March 2008



Corporate Assessment

Luton Borough Council

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Introduction

- 1 Comprehensive Performance Assessment (CPA) is the means by which the Audit Commission fulfils its statutory duty under section 99 of the Local Government Act 2003 to make an assessment, and report on the performance, of local authorities. Corporate assessment is one element in the overall assessment that leads to a CPA score and category.
- 2 The purpose of the corporate assessment is to assess how well the Council engages with and leads its communities, delivers community priorities in partnership with others, and ensures continuous improvement across the range of Council activities. It seeks to answer three headline questions which are underpinned by five specific themes.
 - What is the Council, together with its partners, trying to achieve?
 - Ambition
 - Prioritisation
 - What is the capacity of the Council, including its work with partners, to deliver what it is trying to achieve?
 - Capacity
 - Performance management
 - What has been achieved?
 - Achievement
 - Considered against the shared priorities of:
 - sustainable communities and transport;
 - safer and stronger communities;
 - healthier communities;
 - older people; and
 - children and young people.
- 3 Corporate assessments are normally aligned with a joint area review of services for children and young people (JAR). In practice this means that the Council's achievements in relation to children and young people are assessed using the evidence provided from the JAR. In addition, examples of outcomes and activity, which are relevant to the other themes and which are identified through the JAR, are considered within the corporate assessment.

The JAR covers specific services for children and young people that are directly managed or commissioned by the Council, as well as relevant health and youth justice services provided by other bodies. It focuses on the contributions made by services to improving outcomes especially concerning safeguarding; services for looked after children; and services for children with learning difficulties and/or disabilities. The separate JAR report also covers the leadership and management of services for children and young people and, in particular, the way that such services work together to improve outcomes. The description and judgement in respect of children and young people in this report is summarised from the JAR report and the most recently published Annual Performance Assessment from Ofsted which covers all of the Council's children services.

Executive summary

- 5 Luton Borough Council is performing well. Strong progress is being made with the borough's economic regeneration, and the quality of the local environment is improving. The Council and its partners have worked effectively to promote and support stronger communities in Luton. It is a place where people from different backgrounds respect ethnic differences. Crime and disorder is reducing, although there is still more work to do here.
- The Council and its partners are investing well in improving people's health and in reducing health inequalities. Older people have access to leisure and fitness opportunities tailored to their needs. Outcomes for children and young people are good, with improving levels of educational attainment and good support for vulnerable children. These outcomes have been achieved because the Council has invested well in resourcing its priorities for improvement.
- 7 The Council's priorities link well to national priorities, for example, in promoting sustainable communities and in tackling fear of crime, and they take good account of the needs of diverse and disadvantaged communities. The Council and its partners have a good understanding of their local communities. As a result, priorities take good account of the needs of black and minority ethnic groups and other groups at risk from disadvantage. This is important given the diverse nature of the borough's communities, and the constantly changing demographics with high levels of inward migration. The Council works well with partners to plan and resource joint priorities. However, there is a lack of clarity in the objectives that underpin their shared ambitions.
- The Council has good arrangements for managing its resources and challenging value for money. It uses its capacity effectively to deliver its priorities. Procurement is used effectively to meet Council priorities and to support local suppliers. Programme management is effective, and is underpinned by sound risk management. Human resource strategies are increasingly effective at meeting the Council's needs. Most key partnerships are operating effectively.
- 9 The Council actively manages performance and this has had an impact on improving service outcomes. However, performance management overall is only adequate. This is because the Council does not monitor progress against its priority objectives, and it does not systematically and consistently learn from its customers. In addition, the Local Strategic Partnership (LSP) is not effectively managing performance.
- The Council demonstrates good community leadership. The Council and its partners are investing in improving LSP performance management. They are also actively working to improve clarity around shared ambitions, by developing a clearer and more consistent framework of strategic plans. The Council is working well with sub-regional partners on the planned housing growth in the region. The Council responded positively to the receipt of Preventing Violent Extremism grant by integrating the funding into its work on stronger communities, and by engaging partners and drawing on the advice of local community leaders.

- Political and managerial leadership are improving. The Council Leader now chairs the LSP, and Executive members are now engaged on LSP theme groups. The Council's Executive is actively leading improvements in performance management arrangements. The Council is working in a more corporate way, and this is being effectively led by the senior management team.
- The Council has a good approach to diversity, and it is improving its user focus. The Council has achieved level 3 of the Equality Standard for local government, and it is actively working towards level 5. Equality impact assessments are a routine part of strategy development. The Council is improving access to services, including for people who are at risk of disadvantage. It is investing in improving customer service, but further progress is needed here.

Areas for improvement

- 13 The Council and its partners need to ensure there is a consistent and clear framework of strategic plans in place. In particular, they need to ensure that there are robust and consistent links between the Sustainable Community Strategy, the Local Area Agreement, and the Council's Corporate Plan. This will help partners to ensure there is clarity about shared ambitions, objectives and targets, and will assist joint working towards these ambitions.
- 14 The Council needs to improve the effectiveness of its Scrutiny committees in holding the Executive to account, and in challenging performance. This will help the Council to improve its services, by making them more accountable and responsive to the needs and views of local people.
- The Council needs to strengthen corporate and LSP performance management arrangements. It needs to do this so it can focus on progress against key corporate and partnership objectives, and to ensure a consistent and corporate approach to learning from customer feedback. This will enable the Council and its partners to see more clearly how well they are delivering on their priorities and whether they are ensuring better outcomes for local people. As part of this investment, the Council also needs to improve its approaches to customer service. This is important because all customers should experience an efficient and effective service when they contact the Council.
- The Council should develop a broad based strategy for older people, that goes beyond social care. This will help it to ensure the needs of all older people in the borough are being addressed, and will enable it to draw together existing services into a more joined up approach. This is particularly important because the proportion of older residents in Luton is projected to increase over the coming years.

Summary of assessment scores

Headline questions	Theme	Score*
What is the Council, together with its partners, trying to achieve?	Ambition	2
	Prioritisation	3
What is the capacity of the Council, including its work with partners, to deliver what it is trying to achieve?	Capacity	3
	Performance management	2
What has been achieved?	Achievement	3
Overall corporate assessment score**		3
*Key to scores		

- 1 below minimum requirements inadequate performance
- 2 at only minimum requirements adequate performance
- 3 consistently above minimum requirements performing well
- 4 well above minimum requirements performing strongly

**Rules for determining the overall corporate assessment score

Scores on 5 themes	Overall corporate assessment score
Two or more themes with a score of 4 None less than score of 3	4
Three or more themes with a score of 3 or more None less than score of 2	3
Three or more themes with a score of 2 or more	2
Any other combination	1

Context

The locality

- Luton is located about thirty miles to the north of London. It is one of the largest towns in south-east England and has many of the characteristics of a London Borough. It is a compact and densely populated town with an official population of about 185,000 people and approximately 71,000 households.
- Luton is surrounded by a largely rural area, and borders Bedfordshire and Hertfordshire. It occupies a valley adjacent to an Area of Outstanding Natural Beauty, and forms part of a continuous conurbation with the neighbouring towns of Dunstable and Houghton Regis. Luton is tightly constrained by its boundaries which enclose 4,336 hectares. There is virtually no land left available for development, and growth within the borough is limited to redevelopment of land already in use. Luton is identified as a growth area in the Milton Keynes South Midlands (MKSM) Strategy.
- Transport links include the Council owned London Luton Airport and the Midland Mainline railway line which passes through the town. Widening of the M1 from the M25 London orbital motorway to the south Luton junction is under construction, and the section through Luton up to Milton Keynes will follow in the next few years. The completion of the high speed rail connection from the Channel Tunnel to St Pancras (where the Midland Mainline trains terminate), means Luton now has additional and effective transport links to France and the rest of continental Europe. By contrast, East-West transport links are poor by road and rail.
- Luton faces major challenges on housing. There is a significant imbalance between the supply and demand for affordable housing, and there are high levels of overcrowding and disrepair in the private sector. One of the highest birth rates in the country mean the demand for housing will rise faster than the housing stock, resulting in unmet demand for housing of all tenures. Luton already has a higher proportion (7.6 per cent) of overcrowded households than the regional average (5.2 per cent) or the average for England and Wales (7 per cent). Despite some success in reducing homelessness, there remain around 850 households in temporary accommodation.
- 21 The population is very diverse, with over 28 per cent from Black and Minority Ethnic (BME) backgrounds at the 2001 census (now estimated to be about 35 per cent). Over 50 per cent of children in Luton schools are from BME backgrounds. Luton experiences rapid changes in its demographic profile. Since 2001, there has been a significant change in the ethnic profile of Luton with an increase in numbers from sub-Saharan Africa and a significant increase in the population of eastern European origin, in particular Polish people. There is a high proportion of children in Luton schools from homes where English is not the first language and who start school needing extra help with English. It is predicted that between 2006 and 2011 there will be a 10 per cent increase in the number of people living in Luton aged over 75 years.

- 22 Deprivation is a key issue for the town. Biscot, Dallow and Northwell wards are in the top 10 per cent most deprived wards in the country. The proportion of the working population claiming benefits is 1.4 times higher than for the East of England. Unemployment, at 3.1 per cent, remains above the regional (1.7 per cent) and national (2.5 per cent) averages. There has been a decline in manufacturing employment, and increases in employment have been in the areas of hotels and restaurants and health and social care. The proximity to London provides an employment safety net and underpins earnings levels. While employment in Luton provides over 90,000 jobs, many residents lack the skills required for those providing higher incomes.
- 23 People who live in Luton generally suffer worse health and have lower life expectancy than the average for the country as a whole. Cardiovascular disease, diabetes, mental health, sexual health, smoking and obesity are identified as priorities in the local health strategy. Life expectancy in Luton is improving but still lags behind the national average. Infant mortality is significantly above the national average at 7.6 stillbirths per 1,000 births, compared to the average for England of 5.5. The incidence of low birth weight babies in Luton is also above the national average.

The Council

- There are 48 councillors on Luton Borough Council, with 26 seats held by Labour, 17 by the Liberal Democrats and five by the Conservatives. There are 10 members of the Executive, comprising the Leader and portfolio holders for:
 - Finance:
 - Regeneration;
 - Environment;
 - Children's Services;
 - Children's social care;
 - Housing;
 - Community Engagement;
 - Adult social care, and
 - Leisure and Community.
- 25 There are five Scrutiny Committees, and an overarching Scrutiny Board which also scrutinises local health provision, alongside a facility for scrutinising countywide health provision jointly with Bedfordshire County Council.
- 26 The Council is managed by a Corporate Leadership Management Team comprising the Chief Executive, and four Corporate Directors for Housing and Community Living, Children and Learning, Environment and Regeneration, and Corporate and Customer Services. In addition, there are 27 Heads of Service.

- The Council and its partners signed a Local Area Agreement with the government in 2006. The Local Area Agreement has targets for improving quality of life for local people in a number of areas, including making communities safer and stronger, and improving health and reducing health inequalities.
- The Council's revenue budget for 2007/08 was £258 million, of which £127 million was the schools budget. The Council was planning £107 million of capital spend in 2007/08. In 2006 the Council set a band D council tax level at £987.18, which is below average for unitary authorities. The borough has a low tax base, with over 80 per cent of homes in council tax bands A-C.

What is the Council, together with its partners, trying to achieve?

Ambition

- The Council is performing adequately in this area. There is a shared vision of improving quality of life for local people, which is based on a good understanding of local needs. There has for some time been a lack of clarity in the objectives that underpin this vision, and this is being addressed by the Council and its partners. The Council is demonstrating good community leadership that takes account of the diverse nature of the borough. Most key partnerships are operating effectively, and for those where improvement is needed the Council and its partners are investing in improving partnership working.
- There are clear ambitions for the area. The community plan, refreshed in 2005, sets out a clear vision of what Luton will look like in 2012, articulated around seven themes, namely:
 - a safe and secure Luton;
 - a greener, cleaner Luton with sustainable communities and accessible services:
 - a healthy and caring Luton;
 - a learning and skilled Luton;
 - a working and prosperous Luton;
 - a dynamic and creative Luton; and
 - community cohesion.
- Ambitions are challenging but they are not consistently underpinned by measurable outcomes. Some of the targets are stretching, for example, to reduce the number of people killed or seriously injured in road accidents by 50 per cent by 2010. There is a strong commitment in the plan to ensure a common sense of belonging for all residents, with strong and positive relationships across groups and communities. Several of the objectives have clear, outcome-based targets, for example, on recycling waste and improving educational attainment, but not all. For example, several targets under the Dynamic and Creative Luton theme are focused on activities or processes rather than outcomes. Some objectives still do not have baseline data. As a result, in some areas it is not clear what measurable differences partners plan to achieve.

- **14** Corporate Assessment | What is the Council, together with its partners, trying to achieve?
- Ambitions are based on a good shared understanding of local needs, and the Council and its partners have a good track record of community engagement. The community plan was underpinned by a thorough demographic analysis and was informed by a wide range of public consultations. Demographic analysis is well supported by the Luton Observatory, which is provided by the Council's Research and Intelligence team. This enables the Council and its partners to maintain an up to date understanding of the borough's demographics, which is important given the changing nature of the borough's ethnic profile. The Council and its partners actively consult with the Luton Citizens Panel, although they do not always feed back the impact of these consultations on policy development. Measures are in place to engage with groups at risk of disadvantage, for example, via external reference groups on race and disability. This good understanding of the local area means the Council and its partners have been able to develop ambitions that address the needs of local people.
- There is no clear, consistent framework of strategic plans. The Council's corporate priorities are set out in Luton 2011. These priorities were informed by the community plan ambitions and drew on the same public consultation and demographic analysis. While there are common objectives between the community plan and Luton 2011, there are also some inconsistencies. For example, both the community plan and Luton 2011 set objectives for improving life expectancy and employment levels, however the specific targets for these objectives differ significantly. There is also some inconsistency with the Local Area Agreement (LAA), which also has a different target for employment. As a result, partners do not always have a clear and consistent set of shared objectives and targets that they are all working towards.
- The Council is actively working with its partners to create a clearer and more consistent hierarchy of strategic plans. It is preparing a new Sustainable Community Strategy, which is intended to be the key overarching strategy for the borough. Following the change of administration in the May 2007 elections, it is also working to prepare a new corporate plan which will replace Luton 2011 and will draw directly from the Sustainable Community Strategy. In addition, the Council is working with partners to integrate this work with the new LAA that will be negotiated in 2008.

- The effectiveness of strategic partnership working has been mixed. Most of the theme partnerships are effective. For example, partnership working on economic development is supported by good joint planning with partners in Bedfordshire and good alignment of sub-regional plans. The Children and Young People Partnership has worked effectively to engage young people and to focus on delivering key outcomes. Partners have worked well together on tackling the significant local challenges on health. The Local Strategic Partnership (LSP), the Luton Forum, is well established and there is good engagement of the voluntary and community sector. However, the LSP has not consistently focused on delivery of community plan and LAA objectives. There has been some loss of momentum in the Crime and Disorder Reduction Partnership (CDRP), partly due to a lack of clarity about roles and accountabilities. By ensuring that most partnership working is effective, the Council and its partners have been able to support the delivery of outcomes for local people.
- The Council demonstrates good community leadership. The Council Leader now chairs the Luton Forum, and Executive members are now engaged on the LSP theme groups. The Council is investing, with its partners, in improving partnership governance. LSP theme groups have recently been reorganised to align with LAA blocks, and an LSP performance management sub-group was established in 2007, chaired by the Fire Service. This work has drawn on good practice from some of the LSP's theme partnerships. Plans are in hand to more effectively integrate the CDRP into the LSP governance arrangements, and to improve partnership communications. The Council responded positively to the receipt of Preventing Violent Extremism grant by integrating the funding into its work on stronger communities, and by engaging partners and drawing on the advice of local community leaders. The Council is working well with sub-regional partners on the planned housing growth in the region.

Prioritisation

- The Council is performing well in this area. There are clear priorities for improving local quality of life, and these take good account of the needs of diverse and disadvantaged communities. These priorities are used to shape service provision and this is having an impact on improving outcomes for local people. The Council is willing to take and sustain difficult decisions to support delivery of its priorities.
- The Council has clear priorities for improving local quality of life, which are focused on making a difference for local people. The eight priority areas set out in Luton 2011 cover economic regeneration, environment, crime, deprivation, health and social care, leisure, education, and transport and traffic. These priorities have been in place for a number of years and the Council has sustained focus on delivering them. Following the election of the new political administration in May 2007, the Council is reviewing its future priorities. It is doing this in a measured way, and is linking this work to the development of the Sustainable Community Strategy and the new LAA.

- The Council's existing priorities link well to national priorities, for example, in promoting sustainable communities, tackling anti-social behaviour and in supporting children and young people to achieve positive outcomes. The targets that underpin the Council's priority areas are outcome-focused. For example, by 2011 all wards to have improved in the government's measures of deprivation, and over 75 per cent of residents of Luton to be satisfied with the local environment. The Council is also contributing to national priorities around housing growth by working with neighbouring authorities in Bedfordshire to plan for major new housing developments.
- 40 Priorities and strategies reflect the findings of needs assessments and take good account of the needs of black and minority ethnic groups and other groups at risk from disadvantage. The community in Marsh Farm have been actively involved in deciding how their area should be developed, and this has led to an improved master plan for this New Deal for Communities area. Equality impact assessments are a routine part of strategy development across all service areas. For example, all new services and policies in adult social care are subject to equality impact assessments which cover not only equalities but impacts on social inclusion and community cohesion. As a result, adult social services are increasingly meeting the needs of BME communities. The Council has a good understanding of community cohesion issues in the borough, following a recent mapping exercise carried out by the University of Hertfordshire. Partners are effectively engaged through the LSP's community cohesion sub-group, and the Council works well with the Luton Council of Faiths to inform policies, for example, on reviewing the cemeteries service.
- Corporate priorities inform resource allocation and service planning, and this is resulting in improved services for local people. Sustained investment of resources in school improvement and economic regeneration has resulted in improved outcomes. Public satisfaction with the standard of street cleaning has improved significantly following an additional £0.9 million per year invested in the service. £5 million has been committed to support delivery of the Future Living Needs of Older People strategy. As a result of this investment, the Council has already decommissioned three residential homes and plans are in place to open new extra care homes over the next two years. One of the decommissioned homes is already being used to provide respite care for people with physical disabilities. The Building Schools for the Future programme is being used effectively to look beyond education by taking a more holistic approach to neighbourhood regeneration. The Regeneration Strategy is focused on delivering the objectives in Luton 2011. The Council's medium term financial strategy, budgets and capital programme are soundly based and are designed to deliver its strategic priorities. As a result, strategies are linked within a deliverable framework.
- 42 Service users are encouraged to contribute to action planning. In adult social care, service users and carers are increasingly involved in developing strategies to deliver service priorities. Nearly all children in care have been involved in their statutory reviews, and young people are also engaged via the Children and Young People Scrutiny Committee. Services are therefore being more effectively tailored to the needs of their users.

- The Council works well with partners to plan and resource joint priorities. Some pooled budget arrangements are in place, for example, in learning disability services and a significant pooled budget with the Learning and Skills Council on supporting young people who are not in education, training or employment. The Council worked effectively with Network Rail on planning the new Gateway project linking the railway station with the town centre. There is some alignment of resources between the Council and the Police on community safety issues. The Local Area Agreement has been used in some areas to bring greater alignment between partner plans, for example, it has been used effectively to drive the development of the LAA's Economic Development and Enterprise block. The LAA has also provided a focus for joint planning with the PCT on tackling health inequalities. This joint working has been effective, despite some of the inconsistencies in the shared framework of strategic plans. By working with partners in this way the Council is able to focus on delivering shared priorities and objectives.
- The Council is willing to take and sustain difficult decisions. Following a thorough review of future living needs of older people, the Council has decided to close some of its older residential homes. It is to move towards a service model where older people are supported through extra care and are helped to live more independently. The Council has also raised the eligibility criteria for adults accessing social care services. The Council has worked well with partners to close two poorly performing schools and reopen them as academies. As a result, the Council is making better use of its resources and is focusing more effectively on service improvement.
- Internal communications are effective, but communications with the public are not having as much impact. Staff feel well informed and they understand how strategic objectives affect what they do. Sound arrangements are in place for external communications, for example, with regular delivery of the Council's newspaper 'Luton Line' to all households. The Area Committees and ward forums are active and generally well attended. However, the proportion of residents who say they feel well informed by the Council has fallen from 45 per cent in 2003/04 to 36 per cent in 2006/07. This reflects a national trend, with many local authorities experiencing a decline in public satisfaction regarding communications.

What is the capacity of the Council, including its work with partners, to deliver what it is trying to achieve?

Capacity

- The Council is performing well in this area. There are good arrangements for managing resources and challenging value for money. Programme management is effective, and is underpinned by sound risk management. Procurement is used effectively to meet Council priorities and to support local suppliers. The Council is working in a more corporate way, supported by sound human resource strategies. Customer access and service are improving. Scrutiny is supporting policy development, but its challenge role is not well developed. The Council is investing in developing councillors' strategic skills.
- Approaches to assessing and challenging value for money are good. The Council introduced a robust approach to evidence-based budgeting for 2007/08, which involved benchmarking costs and performance with similar authorities, and this has continued for 2008/09. Because of this, six pilot services have been subject to more detailed value for money assessments, five of which have realised improved performance and savings. A more sophisticated approach to driving efficiency is being developed as part of the new change-management Luton Excellence programme, which is based on sound, well established 'lean thinking' methodologies. The programme is drawing on learning from the previous partnership with Atos Origin. By challenging value for money in this way the Council is able to make better use of its limited financial resources.
- Financial standing and financial management arrangements are good. The Council has a track record of producing balanced budgets, as well as actively and successfully managing budget pressures. The Council receives a considerable dividend from its ownership of Luton airport. It uses this dividend to invest in capital spend and pump-priming investments such as Resourcing Transformation. Resourcing Transformation has in turn been used to lever in external funding and support programmes such as Building Schools for the Future and Marsh Farm master planning. Airport dividend income is also used to support charitable trusts, such as Active Luton, which delivers the Council's sports and leisure services. At least ten different streams of UK and EU public funding have been successfully tapped into, to a combined value of over £100 million, over the past five years. The Council is thus good at drawing in, and deploying, external funding and in linking this to delivery of its priorities.

- 49 Project and programme management arrangements are working well. There is a common corporate approach to managing projects, and the Council has a track record of successfully delivering major projects, for example, the completion of the Butterfield Business Centre. The Council will be spending £465 million on major capital programmes over the next five years, mostly accounted for by the Building Schools for the Future (BSF) programme. It has invested in robust programme management capacity for BSF, including the appointment of a project director with BSF experience. Thus, although there is a recognition that evaluation of risk management needs to become more embedded, the Council actively manages its business risks, and risk management arrangements are well developed.
- The Council has significantly improved the way that it manages its assets, by taking a much more strategic approach through programmes such as Office for the Future, and by working more effectively with partners. There is a clear vision for fewer, high quality assets with more use and more shared management. Asset strategies are being shared with the University of Bedfordshire, and the Council is working closely with the Police and PCT. There are good links between strategies for Reshaping the Estate, Office for the Future and BSF. Because of this strengthened approach to asset management, the realisation of capital receipts from the disposal of assets has increased from about £1.6 million a year to over £20 million in the last year.
- Procurement is strong, and is helping the Council to deliver its wider priorities, building on a good track record of driving efficiencies and cost savings. The Council actively works to build the local supplier base, for example, by hosting Meet The Buyer events and local business breakfasts, and via roll out of e-procurement to 500 online users. It is working with the Marsh Farm Community Trust to develop a 100 acre market garden to deliver fresh fruit and vegetables to the estate. The Council uses analysis of the demographics of temporary staff to understand employment patterns in diverse communities across the borough. The Council has therefore been able to use its procurement policies to support the delivery of priorities relating to economic regeneration and deprivation.
- The Council has used its capacity to deliver improvements in priority areas. The School Improvement Team has had an impact on helping schools to improve educational attainment in some key areas. Investments in waste management capacity have had a significant impact on improving recycling rates.

- **20** Corporate Assessment | What is the capacity of the Council, including its work with partners, to deliver what it is trying to achieve?
- Human resource strategies are increasingly effective at meeting the Council's needs. Sickness absence levels improved in 2005/06 and are relatively low when compared with other councils. The proportion of staff from black and minority ethnic (BME) communities is below average when compared with other councils. The Council has been actively working to address this, for example, by close partnership working with Job Centre Plus and via bursary schemes for BME groups, and the proportion of BME staff improved in 2006/07. The Council performs better for the proportion of top earning employees who are women. Workforce and succession planning is proving effective in some areas, for example, in tackling vacancies in children's social workers, but vacancies in adult social care are proving more of a challenge. Most staff receive an annual appraisal. Human resource strategies have contributed to the Council achieving Investors in People Status in 2007.
- The Council is working in a more corporate way and it is investing in corporate capacity. Corporate management arrangements have been strengthened with the introduction of the Corporate Improvement Board at the start of 2007, which meets monthly and comprises heads of service and members of the corporate senior management team. Partners and stakeholders recognise a more corporate approach from the Council. A community safety data analyst has recently been appointed. The Council recognises the overstretch in supporting the LSP, and it is planning to make several appointments to improve significantly LSP support.
- Customer service is adequate. There is a customer service centre, but it does not currently deal with all service enquiries. The Council is looking at ways to further improve service, for example, by providing bill payment facilities at its area offices, but it has not yet developed a strategic approach to customer service that goes beyond e-access. Information and communications technology is being used to improve customer service. For example, the introduction of 'digipens' in adult social care has improved service turnaround, and the Matrix project is enabling customers to track their enquiries online via the Council's website.
- The Council takes good account of diversity issues when it makes decisions. The Council has achieved level 3 of the Equality Standard for local government, and there are ambitious plans for achieving level 5 within two years. Equality coordinators in each department promote a robust approach to equality and diversity. An equality impact assessment of proposed cuts in school clothing grants showed that this would have a disproportionate impact on minority groups. As a result, the proposed cuts were rejected.

- 57 Decision-making arrangements are adequate. Executive decisions are reserved to the whole Executive and are not delegated to individual portfolio holders, although there is a scheme of delegations for officers. Stakeholders, when asked if the Council makes clear and timely decisions, were equivocal and most answered that they neither agreed nor disagreed, a below average response when compared with the surveys for other councils. There is a reasonably good understanding of the different roles and responsibilities of officers and councillors, but this is still bedding down with the new Executive. Mentors are in place for several senior councillors. Facilitated workshops for senior councillors and officers are planned for early in 2008, to embed and develop more consistent strategic working. The Council therefore recognises the need for investment in councillor development.
- Scrutiny is adding value on policy development, but its challenge role is underdeveloped. Scrutiny committees have undertaken some good policy development work, for example, on developing corporate policies for the future living needs of older people. The Children and Young People's Scrutiny Committee is focused on outcomes and engages well with young people. However, scrutiny committees are not effectively holding the Executive to account and they are not effectively challenging performance. This is due in part to some less constructive political relationships, which have hindered developing a culture of robust, non-partisan challenge. The Council is therefore not making the best use of its councillors to help challenge and improve services.
- 59 The councillors' ethical framework is being operated effectively. The Council's Standards Committee is chaired by an independent person, and independent members of the committee proactively observe meetings such as full council and planning committee. Working relationships between councillors and officers are good. As a result, standards of behaviour and compliance by councillors with their code of conduct are generally good, with few matters reported for investigation by the Standards Board for England.

Performance management

The Council is performing adequately in this area. Performance management is used to challenge and improve performance in many areas, and this has resulted in improved outcomes for local people. The Council improves services because of customer feedback and it is open to external challenge, although it is not always systematic about the way that it uses this learning. The LSP is not effectively managing performance, and the Council is not routinely reporting progress against its priority objectives, but improvements are underway.

- **22** Corporate Assessment | What is the capacity of the Council, including its work with partners, to deliver what it is trying to achieve?
- Performance management arrangements within directorates are well established, and are improving outcomes for local people in many areas. Within Environment and Regeneration, and in Children and Learning, performance management is actively used to tackle underperformance and drive service improvement. For example, sustained focus on processing times for planning applications saw performance improve from the worst performing category to above the national average in 2006/07. Performance management is improving within Housing and Community Living, with the introduction of a service improvement framework in 2007, and action has recently been taken to tackle underperformance in processing disabled facilities grants. Arrangements within Corporate and Customer Services are sound, but their impact has been limited, for example, progress with improving some key under-performing services such as revenues and benefits has been slow. Overall, though, performance management is having a positive impact on improving service outcomes.
- While departmental level arrangements are well established, there are some gaps in corporate performance management arrangements. Performance against a small basket of key indicators from each directorate, as well as some key corporate indicators such as sickness absence, is reported quarterly to the Corporate Improvement Board and to the Executive. These quarterly reports compare performance with other councils, summarise actions to address underperformance, and include clear and well-presented information on revenue and capital budget monitoring. However, they do not include progress against Luton 2011, Community Plan or LAA targets. As a result senior managers and councillors have an incomplete picture of corporate performance. Thus, the Council is able to monitor performance against certain key indicators and against budgets, but cannot clearly see how well the Council is delivering on all of its strategic and priority objectives.
- The Council is investing in improving its corporate performance management arrangements, and the Executive is providing good leadership in this area. Steps have already been taken to improve reporting, for example, by including a high level descriptive analysis to accompany the Quarter 2 reports in 2007/08, and senior managers are planning a more detailed review of corporate performance management. It is too early to assess the impact of these improvements.
- The Council lacks a consistent and corporate approach to learning from its customers, though customer feedback is sometimes used to improve services. The Council changed its policy on making direct payments for adult social care, following a complaint from a carer. Adult social care services have done some outreach to BME community luncheon clubs, after analysis had shown that complaints from BME communities were disproportionately low. Improved policies on preventing bullying came out of the 2005 'Being Young in Luton' survey. The Council routinely reports response times to complaints, but it does not consistently and corporately draw out learning from its customer complaints. This means the Council is not making the best use of customer feedback, for example, by analysing trends and understanding whether customers find it easy to access all services.

- Partnership performance management is mixed. Some key partnerships, such as the Children and Young People's Partnership, have well developed performance management arrangements, with a good focus on outcomes, and this is making a difference for children and young people in the borough. However, the LSP is not effectively managing performance. The Council and its partners are investing in improving LSP performance management, but this is at an early stage in terms of impact. As a result, progress with key strategies such as the community plan and LAA is not being consistently reviewed and challenged by partners.
- The Council is open to external challenge. It invited the Improvement and Development Agency to undertake a peer review before the corporate assessment inspection and is implementing an improvement plan. The Council voluntarily engaged with a recent Home Office-led review of the Crime and Disorder Reduction Partnership. By being open to external challenge in this way the Council is able to get a fresh perspective on how well it is doing.
- 67 The Council is not consistently sharing learning across departments. There has been good shared learning across the Council on project and programme management. Corporate Improvement Board provides a further opportunity for learning to be shared. However, given there are pockets of good practice, cross-departmental learning is not working sufficiently well to translate these across to areas of weaker performance. For example, performance management has been used effectively to address past under-performance in processing planning applications, whereas under-performance in revenues and benefits has not been effectively tackled.

What has been achieved?

- The Council is performing well in this area. It has made good progress in delivering its priorities and improving quality of life for local people. Investment of resources in priority areas has resulted in evident outcomes in many areas, for example, economic regeneration, deprivation, the environment, improving people's health, educational attainment, tackling anti-social behaviour, and improving community cohesion. These outcomes are helping the borough to tackle the considerable challenges that local people face, of deprivation and health inequalities. The Council's own priorities link well to national priorities, for example, in promoting sustainable communities and in supporting children and young people to achieve positive outcomes. These priorities are based on a good understanding of the needs of local communities.
- The borough's diverse communities get on well together. Strong progress is being made with economic regeneration. The Council and its partners have worked effectively to reduce road accidents and respond to emergencies, and are investing well in improving people's health and in reducing health inequalities. Older people have access to leisure and fitness opportunities tailored to their needs. Outcomes for children and young people are good, with improving levels of educational attainment and good support for vulnerable children.
- The Council has met the government's target for reducing the proportion of vulnerable households that live in non-decent properties but although it is making progress with increasing the supply of affordable housing this is not meeting targets. Crime and disorder is reducing, although there is still more work to do here. Good progress has been made on environmental outcomes.
- 71 The Council is improving access to services, including for people who are at risk of disadvantage. For example, people living in Dallow, where 60 per cent of residents are from BME communities, have access to training and development opportunities at the Dallow Learning and Community Centre. School liaison meetings focus on the most vulnerable children. These approaches are supported by a robust strategic approach to diversity and equality.

Sustainable communities and transport

The Council is making good progress in delivering its 2011 target that all wards improve against government deprivation ratings. Between 2001 and 2004 the borough moved from a rank of 88 to 103 in the national indices of multiple deprivation (IMD). Three wards remain in the 10 per cent most deprived, and part of the Council's challenge in meeting this part of the target is that these wards have high levels of inward migration, thus disrupting sustained interventions.

- 73 Strong progress is being made with the borough's economic regeneration. The Council's proactive and innovative response to the demise of traditional manufacturing industries has resulted in an effective transfer of employment opportunities. The Council led work with partners in response to the Vauxhall plant closure, for example, by anchoring supply chains, and as a result the 2,500 jobs which had been lost were replaced within a year. The Council projectmanaged the development of the environmentally innovative Butterfield Green Business Estate, which has now been completed and is attracting business tenants. The regeneration of the town centre is making good progress. The St George's Square redevelopment is complete and over £13 million of government funding has been secured for improving access into the town centre from the railway station. Housing developments are contributing to regeneration, for example, via new high density housing in Holly Street, and the replacement of the poor quality Kirkdale and Rochdale blocks of flats in Albert Road in the town centre. The NOAH scheme, which recycles furniture and operates out of the Council's depot, provides employment for vulnerable people, as well as diverting some waste from landfill.
- Good progress has been made on environmental outcomes. 29 per cent of waste was recycled or composted in 2006/07 and this has continued to improve significantly in 2007/08. The level of air pollutants has reduced, because of air quality action plans being implemented. One of the Council's priority objectives has been to improve public satisfaction with the local environment, partly in response to low levels of public satisfaction in the 2003/04 BVPI survey. 82 per cent of people surveyed in 2006/07 expressed satisfaction with standards of cleanliness, which is a significant improvement and puts the borough amongst the highest performing councils nationally. Public satisfaction with recycling is also in the highest performing category. Two of the borough's parks have achieved green flag status, and public satisfaction with parks and open spaces has improved, although it is still below average when compared with other councils.
- 75 Steady progress is being made with meeting the area's housing needs. A high proportion of Council-owned homes already meet the decent homes standard. The Council has met the government's target for reducing the proportion of vulnerable households that live in non-decent properties, although 3,800 vulnerable households are still living in non-decent homes. Slow processing of benefits applications is undermining the Council's support for vulnerable households. The Council works well to prevent people becoming homeless, despite a high level of demand for this service.

- The Council is investing well to meet future housing needs. It has responded positively to the government's requirements to build significant numbers of new homes in the area. It has already established a statutory joint planning committee in partnership with South Bedfordshire District Council and Bedfordshire County Council. This is important because much of the new build in the growth area will take place outside the borough's boundaries. The Council has also recently negotiated nomination rights with South Bedfordshire District Council on new housing developments in Houghton Regis. The Council is making some progress with increasing the supply of affordable housing but this is not meeting current targets. However, the Council anticipates the growth area will meet its requirements for affordable housing over the longer term.
- The Council and its partners are investing well in meeting their priorities for increasing the use of public transport and in making Luton a safe place to cycle. Planning for the Luton Dunstable Guided Busway is well underway, aimed at providing better access to jobs and services for some deprived areas of the borough. These include two of the most deprived wards, Dallow and Biscot. The Busway will be built along a disused railway, thereby making good use of limited land availability in the borough. The Council has significantly improved provision for cycling. There are now 70km of cycle lanes in the borough, compared with 9km in 2003.

Safer and stronger communities

- The Council continues to build on strong foundations to promote and support community cohesion, and good progress is being made here. This is particularly important for the borough given the rapidly changing ethnic profile of the town. Arrangements for community cohesion are supported by an effective cross-departmental community cohesion group, and by external reference groups on race, gender and disability. The Council supports community-building events such as the major annual carnival, and the Mela. The national Carnival Arts Centre is being built in the town centre. The Council and its partners actively and publicly encourage the reporting of hate crimes. As a result, in the 2006/07 Best Value public survey, 73 per cent of residents said that Luton is a place where people from different backgrounds get on well together. 75 per cent said that Luton is a place where people from different backgrounds respect ethnic differences, a significant improvement on the 2003/04 survey.
- The Council and its partners are making steady progress with reducing levels of crime. Overall levels of crime in the borough have gone down by 13 per cent since 2003. The introduction of 'no cold calling' zones in recent years has had a significant impact in almost eliminating distraction burglaries in these areas. Violent crime in the town centre has reduced by 34 per cent in the last year, because of the Council and its partners actively working via the Luton Safe scheme to tackle disorder associated with the night-time economy.

- Despite these reductions, partners are not on track to meet their government-set crime reduction target. This target is very ambitious, with Luton required to reduce crime by 23 per cent between 2003 and 2008, compared with the national PSA target of 15 per cent. The Council voluntarily and positively engaged in a recent Home Office support programme, and an improvement plan is being implemented. As part of this improvement plan, the Council and its partners have already successfully piloted a multi-agency initiative (SoLUTiONs) that focuses on tackling crime and disorder issues in particular parts of the borough. In addition, steps have been taken to strengthen the Crime and Disorder Reduction Partnership.
- 81 Good progress has been made with tackling anti-social behaviour. There is a robust anti-social behaviour strategy and partners work well together to deliver it, applying preventative strategies. Joint work between the Council and Police has resulted in significant reductions in vehicle related crime in the main town centre car park. Overall, incidents of criminal damage are reducing, although they are still well above the LAA target. Innovative youth offending interventions have had an impact in reducing reoffending rates. Government analysis of satisfaction survey data indicates the public's fear of anti-social behaviour in Luton has dropped significantly since 2003/04, down from 66 to 31 per cent, which is meeting one of the Council's specific priority targets.
- The Council and its partners have a strong track record of reducing accidents and responding effectively to emergency situations. The Council exceeded its LPSA stretch target to reduce the proportion of people killed or seriously injured in road accidents. This was partly due to infrastructural improvements in areas such as Bury Park. Performance in this area is among the best in the country and is well ahead of top quartile performance. There is a strong multi-agency resilience forum, and the Council operates an 'around the clock' mutual response service with other local authorities in Bedfordshire.

Healthier communities

- 83 Steady progress is being made with improving the health of local people and reducing health inequalities. Mortality rates for both men and women from all circulatory diseases are reducing and are meeting LAA targets, although the rates are still higher than the national average. As a result of the investments here, the gap in mortality rates from circulatory diseases between the most and least deprived wards in Luton is closing.
- 84 Good progress is being made with helping people to guit smoking and in tackling drugs and alcohol misuse. Partners exceeded the LAA target for people stopping smoking and they are on track to meet future LAA targets in this area. The number of drug users presenting for treatment and completing 12 weeks or more in treatment is already well ahead of the LAA target. This is supported by robust strategies and partnership working on drugs and alcohol issues. For example, the Luton Safe scheme refers people who are banned from clubs and bars to Alcohol Services for the Community for participation in treatment programmes.

- The Council, with its partners, is investing well in improving people's health and reducing inequalities. A joint director of public health has recently been appointed by the Council and the Primary Care Trust (PCT). There are a number of pooled budget arrangements in place with the PCT and the Bedfordshire and Luton Mental Health and Learning Disability Partnership NHS Trust. The Council is actively working with the Mental Health Trust on a national pilot on mental health in BME communities. Active Luton operates a wide range of programmes to promote good health in various target groups. It participates in a GP referral scheme. It runs a number of programmes targeted at young people of different ages. For example, Active Linx, which is an activity programme targeted at overweight and sedentary young children, the Mend programme which is aimed at children up to 13 years, and the Go programme which aims to increase physical activity amongst girls aged 13 to 16 through enjoyable activities such as dance.
- Partners are working well together to focus on groups that are most at risk. A school-based health service is provided at Lea Manor school, which serves one of the most deprived parts of the borough. Partners are actively targeting the health of men who work in routine and manual occupations through schemes such as health MOTs. One of the groups being targeted through the health MOT scheme is taxi drivers, who are predominantly men from South Asian communities. Good and focused partnership working, including innovative use of the Council's geographical mapping systems, has led to a significant increase in the uptake of child immunisations. Infant mortality rates, which are high in Luton compared to national averages, have been reduced and partners are working together to understand the complex issues involved. High teenage pregnancy rates have shown a recent reduction, supported by a comprehensive partnership strategy and action plan. By targeting groups most at risk, partners are seeking to reduce future health inequalities.
- 87 The Council and its partners are working well to help older and vulnerable people keep warm in winter. The longstanding 'Cosy Rosy' affordable warmth scheme helps people access benefits and grants, and in 2006/07 111 households had central heating or insulation installed. The 'Cosy Rosy' scheme is specifically focused on supporting the Council's priority for reducing deprivation. 28 per cent of Cosy Rosy clients are from BME communities and 70 per cent are people aged over 60. These proportions indicate that the scheme is being targeted appropriately, and reflects the demographics of ethnicity in the borough, where a higher proportion of BME residents are in younger age groups. The energy efficiency rating of council owned homes is in the best performing category nationally.

Older people

- The Council does not currently have a strategy for older people that goes beyond social care. However, it is developing this, as part of a range of new commissioning strategies for adults, planned for publication in April 2008. The Council supports luncheon clubs for older people from black and minority ethnic communities, and Active Luton has a range of leisure and fitness programmes specifically tailored for older people. In addition, programmes such as Cosy Rosy and targeted activity on reducing distraction burglaries also contribute to improving quality of life for older people in the borough. The Council is also investing in meeting the future living needs of older people. The shift away from residential care is underway, with plans in place to deliver two extra-care housing schemes over the next two years. The home library service provides older people with access to books and reduces isolation by providing regular contact. There are therefore services in place that meet the broader needs of older people, but these are not part of a coherent, strategic approach.
- The Council engages adequately with older people. The Council supports an active older person's network, and it undertook public consultation as part of its review of the future living needs of older people in 2006. The Executive portfolio holder for adult social care is the Council's older person's champion, but this has not been clearly communicated to older people in the borough nor to Council staff. There are therefore some arrangements in place for older people to communicate with the Council but older people are not aware of who champions their views at a senior level.
- Progress against Council priorities for older people has been mixed. One of the Council's objectives for 2011 is for the number of older people who live independently at home, and are supported by the Council, to have increased. The number of older people who receive support from social services and who live independently in their own homes has declined over the last three years. This is despite intensive home care for older people being in the best performing category nationally. In its amended priorities for 2007/08, the Council has said that it wants to ensure dignity and respect for older people and vulnerable adults. The Commission for Social Care Inspection, in its 2007 assessment, assessed the Council's performance in this area as good. Adult social care services overall were assessed as adequate.

Children and young people

- Outcomes for children and young people in Luton are good. The actions taken to ensure their health and well-being are good. Outcomes for newly born babies are improving but the rates of initiation of breastfeeding remain low in comparison with those of similar areas. The arrangements for safeguarding are good and there is a strong inter-agency safeguarding culture. The Local Safeguarding Children Board is acting purposefully on a clear set of priorities. Agencies work well together to enable children and young people to enjoy and achieve. Attainment levels are improving, although test and examination results at the ages of 14 and 16 remain below the national average. Children and young people who are in care or who have learning difficulties and/or disabilities receive good services which result in positive outcomes.
- 92 Service management in Luton is good. The children and young people's plan (CYPP) contains realistic plans to improve services. There is a strong awareness of diversity and equality issues, as well as clear ambitions for vulnerable groups of young people. There is a clear focus on raising attainment within an ethos of inclusion. Resources have been effectively shifted to meet priorities. Value for money is good. Effective approaches have been adopted to tackle poorly performing schools. There is a good approach to performance management.
- 93 The combined work of all local services in securing the health of children and young people is good. The key priorities of the PCT are closely aligned with those of the CYPP. The impact of combined services to improve outcomes for babies is adequate. Infant mortality has been reduced and further investigative work is underway to develop better understanding of the complex issues involved. Progress to improve the rates of initiation of breastfeeding is slow, although data collection has improved. Rates of immunisation have improved and are now consistent with similar areas. For young people under 20, emergency hospital admissions for substance misuse have fallen by almost a half since 2001. Progress towards a comprehensive child and adolescent mental health service (CAMHS) is good and an efficient service is provided to young offenders and young people with substance misuse problems. A care coordinator service is offered by health, social care and education professionals for children aged 0 to 3 years with complex and severe needs. The Council is in the early stages of developing a multi-agency strategy to include all disabled children as it does not yet include those who are physically disabled.

- 94 Children and young people appear safe and arrangements to ensure this are good. Most safeguarding outcomes are better than those achieved by similar authorities. Over the last seven years, there has been a large decrease in the number of 0 to 15 year olds killed or seriously injured in road traffic accidents. The child protection system is run efficiently. All cases on the child protection register are allocated to a qualified social worker and reviewed at appropriate intervals. Records of strategy discussions and enquiries made in child protection cases are now quality assured by managers. Family support services are strong, including family workers in all primary and special schools and planned for all high schools. Termly school liaison meetings focus on the most vulnerable children. The Common Assessment Framework has been introduced across the area and three multi-agency Family Support Panels coordinate these to ensure consistency. The proportion of initial assessments completed on time has increased to 65 per cent, which is better than the average for similar areas. Almost all reviews for children in care take place on time, which is outstanding, and 94 per cent of these children had an allocated social worker, which is an improvement on last year and well above the percentage achieved in similar areas. A comparatively low proportion are in residential care. The stability of placements of children in care is good and is in line with that of similar authorities and the national average. The percentage of looked after children in receipt of annual health assessments and dental checks has been consistently above the national average.
- The contribution of all local services in helping children to enjoy their education and achieve well is good. There is an effective School Improvement Team and a shared commitment to inclusion. Outcomes are improving in some important respects. However, for 14 to 16 year old pupils, educational attainment remains significantly below the national average. The overall quality of early years provision is good. Attainment at all key stages is at or below national expectations but in some respects the difference between the local authority performance and the national average has been reduced. At Key Stage 1, results overall are broadly average. There was a more significant improvement in results at Key Stage 2 in 2006 than regionally or nationally, particularly in English and writing. In 2006/07, student attainment at Key Stages 3 and 4 was significantly below the national average in a number of key indicators. At Key Stage 3, the attainment in English, mathematics and science at Levels 5+, 6+ and 7+ was below the national averages. Attainment of five GCSE A* to C grades has improved and is in line with statistical neighbours but remains significantly below the national average. There was a significant under-attainment of girls in obtaining five GCSE A* to C grades compared to the national average for girls' attainment. Although progress at Key Stage 3 is improving, progress overall at secondary level is satisfactory or better in only half of the 12 high schools.

- Outcomes from school inspections are improving and there are no schools in an Ofsted category of concern. Attendance in both primary and secondary schools is in line with the national average. Unauthorised absence in secondary schools continues to remain low and is below the rate for its statistical neighbours and nationally. The rate of permanently excluded pupils is falling sharply. Nearly all permanently excluded pupils receive at least 20 hours of tuition a week, which is well above the national average.
- 97 The impact of all local services in helping children and young people to contribute to society is good. Over 3,000 young people were involved in elections for 25 elected members of a youth parliament. The authority has responded to consultation and concerns expressed by members and young people by making work on bullying a priority and by adopting a more flexible strategy for youth work. There has been an 11 per cent reduction in the number of first-time entrants to the criminal justice system and a fall in the re-offending rates. By the end of this year nearly all children in care had been involved in their statutory reviews. A small but growing number have chaired their own reviews.
- 98 The impact of all local services in helping children and young people achieve economic well-being is good. Campus Luton provides a good collaborative framework for 14 to 19 developments, such as extending curriculum choices. Performance has improved for 14 to 19 year olds, although results for GCE AS/A-levels remain low when compared to national figures. There is a rising trend of improvement in work-based learning. The further education providers inspected have been judged as having outstanding leadership and management. The figure for young people not engaged in education, employment or training, or not known, has been reduced and is broadly in line with the national average. The Council has identified the need to produce a young people's housing strategy for care leavers and, in particular, to increase the availability of supported lodgings. The proportion of care leavers at age 19 who are living in suitable accommodation is around the average for similar areas.
- The capacity of Council services to improve is good. Improvements are evident in key areas, such as the introduction of family workers in schools, school improvement and educational attainment. Service and financial planning is good and satisfactory progress is being made on sharing budgets and joint commissioning. The planned approach to Children's Trust arrangements is good. There are good relations between the Council and its partners and effective leadership.

Appendix 1 – Framework for Corporate Assessment

- 1 This corporate assessment was carried out under section 10 of the Local Government Act 1999, under which the Audit Commission has power to inspect local authorities' arrangements for securing continuous improvement. The results of the corporate assessment contribute to the determination of the overall CPA category for an authority, which the Audit Commission is required to assess and report on under Section 99 of the Local Government Act 2003.
- 2 The Council's self assessment provided a key resource in focusing the assessment activity which included consideration of:
 - key documentation, including the Council's improvement plan;
 - updated performance indicators and performance data; and
 - interviews and meetings attended.
- 3 The assessment for Luton Borough Council was undertaken by a team from the Audit Commission and took place over the period from 3 to 14 December 2007.
- 4 This report has been discussed with the Council, which has been given the opportunity to examine the Audit Commission's assessment. This report will be used as the basis for improvement planning by the Council.