

FAMILIES FIRST FINANCIAL MANAGEMENT GUIDANCE 2017-18

April 2017

Introduction

This document provides information to local authorities on financial management and on what constitutes appropriate expenditure for the Families First (FF) programme. If you have any queries, please email the Families First email address – familiesfirst@wales.gsi.gov.uk clearly stating **Families First Financial Management** in the subject heading.

This document identifies the financial arrangements between the Welsh Government and local authorities. You should ensure that contractual arrangements and the appropriate associated guidance are in place to support your own relationship with the providers you have commissioned to deliver your projects / services. Information contained within this document can be used as a basis for those arrangements. You should, ensure that third party providers are aware of the relevant deadlines set by the Welsh Government and submit appropriate information to you in time for you to meet the specified deadlines.

In addition to taking account of the guidance in this document, you should also ensure that you comply with the provisions of your Families First Award of Funding Letter.

Profiling and claims templates will be issued at the start of each financial year, and should be returned by the date stated on the relevant Progress Report financial tab.

Each local authority has been allocated an Account Manager from within the Families First team. Account Managers are responsible for providing feedback on plans and for advising local authorities when plans have been approved. Your Account Manager will maintain regular contact with you, and will visit you throughout the year to discuss progress and implementation of your plan. The Account Manager is the main point of contact for non-routine queries that are not related to the financial claims process. You will need to contact your Account Manager to discuss changes to your plan as outlined in this Guidance document. Please see appendix 1 for contact details of the Account Managers and the Families First finance team.

From time to time we may amend this document to respond to issues that have arisen since the previous version was issued. We will alert local authorities when amendments are made, and will direct your attention to the appropriate changes.

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1. Purpose of Grant

Families First funding has been made available to local authorities across Wales in order to pursue the purposes of the programme as described in the Families First Programme Guidance. Funding must be used solely as outlined in your approved Families First Action Plan.

2. Budget Profiling

Profiling

You will need to submit a financial profile of your total Families First anticipated spend prior to the start of each financial year. This is usually due by 31 January each year. A further profile should be submitted at the end of September, taking account of expenditure to date, and either amending or confirming the anticipated spend for the remainder of the financial year. The information contained within the profiles should be consistent with the details in your approved Families First Action Plan.

It should be noted that while the number of claim and monitoring returns you need to submit will be reduced you should still continue to monitor expenditure and performance on a quarterly basis.

Where a proposed in-year amendment to the profile would mean that any of the previously notified quarterly totals) increases / decreases by 10% or more, you should raise this in advance with your Welsh Government Families First Account Manager. The proposed amendment should be approved by the Account Manager prior to being actioned.

Further information regarding when to notify an amended profile can be obtained from your Families First Account Manager, or from the Families First finance team.

In compiling your profile you should ensure that you reflect the timing of your proposed payments to any third party organisations providing services. Similarly, in respect of any payments you make to third party organisations, you should claim only those amounts you have actually incurred in the appropriate quarter.

Care must be taken to accurately forecast your expenditure as the information you provide is used in our own profiling exercises to draw down funding from Westminster. Inaccurate profiling could leave the Welsh Government in a position where it is unable to meet its financial commitments to you.

You should be aware that Local Authority Budget Profiles and Actual Expenditure are available under Freedom of Information legislation and may be proactively published as part of the Welsh Governments commitment open government and transparency.

Under spend of funding

Please inform us as soon as possible if you consider that an under-spend against your annual allocation is likely, possibly due to vacant post, for example, or actual costs being less than forecast costs Early notification could result in the funding being used elsewhere within your Families First activities or being returned to the central Families First fund for allocation elsewhere.

Virement of funding between projects

As you implement your Families First Action Plan you may find that virements between the differing expenditure headings may be necessary.

You may arrange small virements across the project headings at your own discretion as long as these changes do not total more than 10% or £100,000 (whichever is the lower) of the project total. You may make discretionary virements up to a total of £100,000 within the year. (For example 5 virements of £20k or a single virement of £100k) Additional virements in excess of £100,000 must be approved by your account manager.

If you wish to vire money from one project to another which is more than 10% value of either heading's value or exceeds the £100,000 in year limit, then you should make a formal request by e-mail to your Families First Account Manager requesting the change.

Virements between budget lines of the same project should not be agreed between you and your partner organisation unless you can be sure that the agreed project outcome remains unaffected. Please refer to your Account Manager if you require clarification relating to specific issues.

If the virement is considered to have a significant impact on the direction or delivery of the programme then it is within the rights of the Welsh Government to reject the changes requested.

Proposed amendments to the budget profile should be notified as soon as you become aware they are required and they should be accompanied by an appropriate explanation for the amendment, along with the impact of the change on the potential to spend the full allocation.

A significant change would be:

- a proposed addition to a grant related activity
- discontinuation of a grant related activity
- the virement of 10% or £100,000 (whichever is the lower) between different projects within your overall Families First budget.
- In-year virements which exceed £100,000 in value.

We will be happy to discuss any amendments with you.

If you intend to introduce a new project following approval of your Action Plan, you should seek approval from your Families First Account Manager before commissioning.

Virements between Communities and Tackling Poverty Budgets

Welsh Ministers have agreed that 5% of programme budgets may, with the agreement of the Welsh Government, be transferred between Tackling Poverty Programmes (Communities First, Families First, Flying Start and Supporting People). Applications to transfer funds between programmes may be made from 1st October to 30th November each year and must be submitted via your Account Manager, on the application form available from the Welsh Government. The Welsh Government will review each application on its merits and communicate its decision as soon as practicable.

Disability Focus – Ring-Fenced Strand

Additional funding has been made available to local authorities through Families First to provide a distinct focus on disability and the needs of families with disabled children and young people. You should ensure that your profile clearly shows how you intend to allocate this additional funding. Similarly, you should clearly identify how you have made use of this funding on the breakdown of expenditure form at the time that you submit your claims.

3. Claiming Procedure

Claiming Process

Families First claims should be made in July and January. A final Progress Report will be required in April confirming actual expenditure for the year.

The July Progress Report will cover the period 1st April to 30th June and payment will be in arrears. Project updates and associated data should be submitted with this report. An incomplete Progress Report will be rejected and the claim will not be registered.

The January Progress Report should show actual spend and output data for the period 1st July to 31st December – also estimated expenditure for the period 1st January to 31st March. Your final payment will be based on this return and we encourage local authorities to over estimate their final quarter expenditure as we will be unable to pay any shortfall after 31st March.

The final Progress Report due at the end of April should confirm actual expenditure in the previous financial year. We appreciate that local authorities may not have closed their ledgers by the end of April and that the actual expenditure may be estimated. This is not a reason to delay your submission and all efforts should be made to ensure your return is as accurate as possible. Project updates and associated data are not required with this submission.

The timetable for claims is stated in your Award of Funding letter issued in March each year. This will be a duplicate of the deadline calendar issued by Welsh Government the previous January. You should claim only for the expenditure incurred and defrayed in each specific claim period. If you are not able to claim for expenditure in the quarter it was defrayed you should claim for it in the next period. You should accrue grant funding to the next financial year if you have commissioned and received services or goods but not yet paid for them in the current financial year. Accrual payments must relate to the correct financial year and evidence kept to support this.

If your actual expenditure for the year is less than the grant we have paid you, we will adjust for this following submission by you of your outturn statement (see Audit Requirements) and recover any overpayments. Please note that invoices which recover grant under-spend are payable immediately upon receipt and do not carry a 28 day period of grace. If you have under-estimated the amount of expenditure to be defrayed beyond the date of submission we will not be able to adjust for this at a later date.

When you submit your claim you should give a clear explanation for the difference between the profile and actual expenditure. Account Managers will query instances where the quarterly claimed totals show either an increase or a decrease of 10% or more from your financial profiles. Please see Section 2.1 (Profiling) above.

The Progress Report should be accompanied by supporting evidence which demonstrates that the amount claimed has been properly spent on activities identified in your Families First Action Plan. This documentation includes:

- a detailed breakdown on what has been spent in the claim period; and
- a progress report on delivery of your Families First Action Plan (the template of which will be forwarded to you at a later date).

You should agree the categories of expenditure to be included in the financial profile before the start of the financial year with your Account Manager.

The financial profile form ('Claim 1' and 'Claim 2' tabs of the Progress Report) should be used to identify how the local authority has used Families First funding. The JAFF/TAF section and any project procured within the local authority, you should show a breakdown of costs, eg project management costs, other staff costs, etc. For the Strategic Project section and Disability projects (only where you have procured a service from a third party), you need only include the total amount paid to them as a result of the procurement exercise. Please do not provide a breakdown of how they will spend the funding. Where the third party has further sub-contracted the total amount paid to the sub-contractor should also be reflected in the breakdown. Again, we do not require a breakdown of how that body will use the funding.

Requests for late submission of Progress Reports should be made in writing to the Families First finance team and should include an explanation of why you are unable to meet the deadline. Requests will be considered on their merits, but payment may be deferred by up to 2 months.

Submission of claim and profile forms

So that you can meet the timetable for submission of claims, it is in your interest that third parties are aware of the provisions of this Guidance document, including the various deadlines.

Documents should be submitted in electronic format (Excel spreadsheet). To avoid the need for providing the hard (paper) copy, please ensure that you send the Progress Report from the email address of the Project Manager stated in the Award of Funding letter as this negates the need for a signature. If you do use a scanned signature, you should ensure that you maintain a record of the authorisation to use each scanned signature, and that this authorisation is available for audit purposes. If the Project Manager is unavailable to send the Progress Report, the deputy should send this and copy e-mails to the Project Manager's e-mail address and insert an electronic signature of an appropriate person with delegated authority to sign on behalf of the local authority.

Electronic copies of the breakdown of the claim and profile should be submitted as Excel spreadsheets and not as PDF versions, as we will link your information to our own documents.

A PDF version may be submitted in addition to above spreadsheets should you wish.

Filing deadlines for Families First claims are set well in advance and the Families First management teams are well resourced, absorbing a significant amount of programme funds. There should be no reason why filing deadlines cannot be achieved. The Welsh Government expect that Families First management teams act professionally, take their contractual obligation in regard to reporting seriously and actively manage their teams to ensure they have the capacity to deliver on time. If you feel your team is under resourced please discuss the situation with your Account Manager.

Designated Financial Authority

Please inform us of the name of the Designated Financial Authority (DFA) who should authorise your expenditure. If the name of the DFA changes, you should notify us as soon as possible. In line with the need to have a clear separation of duties, the DFA must not have any day-to-day involvement with your Families First programme.

Failure to follow this procedure may delay consideration of your claim.

4. Audit Requirements

At the end of each financial year you should complete an outturn statement, certified by your local authority's Chief Financial Officer. A copy of the certified outturn statement should be submitted to the Families First team by 30th September following the financial year to which it relates. We will advise the name and contact details of the auditor, to whom you should pass the original outturn statement, as soon as the Wales Audit Office provide this information to Welsh Government finance team.

The auditor is testing to make 'a fair assessment of the costs attributed to the grant'. Therefore, it is up to the local authority to demonstrate that all of the costs attributed to the grant are eligible expenditure. The Risk and Testing Assessment (RATA) undertaken by the auditor will include an assessment of:

- Risk in the programme management
- Control arrangements
- Eligibility of expenditure
- Quality of supporting papers
- Expertise of programme staff
- Integration with other work
- Internal audit arrangements

The Wales Audit Office will submit the local authority audits to the Families First finance team no later than 31st December.

Further information on these requirements is included in your Families First Grant Award of Funding letter.

Local Authorities may not use Families First funding for the payment of audit fees. Welsh Government Grant funding must be spent only on delivering the supported activity.

The Welsh Government does permit third sector organisations to claim audit fees under principle of Full Cost Recovery outlined in the 'Third Sector Scheme'. Local authorities are not bound by the Welsh Government 'Third Sector Scheme' but we would encourage local authorities to follow the Full Cost Recovery principle with regard to third sector organisations.

The Welsh Government is in the process of reviewing the status of Audit fees as eligible funding for Local Authorities within the Families First and Flying Start programmes. Any changes will be introduced in the 2017-18 financial year.

5. Third Party Expenditure and Procurement

Third Party Expenditure

As the accountable body, you are responsible for ensuring that Families First grant funding is used for approved purposes, especially where expenditure is incurred by, or grants are paid to, third party providers (including other departments within the local authority) under lawful arrangement (Memorandums of Understandings, Collaboration Agreements. or other legally binding contracts) made with the local authority under the Families First grant scheme. Please note that Service Level Agreements are not legally binding and should only be used between local authority departments, not external bodies.

You are also responsible for monitoring the financial status of third party funded organisations (for instance a deficit on its income and expenditure account, a significant reduction in the value of its asset base, or a cash flow problem) and taking appropriate action to safeguard the funding provided through the Families First grant.

In order to properly complete and certify claims, you must have in place internal systems and procedures in place to satisfy yourself, your auditors and the Welsh Government Families First team, that only eligible expenditure is included in the claim, and in the annual outturn statement. Such arrangements may include:

- proper arrangements to prevent and detect fraud or error
- obtaining independently certified statements from third parties certifying the eligibility of expenditure
- a payments monitoring system during the year (supported by appropriate prime records, e.g. job descriptions, timesheets where appropriate)
- a system of spot checks of third party records.

The appropriate method used should be considered on a case by case basis according to the nature, volume and value of the transactions with individual partners. You should follow your own regulations and appropriate risk assessments when making payments to third party organisations and be mindful of the need to maintain clear audit trails. An evaluation of your management of third party expenditure will be included in your WAO audit.

The auditor is testing to ensure the local authority has made 'a fair assessment of the costs attributed to the grant'. Therefore, it is up to the local authority to demonstrate that all of the

costs attributed to the grant qualify as eligible expenditure. If timesheets or a time management system isn't operated, and auditors have any queries about the reasonableness of salary apportionments, they may wish to refer to some or all of the following sources of evidence:

- the annual Action Plan and any costings behind that;
- staffing structures;
- individuals' job descriptions and who they report to or oversee;
- calendars/dairies;
- minutes of meetings;
- level of involvement in partnership business;
- verbal explanations;
- travel/subsistence claims;
- authorship (or co-ordination of / contributions to) plans, monitoring and progress;
- reports and evaluation;
- knowledge of any specific local issues which will have needed management attention in the year;
- any periods of long-term absence (e.g. sickness, parental leave, secondments, career breaks)

Procurement

You should follow your own local authority's procurement procedures when commissioning goods and services for the Families First programme, taking all reasonable steps to ensure the best value for money from Families First funding, where necessary through the procurement of goods and services by open competition.

If you become aware that goods or services may need to be delivered across local authority boundaries please discuss this with your Families First Account Manager and the other local authority(ies) concerned. There may be opportunities for local authorities to collaboratively procure goods and services to achieve best value for money and more efficient and effective delivery.

6. Statutory Requirements

You must not use Families First funding for goods/services which form a statutory obligation upon the Local Authority. Nor should Families First funding be used in relation to activities that have been incorporated into the Revenue Support Grant (RSG). This also includes activities previously funded through the Cymorth Core Costs which are still part of the RSG.

If you can demonstrate that the activities you propose to deliver go beyond what you are statutorily required to deliver then this could be considered for funding. You should discuss such additionality with your Account Manager prior to committing to delivery.

7. <u>Match-funding into European Projects and Joint Funding of Projects</u>

For the purposes of this document the term match-funding applies to match-funding for European and non European funded projects.

Match-funding into European Social Fund (ESF) projects

Families First funding may be used to match-fund ESF projects provided the objectives of both the Families First and the European project are met. However, funding allocated to a specific European project cannot then subsequently be used as match-funding for a further project, as European rules governing the use of ESF funds do not allow this.

Having used a portion of your Families First allocation to match-fund a European project, you are still able to match-fund further European projects from the remainder of your Families First allocation, provided you follow the guidelines above.

You should provide details of any projects intended to be match-funded with Families First money in the appropriate row of the Progress Review. Failure to provide this would mean that the match-funding would be considered ineligible expenditure in accordance with Families First Conditions.

If you require additional information on the match-funding of European projects, please contact your Authority's European Officer.

Joint funding of projects

You are able to use Families First funding to part-fund projects / services provided you clearly identify your intentions in your Action Plan for the year at the start of the project. Please provide the financial contribution of each programme, and what services / products are intended to be purchased by each programme. You should also clearly demonstrate that the project / service meets the aims and objectives of Families First and the other grant programmes concerned.

You must ensure that double funding does not occur at any time.

Where your Authority part funds a project using one or more Welsh Government grant programmes in addition to Families First, you must clearly identify those projects which are being funded from those programmes on the progress reports when you submit your Progress Report. You should also provide copies of the relevant claim forms that you submit to the other Welsh Government departments for payment.

8. <u>Capital Expenditure</u>

Families First is a revenue grant. You must demonstrate that the purchase of items is solely for the delivery and benefit of the Families First Programme. Funding should not be used for the purchase of items normally classified as capital.

The Welsh Government normally classifies as capital, items totalling more than £5,000, whether made as a single purchase or as a multiple purchase in one transaction (for example, furniture or motor vehicles). If you are unsure whether an item of equipment should be classified as capital, please contact the Families First finance team as soon as possible. Proposals for capital purchase must be discussed and agreed with your Families First Account Manager **before** purchase takes place.

IT hardware / software

You may purchase ICT hardware or software if it can be demonstrated that it is essential for the successful delivery of a specific service/ project within your Families First programme and used only for that purpose.

Building / land / infrastructure activities

You must not use Families First funding for the purchase of buildings, land or any work related to infrastructure including, for example, the installation of ICT cables for telephones and computers.

9. Staff costs

Existing posts

If you intend to fund a post(s) using Families First, you must ensure that the funding of staff salaries, either fully or in part, is approved by your Families First Account Manager. This approval should be sought as soon as you decide to utilise the funding in this way. It is unlikely that Families First funding could be used to fund senior positions in your local authority, such as Director, which are normally funded through Revenue Support Grant, unless you can demonstrate that they devote an identified and specific portion of their time to the Families First programme, in which case you would need to provide the relevant job description.

Job descriptions (and adverts) must make the funding source clear for each part of a post-holder's salary. This applies to all posts receiving Families First funding, whether fully or partly funded by Families First.

New posts

If additional posts are needed to deliver Families First in your local authority, funding may be used, provided:

- there is a clear rationale for the purpose and function of the post(s);
- that the funding allocated is proportionate to the amount of time apportioned to that role;
 and
- a job description is provided to your Account Manager which should include information on the apportionment of Families First funding to the post.

Where possible consideration should be given to employing apprentices in new administrative posts.

10. Redundancy

Use of Families First Funding for redundancy costs

You may not use Families First funding for the payment of redundancy costs. Welsh Government grant funding must be spent only on delivering the supported activity.

Third party arrangements - redundancy costs

The Welsh Government provides funding to local authorities for the delivery of the Families First programme. Local authorities are responsible for the commissioning and/or procuring of projects / services to support that delivery. You should ensure that you have in place appropriate terms and conditions relating to any agreements and contracts entered into with third parties for the delivery / support of those services.

Where you have commissioned / procured a service from the Third Sector you should consider which party (if either) bears responsibility for any redundancy costs under your contractual arrangements. Families First funding is not available for meeting such costs. You should be mindful of the principles laid out in the Code of Practice for funding the Third Sector, as appropriate (see this link:

http://wales.gov.uk/topics/housingandcommunity/voluntarysector/publications/code/?lang=en_)

A well managed project and organisation will have in place plans to minimise the impact of government funding coming to an end. An exit strategy (or succession planning arrangements) will assist grant recipients manage the withdrawal of funding and ensure that projects are sustainable, valuable staff resources and experience and other assets are not lost, and that a positive legacy results from the contribution of public funds.

11. Rent

If you wish to use Families First funding to pay for rent you should clearly demonstrate why such costs should be met from programme resources and not funded by your local authority. This is particularly relevant where you propose to provide community based activities as part of your Families First programme (for example, a community based hub as part of your proposed Team Around the Family activity).

We would not normally provide funding for renting of community based premises where the local authority has recently closed premises which it owned in the same locality. Nor would we cover rental costs where these are to be paid to the local authority, as these should be funded through local authority central costs.

12. <u>Services of other Local Authority Departments</u>

Families First funding should **not** normally be used to fund services provided by other departments in your authority (e.g. legal services and finance). If you wish to use Families First funding for such corporate services you should discuss this with your Families First Account Manager prior to committing to these payments. You would need to demonstrate why Families First funding is required to fund such corporate services rather than the Revenue Support Grant.

13. Project Related Costs

There may be other costs that it may be necessary for you to fund using Families First, but which are not directly related to the delivery of the supported activity. It may be possible to use Families First funds for such costs provided you can demonstrate that they are critical to the delivery of the project.

Below are a number of examples of this kind of cost. More examples may be added over the duration of the programme as fresh instances are brought to our attention for consideration. These should be discussed with the Families First finance team before the funding is committed and, if necessary, approval sought from your Account Manager as to whether this is appropriate use of Families First funds.

DBS Checks

DBS checks can be funded through Families First if it can be demonstrated that the post, for which the check is being undertaken, is critical to the delivery of Families First. This applies whether the individual filling the post is working for the Families First activity on a full-time or a part-time basis.

Please note that if you are using volunteers for specific elements of your project/service, there is a possibility that the DBS check could be funded through another WG programme via the WCVA. This needs to be investigated and ruled out as a double funding risk before funding is committed from Families First funding.

Vehicle Insurance and MOTs

Families First funding can be used to pay for vehicles (bearing in mind the restriction on capital costs referred to at Section 8 above), MOTs and vehicle insurance if you can demonstrate that these costs are critical to the delivery of the programme.

If you are using the vehicle partly for Families First and partly for another (non-Families First) project, you may be able to claim only the pro-rated value of the vehicle or the associated costs (eq MOT, insurance, etc) from Families First.

Families First running costs, overheads and support services

A wide range of activities contribute to Families First running costs, including:

- administration costs which apply to the Families First service as a whole, such as promotional material, or licensing costs;
- enquiries and consultations;
- monitoring and evaluation;
- training costs;
- Where they represent an additional cost to the local authority, premises costs, including the related servicing such as heating, lighting, cleaning, small scale repairs and decorating (also see para 11 above).;
- equipment costs;

- costs in relation to the creation of Memorandum of Understanding, Association and Service Level Agreements etc between delivery partners
- an appropriate share of central services such as human resources, legal, finance and information technology.

There may be other costs that it may be necessary for you to fund using Families First funding, but which are not directly related to the delivery of the supported activity. It may be possible to use Families First funding for such costs provided you can demonstrate that they are critical to the delivery of the programme.

Activities ineligible for Funding

Families First funds should be focused on delivering or supporting the delivery of the 4 key elements of the programme. It would be inappropriate to use Families First Funds for other purposes. Examples of ineligible activities include:

- Family or group holidays (with the exception of short breaks and respite services commissioned through the Disability element of the programme)
- Purchasing of furniture or domestic equipment for individuals benefiting from the scheme, e.g. washing machines, microwaves, sofas etc.
- Food parcels (with the exception of the provision of snacks and refreshments, when used as an engagement tool for families)
- The delivery of statutory services
- Purchasing ICT equipment for individuals benefiting from the scheme.

Families First funds should only be used to purchase furniture, domestic equipment or food parcels in the most exceptional of cases and with the agreement of your Account Manager.

Appendix 1

Families First Account Managers and Finance Team contact details

Families First Revenue Account Managers

Ann O'Connor	Ann.o'connor@wales.gsi.gov.uk	Anglesey, Ceredigion, Conwy,
		Denbighshire, Flintshire, Gwynedd
	0300 062 5208	Powys and Wrexham
Dafydd Kidd	Dafydd.kidd@wales.gsi.gov.uk	Blaenau Gwent, Bridgend, Caerphilly, Merthyr Tydfil, Monmouthshire, Neath Port Talbot, Newport, Rhondda Cynon
	029 2082 5531	Taf and Torfaen
Sandra	Sandra.owen@wales.gsi.gov.uk	Cardiff, Carmarthenshire,
Owens		Pembrokeshire, Swansea and Vale of
	029 2082 5516	Glamorgan.

Finance Team

Marie Edwards	Marie.edwards@wales.gsi.gov.uk	Senior Resource Manager
	029 2080 1231	
Andrew Carter	Andrew.carter@wales.gsi.gov.uk	Resource Manager
	029 2082 6379	
Gareth Chestney	Gareth.Chestney@wales.cgsi.gov.uk	Resource Officer
Onesuley	029 2082 3614	

Appendix 2

Families First Project Manager

The Families First Award of Funding letter issued to local authorities refers to the post of Project Manager. The post holder has several functions which can raise questions as which local authority official should be designated for this role. The duties include:

- 1. Attend meeting with Welsh Government Officials
- 2. Receive documents related to the Families First Programme for dissemination to relevant colleagues..
- 3. Submit Progress Reports and other returns to The Welsh Government.

Which Official holds this post is a matter for the local authority to decide and does not reflect the hierarchy within the local authority.