CPA – district council framework from 2006

Comprehensive Performance Assessment for district councils
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First published in July 2006 by the Audit Commission for local authorities and the National Health Service in England, 1st Floor, Millbank Tower, Millbank, London SW1P 4HQ
Foreword

There are 238 district councils in England which provide a range of services for their communities. These services, such as street cleansing, housing, waste collection and sports and leisure have a major impact on the lives of local people. Increasingly, district councils are also making a major contribution to improving the well-being of their populations by working in partnership with others on cross-cutting issues such as making communities safer, more prosperous and healthier.

District councils are best value authorities. They have a statutory duty to put in place arrangements to secure continuous improvement in their functions having regard to a combination of economy, efficiency and effectiveness. Under the 1999 Local Government Act the Audit Commission (the Commission) has a duty to assess from time to time how well authorities are fulfilling this general requirement for continuous improvement. The Commission also has a duty to categorise local authorities according to their relative performance.

The Commission introduced Comprehensive Performance Assessment (CPA) in 2002. CPA is a tool that brings together the most significant elements of our audit and inspection work to form a single judgement about the performance of councils and their arrangements for improving services. It also enables comparison between councils. Since its introduction, CPA has proved to be an effective catalyst for improvement in local services.

Between June 2003 and December 2004 we completed a CPA assessment of all 238 district councils. This comprised a corporate assessment, similar to that undertaken in single tier and county councils, and diagnostic work in key service areas of housing and public space. It also took account of assessments from the Benefit Fraud Inspectorate (BFI) and the appointed auditor. The results of these assessments, together with the learning from it, were published in September 2005.¹

Since the introduction of CPA there have been a number of changes in the operational and regulatory framework which have a bearing on the future shape of CPA for district councils. In particular, the Commission has committed itself to the principles of strategic regulation\(^1\). This means that all our work is risk-based, targeted where it can have the maximum impact, and user focused. The external landscape is also changing, with an increasing focus on locality-based partnerships as the key mechanism for delivering public services through arrangements such as local area agreements.

This paper sets out the arrangements that the Commission will put in place for undertaking CPA in district councils from 2006.

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\(^1\) Strategic Regulation: Minimising the Burden, Maximising the Impact, Audit Commission, November 2003.
Introduction

1 Since September 2005 the Commission has consulted widely on options for district council CPA from 2006¹ and proposals for the framework². This has included regional events for a wide range of local authorities, regular discussion with a reference group of district councils and meetings with a number of stakeholders, including government departments. We have also received over a hundred responses to the recent formal consultation exercise. Overall there has been a high level of engagement and a general consensus about the way ahead.

2 This document now sets out the confirmed framework, following all the consultation. We believe that these arrangements strike the right balance between a robust measure of corporate performance and minimising the burden of regulation.

3 The new arrangements will run from 2006 to March 2009. A brief summary of the responses to the latest consultation exercise is also included to show how the Commission has taken these into account in determining the final framework. The full analysis is published separately on our website: www.audit-commission.gov.uk.

4 This document does not cover CPA for single tier and county councils. We will publish a separate document setting out changes to the single tier and county council framework for 2006³.


Summary of consultation responses and key changes from 2006

Between April and May 2006 the Commission undertook consultation on proposed revisions to the district council CPA framework. We received 112 written responses from councils and other organisations. We have also received detailed feedback from councils on the proposed corporate assessment methodology through the piloting process.

We have considered all these responses, and the valuable feedback they provided, and have taken them into account in finalising our methodology. The key issues raised in the consultation are summarised below, along with our response. The remainder of this document then sets out our confirmed approach.

The overall framework

There was strong support for the proposed framework. Eighty-five per cent of responses agreed with the approach set out in the latest consultation document. In particular there was support for the targeted and risk-based approach.

The Commission has therefore decided that from 2006 all 238 district councils will continue to receive an annual use of resources assessment and a direction of travel statement.

In addition, CPA re-categorisation for district councils will follow a two-stage approach:

- to decide whether or not there is sufficient evidence of a potential category change; and if so
- to undertake a corporate assessment to determine if a category change is warranted.
Re-categorisation

10 There was general support for our proposal to undertake re-categorisation only where there is significant evidence of a potential change from the original CPA category. Eighty-six per cent of responses agreed with this approach. It was recognised that this provided an effective use of resources for both the Commission and councils.

11 Therefore, from 2006, the Commission will only undertake re-categorisation activity in the following circumstances:
   - where a council requests re-categorisation and is able to demonstrate significant evidence of improvement; or
   - where the Commission identifies evidence of significant deterioration.

12 There were some concerns about the detail of how regional panels will make decisions about the need for re-categorisation activity. We have addressed some of the issues later in this paper and will also publish separate guidance on our website by the end of July.

Use of resources

13 A range of comments were made on use of resources assessments. A small number commented specifically on proposals to implement the additional value for money (VFM) rule, with mixed views about its introduction. We have decided not to introduce an additional rule, requiring councils to score 3 on VFM in order to score 3 overall on use of resources, but are confirming the remainder of the proposals set out in the last consultation paper.

Direction of travel statement

14 There was general agreement with the proposal to continue the approach to direction of travel statements introduced in 2005. Eighty-four per cent supported this approach. We will therefore continue with the current non-scored approach.

15 There was some support for reporting progress more consistently. We will address this through improved guidance to our staff and also consider whether or not further changes are required in 2007.
Analysis of service performance information

16 There was broad support for the principle of analysing service performance information with 60 per cent of responses in agreement with the proposal to use this to inform the decision about the need for re-categorisation. However, there were a number of comments questioning the appropriateness of the proposed performance indicator (PI) set and whether it broadly reflected the services that councils deliver.

17 As a result of the feedback received, the Commission has supplemented the PI set with an additional indicator on housing benefit.

18 Other PIs were suggested for inclusion. Although they are not appropriate for inclusion in the analysis of service performance information, they will form part of the wider evidence base to inform the achievement judgement of the corporate assessment. For example, where relevant, we will take into account indicators such as participation in sport and active recreation (from the Sport England active people survey) data in assessing councils’ achievements.

Corporate assessment

19 There was general support for the proposed changes to the corporate assessment. The highest level of support was for the inclusion of a council peer on the corporate assessment team (93 per cent). However all the proposed changes received a high level of support. Overall councils felt that the proposed changes to the key lines of enquiry (KLOE) and scoring were appropriate.

20 Therefore, we confirm the corporate assessment methodology will be streamlined to make it more proportionate and will include:

- five corporate assessment themes instead of ten;
- direct involvement of a council peer in the assessment process; and
- a web-based stakeholder survey.

21 It will not include diagnostic assessments of service areas.
The overall district council CPA framework

Guiding principles

22 Strategic regulation is at the heart of our approach to CPA. The CPA framework for district councils from 2006 will:

- continue to encourage improvement;
- be seen from the perspective of service users;
- provide value for money for taxpayers;
- be targeted and risk-based; and
- be delivered in partnership with others.

23 We will continue to encourage improvement and value for money by undertaking annual use of resources assessments and direction of travel statements in all 238 district councils. These mechanisms, together with national performance indicators, targeted inspection activity and ongoing monitoring by relationship managers and appointed auditors, provide the foundation of our public assurance role.

24 In addition, the new framework will:

- build on the previous round of CPA of district councils but be much less intensive, both in terms of inspection activity and the impact on the capacity of district councils;
- be more affordable, both in terms of the level of central government grant and fees paid by councils; and
- include appropriate involvement of other organisations supporting improvement, including the use of council peers in our assessment activity.
Which councils will be considered for re-categorisation?

25 In line with the principles of strategic regulation, from 2006 the Commission has adopted a targeted and risk-based approach to CPA for district councils. We will undertake re-categorisation activity only where there is significant evidence to indicate a potential change in CPA category. This will apply in the following circumstances:

- where councils can demonstrate performance that is significantly better than that identified in the original corporate assessment, and the council wishes to be considered for re-categorisation; or
- where there is evidence of significant deterioration in either service or corporate performance which could result in re-categorisation if a further corporate assessment was undertaken.

26 Where there is no evidence of deterioration in performance, councils will only be considered for re-categorisation activity if they request it.

Overall shape of the CPA framework

27 The framework will involve a two-stage approach:

- to decide whether or not there is sufficient evidence of a potential category change; and if so then
- to undertake a corporate assessment following which a change in category may be warranted.
Decisions about whether or not to undertake re-categorisation activity will be made regionally by Commission panels which will include peer representatives. If a panel decides that there is evidence of sufficient improvement or deterioration to justify re-categorisation activity, this will take place through a corporate assessment. Further details on each of these elements are provided in the next section.

We will publish guidance which clarifies how the regional panels will work.

What will stay the same?

Although we have introduced some changes to the way district council CPA will take place from 2006, the Commission will not introduce a harder test into re-categorisation activity. The categories will remain the same and corporate assessment broadly similar, to ensure comparability between the 2003/04 categories and those determined from 2006 onwards.

Some changes have been made to the methodology to reflect changed national/local priorities and new ways of working. So, while the criteria used to assess performance are different, they reflect the equivalent levels of performance.
How will the individual elements of CPA fit together?

Use of resources

32 The use of resources assessment is conducted annually in all councils. It provides a judgement on how well a council manages and uses its financial resources. The assessment focuses on the importance of having sound and strategic financial management to ensure that resources are available to support the council’s priorities and improve services. It covers the following themes:

- financial reporting;
- financial management;
- financial standing;
- internal control; and
- value for money.

33 The use of resources assessment helps to establish clear minimum requirements that will provide the foundation for reducing regulation in the future. The approach in 2006 will be more proportionate in recognition of the significant investment made in 2005 by authorities and auditors alike to establish a baseline assessment. In 2006 auditors will focus on reviewing whether the assessment is still appropriate, updating it for any changes and improvements.

34 In 2005 all councils submitted a self-assessment for the value for money theme. From 2006 councils will only be required to submit a new self-assessment if they scored a 1 for the value for money theme in the previous year. Other councils will only be asked to submit an update to reflect any significant changes. A self-assessment is not a requirement for any of the other themes.

35 The value for money element will complement work completed by councils in producing their annual efficiency statements and avoid unnecessary duplication of effort on the part of councils. Auditors will review the arrangements underpinning councils’ annual efficiency statements as part of the value for money assessment and also in meeting their responsibilities under the Code of Audit Practice.
Auditors will not provide specific assurance on the annual efficiency statements. However, in reporting back to the council and to the Commission on the results of their value for money assessment, they will report by exception where they have specific and significant concerns about the process followed by the council in compiling the efficiency statement or where the statement is not consistent with the auditor’s knowledge of the council obtained through other audit work. Efficiency gains supported by appropriate evidence and any concerns will be reflected in the auditor’s overall value for money assessment.

In response to the views expressed during consultation, we will not introduce change to the scoring rules in 2006.

The next use of resources assessment in district councils will follow a similar timescale as for the 2005 assessment and will be reported in March 2007. The subsequent assessment will be based on the 2006/07 financial year and we will then bring forward the reporting of our judgements to December 2007.

The use of resources assessment will be a key evidence source in the Commission’s decision on whether or not to undertake a corporate assessment.

**Direction of travel**

In September 2005, we introduced direction of travel statements for district councils. These statements were designed to recognise progress achieved since the last CPA categorisation.

The direction of travel statements provide public assurance, through a robust annual assessment, of whether councils are complying with their duty of making arrangements to secure continuous improvement. In 2005/06, district councils received an unscored summary commentary for inclusion in the annual audit and inspection letter, on the council’s overall progress in delivering its improvement priorities since CPA categorisation.

The Commission intends to maintain this approach to direction of travel. In 2006/07 councils will continue to have an unscored statement of progress in delivering improvement in the last year. In line with single tier and county councils, we will also integrate our work on assessing the progress of underperforming authorities with direction of travel. From 2006, progress assessments for councils which are the subject
of Department for Communities and Local Government (DCLG) engagement will be replaced by direction of travel statements, focusing on how well the council is building capacity and delivering its improvement plans since the last direction of travel statement.

43 The evidence collected in the course of preparing direction of travel statements and the statements themselves will inform decisions about whether or not to undertake a corporate assessment.

Service performance information

44 The systematic analysis of service performance information to identify improvement or deterioration will form a key part of the evidence considered by the Commission in deciding whether or not to undertake a corporate assessment. This element will include:

- analysis of performance indicators; and
- inspection scores – both those undertaken by the Commission and by the BFI.

45 We will present and analyse service performance information in a clear and consistent way but this will not constitute a scored service assessment. The significance given to the analysis of service performance information in determining whether sufficient improvement or deterioration has taken place to warrant a new corporate assessment will depend on the circumstances of the council. For example, service improvement is likely to feature more prominently if service performance was an area of weakness in the last corporate assessment. This will be considered alongside other evidence to get a rounded picture of improvement or deterioration in each council.

46 The Commission will produce a tool which sets out, for each district council, improvement and current performance on an agreed set of PIs. The PIs we will use can be found in the District Council PI Set for Use in Assessing Service Improvement which will be published on our website at www.audit-commission.gov.uk/cpa/districts. This also sets out any particular treatment of the PIs including adjustments for deprivation where appropriate. The tool will be made available to all district councils in August 2006 to assist with their internal discussions about whether to apply for a new corporate assessment. It will subsequently be updated annually in January when new audited PI information becomes available.
The PIs we will use are based on those used in the service assessment of single tier and county councils in 2005, with the addition of a supplementary PI on benefits. They have been selected as robust and reliable measures of service performance, covering a range of the services that district councils provide.

District councils will be able to use other robust performance information as part of the evidence they wish to be considered if making a case for re-categorisation. For example, it is recognised that councils may wish to use reliable local performance indicators to demonstrate progress against their priorities.

When deciding whether to carry out a new corporate assessment, the Commission will consider the following evidence from the analysis of service performance information:

- the extent of improvement – what proportion of the PIs in the set are improving;
- the strength of improvement – whether improvement seen at the individual PI level is significant or better than expected; and
- the areas of improvement – whether improvement is seen in areas of previously weak performance or areas of local priority.

The extent of improvement and current performance will be considered in the context of other district councils. Except for user survey data, we will use 2002/03 as the baseline year from which to assess whether significant improvement or deterioration has taken place. Quartiles will be used to distinguish how current performance compares with that of other councils.

Identifying councils for re-categorisation activity

The Commission will plan and deliver a programme of corporate assessments between 2007 and 2009. There will be a number of opportunities for councils to request re-categorisation throughout this period; further details of this are given in the next section. Councils should work closely with their relationship managers in deciding if and when to apply for a corporate assessment. Early discussion with relationship managers is recommended.
52 It will not be necessary for councils to undertake a self-assessment at this stage in the process. Instead, all councils will be sent a copy of the PI tool to assist in assessing service improvement. They will then be given the opportunity to submit a brief statement (a maximum of three sides of A4) outlining the improvements which they have made since the original CPA and signposting supporting evidence.

53 Where we are proposing to undertake a corporate assessment on the basis of evidence of deterioration, councils will be notified by their relationship manager and invited to submit written evidence.

54 The key decision on whether or not a corporate assessment will be undertaken will be made by regionally coordinated panels. Each panel will involve a council peer representative and out-of-region Commission involvement to ensure consistency and transparency. The panels will also consider those cases where there is evidence of deterioration.

55 In deciding whether or not to undertake a corporate assessment, the Commission will take into account both quantitative and qualitative evidence of improvement or deterioration. The test the panels will apply is whether there is a realistic prospect of a change in category if the corporate assessment is carried out. As well as the council’s statement, key sources of evidence will include:

- use of resources assessment (scored);
- direction of travel statement;
- service performance information summarised to show any changes in performance since 2002/03, current performance, service inspection scores (if any) and BFI information; and
- any other relevant evidence of improvement or deterioration such as robust local PIs.
We will also invite written evidence from a limited number of key stakeholders including:

- Audit Commission lead housing inspector;
- Government Office/Lead Official;
- BFI; and
- appointed auditor (when not the same as the relationship manager).

This first stage will not involve any fieldwork or on-site activity, although some discussion with the council may be necessary.

The Commission has published a review procedure which covers situations where audited and inspected bodies are dissatisfied with scored judgements in local government, housing and fire and rescue services. These arrangements will also apply to the panel decision about whether or not a new corporate assessment should take place in a district council. This is likely to involve a desktop review of the evidence considered by the panel in reaching their decision.

Timing and priorities for corporate assessment activity

The Commission will develop a rolling programme of corporate assessments which will be updated at regular intervals. In order to give councils advance notice of when they will be able to request re-categorisation, Table 1 below sets out a series of submission dates, together with details of their links to the audited PIs and Annual Audit and Inspection letters (also known as relationship manager letters) that will be taken into account.

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**Table 1**

*Submission dates for consideration by regional panels*

<table>
<thead>
<tr>
<th>Submission date</th>
<th>Audited PI data set to be used</th>
<th>Annual Audit and Inspection letter</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 October 2006</td>
<td>2004/05</td>
<td>2005/06</td>
</tr>
<tr>
<td>1 February 2007</td>
<td>2005/06</td>
<td>2005/06</td>
</tr>
<tr>
<td>1 June 2007</td>
<td>2005/06</td>
<td>2006/07</td>
</tr>
<tr>
<td>1 October 2007</td>
<td>2005/06</td>
<td>2006/07</td>
</tr>
<tr>
<td>1 February 2008</td>
<td>2006/07</td>
<td>2006/07</td>
</tr>
<tr>
<td>1 June 2008</td>
<td>2006/07</td>
<td>2007/08</td>
</tr>
<tr>
<td>1 October 2008</td>
<td>2006/07</td>
<td>2007/08</td>
</tr>
</tbody>
</table>

60 We will aim to notify councils of the outcome of their requests within six weeks of the submission date. It is planned to undertake the first re-assessments between January and March 2007. Councils will be given three months’ notice of our intention to undertake a corporate assessment, except for the first tranche where the notice period will be eight weeks.

61 In line with strategic regulation, the Commission will focus its efforts where it can achieve maximum impact. In undertaking a new corporate assessment, priority will be given in the first instance to those councils where there is evidence of deteriorating performance. Subsequently, priority will be given to councils in the poor and weak categories where there is significant evidence of improvement and where the council has requested re-categorisation activity.

62 The detailed programming of those councils prioritised for re-assessment will depend on factors such as:

- proximity to next category boundary in 2003/04 assessment;
- length of time since the last published CPA category; and
- strength of evidence for re-categorisation.
Corporate assessment

Self-assessment will remain the starting point for corporate assessment. In preparing their self-assessments, councils will be asked to expand on the brief statement outlining their improvement to address current performance and cover the KLOE. This should avoid repeating any work involved in submitting their case. Councils will be given six weeks to prepare their self-assessments.

The Commission is working with other members of the Local Services Inspection Forum (LSIF) to rationalise and align self-assessment requests to reduce the burden on councils. The content of district council self-assessments will be informed by the outcome of this work.

The corporate assessment methodology has been streamlined to make it more proportionate. The effectiveness of the methodology has been tested through pilot work. Changes include:

- five corporate assessment themes instead of ten;
- direct involvement of a council peer in the assessment process;
- greater reliance on pre-site analysis to minimise the on-site work;
- the introduction of web-based stakeholder surveys, as currently used in corporate assessment for single tier and county councils. This involves a web-based survey of key partners within the locality to ascertain their views of the council, reducing the need for extensive interviews and written evidence; and
- auditor’s judgement (now use of resources) and BFI assessments are no longer separate components, although they will be integral to the evidence considered for both the panel decision and any subsequent corporate assessment.

Corporate assessments will be more proportionate and significantly less resource intensive than those undertaken in 2003/04. There will be no diagnostic service assessments.
Key questions and themes

The new KLOE have been updated and streamlined but map directly across to the original KLOE used for corporate assessment in 2003/04. The key questions and themes are set out below.

The self-assessment will be used by councils to explain their achievements in the context of their locally determined priorities. However, as before, councils will be expected to demonstrate that they have focused on an appropriate balance between local and national priorities.

Table 2
Corporate assessment from 2006: key questions and themes

<table>
<thead>
<tr>
<th>Key questions</th>
<th>Themes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. What is the council, together with its partners, trying to achieve?</td>
<td>1. Ambition for the community</td>
</tr>
<tr>
<td></td>
<td>2. Prioritisation</td>
</tr>
<tr>
<td>2. What is the capacity of the council, including its work with partners, to deliver what it is trying to achieve?</td>
<td>3. Capacity</td>
</tr>
<tr>
<td></td>
<td>4. Performance management</td>
</tr>
<tr>
<td>3. What has been achieved?</td>
<td>5. Achievement and improvement</td>
</tr>
</tbody>
</table>

The corporate assessment KLOE which underpin these will be published on our website: www.audit-commission.gov.uk/cpa/districts.
In line with our other inspection activity and that of other regulators, the Commission has adopted the LSIF scoring system for corporate assessment theme scores. This remains a four-point scale, but with some changes to the labels. These are as follows:

### Table 3
Corporate assessment theme scores from 2006

<table>
<thead>
<tr>
<th>Score</th>
<th>Label</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>Well above minimum requirements – performing strongly</td>
</tr>
<tr>
<td>3</td>
<td>Consistently above minimum requirements – performing well</td>
</tr>
<tr>
<td>2</td>
<td>At only minimum requirements – adequate performance</td>
</tr>
<tr>
<td>1</td>
<td>Below minimum requirements – inadequate performance</td>
</tr>
</tbody>
</table>

As there are now five themes instead of ten, the theme weightings have been adjusted accordingly. This is based on mapping the previous KLOE to the new ones. All the new theme scores will be multiplied by a weighting factor, to align them with the original themes, so that they form approximately the same proportion of the overall score. The weighting for the new themes is as follows:

### Table 4
Weighting for corporate assessment theme scores from 2006

<table>
<thead>
<tr>
<th>Theme</th>
<th>Weighting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ambition</td>
<td>2</td>
</tr>
<tr>
<td>Prioritisation</td>
<td>2</td>
</tr>
<tr>
<td>Capacity</td>
<td>2</td>
</tr>
<tr>
<td>Performance management</td>
<td>2</td>
</tr>
<tr>
<td>Achievement</td>
<td>7</td>
</tr>
</tbody>
</table>
72 As not all district councils will undergo a re-assessment, we will keep the same CPA categories to ensure comparability with the 2003/04 assessments. District councils will continue to be categorised as:

- Excellent;
- Good;
- Fair;
- Weak; and
- Poor.

73 We recognise that the individual theme scores will be affected by changes to the scoring system. As a result, the total scores will not be equivalent to those in 2003/04. We have compensated for this by adjusting the category bandings. The bandings are outlined below.

### Table 5
**Bandings for corporate assessment**

<table>
<thead>
<tr>
<th>Category</th>
<th>Required score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Excellent</td>
<td>45 – 60</td>
</tr>
<tr>
<td>Good</td>
<td>36 – 44</td>
</tr>
<tr>
<td>Fair</td>
<td>28 – 35</td>
</tr>
<tr>
<td>Weak</td>
<td>21 – 27</td>
</tr>
<tr>
<td>Poor</td>
<td>20 or less</td>
</tr>
</tbody>
</table>

**User focus and diversity**

74 User focus and diversity will continue to be a core element of the corporate assessment. Judgements on each of the themes will take into account how effectively a council is addressing these issues within the local context. We will also ensure that any areas of notable or poor performance are highlighted in our reports.
Reporting

In 2003/04, district council CPA reports were published quarterly, on a county-by-county basis. Where a re-assessment has taken place, we will publish those reports and update the categories as required on a quarterly basis.

Quality assurance

The Commission has in place an effective quality assurance framework for single tier and county council corporate assessment. This will also apply to district council CPA. Specific arrangements will be put in place to assure the quality of our work at each stage. Within corporate assessment this will cover:

- pre-assessment analysis;
- initial challenge and scoping;
- on-site evidence gathering; and
- reporting.

Our approach to ensuring the quality of our work will also be built into our processes for selecting and training those carrying out corporate assessment related work. We will:

- aim to select only highly experienced, trained and accredited staff and contractors to deliver our corporate assessments;
- continue to work with the Improvement and Development Agency on recruiting and developing council peers;
- regularly review and seek feedback from authorities on the performance of teams; and
- allocate teams to authorities on the basis of their understanding of the type of authority.

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1 CPA – the Harder Test, Audit Commission, June 2005.
The Commission has adopted a review procedure applicable to all its scored judgements from April 2005. This will apply to:

- corporate assessments;
- service inspections;
- use of resources judgements (a Commission judgement although the work is carried out by appointed auditors); and
- the decisions by regional panels on whether or not to undertake re-categorisation activity.

More information on the review procedure for scored judgements can be found at www.audit-commission.gov.uk.
This report is available on our website at www.audit-commission.gov.uk. Our website contains a searchable version of this report, as well as a text-only version that can easily be copied into other software for wider accessibility.

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