

Local Government Outcomes Framework

How would you like to see the framework used as a tool to support local authorities and local partners to deliver against key national outcomes?

The council welcomes the Local Government Outcomes Framework (LGOF) and its aims to:

- Support the simplification of grant funding by setting key outcomes central government wants to work with local government to deliver this Spending Review period with more flexible funding.
- Provide greater freedom for local authorities to make their own decisions about how best to delivery for local people and communities – in alignment with the government's devolution agenda.
- Promote better joint working between local partners, central and local government, and across Government.
- Drive improvement in priority outcomes for local residents.

We also support the work MHCLG advises is occurring in the background to support local government delivery against the LGOF, including:

- Moving to multi-year settlements and delivering significant funding reforms, including simplified funding arrangements.
- Streamlining reporting requirements, such as by reviewing the Single Data List and bringing more grants onto the MHCLG Funding Service.
- Unless absolutely necessary, removing instances where a Secretary of State is required to give consent for local authorities to take action.
- Reviewing statutory duties with a focus on reducing unnecessary burden.

The LGOF must recognise the varying contexts between and within areas

It is good to see the LGOF recognises the significant contributions local government makes to improving outcomes for local communities. We note that local authorities will each prioritise different outcomes in response to local circumstances, which will not always align neatly with the framework. Our primary accountability is local and not national. It is important that any monitoring framework considers and represents local variations.

It is also important to recognise the differences to be found within council areas. We note that data sets will be reported at LA level and would like to reiterate the message given at many webinars of the importance of granularity of data lower than LA level. Outcomes that are reported at Oxfordshire County level for instance will not fairly represent outcomes differentials between the Oxford City and the heavily rural parts of the authority. This is particularly important for rural authorities where both presenting issues and possible systems solutions are very different from more urban areas. We would welcome further discussion on how the Framework's reporting methodology could reflect or take account of the wide disparities in context within and across areas.

The LGOF must complement other statutory duties carried by local authorities

We would like to better understand how the framework will link in with the demanding regulatory systems that already sit over the top of services such as children's social care, planning, etc. We accept MHCLG's statement that there is no appetite to add to the regulatory or reporting burden, but we would welcome a well signposted process for how MHCLG will manage the LGOF cycle.

For example, the council would like to know how enquiries on performance will be provided to local authorities in such a way that they align with existing scrutiny mechanisms and don't create more work. Also, we would like some clarification on how the LGOF will link into the existing performance management reporting that HM Government currently requires us to do.

Greater clarity is required on the role of partnership working

Local government achieves outcomes through working in partnership across public services in place. Given the importance of partnership working, we would like to see greater recognition in the LGOF of the place of partnership working and the relative contributions of system partners to achieving outcomes. While the Framework states it has been designed to support partnership working across different public services, it is not yet clear how this ambition will be achieved.

In many respects, the LGOF is an outcomes framework for place. We understand that the purpose of the LGOF is to focus on local government contributions to achieving place-based priority outcomes. However, we agree with the LGA that while local authorities will convene partners in their place to achieve local priorities, where outcomes requiring coordinated work across public services in a place are not achieved, it will be essential that local government is not held accountable for delivery of outcomes which are contingent on other partners. We would welcome further discussion on how non-council partners will be incentivised (or held accountable) for those outcomes which are place-based and can't be delivered by councils alone.

It is not yet clear how the LGOF will be used to drive change

We would like to see central government working in partnership with local government to identify barriers to the achievement of priority outcomes and unblock them, working across government as required.

However, we do not want local authorities' performance against individual metrics and the wider framework to be viewed out of context or without nuance. We would like to understand more about how the findings will be used to drive change. If as stated, the LGOF won't be used to set targets, how will MHCLG assess what good looks like, especially if using the LGOF to feed into an assessment of councils Best Value Duty? Equally, will the LGOF be linked to the Fair Funding Review and the agreed settlement? The Government should particularly address the risk that data is presented in the form of 'league tables'.

The consultation document does not state how 'concerns against outcome delivery' will be calibrated by central government: what level of (non) delivery is sufficient to give rise to concerns? It will be essential that context is considered and that government works closely with the sector when any concerns are identified, as part of an early warning system in which the sector works as an equal partner alongside government to identify authorities experiencing challenges to delivery and targets support to them.

We would also ask for consideration of how the LGOF could reflect the reality of delivering against statutory and non-statutory services. As budgets continue to tighten, there may well be an imbalance in performance not driven by quality but by finance. Non-statutory services may suffer disproportionately. How will this be recognised?

We have concerns regarding local authorities focusing on delivering against the proposed LGOF metrics to the detriment of other priorities. If the LGOF metrics are used as a primary indicator of performance, councils will understandably focus their efforts on these areas.

The use of publicly available data is welcome but better metrics are needed

It has been striking during the LGOF webinars how often a better metric hasn't been used because of a lack of national data, or conversely because the data is not available at LA scale. We would strongly support any efforts to build better data that will support improved outcomes

reporting, including by reflecting on the wealth of feedback that has been given and received throughout this process.

Reinforcing this point is concern about the quality/validity of the inputs being proposed. Many metrics still rely on 2021 census data, which is problematic for many reasons e.g. COVID-related errors that have skewed movement data. We would welcome clarity on any proposals to address the issue of 2021 census data.

Similarly, we have concerns about the extensive use of surveys in the LGOF, when we know survey responses are falling, and in areas with small populations, survey results can widely skew findings. We believe there is clear need for an ongoing conversation on improving the quality of our data, including identifying metrics that would best indicate progress against priority outcomes, and then working out how to measure those factors.

How the data is reported will be fundamental to its success

We firmly support MHCLG's ambition of having all data and reporting related to the LGOF in one place where it will be readily accessible and enable comparison between areas. We urge MHCLG to commit to publishing the data in a careful way, couched in the necessary nuance needed to convey the reality of differing situations across the country.

How the data is reported will be a significant element of the success of the LGOF. For example, the reporting platform should clearly cross-reference metrics that cut across domains, enabling local government and our partners to better understand the impacts of interventions across multiple outcomes. It should explain the strengths and weaknesses of the data, where data sets are sourced, and why the metrics were chosen. The platform must be easy to access and navigate and enable robust interrogation of the data and its findings.

If the reporting platform is successful, it could help provide a shared understanding of the drivers of local government performance and explain changes in outcomes (whether positive or negative). This in turn may lead to improved understanding of local government's mission and purpose, helping to secure a more stable funding settlement and reducing reliance on competitive bidding pots, which add cost, create uncertainty, and encourage short-term thinking.

How would your organisation use the Framework either in its own work or when working with partners?

The framework will provide a consistent set of measures at a national level that can be monitored and compared at a local authority level. This could enable consistent comparisons across partnership areas, fostering evidence-based discussions and sharing of successful approaches. Additionally, the use of a consistent set of measures will support long-term trend analysis and scenario planning.

The development of the framework will strengthen our understanding of the interdependencies between policies by synthesising evidence across domains. It will also provide a robust foundation for assessing the implications of potential policy choices.

Specifically, the council will use the LGOF as part of our strategic planning, performance monitoring and reporting system, currently expressed in our Council Plan 2025-2029. We will use the LGOF to help us benchmark progress, identify areas for improvement, and support integrated planning with partners such as upper tier authorities and the Integrated Care System. We will review our outcomes and measures for our 26/27 Delivery Plan to align with the LGOF, incorporating the LGOF metrics into our strategic planning, and helping the council and partners to align local objectives with national missions

We will look to use the shared language and metrics provided by the LGOF to support our partnership working more broadly, helping align the council with existing or new partners in the public, private and third sectors.

Do you have views on how the Framework can best support local innovation, partnership working and long-term planning?

Principally, the LGOF could function as a coordination tool across government departments, for example bringing local government together with DfE, MoJ and MHCLG where concerns cut across multiple outcomes such as SEND, youth justice, housing quality, or multiple disadvantage. To help deliver on this possible goal of acting as a coordination tool across government departments, the council would like to know whether other Whitehall departments have committed to utilising the framework.

By shifting from rigid, ringfenced funding and output-based reporting to outcome-focused accountability, the LGOF could give councils more freedom to design and test local solutions. It could also encourage alignment across public services (e.g. health, education, housing) by providing a shared set of outcomes and metrics.

Having a set of commonly understood outcomes will support councils to work with partners, particularly where those partners work with numerous councils. It will provide a consistent starting point for local intervention design and understanding across multiple disciplinary partnerships.

The LGOF will support improved local outcomes if it is integrated into the wider system However, LGOF will best support local outcomes if it is clear how it fits into the bigger picture. How do all the individual elements of the government's reforms for local government – such as reorganisation, devolution, and financial reform tie together? The challenge lies in creating a cohesive whole that is stronger and more impactful than the sum of its individual parts. We have heard in many of the webinars of other system elements (including outcomes frameworks) that could tie in with the LGOF – or could result in duplication, wasted effort, and confusion. For example, will the LGOF align with the Public Health Outcomes Framework, and what of the impact of the NHS 10 Year Plan on how services are organised and delivery? We would like to see effort go into mapping all the seemingly disparate system pieces related to performance, measurement, and funding, and an explanation from central government of how they will coalesce into a unified and effective system that works best to deliver for our communities.

The council particularly notes the difficult timing of the introduction of the LGOF with so many authorities facing reorganisation and devolution in the coming 3 years. In areas that are currently 2-tier, it will be important for upper and lower tier authorities to come together to plan for delivery against the Framework in advance of unitary authorities and strategic authorities being in place. The Framework will have to be integrated into future strategic plans by shadow authorities. The challenges of making this a priority should not be underestimated.

Transparent and collaborative monitoring and review will support be essential

To ensure that centrally set metrics do not stifle local innovation, it will be important to ensure that the metrics chosen are kept under review to ensure no unintended consequences arise. The commitment to review the framework on an annual basis with MHCLG allows for co-design, the building in of the understanding of cause and effect, and the potential adoption of best practice intervention design where appropriate.

It is also important that measurements do not turn into targets – clarity on how they will be monitored and progressed is crucial. We support a framework that drives up minimum standards, but not if it acts as a brake on local innovation and creates significant additional administrative burden. This has been the experience of the past, and we are unsure how central government intends to ensure the same doesn't happen this time around.

In addition, the council would highlight the necessity for HM Government to create a framework which has few – if any – opportunities for 'gaming the system'. We have concerns that if the proposed LGOF could be engineered to produce a distorted/inaccurate picture in relation to the proposed outcomes, it would undermine much of the rationale behind its introduction.

The best results will be achieved if we all share a common understanding

It is crucial that the LGOF supports shared understanding, and therefore we would like to see clear definitions for all terms used in the LGOF, particularly where feedback indicates there is little current agreement on what a central term means (e.g. multiple disadvantage). We would also support the distribution of shared language around outcomes, indicators, metrics and measurements tools alongside the LGOF, to support clarity of understanding between central and local government and our partners. We understand the Common Outcomes for Children and Young People Collaborative have shared such work with MHCLG as part of this process.

We would also emphasise the importance of ensuring that standardised, tested metrics are used wherever possible.

The collegiate style of the webinars and feedback process in the development of the LGOF have been positive. The council hopes that this will lead to a stronger framework overall and that this collegiate process might inform policy making going forward.

Homelessness And Rough Sleeping

 To what extent do you agree that these are appropriate metrics to assess local progress against the priority outcome.

Agree

• If you disagreed with any of the metrics in question 1) above, please explain why.

N/A

 Do you think any other metrics should be added to indicate progress towards the priority outcome? If you suggest alternative metrics please provide specific examples including links to data sources.

No Response.

Relevant contextual information will be presented alongside the metrics e.g. detail of
influencing factors outside of local authority control such as population
demographics or geography Is there specific contextual information you think
should be captured alongside any of the metrics? Please be as specific as possible.

No Response.

Housing

• To what extent do you agree that these are appropriate metrics to assess local progress against the priority outcome.

Agree – but with some concerns.

House prices and workplace-based earnings are not primarily influenced by the activities of individual local authorities but instead by regional and national factors and, therefore, this specific measure's validity as a useful metric is questionable.

In addition, any metric relating to the proportion of homes rated EPC C and above has got to take into account certain considerations such as the age of the housing stock, rurality etc.

• If you disagreed with any of the metrics in question 1) above, please explain why.

N/A

 Do you think any other metrics should be added to indicate progress towards the priority outcome? If you suggest alternative metrics please provide specific examples including links to data sources.

No Response.

Relevant contextual information will be presented alongside the metrics e.g. detail of
influencing factors outside of local authority control such as population
demographics or geography is there specific contextual information you think
should be captured alongside any of the metrics? Please be as specific as possible.

No Response.

 The metric 'Proportion of rental housing in local authority area deemed decent' uses modelled data given the lack of suitable alternatives. To what extent do you think the use of modelled data is suitable?

The council, along with many other local authorities in England, have a very limited amount of detailed information about the quality of private rental sector accommodation in its area. Although section 3 of the Housing Act 2004 requires local authorities to keep the housing conditions in their area under review, the council does not undertake its own survey at this time. Instead, it relies upon MHCLG's English Housing Survey which surveys and uses modelling to report stock condition data for each local authority area. The latest report is using 2023 data. The survey report states that the data should be used:

- o To show local authorities where housing quality might be poorer/worse than average.
- o To examine how housing quality might vary by tenure and dwelling type.
- To indicate the likely scale of the "problem", i.e., by estimating the number of nondecent homes in each local authority.
- To use alongside other local level data and/or intelligence to develop an understanding of housing condition.

Due to the limited percentage of surveyed properties, the survey also reports that the data in the survey data should not be used as a replacement for survey data at the local authority level. However, we believe that the cost of such a local survey is between £30,000-£70,000 simply to undertake a desktop survey with no physical inspection, and this is a cost that we do not have within current budgets.

Therefore, we believe that modelled data is the only realistic way that local authorities can have any knowledge about the condition of the private rented sector unless they have a selective licensing scheme for all private rental properties. The council has no justification for such a licensing scheme at this time.

Furthermore, if there is a desire from MHCLG for all local authorities to have meaningful and locally derived information about the quality of the private rented sector, this will be an additional financial burden that needs to be factored into local government settlements. Given the approaching local government reorganisation, it would appear sensible that this

work would wait for new authority areas who can undertake the work at greater scale, and therefore be more financially efficient.

The metric 'Percentage of planning applications decided on time (dwellings)'
combines both major and non-major planning decisions, which operate on different
legal timeframes. To what extent do you think this combined metric is suitable?

No Response.

Multiple Disadvantage

• To what extent do you agree that these are appropriate metrics to assess local progress against the priority outcome.

Agree

• If you disagreed with any of the metrics in question 1) above, please explain why.

N/A

 Do you think any other metrics should be added to indicate progress towards the priority outcome? If you suggest alternative metrics please provide specific examples including links to data sources.

No Response.

Relevant contextual information will be presented alongside the metrics e.g. detail of
influencing factors outside of local authority control such as population
demographics or geography is there specific contextual information you think
should be captured alongside any of the metrics? Please be as specific as possible.

No Response.

 The approach to capture multiple disadvantage (MD) outcomes has been to look at data covering elements of MD and proxy the MD cohort by looking at the existing overlaps with other support needs captured in the data. To what extent do you agree with this approach? Please expand.

There is currently a lack of data that captures households with multiple disadvantages (MD). In the absence of reliable data, the above approach may be the best available while more comprehensive data is developed.

- Are there any suitable data sources that could be used to capture outcomes around:
 - o the role of local authorities in improving population mental health
 - local efforts to support people leaving prison and/or serving sentences in the community to secure settled accommodation?

Mental Health accommodation providers commissioned by local authorities should be recording the health outcomes for residents. Other LA commissioned services for mental health support should also be recording outcomes.

Prison and Probation Services should be capturing data in relation to local efforts to support people leaving prison and/or serving sentences in the community to secure settled accommodation.

 How can we best capture the holistic efforts to coordinate services across delivery partners to improve the lives of those experiencing MD?

The first step would be to improve data recording by all agencies to identify households experiencing MD. The second step would be to develop better data sharing and outcome tracking across the agencies.

• Would more flexibility be required in the definition of MD to accurately capture the MD population in your area? Are there suitable data sources that capture this?

A more flexible definition may lead to an ill-defined cohort that lacks focus on MD persons that need the focus of support and resources.

• There are data gaps that make measuring this cohort difficult. Putting those data gaps to one side, what would an ideal priority outcome area for MD measure?

Broadly, the ability to maintain independent living in a secure housing environment with the opportunity of personal development.

• Is there work ongoing in your area to improve data collection/linking around identifying individuals experiencing MD?

Oxfordshire are working to develop a new homelessness database that should help identify individuals experiencing MD.

Health and Wellbeing

• To what extent do you agree that these are appropriate metrics to assess local progress against the priority outcome.

Agree – but we would highlight that district councils do not have overall responsibility for many aspects of health policy within their areas. Any metrics would, therefore, have to explicitly acknowledge this fact.

• If you disagreed with any of the metrics in question 1) above, please explain why.

N/A

 Do you think any other metrics should be added to indicate progress towards the priority outcome? If you suggest alternative metrics please provide specific examples including links to data sources.

No Response.

Relevant contextual information will be presented alongside the metrics e.g. detail of
influencing factors outside of local authority control such as population
demographics or geography Is there specific contextual information you think
should be captured alongside any of the metrics? Please be as specific as possible.

No Response.

The Slope Index of Inequality (SII) in life expectancy has been proposed as a metric
to track changes in health inequality within LAs. To what extent do you think this is a
suitable indicator to measure changes in health inequality at local authority level?

No Response.

• Is there an alternative metric available to measure health inequality at local authority level, which is better aligned to local authority delivery?

No Response.

• Are there any available metrics that could be used to capture outcomes around the role of local authorities in improving population mental health?

No Response.

Neighbourhoods

• To what extent do you agree that these are appropriate metrics to assess local progress against the priority outcome.

Agree – although we do have reservations about the reliance on the Community Life Survey for many of the metrics within this section.

If you disagreed with any of the metrics in question 1) above, please explain why.

N/A

 Do you think any other metrics should be added to indicate progress towards the priority outcome? If you suggest alternative metrics please provide specific examples including links to data sources.

No Response.

Relevant contextual information will be presented alongside the metrics e.g. detail of
influencing factors outside of local authority control such as population
demographics or geography Is there specific contextual information you think
should be captured alongside any of the metrics? Please be as specific as possible.

No Response.

• Are there any available metrics to capture local authority responsibility for reducing Anti-Social Behaviour?

We can provide metrics on the number of reports and outcomes of anti-social behaviour received by the council under the following headings:

- Neighbour disputes
- o Public nuisance
- o Vehicle anti-social behaviour
- Assault
- Harassment
- Drug use/dealing
- Unauthorised encampments
- Dangerous dogs
- Other.

We can also report on the number of Anti-social behaviour case review requests that are received; these relate to where a resident is not satisfied with the response by agencies to the issues that have been reported. A certain threshold must, however, be met before these are accepted for review. Nevertheless, metrics could include the number of requests received, the number accepted, and the outcome of the review.

Environment, Circular Economy and Climate Change

• To what extent do you agree that these are appropriate metrics to assess local progress against the priority outcome.

We strongly disagree with the suggested biodiversity metric – or lack thereof.

• If you disagreed with any of the metrics in question 1) above, please explain why.

HM Government are not currently proposing metrics for biodiversity, despite the existence of data.

 Do you think any other metrics should be added to indicate progress towards the priority outcome? If you suggest alternative metrics please provide specific examples including links to data sources.

There are currently no metrics proposed for climate change or climate adaptation. The <u>Fuel poverty</u> data provides a good proxy for those domestic properties that are likely to be difficult to decarbonise. This could be used as a way of targeting specific funding at those areas that are likely to be hardest to decarbonise.

The <u>Heat mortality</u> datasets provide an indication of those sectors of society that are most vulnerable to a changing climate and could be a good way of targeting investment to help people to adapt to climate change.

The <u>UK local authority GHG emission statistics</u> provide data on the progress on decarbonisation. This is a key measure for each local authority area and would be a good measure of LA progress on tackling climate change.

We would suggest that there is the potential for considering a metric regarding air pollution.

We would also request that consideration is given to introducing a metric which takes into account overall waste volume – including that for recycling, incineration and composting etc.

Relevant contextual information will be presented alongside the metrics e.g. detail of
influencing factors outside of local authority control such as population
demographics or geography is there specific contextual information you think
should be captured alongside any of the metrics? Please be as specific as possible.

No Response.

 Are there any available metrics to measure local government's contribution to flood resilience?

No Response.

 Are there any available metrics to measure local government's contribution to biodiversity?

There are two metrics currently in existence, the Nature Conservation: <u>Local Sites in Positive Conservation Management</u>. Local Authorities are key to delivering Local Sites systems across England and the percentage of local sites in positive management could be used as a proxy for the state of biodiversity.

The Environment Act requires Local Authorities to publish a <u>Biodiversity Report</u> on or within 12 weeks of 1 January 2026. This report will provide comparable datasets on the delivery of BNG and other activity across the public sector.

It is likely that the best measure of Local Authorities progress on delivering Nature Recovery will be through the delivery and monitoring of Local Nature Recovery Strategies. This should be a key focus of the LGOF in future.

Transport and local infrastructure

• To what extent do you agree that these are appropriate metrics to assess local progress against the priority outcome.

Agree – but we would highlight that district councils do not have overall responsibility for many aspects of transport policy within their areas. Any metrics would, therefore, have to explicitly acknowledge this fact.

• If you disagreed with any of the metrics in question 1) above, please explain why.

N/A

 Do you think any other metrics should be added to indicate progress towards the priority outcome? If you suggest alternative metrics please provide specific examples including links to data sources.

We suggest that consideration is given to looking at potential metrics that measure the maintenance of paths and cycle routes as we wish to encourage more people out of their cars.

Relevant contextual information will be presented alongside the metrics e.g. detail of
influencing factors outside of local authority control such as population
demographics or geography is there specific contextual information you think
should be captured alongside any of the metrics? Please be as specific as possible.

No Response.

• Do you have views on how the transport responsibilities at different tiers of government could be clearly reflected in the presentation of the metrics?

No Response.

Economic Prosperity and Regeneration

• To what extent do you agree that these are appropriate metrics to assess local progress against the priority outcome.

Agree.

The proposed economic prosperity metrics are, however, limited in scope, and there will need to be substantial cross referencing with multiple other sections, (such as health and wellbeing and environmental sections) to show a clear picture of economic wellbeing. These layers could be added at a local level, ensuring that causality and effect on national metrics are appropriately understood within wider partnerships (i.e. health and economic partnerships).

• If you disagreed with any of the metrics in question 1) above, please explain why.

 Do you think any other metrics should be added to indicate progress towards the priority outcome? If you suggest alternative metrics please provide specific examples including links to data sources.

Cross-referencing with other outcome areas is as important as adding new metrics. A comprehensive view of local economic wellbeing requires integrating social and environmental indicators alongside traditional economic measures.

Two additional metrics to consider:

- o <u>Inclusive income</u>: If available at the local authority level, this would help assess equitable growth.
- Decoupling Prosperity from Fossil Fuels: A localised version of the <u>UK's</u> <u>Environmental Accounts statistics</u> could demonstrate sustainable economic growth.
- Relevant contextual information will be presented alongside the metrics e.g. detail of
 influencing factors outside of local authority control such as population
 demographics or geography is there specific contextual information you think
 should be captured alongside any of the metrics? Please be as specific as possible.

No Response.

 Are there any available metrics to capture local authorities' responsibilities for reducing poverty and delivering employment support?

It is difficult to measure individual local authority responsibilities in this context, as many interventions are primarily facilitated by external cross-boundary bodies, such as DWP, or Chambers of Commerce (in the case of Local Skills Improvement Plans). Interventions such as the Connect to Work programme for South Oxfordshire and Vale of White Horse is part of an Oxfordshire wide programme led by Oxfordshire County Council. There are also many private organisations supporting access to work, including charities and social enterprises with employment objectives.

While it may be possible to measure Universal Credit claimant levels against uptake of local employment support programmes (such as Connect to Work), this is unlikely to offer a comprehensive picture of employment support engagement by local authorities, and we would suggest it's not necessarily an appropriate measure for all current local authorities, but may be more relevant for those with appropriate powers / adult education budgets etc.

Other employment initiatives, such as Community Employment Plans, (that are linked to the local planning system), can incentivise apprenticeships and traineeships, but are not standardised across the country, and also operate across current authority boundaries, so are also not wholly indicative of an LA's performance.

 Are there specific local authority activities you think should be highlighted in the contextual narrative when presenting this priority outcome?

As a district council, our effect on this metric is likely to be limited.

Is there anything else you would like to feedback in relation to the Local Government Outcomes Framework?

The framework could be used as a tool to articulate what HM Government hopes to affect through specific decisions. Reviews of metrics could also form part of annual meetings with MHCLG, so

that we can add context to statistics, supporting HM Government to know more about the causal factors and drivers of change.

The metrics may also lead to uncomfortable conversations, and both local and national government need to be prepared that evidence might be telling us things we would rather not hear – there need to be appropriate systems in place to allow for confrontation of negative outputs, allowing timely attention to intervention. Data lags will not be helpful in this regard, and consideration should be given within the development of the tool in supporting more regular data updates than proposed.

Dashboards for Local Authority areas to allow for a clear and quick understanding of the current position of each area would also be a useful tool for analysis. If dashboards are introduced, we would request that this should not only include snapshot data but also trendline reporting.

The council would also note that the Environment, Circular Economy and Climate Change – Priority Outcomes and Metrics section seems to be particularly lacking. Climate change and nature loss are existential threats to human society, yet there are no measures proposed to directly measure local authorities' performance in delivering climate mitigation, adaptation or nature recovery. This is a significant omission from the LGOF, and it highlights the need for HM Government to introduce new relevant measures in these areas.