal resources following the decision to undertake the work to our sheltered housing schemes by utilising our in-house workforce.

This includes the appointments of an additional Project Manager, Surveyors, Clerk of Works, Tenant Liaison Officer and trade operatives.

- 4.37 A ‘blanket’ business case to appoint additional staff and operational resources had been approved prior to the WAO Review and is being utilised to recruit additional resources as and when required. In relation to the appointment of additional contractors, the DPS arrangement was being implemented during the review and is now fully operational and working successfully.
- 4.38 As mentioned previously, a new DPS has been put in place not just to provide external contractor support to deliver the external works in the lower Rhymney Valley, but to also act as a contingency to provide support for any internal or external works throughout the county borough. This arrangement has been operational since April, 2017 and has already proved to be very successful with 11 contracts having been awarded.
- 4.39 Unfortunately since the WAO review the contractor delivering the internal works in the Lower Rhymney Valley area has ceased trading and alternative arrangements have been put in place. The in-house workforce will now be responsible for the majority of work in this area, but they will also be supported by external contractors with smaller packages of work being issued via the DPS. This demonstrates the flexibility in the programme offered through the various contractual arrangements and the in-house workforce that is in place.

Recommendation 2

- 4.40 Assure itself that it is meeting its statutory landlord responsibilities by ensuring that:-
- *All properties have a valid gas safety certificate in place, or are having the Council’s non-compliance arrangements applied to them fully and,*
 - *Arrangements for undertaking asbestos surveys and recording the results of these surveys, is robust.*

Officers’ Comments

- 4.36 At the time of the WAO review 98% of the Council’s properties had a valid gas safety certificate, which equated to 221 tenanted properties not having a current gas certificate. All 221 properties were being progressed via the “no access” process. The reason for this shortfall is due to access issues and whilst the Council had access procedures in place which are being utilised, it is accepted that these procedures were prolonged and could take a number of months to either gain access or to take the case to court to obtain a possession order.
- 4.41 In order to improve performance with the aim of achieving full compliance, the no access procedure has already been reviewed and now includes the introduction of charges to tenants if they fail to provide access when an appointment has been made. Continued “no access” will then result in a “Notice of Seeking Possession” being issued to the tenant. If access is still not provided, then arrangements will be made to force entry, although this will only be used as a last resort. Following the implementation of the revised no access procedure, performance has increased to 99% (81 properties outstanding) and 20 forced entries have been undertaken.
- 4.42 In relation to asbestos surveys, officers have undertaken a full review of the process to ensure that accurate data is being recorded in a timely manner and the information made available to all stakeholders via a central IT database. To support this area of work the appointment of a dedicated additional technical officer is being progressed.
- 4.43 This review will also aim to improve the integration of services and information sharing to avoid any duplication and ineffective use of resources between the WHQS delivery team and the Housing Repair Operations team. It should be noted that it is already a requirement that contractors cannot commence work on any property unless they are in receipt of an appropriate asbestos survey.

Recommendation 3

- 4.44 Ensure it has sufficient project management capacity to deliver the Council's WHQS programme effectively by 2020.

Officers' Comments

- 4.45 In order to assist with the project management of such a major investment programme, the use of resources is being maximised through improved integration within Caerphilly Homes following changes in the management structure last year and by also utilising the services of other departments within the Council, including Building Consultancy, Grounds Maintenance, Highways Operations Group and Network Contracting Services.
- 4.46 As mentioned above, a business case has previously been approved which enables officers to proceed with the recruitment of additional resources without delay, either directly or via a recruitment agency. This allows resources to be brought into the programme as and when required to meet contractual demands, being mindful that post 2020, it is likely that resource levels will need to reduce.
- 4.47 The WHQS programme is overseen by the Corporate Director Communities with the Chief Housing Officer as the lead Head of Service, who is supported by a WHQS Programme Manager. This management structure is supported by a multi-disciplined WHQS and Caerphilly Homes staff structure. In order to maximise the use of skills and capacity across both teams, a restructure is already being developed with the aim of ensuring that sufficient capacity is in place to deliver the WHQS programme by 2020 and this will be further informed by the review of our systems.

5. CONCLUSIONS

- 5.1 The WAO have summarised their opinion of the Council's approach to delivering WHQS as:

"The majority of tenants' homes remain below the WHQS due to longstanding, inefficient and ineffective programme management and the Council is unlikely to achieve the standard by 2020."

- 5.2 Officers accept further improvements need to be made and agree with the recommendations set out by WAO. These identified improvements are being delivered in accordance with the action plan detailed in Appendix 5. It is accepted that the recommendations were following the review during March/April 2017, however at that point in time significant changes were already in the process of being made and this is demonstrated within the action plan with many tasks already completed.
- 5.3 Officers, therefore, do not agree with the overall conclusion drawn as it is felt that this statement does not offer a fair assessment of the current position of the programme. The following information is offered to support this view:

"Inefficient"

- i) The "internal/external" component approach to delivering the programme was agreed as the preferred approach following full consultation and agreement with tenants, CHTG, Policy & Resources Scrutiny Committee, Cabinet and Full Council. Furthermore, this approach is used routinely by other registered social landlords and local housing authorities and WG support this approach as a cost effective approach to delivery. Furthermore on the insistence of the Leader internal and external completions will continue to be reported separately as this has proved invaluable in pinpointing weekly instances of fluctuations in contractors' performance.

- ii) The WAO highlights that only 2.5% of tenants' homes fully met the WHQS standard. The internal/external approach taken to date has resulted with 65% (7,033) of internal works completed and 24% (2,602) external works completed. On the basis of work undertaken to date 45% of the programme has been completed. It is expected that as the number of external and internal completed works align the number of properties which fully meet the standard will increase significantly, with all properties programmed for completion by 2020.
- iii) We are able to demonstrate that the programme is providing value for money. Value for money is not measured through cost alone, tenant satisfaction rates have remained at 90% throughout the duration of the programme to date. Staff are fully committed to programme delivery. The Council's Caerphilly Homes team was awarded UK wide recognition in 2016, as "Best Housing Team" by the Association of Public Service Excellence (APSE).

"Ineffective"

- (iv) Whilst a full survey of the properties was not undertaken at the beginning of the programme, a sample survey was undertaken and this has since been supported with an individual property detailed survey, which is used to inform the works required, programming and financial profiling. By March 2018, 90% of tenant properties would have been surveyed and 70% had been completed at the time of the review. This completed data has been used to further improve the cost/budget plan that was originally provided from the sample survey, and using this accurate data, we remain still within the overall financial envelope for the overall programme, whilst acknowledging this has increased our projected financial profile by £10M. The programme therefore remains financially viable.
- (v) Tenant satisfaction survey results show for internal works for the whole contract to date, 89% of tenants were very satisfied or satisfied, 5% neither satisfied nor dissatisfied and 6% dissatisfied or very dissatisfied.
- (vi) The work to date has transformed people's lives by not only transforming their homes, but by also ensuring that the improvements meet the individual needs of the household. This has resulted in significant adaptations being undertaken to properties, including some work being carried out to the Royal National Institute of the Blind (R.N.I.B.) standard. Insulation and new heating work has also assisted in addressing fuel poverty, and considerable "community benefits" have also been delivered.

"Unlikely to achieve WHQS by 2020"

- (vii) Based on our current position and anticipated projections, 75% of internal works are expected to be completed by March 2018 and 40% of our external works. By March 2019, 94% of internal works are expected to be completed and 80% of external works. In relation to internal works specifically there are contingency arrangements in place to allow cessation of contractor involvement with remaining work available during 2019 for the in house workforce. There is, therefore, a plan and resources in place to complete the programme by 2020.
- vii) Whilst we accept that completion of the programme by 2020 is challenging, officers consider that the measures put in place has resulted in a significantly increased and focused rate of completions and officers are confident that the programme will be completed by 2020.

6. WELL-BEING OF FUTURE GENERATIONS

- 6.1 The report outlines the contribution made towards the Well-being Goals as set out in the Links to Strategy section above. It is consistent with the five ways of working as defined within the sustainable development principle in the Act in that our processes have been developed in collaboration with Welsh Government and the local authority's housing partners, taking a long term approach to the development needs of the county borough. The programme itself assists the prevention agenda being delivered by our Homelessness Team and the affordable housing programme delivery plan integrates the work of the local authority alongside the work of the Housing Associations who themselves have similar aims.

7. EQUALITIES IMPLICATIONS

- 7.1 This report is for information purposes so the Council's Equalities Impact Assessment process does not need to be applied.

8. FINANCIAL IMPLICATIONS

- 8.1 There are no financial implications as a result of this report.

9. PERSONNEL IMPLICATIONS

- 9.1 There are no personnel implications arising from this report.

10. CONSULTATIONS

- 10.1 The report reflects any views of the consultees.

11. RECOMMENDATIONS

- 11.1 Cabinet is asked to:-

- 11.2 Consider and comment upon the content of the WAO report.

- 11.3 Note and approve the officers' responses to the WAO proposals for improvement.

12. REASONS FOR THE RECOMMENDATIONS

- 12.1 To ensure that Cabinet is aware of the review work undertaken by the WAO and the resultant findings, conclusion and proposals for improvement.

13 STATUTORY POWER

- 13.1 Local Government Acts 1972 and 2003.

Author: Christina Harrhy, Corporate Director, Communities
(Tel: 01443 864948/Email: harrhc@caerphilly.gov.uk)
Shaun Couzens, Chief Housing Officer
(Tel: 01495 235314/01443 864208/Email: couzes@caerphilly.gov.uk)

Consultees: CMT

Cllr Dave Poole - Council Leader
Cllr Barbara Jones - Deputy Leader and Cabinet Member for Finance, Performance and Governance
Cllr Lisa Phipps - Cabinet Member for Home and Places
Marcus Lloyd - WHQS and Infrastructure Strategy Manager
Jane Roberts Waite - Strategic Co-ordination Manager
Gail Williams - Interim Head of Legal Services & Monitoring Officer
Steven Harris - Interim Head of Corporate Finance
Alan Edmunds - WHQS Project Manager
Steve Greedy - WHQS Project Manager
Colin Roden - WHQS Project Manager
Kath Webb - Relationship Manager
Lesley Allen - Principal Accountant
Rhys Lewis - Systems and Performance Manager

Appendices:

Appendix 1 – Wales Audit Office Review of the WHQS Delivery Programme June 2017
Appendix 2 – CCBC WHQS Programme
Appendix 3 – WHQS Scorecard Draft
Appendix 4 – WHQS Performance Information
Appendix 5 – CCBC WHQS Action Plan