Annex A

CPA 2005 – Response to consultation – Canterbury City Council

The Audit Commission asked for comment on a number of specific areas. These are set out below together with a suggested response.

1. Overall categories

(a) What do you think about the suggestion of moving from five overall categories (excellent, good, fair, weak and poor) to four?

This proposal is supported, subject to the final CPA reports reflecting the relative performance of authorities within that category.

(b) What labels would you attach to four categories?

To maintain continuity and ease of comparison with the original CPA scores, the same as the original categories with the ‘poor’ and ‘weak’ being merged into ‘weak’.

2. Scoring and rules

(a) What do you think about the scoring and rules for corporate assessment?

Whilst the council places great value on its partnerships and their contribution to delivering key priorities, it would be unfair to judge performance on areas where the council has little or no control over delivery. Therefore, we welcome the emphasis on scoring the council’s contribution to achieving outcomes directly. A consistent rules-based framework seems the fairest way to achieve this.

(b) Do you think we should report an overall score for achievement, in corporate assessments, or report only individual scores for each shared priority theme?

We support a single overall score with the individual shared priority scores provided for information.

(c) How do you think individual scores for each shared priority should be used to determine an overall score for achievement?

We support the proposed system.

(d) What do you think about the scoring and rules for use of resources?

On a general point, we would hope that the proposed emphasis on Value for Money does cut across work authorities have already carried out under the Best Value regime. We would argue that bullet point two of paragraph 44 (costs alone do not reflect value, etc…) reflects an important principle and that this statement should have a more prominent priority in any subsequent auditor guidance.
As far as scoring is concerned, we support consistency in the way individual elements in CPA are assessed and support the proposed system.

(e) **What do you think about the rules for determining the overall CPA category?**

We would support the proposed rules for determining overall category, subject to their being adapted for district councils, who will require a different classification to cover the level 1 and 2 services in county and unitary councils. This may be a combination judgement that reflects total service block performance or a rules-based amalgamation of individual service-block scores. We look forward to the Commissions’ proposals for districts in this area. (see next response)

(f) **What are your views on developing an annual performance assessment for district councils covering key service areas?**

An annual performance assessment for major service areas combined with the other judgements represents a major investment in terms of audit resource and undermines the principle of strategic regulation. We would prefer to see a targeted programme of inspection for service areas and this should be aligned to the proposed targeted corporate assessment activity.

(g) **If we develop an annual performance assessment for district councils, do you think that each service area within this should be scored or should there be just an overall score?**

The service block areas (housing, benefits, environment, culture and community safety) are diverse and each has distinctive characteristics. It would be difficult we believe, to amalgamate them into a single score without coming to an individual judgment on performance in each block. Therefore we support a score for each service area, which is then amalgamated into an overall score.

3. Direction of travel statements

(a) **What do you think about the introduction of a direction of travel statement?**

We welcome the direction of travel statement as a valuable supplement to the regular audit activity. However, further clarification is required on how the statements will contribute to re-categorisation, either through assessment or as a trigger for full inspection.

(b) **Do you agree with the proposed labels and, if not, what labels would you suggest for these?**

We agree with the proposed labels.

4. Performance information

(a) **the principles of using broader performance information and how this should be used to produce scores;**

We support the proposed approach.
(b) the scope and content of each block (including the approach to Supporting People);

We are broadly supportive of the Commissions proposals subject to the following comments:

We welcome the introduction of the culture block as a distinct service block within the proposals. This recognises the important role that culture plays in delivering broader local authority objectives relating to issues such as regeneration, health, social inclusion, and learning. However, the suggested indicators within the culture block do not in our opinion reflect the contribution that culture makes to these areas. There is a growing evidence base to back this contribution up and the DCMS in particular has been playing a key role in advocating the important role that cultural development can play to the agendas of Government departments and within local government. Government sponsored bodies such as Sport England and Arts Council England have also been developing indicators and advocacy documents to make the same point. These don't appear to have been reflected within the culture block.

In addition to the work being done nationally, we would draw the Audit Commission's attention to the research paper ‘Developing the Evidence Base for Support of Cultural and Creative Industries in South East England’ produced by Kate Oakley for the South East England Cultural Consortium and South East England Development Agency, which again provides useful context in this area.

Specifically, we would make the following points:-

The definitions for success factors in the delivery of cultural services are too narrow as they focus predominantly on visits and satisfaction ratings. These do not tell the full story in relation to the impact cultural services can have on individuals and communities. The emphasis on quantitative rather than qualitative evaluation and outputs rather than outcomes would not in our view demonstrate the effectiveness of cultural policy and provision within local authorities. We accept that some continuity in relation to existing indicators is useful for comparative purposes but cultural policy has moved on and it is surely necessary to reflect this more fundamentally in the culture block.

The suggested indicators predominantly focus on museums, libraries, fitness, and library provision. This is old fashioned and does not reflect the wide cultural brief that many local authorities have or indeed the broad definition of culture as defined by the DCMS. Important areas such as arts development, festivals and events, creative industries and tourism do not appear to be covered within the cultural block. Yet for many local authorities these are key priorities for cultural development.

Sustained community engagement does not appear to be a factor in determining the success or otherwise of cultural policy within local authorities. The ability to capacity build through community engagement and audience development, with an emphasis on creating and developing new audiences for cultural activities, should be at the heart of local authorities cultural provision. The effectiveness of local authorities in achieving this needs to be taken into account within any assessment made.

As with local authority provision generally, within culture a greater emphasis is placed on partnership working at a national, regional and local level in order to meet the cultural
needs of local people. No account appears to have been made of this within the culture block. We do welcome the concept of commentaries from regional cultural bodies as an element of peer review but would like to know the systematic to be used in mapping this assessment.

Equally, the delivery of cultural objectives within those authorities that recognise the importance of culture relies on the ability to lever in external funding and increasing external investment in culture. This again should be a major consideration in any assessment.

(c) how levels of required performance, for scoring purposes, should be determined;

The council agrees that the use of performance information could be improved. A recent report by the consultant Covalent suggests that relative performance against BVPIs did not have a significant impact on the final CPA score. We suggest that the relative performance against BVPIs did not have a systematic impact on the final CPA score. However, some measures of an authority’s own performance year on year is also important. But this should be equally as important as the comparative performance of a council.

The comparative performance issues should not be overlooked. A simple pass/fail test around indicators may be an oversimplification. This cuts against the differentiation of councils into separate performance categories. Minimum thresholds for performance levels may be helpful for identifying poor performance but it is also important to set a standard for council’s to aspire to reach.

We support the drive to rationalize data collected as part of the process. This consistency is vital if performance trend data is given more weight.

(d) how local priorities should best be reflected in this approach;

Performance against key performance measure should be assessed with reference to their contribution to the council’s own stated priorities.

(e) whether and, if so, how third party commentaries on performance could be used;

The use of third party data, will depend very much on the reliability and veracity of the source. Third party data was used successfully in the original CPA and this trend should continue.

(f) what the impact of individual, and groups of, indicators and other performance information should be in the overall assessment for each block; and

The relevance of user satisfaction data should be approach with caution. Many factors, some outside of the council’s control can impact on satisfaction levels. Any service block judgement should not over-rely this data.

(g) how we should seek to confirm that authorities are ensuring data quality.

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1 Covalent research: ‘BVPIs versus CPA’ December 2004
Existing Audit and inspection regimes should, if applied rigorously and consistently, including the construction Area Profiles address this issue.

5. Integrating corporate assessments and joint area reviews

(a) What are your views on the proposals for managing the demands and processes of these by integrating them where possible?

The continued integration and subsequent reduction in the audit and inspection burden is welcome, however, the synchronization of these processes, for example the proposed Joint Area Reviews, should be carefully planned and focused to ensure that data collection and inspection follow in a consistent and logical order.

On a more specific point, many district councils, including Canterbury, provide a number of children and youth-related services as key areas of service delivery. Districts will not be directly included in a Joint Area Review. Therefore, the overall CPA model should reflect this diversity and if necessary, state specifically where these services will be assessed in the proposed model.