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Dear Mr Thomas

Re: Improving Local Services in Scotland: A new performance framework

Thank you for providing the Scottish Consumer Council (SCC) with the opportunity to comment on the above discussion paper. The SCC has a history of research and policy development in this field. The performance measurement framework is a key mechanism to develop more outcome focused public services. We consider that the proposals fail to address the consumer interest.

1. Context

The proposals do not take account of the current Independent Review of Regulation, Audit, Inspection and Complaints Handling of the Public Services in Scotland. The Review is likely to outline key principles of all external scrutiny of public services and interim recommendations include the development of a common dataset for performance information required by scrutiny bodies. There is therefore significant overlap with the current proposals that needs to be recognised. While the paper notes that the performance framework must fit comfortably within a new scrutiny regime, this fails to take account of the fact that the performance framework is itself a key component of the scrutiny regime and cannot be developed separately.

2. Consumer focus

The new performance management framework should begin from the viewpoint of consumers. Measuring and reporting outcomes as experienced by consumers should be the first, and guiding, principle of the framework. It should measure what is important and relevant to consumers and the information required by local and central government to ensure that public services are meeting consumer needs. The proposals seek to give greater flexibility to local government but they do not, at present, put users at the heart of the framework.

It is important to note that the costs of performance measurement (internal and external) fall on citizens and consumers, either in direct charges or through loss of front-line staff. The desire for high quality information must be

balanced with the cost implication of gathering the data. However, this needs to be put in the context of the cost implications of not understanding how services impact on consumers. While cost effectiveness is mentioned in principle 3, there is no discussion of what it means in this context – while the principle is difficult to disagree with, the lack of detail means that it is likely that different stakeholders have a different conception of what it actually means.

A significant amount of the paper seems focused on increasing flexibility for local government, however we are not currently aware that there are significant barriers limiting local government's ability to set its own priorities and measure outcomes against these.

While user-focus is referred to in the document, the consumer voice is insufficiently included within the project: all members of the Performance Framework Project Board come from the provider perspective and the key stages proposed do not include direct consultation with consumers. Without consumer involvement in the project, there is a danger that the new performance framework will focus on the provider interest to the detriment of service users.

3. Objectives

While the current proposals discuss principles, they do not effectively describe what the objectives of the new performance framework are to be. The drivers section is insufficient to explain the reason behind the proposals. From a recent discussion seminar on the topic, SCC suggests the following objectives are also included:

1. The development of mechanisms to gather high-quality, robust consumer experience information to improve service delivery and inform policy developments.
2. The ability to compare data across local areas and allow for benchmarking between services to support improvement.
3. The ability to give a comprehensive overview of the performance of local services, including all partner agencies.
4. The ability to segment the information gathered into the same categories (for example age, income, ethnicity).
5. The need to measure performance against service standards set both locally and nationally.
6. The production of relevant information, provided in an accessible format to consumers and citizens to hold service providers and politicians to account.

4. Moving forward

It has been difficult to comment on the paper as the proposals are brief and lack detail. For example, in principle 1 it is unclear whose confidence is going to be increased through the framework, consumers or providers? Similarly, principle 5 on supporting joint working does not explain what this means, who the partners are likely to be and how performance management is to assist in its development.

Similarly, while the paper appears to view targets negatively, the problem is often how these are formulated and reported on, not with targets themselves. The paper would benefit from a more in-depth discussion of the different mechanisms of performance measurement available to the public sector.

Overall, the framework needs to be much clearer both about its aims and the tools it will use to promote these aims. I enclose the recent LGA/NCC publication *Customer Satisfaction with Local Services*. This publication provides a detailed overview of what a consumer-focused performance management framework would look like, and what tools it requires to underpin it. The Scottish Executive would benefit from considering in detail the tools required to support public services in developing outward focused performance measurement.

If you would like to discuss these issues further please contact myself or Jennifer Wallace, Policy Manager on 0141 227 6450 or email jwallace@scotconsumer.org.uk.

Yours sincerely,

Martyn Evans
Director