



# Comprehensive Area Assessment

Consultation feedback and next steps



---

# Introduction

---

- 1 The seven inspectorates jointly commissioned by the government to develop Comprehensive Area Assessment (CAA) will be publishing detailed proposals in the summer of 2008 for further consultation. This follows an earlier consultation on the general principles and approach to CAA. Alongside the consultation, there has also been action learning work to develop this approach in four areas, CAA consultation events across the country to get wider input from stakeholders on the initial proposals, and work commissioned from Ipsos MORI to inform how CAA can be more citizen-focused. This report summarises conclusions from all aspects of this work and sets out the joint-inspectorate initial response to the issues raised. It is intended to indicate our current thinking and the general direction in which developing proposals are heading. These proposals may change in advance of the publication of the full consultation in the summer. This report is not part of the formal consultation process and we are not inviting comments on it or the developing proposals for CAA at this stage.
- 2 This report is set out in the following sections:
  - overall conclusions from consultation activity;
  - main messages from the joint-inspectorate CAA consultation, citizens reference groups, and action learning;
  - detailed summary of key issues from the consultation;
  - developing CAA – the next steps;
  - **Appendix A** – breakdown of responses by sector and organisation type; and
  - **Appendix B** – detailed analysis of responses to each consultation question.
- 3 Alongside this report, the Audit Commission has published the finalised key lines of enquiry for the use of resources assessment to be made in 2009. The inspectorates are doing some further work to ensure the use of resources is fully integrated into the CAA proposals. The assessment of use of resources under the first year of CAA commenced in April 2008. We have therefore published the key lines of enquiry at this stage to ensure that the relevant authorities understand as soon as possible the arrangements that are expected to be in place and how they will be evaluated.

- 4 The initial joint-inspectorate CAA consultation document was published on 19 November 2007 and the consultation period closed on 15 February 2008. The document was the first joint consultation published by the inspectorates and set out the overall vision for CAA. It followed the publication of the Local Government White Paper *Strong and Prosperous Communities* and subsequent joint ministerial commissioning letter to the inspectorates in April 2007. The document set out the proposed scope and key components of CAA and sought responses to 20 specific questions on the proposals.
- 5 In parallel with the consultation, action learning was carried out in four areas: Thurrock; Barking and Dagenham; Tees Valley; and Hampshire. The aim of this was to explore how the initial published vision for CAA could be delivered in practice, focusing on outcomes in relation to the local context, partnership working among local services and joint working by inspectorates.
- 6 In order to supplement the written consultation document, a series of nine consultation events were held across the country from December 2007 to February 2008. Stakeholders from all of the different public service sectors and community and voluntary sectors attended the events, which allowed stakeholders to further explore and express their views on the proposals set out in the consultation document.
- 7 A key principle of CAA is a strong focus on citizens and people who use local services. To support this, Ipsos MORI was commissioned to run ten CAA citizen and user reference groups. These were undertaken in the action learning areas, supplemented by additional groups in Suffolk Coastal District. Both the citizen reference groups and the user reference groups were attended by between 5 and 14 attendees, with a mix of men and women. Each citizen group focused on a different social classification<sup>1</sup> and some focused on specific age groups (over 65 and under 35). Each user group focused on particular groups of service providers and users of that service. This work has focused on how the design of CAA can best reflect citizen and service user's interests. Further work will look at how the reporting of CAA can be made most relevant and accessible to people.

---

<sup>1</sup> Social classifications are as follows: A – Professional; B – Managerial; C1 – Supervisory and clerical; C2 – Skilled manual; D – Unskilled manual; and E – Unemployed.

## Overall conclusions from consultation activity

- 8 These four major strands of work have reinforced the general principles we have set out for CAA. There was strong support for the vision set out in our previous consultation that CAA should be:
  - relevant to the quality of life of local people;
  - area and outcome focused;
  - constructive and forward-looking; and
  - joint and participative.
- 9 These remain our guiding principles. Alongside these, there was also strong support for CAA being citizen-focused, delivered proportionate to risk and simpler and easier to understand. The principle that local services should hold prime responsibility for managing their own performance, individually and collectively, was also agreed widely.
- 10 It was apparent that we have not yet made sufficiently clear how a model that takes the local area agreement (LAA) and sustainable community strategy (SCS) as its starting points will work in areas with county and district councils, or in relation to issues that span large cities and sub-regions. There were concerns that the proposals might result in an assessment framework that was more, not less, demanding of time and resources. There was some scepticism that the inspectorates, along with their sponsoring government departments, government offices for the regions and other bodies, could be genuinely joined-up and eradicate duplication.
- 11 We do not underestimate these challenges, but we are confident that together we can deliver a model for CAA that delivers these principles and tackles the main concerns raised and the practical challenges highlighted by the action learning. We believe it is more important to get this right than to try to implement everything at once. So our forthcoming proposals are likely to set out an evolving approach, establishing the framework and key elements in the first year, and building year on year as the new national indicator set is bedded down and the expectations of joint outcomes, agreed and delivered in partnership, increase.

## Main messages from the joint-inspectorate consultation, citizens reference groups, and action learning

- 12 The headline messages from the full consultation analysis and events were (further detail is set out in the detailed summary of the key issues from the joint-inspectorate consultation and **Appendix B** of this report):
- strong support for the overall objectives for CAA and its greater focus on the area and partnership working to deliver shared priorities;
  - strong support for putting citizens at the heart of the assessment;
  - concerns about the perceived complexity of the proposed set of assessments;
  - desire for more clarity on how CAA will be made proportionate to risk;
  - queries about the inspectorates' approaches to ensuring they have the necessary resources and skills for CAA;
  - requests for the concept of an area to be more clearly defined and how CAA will apply in more complex areas with multiple authorities explained;
  - uncertainty about how CAA will be able to deal effectively with issues around partnership working and accountability; and
  - ensuring that CAA can focus on overall outcomes at an area level and the needs of individuals whose circumstances make them vulnerable.
- 13 The headline messages from the citizen and user reference groups were (further detail is set out in the full report *Engaging the Public in the Development of CAA – citizen and User Reference Groups* available at [www.audit-commission.gov.uk/caa](http://www.audit-commission.gov.uk/caa)):
- wide ranging experiences and perceptions of quality of life, both between and within areas, supported the proposed CAA approach of taking account of diverse groups, including those whose circumstances make them vulnerable. However, this highlighted the challenge of balancing the needs and wants of different groups within an area;
  - knowledge of the role of local public services in community well-being was generally well understood, but less so in relation to partnership working and it was less clear how CAA will work in relation to the third sector;

- people were more inclined to form views about local services from personal contact (their own and other people's) than from official judgements;
- people were keen to use CAA and supported its holistic approach to area assessment and focus on place, but were not clear how it would provide accountability for improving outcomes; and
- public confidence in its judgements will be crucial to the success of CAA. This would be strengthened by public involvement and a range of ideas for how this could be achieved were put forward.

14 The headline messages from the action learning, including the views from local partnerships from the four areas, were as follows:

- there was a large volume of data available, which gave substantial opportunities to identify key issues and inform the area assessment, but it must be well organised and presented;
- joint working across inspectorates enabled conclusions to be brought together to highlight cross-cutting issues;
- engagement with local areas needed to be clearer, with expectations set out earlier;
- there were significant issues to resolve between inspectorates about shared understanding, use of language and approaches and the role of the government offices for the regions needed to be further clarified;
- levels of awareness varied substantially among local partners, with councils often being the route for most communications;
- the local priorities of elected councillors and their partners need to be taken into account and fully reflected in the risk assessment;
- there needs to be a full understanding of the context of the local area to add real value to the process and reporting needs to recognise differences within local communities and be fully tailored to the context of the area in question;
- CAA can have real value as an impetus for local partners to work more effectively together to address priorities for their local area; and
- the assessments need to be conducted in an open and transparent way to enable the local partners to challenge judgements and provide additional evidence as appropriate.

## Detailed summary of the key issues from the joint-inspectorate consultation

- 15 There were a number of general issues raised within the consultation responses that cut across the different elements of CAA. These are summarised below.

### The administrative impact of CAA

- 16 The most frequent issue raised by respondents was the need to ensure that CAA reduces the administrative impact of regulation on public services. Respondents commented that CAA, and the resulting inspection or improvement activity, must lead to an overall reduction in the burden on local services. Although most comments about additional impact focused on use of resources, a number of respondents also pointed to the potential for duplication across inspectorates and between the individual elements of CAA. For example, across use of resources, direction of travel and area risk assessment.
- 17 Further detail was sought on the extent and regularity of contact required with the Audit Commission's CAA lead and how evidence will be collected without placing additional strain on local resources. Many responses stated that the role of self-assessment under the new framework was unclear, and that there is scope to use self-assessment to reduce assessment activity. This aspect is being progressed through the Improvement and Development Agency and Local Government Association to ensure that their work on locality self-assessment is more aligned to our timescales for the next round of CAA trialling.

### Proportionality and frequency of assessments

- 18 While it was broadly acknowledged that CAA would not be a one size fits all assessment, a number of respondents commented that the framework must adequately recognise good performance. These responses tended to highlight the need for CAA to be proportionate where partnerships or individual organisations are strong and delivering improved outcomes. A number of responses suggested that elements could be undertaken on a phased or less frequent basis.

## The concept of 'area'

- 19 The concept of an area was of particular concern to councils in two tier areas, as well as London based organisations and the voluntary and community sector. Many respondents made the point that local people are more likely to identify with their neighbourhood, town or local area than with any broader boundary. Respondents cited the different statutory responsibilities of district and county councils as presenting challenges when considering a single CAA judgement as well as the capacity to report on CAA findings that meets the requirements of citizens at the neighbourhood level.
- 20 Conversely, a number of organisations also stated the need for CAA to take into account the 'area' or partnership contributions towards national and regional priorities, including a link to multi area agreements.

## Partnership working and accountability

- 21 There was broad support for a framework that enhances local accountability and clearly identifies risks and those responsible for addressing them. However, some respondents thought there needed to be more clarity about how performance, good or bad, will be recognised to ensure that risks are not unfairly attributed. Many comments referred to the need for clear and unambiguous reporting to ensure that accountability is clear to the public.
- 22 There was recognition among some respondents that local partnerships vary in how well established and effective they are. The emphasis that CAA will place on partnerships was seen by many as a mechanism that would support improvement in joined-up working.
- 23 Some respondents raised concerns relating to sub-regional issues but recognised the difficulties of assessing risks where multiple partners are accountable for shared outcomes. Respondents highlighted the need for careful consideration of the complexity of co-production or joint delivery. Others highlighted the issues concerning partnership working and accountability. In particular they raised the risk to public confidence if arrangements and reporting were not open and transparent.

## The changing role of inspection and inspectorates

- 24 Many respondents were clear in pointing out their expectations associated with implementing CAA and the need for inspectorates to work together in making judgements. Many also highlighted the opportunities and challenges for inspectorates in working with partnerships, and stated that this will require new skills and ways of working.
- 25 A range of organisations raised the need for alignment of performance frameworks and assessment regimes. Many respondents believed that conflicting priorities would continue to be placed on different sectors and organisations through other assessment and performance frameworks if this is not achieved.

## Maintaining a focus for CAA on those whose circumstance make them vulnerable

- 26 A number of respondents commented that it would be a challenge for CAA to look at broader outcomes delivered for the community, while maintaining a focus on inequalities within the area and individuals whose circumstances make them vulnerable.

## Developing CAA – the next steps

- 27 The local government white paper *Strong and Prosperous Communities* described CAA as comprising four key elements: reporting of the new national indicator set; an outcome-based area risk assessment; a use of resources assessment (for councils, primary care trusts (PCTs), fire and rescue and police bodies); and a direction of travel assessment (for councils and fire and rescue authorities). In the consultation responses there was widespread support for changing the term ‘risk assessment’ as it was seen to be potentially confusing to the public and has negative connotations. We are considering alternative ways to describe the forward-looking area-based assessment. We are also considering how we can ensure that CAA is proportionate to risk in the way it is delivered.
- 28 We will also be publishing an Equality Impact Assessment of CAA, alongside the summer consultation document. This will set out how we plan to ensure that equality and diversity and the needs of those whose circumstances make them vulnerable will be integrated within the assessments.

- 29 We will set out more clearly what we mean by 'area' within CAA, to remove any confusion between assessments of the area and partnership working between local public service bodies and assessments of the local bodies themselves. We will also ensure there is greater clarity about how CAA will be applied in two-tier and multi-council areas (such as those with Multi Area Agreements). As we develop these proposals in more detail, we will also set up further trials to test them out in practice.
- 30 Our proposals will be published in July 2008 for a three-month consultation. We will review responses and evaluate the trialling during the autumn and publish the final CAA framework early in 2009 or before, to take effect from April 2009. The first results under the new framework will be published in the autumn of 2009.
- 31 The methodology for assessing single tier and county councils in the final year of the existing comprehensive performance assessment (CPA) framework will be published by the Audit Commission in summer 2008. The consultation on the detailed proposals for the final year of CPA closed in April 2008. The Audit Commission is considering the issues raised through that consultation in advance of the publication of the framework, including how the transition from CPA to CAA can best be managed for councils and their partners to ensure that there is no duplication of effort or resources in moving from one framework to another. For example, we are looking in more detail at how the relevant evidence generated through CPA can be used in CAA.
- 32 The final set of CPA results for all single tier and county councils and the performance assessment results for all fire and rescue authorities will be published in February 2009. Alongside this the Audit Commission will also publish CPA results for district councils and fire and rescue authorities, for the relevant authorities. These results will be used as part of the baseline of evidence, alongside judgements and evidence from other sectors, in the early stages of CAA.

---

# Appendix

# A

---

## Breakdown of responses by sector and organisation type

Three hundred and thirty one responses were received and have been included in the analysis. Responses were received from a wide variety of sectors and organisation types, but the majority (56 per cent) were from the local government sector. A breakdown of respondents by sector and organisation type is set out below.

The breakdown by sector and organisation type is as follows:

<b>Local government</b>	<b>184 (56%)</b>
District councils	72
County councils	29
London Boroughs	27
Metropolitan councils	26
Unitary councils	18
Regional (Greater London Authority)	1
Representative bodies (including London councils and County Councils Network)	9
National agencies (National Youth Agency)	1
Others	1
<b>Cross-sector (all LSPs)</b>	<b>11 (3%)</b>
<b>Fire</b>	<b>20 (6%)</b>
Fire and rescue authorities	19
Representative bodies (Chief Fire Officers Association)	1
<b>Government departments</b>	<b>3 (1%)</b>
DOH – Secretary of State	1
DWP and GOYH – officials	2
<b>Health</b>	<b>24 (7%)</b>
PCTs	9

NHS trusts	2
Strategic health authorities	1
National agencies and representative bodies (including British Medical Association and National Institute for Clinical Excellence)	11
Others	1
<b>Housing</b>	<b>10 (3%)</b>
Housing associations	7
National agencies and representative bodies (National Housing Federation and Chartered Institute of Housing)	3
<b>Police</b>	<b>16 (5%)</b>
Police authorities	6
Police forces	8
Representative bodies (combined response from Association of Police Authorities, Police Authority Treasurers Society and Association of Police Authority Chief Executives)	1
Others	1
<b>Probation (all probation services)</b>	<b>2</b>
<b>Third sector</b> (local and national community and voluntary sector organisations)	<b>21 (6%)</b>
<b>Others</b>	<b>40 (12%)</b>
National agencies and representative bodies (including Arts Council, English Heritage, Society of County Treasurers, Sustainable Development Commission, Environment Agency and Confederation of British Industry)	28
Professional bodies and private firms (including Grant Thornton, KPMG and CIPFA)	10
Individuals	2

---

# Appendix

# B

---

## Detailed analysis of responses to each consultation question

**Do you agree with the key questions, for the risk assessment, as the basis for the area risk assessment? Are there any others that should be added?**

- 1 We received 282 responses to this question. Responses were not limited to the proposed risk assessment questions; many respondents raised more general concerns about the broader proposals. One representative body said, in relation to risk assessment: ‘In our view the risk assessment should be the real heart of the CAA. It is right that it should focus on how local partners have understood the needs of communities; how they have identified local priorities; how they are going to work together on delivery and to manage risks – because these are the questions local partners need to ask themselves if they are to ensure delivery.’
- 2 Respondents were generally supportive of the overall proposals for the risk assessment questions. However, most, including those that agreed with the proposals, raised concerns about the detail of the risk assessment.
- 3 Fifty-eight respondents (21 per cent of those that responded to the question) agreed with the proposed risk assessment questions. Two hundred and seven respondents (73 per cent) broadly agreed with the questions overall but raised significant concerns with one or more of the proposed questions. Seventeen respondents (6 per cent) did not agree with the overall proposed questions for risk assessment.
- 4 The main concern expressed by respondents was in relation to the balance between national, regional and local priorities. Many respondents had reservations about the degree to which the risk assessment would focus on the LAA and SCS. Others felt that sub-area or neighbourhood priorities should be covered in CAA.
- 5 Many respondents raised issues about how the views and issues of local people would be taken into account in the risk assessment, also highlighting questions around the particular needs of vulnerable groups. Concern was expressed by a number of respondents about the place survey and whether this would provide a robust evidence source for CAA.

- 6 Another significant issue raised by a range of organisations (particularly third sector organisations, fire and rescue authorities, housing associations and police authorities), was the need for CAA to focus on the inclusiveness of local partnerships and the extent to which local partners are cooperating. This was raised by 33 (12 per cent) of respondents.

### **Do the proposals address concerns raised in the earlier consultation about areas with county and district councils?**

- 7 One hundred and forty respondents either answered this question directly or more broadly commented on the proposals for the assessment in two-tier areas. Responses to this question were received from a wide variety of respondents and were not limited to county and district councils.
- 8 Responses to this question were mixed. Twenty-one respondents (15 per cent of those that responded to this question) agreed that the proposals had addressed previous concerns. Thirteen respondents (9 per cent) agreed that the proposals had gone some way to addressing issues but still had some outstanding concerns.
- 9 Seventy-two respondents (51 per cent) did not agree that the proposals had addressed previous concerns. Of these 72 respondents, 50 cited specific concerns that they did not feel had been sufficiently addressed or clarified. Thirty-four respondents did not directly answer the question but raised specific concerns about the proposals for the risk assessment in two-tier areas.
- 10 The main concerns expressed by respondents in relation to the proposals for risk assessment in two-tier areas were around accountability of individual councils, that the proposals do not adequately recognise the complexities in two-tier areas and that the achievements and risks of individual councils would not be recognised. A smaller number of respondents also raised issues about how the assessment would ensure that priorities are assessed at the right level. There were also a small number of concerns raised about how the proposals would take account of local government reorganisation.

## Should we adopt the term ‘the prospects for the area and the quality of life for local people’ instead of ‘the risk assessment’ when reporting CAA results, or can you suggest a better description?

- 11 We received 246 responses to this question. Although there was widespread support for changing the term ‘risk assessment’, there were a wide variety of suggestions for alternative terms. Only four respondents supported retention of the term ‘risk assessment’. Sixty-three respondents directly commented that the term ‘risk assessment’ should be avoided due to its negative connotations and the perception of the public.
- 12 One hundred respondents (only 41 per cent of those that answered the question) agreed with the proposal to adopt the term ‘prospects for the area and quality of life for local people’. This constituted only 41 per cent of those that responded to this question.
- 13 Twenty-eight respondents did not support either the term ‘the risk assessment’ or ‘prospects for the area and quality of life for local people’ but did not suggest an alternative term. The most frequently suggested alternative term for the risk assessment was ‘area assessment’, which was put forward by 30 respondents. Eighty-eight respondents suggested other alternative terms; examples include:
  - future prospects for the area;
  - prospects for improvement;
  - prospects for the area;
  - area prospects (assessment); and
  - prospects for success.

**How should we report on the national indicator set for local authorities and their partners? What is the most helpful way of comparing performance of local areas? How should we ensure that the performance information we publish is relevant and accessible to councils and their partners, local people and central government?**

- 14 We received a wide range of responses to the questions on the use, treatment and reporting of performance information. Many respondents gave a view on the role of performance information in its widest sense, while others commented on particular aspects of the proposals. Most respondents did not distinguish between how we should report information and how we should compare performance as evidence to support assessment. The analysis of these questions has been brought together and broken down by themes, rather than against the questions.
- 15 Overall 252 respondents directly answered these questions or commented on the proposals for the use and reporting of performance information. Many respondents made general comments regarding performance information and the national indicator set, for example that more clarity was needed on the definitions of the national indicators and that the collection and reporting of performance information should be streamlined under CAA.
- 16 A number of respondents did not feel that we should be comparing the performance of different areas under CAA. Twenty-one respondents commented directly that it would not be relevant to compare performance between areas under CAA and a further eight respondents thought it would be difficult or impossible to do so in a meaningful way. Other respondents thought it was important that CAA should include an element of benchmarking but the vast majority of these commented that performance information should not be used or reported at 'face value' without taking account of local context, local factors or local priorities and targets.
- 17 Twenty-two respondents directly commented that we should not publish league tables of performance under CAA, although six respondents were in support of national league tables.

- 18 One hundred and forty one respondents commented on the importance of comparator groups in the use and reporting of performance information and that we should not use 'all-England' comparator groups under CAA. However, there was no clear agreement on what comparator groups should be used. Some respondents felt that comparator groups should be flexible and not defined but others advocated the use of nearest or statistical neighbours.
- 19 Fifty-six respondents commented directly that it was important that local factors should be taken into account whenever we use or report performance information. However, only a small number of these went on to say that we that we should actually adjust the data mathematically to take account of local factors. This is linked to the point about comparator groups as many respondents thought that using the right comparator groups would sufficiently take account of local factors when comparing the performance of different areas. A number of respondents, 35 in total, commented that demographic data are as important as performance data and should be considered / reported alongside performance information data so that local context can be taken into account whenever we compare or report on the performance of areas.
- 20 Apart from issues of comparator groups there was a mixed response on how we should analyse data to use it to compare and report on performance. Sixteen respondents stated that we should continue to compare performance in the way that we do currently and eight respondents advocated the use of quartiles as the most appropriate mechanism for comparing performance. Six respondents thought that we should use thresholds to distinguish relative levels of performance and 21 respondents argued that performance information should only be used to judge improvement rather than current performance.
- 21 Sixty-seven respondents thought the most important factor to bear in mind when using and reporting performance information was local priorities and targets. Fifty-eight of these argued that we should find some way of reflecting which indicators have been set as local priorities whenever we use or report performance information. A smaller number (9 in total) suggested that performance information should not be used to compare performance but only to judge progress towards the agreed targets.

- 22 Nineteen respondents commented on the level at which performance information would be collected and reported and the need to ensure that this would aid accountability of the different organisations in the area. Eight respondents highlighted the need to ensure that performance information was capable of being disaggregated appropriately in order to be used and reported in a meaningful way.
- 23 On reporting performance information to local people, 11 respondents said we should use the citizen and user stakeholder groups to find out what they would find the most useful. Twenty-three respondents said it should be up to the local area to agree what and how to report to local people and that this should not be done on a national basis.
- 24 Forty-two respondents commented that the information should be tailored towards the audience it is aimed at and that it should be provided in a wide variety of formats. Fourteen respondents suggested that the performance information could be made more accessible by breaking it down into different layers of detail. While 70 respondents supported the proposal to make the information available via the internet, other respondents urged caution in relying too heavily on this approach as it would exclude certain sections of the population. Twenty-four respondents said we should make the information available through a wide variety of sources, including local press, libraries and council bulletins. Twenty respondents said that we should make more use of graphics and mapping to ensure the information is more meaningful and accessible to a variety of audiences.
- 25 Sixty-five respondents said that the key to ensuring that performance information can be used and reported in a meaningful way would be to ensure that it is available in a much more timely fashion than previously. A total of 24 respondents commented on the need to ensure the quality and accuracy of performance information before it was used in CAA or reported more widely.

## Do you agree with our proposals for direction of travel assessments and are there any aspects of these proposals you would like us to change?

- 26 There were 248 responses to this question. Overall responses were supportive of the proposals for direction of travel. One hundred and twenty respondents (48 per cent) directly agreed with proposals. Only 75 respondents (30 per cent) did not agree with the proposals. A further 53 respondents did not directly agree or disagree, but raised significant issues or concerns.
- 27 Twenty-eight respondents said that the relationships between the various parts of the framework should be clarified. A further 11 set out concerns on the overlaps between direction of travel and other parts of the framework.
- 28 Fifty-eight respondents (including a number of those that did not directly agree or disagree with the proposals) argued that the direction of travel assessment should be merged with another element of the CAA framework. Thirty-two respondents said the direction of travel should not be included in the new CAA framework. One county council responded: 'We are unconvinced, given the expansion of the use of resources block and the new risk assessment which judges risks to future outcomes (albeit for the area as a whole), the distinctiveness and value added of the direction of travel assessment. This is particularly the case where the same evidence is being used for the assessments – which could lead to double counting if we get two judgements. We believe that the separate Direction of Travel element of CAA should be scrapped and included in the two other main elements to avoid a separate industry. In an extension of the argument that all partners ought to be subject to the same performance framework, a point that strengthens the discontinuation of the direction of travel assessment is that PCTs and police authorities will not have one.'
- 29 Fifty-three respondents believe that we should review the proposals for scoring direction of travel.

- 30 Thirty-six respondents proposed that direction of travel should be broader and more partnership focused with 12 respondents suggesting that it should be area rather than organisational focused. For example, one housing association said: 'The proposals for the direction of travel assessments appear to be very local authority focused. This appears to indicate a lack of clarity as to which direction the CAA wants to move. While we acknowledge the local authority's community leadership role, this does seem to constitute a disproportionate part of the proposed assessments. The CAA Framework could be adapted to scrutinise and hold to account a much wider range of organisations.'

### **Do you agree with our proposals for the use of resources assessment? Are there any aspects of the proposals you would like to see changed?**

- 31 Two hundred and twenty respondents answered this question or commented more broadly on our proposals for use of resources. (Other respondents to the CAA consultation that did not answer this question may have submitted a separate response to the use of resources consultation.)
- 32 One hundred and forty respondents did not express a clear view but raised issues on the proposals as they stand. Only 21 respondents (10 per cent) directly disagreed with the proposals. Fifty-nine respondents (27 per cent) clearly stated that they supported the use of resources proposals. The majority of the respondents (even those who agreed in principle with the proposals) raised significant concerns with the detail of the assessment.
- 33 The most common concern raised by respondents (mentioned by 45 per cent that answered this question) was the perceived burden of the proposed assessment. Seventy-seven respondents made specific reference to the perceived expansion of the assessment, with many saying that this represented an increased burden and was now comparable to a corporate assessment.
- 34 Fifty respondents cited concerns with the frequency of the assessment, with many going on say that it should be a triennial assessment. Forty-four respondents specifically referenced proportionality and questioned whether the assessment would be tailored to reflect the track record of the organisation.

35 Forty-two respondents expressed concern that there was significant overlap and duplication between the use of resources assessment and other elements of the CAA framework. Twenty-five respondents proposed that use of resources assessment should be merged with direction of travel as these are both organisational assessments. Twelve respondents suggested that a merged assessment could be revised to become a single organisational assessment. However, 33 respondents commented that the use of resources, as proposed, does not adequately reflect the increased focus on partnership working. Eight respondents directly suggested that the use of resources assessment should be an area based, rather than organisational, assessment.

### Should there be an overall CAA score?

- 36 Two hundred and twenty five respondents answered this question directly or commented on the proposals for scoring CAA. Responses to this question were mixed; many respondents raised issues about the proposals for scoring without directly answering the question. There was also some confusion about whether this question was about one overall score for CAA, or the proposals to score individual elements (in particular the risk assessment).
- 37 Of the 225 responses, only 45 respondents (20 per cent) were directly in support of one overall score for CAA. A number of those that agreed went on to say that this should be supported by a more detailed narrative. The most commonly cited reasons for supporting one overall score were that it would be helpful to drive improvement, provide clear accountability to the public and would be simple and easy to understand. One LSP said: 'The use of scoring mechanisms in the CPA process did help to focus attention on improvement and a desire to either improve on scores or maintain existing scores. Scoring is more likely to be understood by residents rather than worded judgements which require a greater understanding of what stands behind these.'
- 38 Four respondents also commented that if there was not one overall CAA score then this would place too much emphasis on the scored direction of travel and use of resources, rather than the risk assessment and overall performance of the area.
- 39 In addition, 30 respondents commented that it would be helpful to flag or score certain elements of CAA, without giving one overall score for the whole framework.

- 40 One hundred and four respondents were concerned that giving one overall score for CAA would be too simplistic and not helpful given the complexities of the areas being assessed and the focus on local priorities. One LSP commented: 'The proposals are complex and therefore a meaningful overall score will be difficult to achieve. Areas will have different priorities and targets and the most important factor should be whether the locally set targets have been achieved.'

### **Should the national indicator set be scored?**

- 41 We received 233 responses to this question. Most respondents did not agree that the national indicator set should be scored however there was general support for consistency in the treatment, use and reporting of performance information. Many respondents commented that performance on the national indicator set should be used as evidence to support the other assessments and should not be a stand alone element of CAA.
- 42 One hundred and seventy two respondents expressed a clear preference for not scoring the national indicator set. A variety of reasons were given for this response, but the most common (given by 107 respondents) was that an overall score for the national indicator set would not be helpful or relevant under CAA. Many respondents commented that CAA should focus on local priorities and scoring the national indicator set would detract from this and drive partnerships to prioritise improvements in other areas. A number of respondents did not support the scoring of the national indicator set due to concerns about the lack of clarity on the indicators included in the set. One fire and rescue authority commented that: 'Selected national indicators in the LAA should be those most relevant to the local area, and the LAA will be performance monitored on the achievement of these through agreed targets determined with communities, partners and government offices. This approach does not lend itself to easy scoring for comparison purposes, because each area is different. While all national indicators will be reported on, each will have a different level of priority or significance depending on the circumstances of the local area. As such, scoring them would not provide any meaningful comparisons.'
- 43 Only 32 respondents (14 per cent of those that answered the question) supported one overall score for the national indicator set. A small number of respondents commented that it may be possible to score the national indicator set in the future but it should not be done in the first year under CAA.

## Are the proposed / labels scoring arrangements for use of resources the right ones?

- 44 Responses to this question were generally positive; of the 178 responses to this question, 120 (67 per cent) agreed with the proposals. A further 28 respondents broadly agreed but expressed concerns on the detail of the scoring arrangements.
- 45 Thirty respondents did not agree with the proposals for the scoring of the use of resources assessment. Five of these respondents commented that use of resources should not be scored at all and one suggested that a narrative report only should be given for this assessment. The remaining respondents that did not agree with the proposed scoring for use of resources were generally raising broader issues about the focus and scope of the assessment, for example they did not agree that there should be a separate use of resources assessment.

## What would be the best way of scoring the direction of travel assessment?

- 46 There were 216 responses to this question. Responses were mixed but generally there was more support for retaining the existing labels for scoring direction of travel.
- 47 Many respondents commented that the focus of the question was too narrow and that the overall proposals for the direction of travel assessments should be reviewed. It was also noted by a number of respondents that it was difficult to answer this question as there was a lack of clarity on the overall focus of the direction of travel assessment. For example, if the direction of travel is going to be forward looking then we should adopt the 'prospects for improvement' labels but if it is going to focus on progress achieved then the 'improving' labels would be more appropriate.
- 48 Sixty-six respondents (31 per cent of those that responded) directly supported the retention of the existing direction of travel labels. However, a small number of these did raise minor concerns, for example that we should replace the term 'strongly' with 'very well' or add in 'deteriorating' as a category. The main reasons given for the support for the existing labels is that it would ensure consistency with previous assessments and would reward actual improvement, rather than speculating about what might happen in the future. A further 13 respondents expressed concerns regarding the overall proposals for direction of travel, that is, they did not think there should be a separate assessment, but would support the existing labels if the assessment is retained in its proposed form.

- 49 Thirty-four respondents (16 per cent), either directly or broadly, supported the proposal to change the direction of travel category labels to 'prospects for improvement'. A further four respondents would support these labels for scoring but expressed broader concerns regarding the proposal to have a separate direction of travel assessment at all.
- 50 Thirty-eight respondents commented that it was difficult to answer the question as they did not agree that there should be a separate direction of travel assessment. Eighteen of these went on to express a preference for scoring if the direction travel assessment was retained (see above).
- 51 Thirty-three respondents did not express a clear preference for how we score direction of travel assessments. Seven respondents did not agree that we should score direction of travel at all and 38 respondents suggested alternative labels or mechanisms for scoring. The most common alternative suggestion, put forward by 14 respondents, was that we should combine the proposed labels into a scoring framework that is both forward and backward looking, that is, we score progress over the last year and provide a judgement on prospects for improvement. Other suggestions include traffic lighting and star ratings.

### **How should we ensure that the reporting and scoring of the area risk assessment is relevant, accessible and meaningful to the council and its partners, local people and central government?**

- 52 We received 198 responses to this question. The responses were wide ranging and varied, from commenting on how we should make the information available to the content and presentation of the reporting. A number of respondents commented that we should be using the citizen and user stakeholder groups that have been set up to determine how best to report for local people.

- 53 There was broad support for the reporting concept set out in the consultation paper. However, there was also significant support for reports that are available and accessible to the general public through a variety of mediums to maximise engagement from a wide range of audiences. To ensure that reporting and scoring are meaningful, many respondents pointed to the need for reporting to be delivered in easy to understand language, with minimal jargon and supported by the use of graphics to make information more accessible. There was mixed support for scoring or traffic-lighting risk areas although some felt this would aid the identification and sharing of notable practice to support improvement. Where there was support for flags it was felt that this should be supplemented by a narrative explanation.
- 54 Most support was for publication via a dedicated website that should:
- be largely narrative in content;
  - focus on outcomes over processes;
  - include simple, easy to read summaries;
  - provide clear and unambiguous judgements;
  - give varying levels of detail depending on the audience, that is, able to identify local or neighbourhood issues, high level summaries or detailed analysis;
  - provide supporting contextual and performance information;
  - have a strong focus on locally identified priorities; and
  - be clear about responsibility and accountability.
- 55 Other suggestions included considering the use of simple, plain English or easy to read versions, other languages or making reports available in other formats for example Braille, large text or audio tape. There was little support for paper or hard copy reports.
- 56 There was broad support for a reported assessment that focuses both on areas for improvement and notable practice. This was felt to be a useful tool to help drive improvement in local areas.

- 57 While national reporting was felt to be the responsibility of inspectorates, many respondents suggested that the responsibility for reporting performance locally should be via existing partner or council publications. The effectiveness of existing communications mechanisms and the desire for local services to take greater responsibility for reporting their own performance was supported by many respondents. This was also felt to support local accountability.
- 58 Meaningful comparison was felt to be an important element of reporting for many respondents. Given the focus of local priorities, a number of respondents pointed to the need to be able to compare performance against areas with similar priorities rather than on a national basis.
- 59 Although views on league tables were mixed the balance of opinion tended to be against them. While there was recognition by a number of respondents that league tables have supported improvement through peer pressure and enhanced self-awareness, it was also felt that area league tables could provide an incomplete and unfair view of an area and that genuine comparability would be limited. A few suggestions supported comparison by specific priority areas where comparability may be more relevant. Highlighting or flagging levels of performance was felt by some to support this approach.

### **What is the best way to report CAA in two-tier council areas?**

- 60 One hundred and fourteen respondents made either single or multiple suggestions in response to this question.
- 61 Forty-one respondents supported the inclusion of specific chapters or sections for each district to ensure that their relative contributions are adequately recognised. These were largely suggested to support an overall assessment of the area. There was less support for individual assessments which were felt to be more burdensome on district councils.
- 62 There was also strong support (30 respondents) for making specific reference to the contributions of districts where relevant. This would relate more specifically to the priorities of the area where one or more district councils are contributing to the achievement of desired outcomes.

63 There was only limited support for council specific, rather than area focused, reporting. Although there were a number of other suggestions made, these substantially focused on communicating the results via media or local communications mechanisms for example, local papers, leaflets or council magazines.

### **How can we try to make sure that our reporting is equally accessible to all people in communities?**

64 There were 183 responses to this question. Many respondents cited a number of ways that the findings of assessments could be reported.

65 There was widespread support (64 respondents) for reporting CAA in a wide range of formats to maximise accessibility. While some responses suggested specific mechanisms, many responses were less detailed.

66 There was support for making use of existing local reporting mechanisms to engage with local people, as identified by 56 respondents. Many of these suggested that the responsibility for reporting performance locally should be via existing partner or council publications. The effectiveness of existing communications mechanisms and the desire for local services to take greater responsibility for reporting their own performance was supported by many respondents. This was also felt to support local accountability.

67 A specific and dedicated website was supported by 54 respondents as a key mechanism for publication of CAA results.

68 Promotion of CAA on a national basis was felt to be the responsibility of inspectorates and was cited by 27 respondents. However, many comments (17) identified the need to ask the public and diverse communities how they would like to be communicated with, to enable inspectorates to develop a reporting system that is tailored to their needs. Other frequently cited responses included the need for easy read versions of reports and via the press.

## Do you agree with these proposals about the purposes, principles and benefits of inspection and the circumstances in which inspection might be suitable?

69 Two hundred and sixty-nine respondents answered this question directly or commented on our proposals for inspections. Responses were generally supportive of the proposals; 64 respondents (24 per cent of those that responded) agreed with the proposals without raising any additional concerns. A further 130 respondents broadly agreed but had outstanding concerns. Only 12 respondents expressed clear disagreement and a further 63 neither agreed nor disagreed but raised concerns on the proposals as they stand. Five respondents commented that there was not sufficient clarity on the proposals to respond in detail at this stage.

70 The main concerns with the proposals for inspection are set out in the table below:

<b>Response</b>	<b>Frequency</b>
Issues around administrative impact (inspection costs)	119 (24)
Concerns about cross inspectorate working	38
Need more clarity on triggers for inspection	19
Concerns with links to other improve mechanisms	9
Concerns with continued inspection regimes	4
Other concerns	57

## Will the approach described be an effective and efficient way of working with councils and their partners to deliver CAA?

- 71 We received 232 responses to this question, either directly or commenting more broadly on the proposals. Responses were generally positive; with only 12 respondents (5 per cent) directly disagreeing that the proposed approach would be an effective and efficient way of delivering CAA.
- 72 Forty-four respondents (19 per cent) directly agreed with the proposals. One hundred and seventy six respondents broadly agreed (or did not directly disagree) but raised significant concerns on the proposals as they stand. One health sector organisation commented that: ‘We believe that the ongoing relationship between the local presence from the Audit Commission and the LSP is of crucial importance in the development of a system based on improvement and open discussion and support with areas of concern. The “no surprises” concept within the assessment is one which we would support. However we also believe that regular evaluation of the impact of the CAA assessment would be worthwhile to ensure that the system develops in accordance with the needs of LSPs and the wider regulatory system’.
- 73 The main concern regarding whether CAA will be an effective and efficient approach to working with councils and their partners was that it would not reduce the burden of regulation (cited by 111 respondents). A number of respondents also expressed concerns about the workings of the new relationships with CAA leads. A smaller number of responses highlighted issues regarding the skills and knowledge that would be required by the inspectorates and whether this would be in place by the time CAA was introduced.

## Have we explained sufficiently clearly the inspectorates' relationships with regional government offices?

- 74 Although responses to this question were generally positive, most of the respondents still do not believe there is enough clarity or detail setting out how this will work in practice.
- 75 Only 29 respondents (14 per cent of the 208 responses to this question) directly stated that they did not believe we had sufficiently explained the respective roles. However, many other respondents who agreed with the principle went on to say that the proof would be in the implementation of the arrangements.
- 76 Fifty-two respondents still had concerns that the roles of the inspectorates and government offices would duplicate each other and that the overlap between the roles had not been addressed. Forty respondents specifically reference the confusion between the government office monitoring of LAAs and the focus of the area risk assessment. For example, one district council commented that: 'We believe there is potential for duplication and confusion in the role of the Government Office and the CAA lead, especially because of the focus of CAA on the delivery of the LAA. The agreement between an area and the Government Office about the content of the LAA starts with the list of national indicators – some of which are not appropriate measures for local priorities. Targets are to be agreed between the area and the Government Office, and so there already has to be an understanding of the ability of the area to deliver against its priorities. Reporting performance against the national indicators, and discussions with the area will provide information to the Government office as to whether the LAA needs to be re-negotiated. The CAA must be broader than the LAA if it is to be useful locally, and so the CAA lead will need to have a broader perspective of local performance and an understanding of the partnership landscape within the locality.'

