

**North Yorkshire Strategic Partnership - Executive**

**2 October 2008**

**Comprehensive Area Assessment (CAA)**

**Consultation Response**

**1 Purpose of Report**

- 1.1 To advise the NYSP Executive of the County Council's draft response to the consultation on the new inspection regime, the Comprehensive Area Assessment. If partners wish this could be the basis of a joint NYSP response in addition to any individual responses from partner organisations.

**2 Background**

- 2.1 Comprehensive Area Assessment (CAA) is the new performance assessment framework for the public sector resulting from the 2006 White Paper 'Strong and Prosperous Communities'. It will take effect from 1 April 2009.
- 2.2 CAA will assess how well local services are working together to improve the quality of life for local people. It will hold local public services to account for their impact on better outcomes. The assessment will look across councils, health bodies, police forces, fire and rescue services and others responsible for local public services, which are expected to work in partnership to tackle the challenges facing their communities.
- 2.3 CAA is being developed jointly by the Audit Commission, Commission for Social Care Inspectorate, Healthcare Commission, HM Inspectorate of Constabulary, HM Inspectorate of Prisons, HM Inspectorate of Probation and Ofsted. These partner inspectorates are consulting on the latest proposals for the CAA framework which were published on 29 July 2008.

**3 Proposed CAA Framework for Consultation**

- 3.1 It is proposed that CAA will have two main elements:
- an area assessment; and
  - organisational assessments.
- 3.2 The area assessment will look at how well local public services are delivering better results for local people in local priorities, such as

health, economic prospects and community safety, and how likely they are to improve in the future.

- 3.3 The organisational assessment of the councils and fire and rescue services will be made up of two assessments; Use of Resources and Managing Performance. For primary care trusts and police authorities they will include use of resources assessments linked to the separate performance frameworks for the NHS and police authorities respectively.
- 3.4 CAA will change the way inspectorates engage with the local public sector organisations, moving from a rolling programme of on-site inspections to an on-going relationship with local areas. The Audit Commission has appointed CAA Leads covering each LAA area to help co-ordinate local assessments and teams. On site inspections will only be undertaken where it is necessary to fill evidence gaps.
- 3.5 A variety of evidence will be gathered throughout the year to make the assessments, this includes:
  - key documents such as Sustainable Communities Strategy, Local Area Agreement;
  - views of services users including the Place Survey;
  - self-assessment and performance management information ;
  - the National Indicator set;
  - other inspection findings; and
  - intelligence from other bodies including Government Office Yorkshire & the Humber.
- 3.6 The area assessment and organisational assessments will be published in November 2009. The proposal is for the assessments to be published on a joint inspectorate CAA reporting website. A prototype reporting tool has been produced for consultation.
- 3.7 The area assessment will not be scored but will instead use a flag system. A 'red flag' will indicate significant concerns about outcomes, performance or future prospects. A 'green flag' will indicate where others may learn from innovative or exceptional success in the area / very positive achievements in an area.
- 3.8 The organisational assessment will be scored on a 1 (performs poorly) to 4 (performs excellently) basis. The scoring system for councils and fire and rescue authorities is being consulted upon, with three options put forward:
  - a single score, based on a combination of the use of resources and managing performance assessments, with the managing performance assessment having the greatest weight;
  - a single score, based on a combination of the use of resources and managing performance assessments, with the inspectorate using judgement to decide on the weighting; and
  - separate scores for use of resources and managing performance.

- 3.9 The inspectorates are keen to involve 'external expertise' in the process. Currently two options are under consideration:
- A panel of peers to provide support and guidance to the Audit Commission's CAA Leads.
  - Involvement based on the QA / consistency panel approach.

#### **4 Consultation**

- 4.1 The inspectorates have set 15 questions on which views are being sought in order to refine the final CAA methodology. Responses must be made by 20<sup>th</sup> October 2008.
- 4.2 North Yorkshire County Council has prepared a draft response to the consultation. Partners are invited to consider whether they would wish to support this as the basis for a joint NYSP response and if so what amendments they would wish to propose.

#### **5 Recommendations**

- 5.1 To consider whether to support the attached draft response as the basis for a joint NYSP response and to agree any proposed amendments.

Hugh Williamson  
Head of Scrutiny and Corporate Performance  
North Yorkshire County Council

19 September 2008

**North Yorkshire County Council**

**Response to consultation on Comprehensive  
Area Assessment (CAA) proposals**

**October 2008**

1. *Do you broadly agree with our proposals for the overall CAA framework?*

The overall CAA framework generally appears to address the white paper ambition for a more outcomes focussed and area based assessment. We broadly agree that an assessment of 'place' should capture the contribution and effectiveness of those organisations that shape the place and that in principle this can be achieved via the combination of area and organisational assessments.

The move from rolling programmes of on site inspection to an ongoing relationship is a positive development. This ongoing relationship should allow evidence and assessments to be shared during the year so that there are no surprises at the year end in the draft reports.

However, we are concerned about the resource implications of the self assessment on the council and its partners, the lack of clarity around the scope of the performance management aspect of the organisational assessment and the lack of clarity of the role of Ofsted and the Care Quality Commission. These areas of uncertainty lead us to fear that CAA will not reduce the burden of regulation.

2. *Are the area assessment and the organisational assessment, as the two key elements of the framework, clearly explained?*

The consultation document generally explains the area assessment clearly. However, further clarification of how the assessment might 'expand' to explore sub-regional agendas or 'shrink' to focus on a smaller area would be useful (case studies would help).

The explanation of the organisational assessment raises a number of areas for further clarification. We are uncertain as to how Ofsted and the Care Quality Commission will fit in with their assessments of children and adult social care services. The consultation document states:

*"Each council organisational assessment will comment directly on the performance of key local services. For example, we will comment specifically on services provided for children and young people and adult social care, drawing on evidence from the area assessment and Ofsted, the Commission for Social Care Inspection and (in future) the Care Quality Commission, evidence about individual service performance".*

This does not clarify the role of Ofsted and the Care Quality Commission, it just raises further questions and creates uncertainty about the reduction of the burden of regulation.

The consultation provides little information on how the performance management element will be pulled together. The assessment is not outlined in detail. We are concerned that this aspect of the assessment could have a considerable resource impact on the Council particularly if the assessment proves to be complex and has to be completed for each key local service.

The explanation of the area assessment considers the complications of two tier areas and states that these will be considered. However, we are still concerned about how this will work in practice and whether these complications are fully understood. We feel it could result in increased inspection burden in two tier areas and potential for confusion in terms of the relationship between eleven organisational assessments (8 councils, PCT, Fire, Police) and the area assessment in North Yorkshire.

3. *Is the link between these two assessments clear?*

The link between the two assessments could benefit from further clarification. How the two assessments will be linked during the process of evidence collection and which individual elements are linked is left to the reader to attempt to work out from the detailed information. The lack of detail on the performance management assessment makes it difficult to be explicit about the links.

There is also a need for more clarity on how the publication of the reports will be brought together in a way that is meaningful for their audience and helps them to come to a single view of achievement and progress.

4. *Do you agree that the three questions and supporting issues (see Appendix1) proposed for the area assessment are the right ones? If not, please suggest alternative questions and/or issues.*

We agree with the questions for the area assessment and that the main focus should be on the third question.

Consideration of whether people feel that their contributions make a difference needs to be done carefully as opinions will be coloured by whether individuals feel that their own views have been acted on and this cannot be the case for everyone.

5. *Do you agree that we should use the green and red flag approach for reporting the area assessment? If not, please suggest an alternative approach.*

We agree with the use of green and red flags for the area assessment as long as these are not used excessively, that it is supported by a good quality assurance programme and ongoing dialogue. We would like reassurance about the consistency of use of flags across the country and a clear process for disputing red flags.

Given that the green flag is about identifying learning points for others, how is this information going to be made accessible to a wider audience without having to read the assessments of many different areas?

6. *Do you agree that we should have one overall organisational effectiveness judgement, drawn from integrating the managing performance theme and the use of resources themes?*

There should be consistency between Council, PCT, Fire and Police authorities with a preference for one overall judgement for the organisational assessment.

Nonetheless, use of resources and managing performance should be reported separately. There is some concern that one overall organisational effectiveness judgement for the local authority may not discriminate sufficiently between service areas, and so excellence in a service area might not be sufficiently recognised.

7. *Do you agree with our proposals for the key questions and focus for the managing performance theme of the organisational assessment for:*

*a) councils?*

*If not, please suggest alternative questions and/or focus.*

The key questions appear sensible but there seems to be considerable overlap with the area assessment and we are still unsure of the scope of this assessment.

8. *Which of the three options for scoring the organisational assessment should we adopt? If you disagree with all the options, please propose an alternative approach to scoring.*

We feel that there should be consistency between all the public bodies in the area with a preference for option 1 (overall organisational score based on clear rules).

9. *Do the proposals provide for an appropriate focus to be given to people in vulnerable circumstances?*

This is certainly emphasised in the proposals but there needs to be more detail in terms of precisely how performance in this regard would be assessed. For instance, there is mention of new inspection arrangements for children in care and for safeguarding, but no detail.

*10. Do you agree that CAA should evolve over time?*

Our preference would be to take time to get it more or less right before implementation, rather than amending it post implementation. The problem with evolution over time is that the goalposts are constantly shifting and so year-on-year comparisons become less valid. It would be best to establish a framework that is as close to complete as possible from the start, and limit future changes to relatively minor refinements.

*11. Do you broadly agree with the way we are proposing to use the National Indicator Set within the CAA framework?*

Yes. Using the National Indicator Set as evidence alongside other factors makes the process more robust as it provides the full context rather than simply a comparative position. We are pleased that performance will be compared with similar councils and areas (nearest neighbours) rather than simply compared to all.

We have a concern that the National Indicator set is too narrow to capture properly the range of activity in respect of services for children and young people.

*12. Do you support our proposals to report the assessments as set out in our prototype CAA reporting tool? If not, please suggest alternative proposals for reporting.*

Yes, the example website pages appear to be clear, easy to read and understand but thought needs to be given to how assessments can be made more widely available especially to those who are not ICT-literate.

At a more detailed level it would be useful if performance data in the reports could be linked to definitions. It was difficult to understand how the pages labelled local innovation and excellence related to the rest of the web pages. The pages comparing the area qualitatively were also a bit confusing.

We have a concern that reporting will not be aligned explicitly with the Every Child Matters five outcomes around which children's services planning, delivery and inspection is currently organised.

*13. Do you agree with our proposals for peer involvement? If you have other suggestions about this, please outline your ideas.*

We agree with the need for peer involvement but are unsure whether either of the two proposals are the best approach to take.

The 'panels of peers' to support CAALs seems sensible in principle but we are unsure how this would work in practice. We are concerned about how much peer input this would allow, how consistent this would be in between areas as it would appear to be very dependent on individual CAAL. It would be sensible to involve peers in consistency

panels but only if they had also been involved earlier in the process. If peers were not involved until the consistency stage, it may be too late in the process, to delve further into any issues raised at this stage. We await with interest further detail of the involvement of peers in the trial sites.

*14. Do you agree with our approach to self-evaluation?*

Yes, a self-evaluation approach would seem the most appropriate approach. However, we are concerned about the resource implications of this approach and would appreciate more detailed guidance.

Self-evaluation for CAA should align with existing statutory inspection or reporting requirements that remain in place – for instance, there remains a statutory requirement for the county council and its partners to produce an annual performance review of progress towards delivering the CYPP, and this should be aligned with or incorporated into CAA self-evaluation requirements.

*15. Do you agree with our approach to gather relevant information from sources such as Citizens Advice Bureaux and Regional Business Forums? Are there any other sources we should consider?*

Yes. As many sources as possible should be used particularly where they are immediately available e.g. recent assessments by the regional cultural agencies. However, it is essential that feedback is shared with the audited bodies on an ongoing basis.