Department for Business Innovation & Skills

Better Regulation Delivery Office

Summary Report

Exploring the Links Between Regulatory Activity and Health Outcomes

June 2013

Purpose of this document

This document seeks to explore how effective regulatory delivery can contribute towards improved public health outcomes while also boosting business confidence and competitiveness.

This document focuses specifically on the role of local regulatory delivery in improving health outcomes, at a time of great change in public health responsibilities. In England the creation of a new, integrated and professional public health system is designed to be more effective and to give clear accountability for the improvement and protection of the public's health. Reflecting the role of local authorities in improving local place, the new system involves new responsibilities and resources for local government, within a broad policy framework set by Government to improve the health and wellbeing of their populations.

These new responsibilities at the local level stand alongside existing regulatory functions of environmental health and protection, trading standards and planning, and it is for local authorities to consider how these regulatory functions can assist delivery of new public health responsibilities.

This document focuses on the local delivery of regulation that impacts directly on businesses outside of the financial and privatised sectors and how regulation can be delivered in a manner that contributes both to public health outcomes and to supporting business compliance and confidence. It is targeted both at those involved in regulatory policy and front line regulatory practitioners. It does not prescribe specific regulatory solutions, as appropriate approaches will naturally vary by local context. Instead, it aims to clarify and inform policy by highlighting three key critical success factors to regulatory delivery approaches that help meet both regulatory and health objectives, supported by case studies of work conducted to date.

Introduction: Regulation and Public Health

The purpose of this report is to consider whether and how local regulatory delivery impacts on public health outcomes, whilst also supporting business. It has been shown that local authority regulatory services contribute to 48 different cross cutting outcomes[1], despite commanding only a small share of local government spending in the UK, slightly less than one per cent of total local authority expenditure[2].

Recent changes to public health in England reflect Government's commitment to protect the population from serious health threats; help people live longer, healthier and more fulfilling lives; and improve the health of the poorest, fastest. In January 2012, the Public Health Outcomes Framework was introduced, refocusing the system towards achieving positive health outcomes for the population and reducing inequalities in health, to be achieved through new responsibilities and resources for local government. The framework is focused on two high-level outcomes: increased healthy life expectancy and reduced differences in life expectancy (and healthy life expectancy) between communities. These high-level outcomes are supported by a set of public health indicators.

Directors of Public Health are the strategic leaders overseeing public health and tackling inequalities and local health improvement functions have been returned to local government for the first time since 1974. The Health and Social Care Act recognised that many of the wider determinants of health, for example, housing, economic development and transport can be 'more easily impacted by local authorities, which are well placed to take a very broad view of what services will impact positively on the public's health, and combine traditional 'public health' activities with other activity locally to maximise benefits'.

Public health is an area where there are clear links with regulatory activity, in areas as diverse as air quality, food safety, housing quality and tobacco control. In particular, regulatory services provide a mobile field force engaging local businesses, which themselves have a key role to play in local public health. The work of regulatory services is closely linked to tackling the determinants of health and supports the effective targeting of specific issues, often via project based initiatives. Public health objectives are also integral to the priority regulatory outcomes in England, and national enforcement priorities in Wales.

Previous reviews have articulated the relationship between regulatory activity and public health and the potential savings to the economy that could be achieved through a greater focus on preventative interventions. In 'Our health, our wellbeing', the Chartered Institute of Environmental Health identified 36 good practice case studies of regulatory interventions that support public health outcomes, whilst the Local Government Association report, 'Taking forward the health role of council regulators' (LGA 2009) demonstrated the work of regulatory services on the health of local communities. The contribution of trading standards to public health was discussed in the Trading Standards Institute report 'Making the connection' (TSI 2003).

This report has specifically considered regulatory services initiatives that have the potential to deliver multiple outcomes, namely improving public health whilst contributing to business confidence, productivity and growth. The Department of Health's 'Public Health Responsibility Deal'[3] acknowledges the role of small businesses in delivering health outcomes and the growing importance of local authority engagement with SMEs to achieve healthcare outcomes.

Collaboration between public health and local government is commonly considered best practice and partnership approaches are already widespread. However, evidence of the impact of local regulatory activity in respect of improved public health outcomes is not widely available and is poorly represented in academic literature. Although there are examples of good practice, there is considerable potential for local regulatory services to create a stronger evidence base to demonstrate the value of their services to public health. There is currently an insufficient focus on gathering relevant baseline or evaluative evidence and the use of tools to demonstrate impact.

In order to contribute to the delivery of public health outcomes, local regulatory services will need to address the challenge of moving from an environment with limited baseline evidence to one in which evidence is a key driver of practice and commissioning. This will require a strong focus on outcomes and developing clear rationales for projects that demonstrate impact on the public health outcomes framework. The move of public health staff into local authorities, and the combination of organisational cultures, may provide a strong driver for the adoption of more evidence-based approaches. Access to funding may also facilitate closer working, but only if public health teams can work with local regulatory services to address the issue of the shortage of evidence of impact when they are commissioning activity.

During this research, a number of initiatives undertaken by local regulatory services and partners were reviewed with the objective to identify learning and to support others to adopt successful practices. From this review, a number of critical success factors have emerged:

- Having a rigorous focus on outcomes – including aligning with local and national priorities and having a clear rationale for the work. This includes identifying where work can contribute to cross cutting and multiple priorities and outcomes. The examples cited in this report have a particular emphasis on health but many contribute to other key priorities.

- Providing a clear demonstration of impact – including showing the effectiveness of interventions on the target groups and populations. Use of tools such as the LBRO Outcomes and Impacts Toolkit[4] has assisted some projects, while others have developed their own ways of evaluation and measuring impact.

- Selecting the right partnerships for maximum effect – including identifying the best use of skills and knowledge to ensure joined up thinking and better delivery. Partnerships and collaborations help to spread good practice, once it has been developed and evaluated.

These critical success factors are considered in further detail in the remainder of this report.

Theme 1: A Rigorous Focus on Outcomes

Research has highlighted the difficulties that local regulatory services sometimes experience in demonstrating how regulatory activity can improve outcomes. Nevertheless, many of the case studies and examples cited in this report demonstrate how, with the right planning, effective regulatory delivery can move beyond ensuring compliance to address key outcomes such as supporting public health.

'Designing in' approaches that support delivery of multiple outcomes by making it clear why the work is taking place, the need it is addressing and how it is to be delivered provides a solid foundation from which to establish a comprehensive framework for evaluation. Put simply, deciding **why** a piece of work is being done, **what** should be achieved and **how** it can be delivered to achieve the stated objectives should be central to project design, implementation and impact measurement in order to demonstrate how regulation can improve public health outcomes.

There are three levels where a rigorous focus on outcomes can make a significant difference:

Level 1 – Strategy: At a strategic level, this means answering the why, what and how questions. It may be council wide or service specific but should establish a clear vision of local priorities that reflect the needs of local communities, including businesses.

Level 2 – Business Planning and Mapping: This means establishing a framework that describes what successful delivery of the strategic plan looks like 'on the ground'. It provides a reliable reference point for checking the relevance of individual actions and making sure that the sum of individual activities will collectively deliver bigger goals. Setting clear objectives for mapping exercises can ensure that activities that will contribute to multiple priority outcomes are not overlooked.

Level 3 – Project Planning: The case studies produced here demonstrate how public health and economic growth objectives can successfully be combined. Key to the success of these approaches is designing the project from the perspective of participants and thinking through what would make businesses engage in the work. Some approaches used are:

- minimising extra time that businesses spend on work associated with the project;
- ensuring contributing to the project has the potential to increase business competitiveness – by increasing spend per customer, appealing to new customers or helping the business to enter new markets; and
- helping to subsidise the cost of new equipment or other resources.

Co-designing projects with businesses is another way of addressing this to ensure the objectives of both parties are understood and can be met and that solutions can be built in to overcome any barriers to success. Time invested in front-end planning enables more effective project delivery and impact measurement.

Setting a clear strategy

Featherstone Takeaway project

In setting up the Featherstone Takeaway project, West Yorkshire Joint Services set itself joint objectives to contribute to central Government's intentions to improve public health and to meet its own objectives to promote a vibrant local economy. It combined these two objectives by encouraging takeaway owners to reduce the quantity of calories, fats and salts in processed food but to do so without causing any changes to the products' taste, texture, etc, that could harm business profitability.

Eat Out Eat Well

EOEW is an initiative from Bath and North East Somerset Council which has been developed in association with the health care provider Sirona Care and Health. EOEW is a free award scheme open to all types of food outlets that cater for the general public. The scheme has been developed to reward food outlets that provide customers with healthier choices. It has three levels with the Gold Award level requiring staff to have undertaken accredited training in nutrition.

The scheme aims to encourage food businesses to provide healthier options to customers, through the use of healthier catering practices, increasing fruit, vegetables and starchy carbohydrates used, and decreasing fat, sugar and salt levels. It is intended to help owners achieve a competitive edge and higher levels of customer satisfaction.

http://www.bathnes.gov.uk/services/environment/food-safety/eat-out-eat-well

Takeaways toolkit

The takeaways toolkit for Indian and Chinese restaurants is one of a number of resources from SWERCOTS, the South West Trading Standards Partnership of 15 local authority trading standards services. The toolkit aims to help restaurant owners to increase their business and the attractiveness of their offer whilst helping to address public health issues of food safety, avoidance of allergens and reducing salt and fat content of menu items. The toolkit contains resources to help restaurant owners to adjust their menu, ensure high standards of food hygiene, increase profitability and adopt better sales strategies.

http://swercots-partners.org.uk/takeaways-toolkit-indian-and-chinese-restaurants

Using business planning and mapping to drive activity

Cheshire East

Cheshire East has undertaken an extensive strategic mapping process to matrix all aspects of Public Protection and Health activity with the public health impact that it supports. Summary graphics set out for each public health impact the public protection and health services that can affect it. These documents are helping with the integration of public health into the work of the council.

Trading Standards South East

TSSE is developing a knowledge hub database to map trading standards activities to public health outcomes to facilitate the sharing of good practice, increase effectiveness of trading standards work and also help public health colleagues rapidly to familiarise themselves with the range and depth of trading standards work that contributes to the public health agenda.

Public health alignment

In anticipation of the reforms, Buckinghamshire County Council Trading Standards made a short term appointment of a public health professional to work with its teams to help align their work to new operating arrangements. The appointee has developed a hybrid diagnostic assessment process (based on work from the health and inequalities national support team, the tobacco and alcohol support team and others) which will be used to carry out an information and good practice gathering process with trading standards team leaders. The ambition is to pull the results together in a way that will generate interesting ideas and data which can be shared with the Healthy Communities Partnership on which sit representatives of district councils.

Project planning from a business perspective

Worcestershire Regulatory Services

WRS has pioneered a successful approach to helping road side cafés to sell healthier food that is now being rolled out in other parts of the Central England Trading Standards Authorities. Known as 'Truckers' Tucker', the project adopted good practice from a Food Standards Agency sandwich shop project in South West England. This sought to encourage traders to participate in order to improve their profitability, rather than emphasising the benefits improving the health of the UK population.

A clear objective of the programme was to make sure that there was no detriment to the businesses' turnover or profitability; business owners were supported in making the changes and initially only committed to involvement for four weeks. The TS and EH officers sought help from a qualified nutritionist to develop 'Top Tips' for healthy options, visited the cafés to help the owners implement changes and supplied food and equipment kits.

Theme 2: Demonstrating Clear Impact

Evidence of the impact of an activity on achieving better outcomes is increasingly necessary to maintain successful initiatives in an environment of shrinking resources. Without evaluation and evidence of effect, initiatives can be vulnerable to changes of policy, organisational restructuring and competition for funding.

The importance of an evidence-based culture was highlighted as a key factor in changes to public health responsibilities, with the need for local authorities to identify members of council workforces who contribute to health outcomes and develop their public health skills and competencies, including needs assessment, health impact assessment and evaluation[5].

Although many local authorities collect data, only half of local authorities even attempt to collect information about the wider impacts of regulatory services, such as the impact on public health outcomes[6]. Yet the availability of data regarding need and the effectiveness of interventions is essential to the production of local Joint Strategic Needs Assessments. Produced by county and unitary authorities, such assessments aim to provide an accurate assessment of the health needs of the local population so that services can be commissioned to improve the physical and mental health and wellbeing of individuals and communities.

In addition to the lack of baseline data, the difficulties of attribution in collaborative projects, and against long term improvements in outcomes, are well documented. The step by step process outlined in the Outcomes and Impacts Toolkit[7] provides a comprehensive and consistent framework to support the planning of an initiative in such a way as to ensure that its impact can be evaluated.

The toolkit draws the distinction between **outputs** (direct products of an activity that are typically tangible, countable and, in principle, fully controllable) and **outcomes** (the intended and unintended results and consequences of activities and outputs). Longer term outcomes with a wider impact on the community or environment are commonly described as **impacts**.

Recognising this distinction at a planning stage allows the identification of the range of potential impacts and outcomes that are important to all partners and enables the determination of **indicators** that can be used to measure them. The toolkit is published with a range of supporting resources, including dashboards of indicators, allowing users to represent the most significant indicators in a dashboard format to provide easily accessible information on the effect of the initiative.

Evaluation and assessment of impact, particularly if published, are considered to be useful drivers for closer working. The Community Alcohol Partnerships (see the case study below) are required to undertake baseline assessments and evaluations in order to demonstrate evidence of need and of the effectiveness of measures implemented. This enables the partners to draw in funds from the private sector, which can see the value of the work being undertaken, as well as encouraging local authorities to offer in kind support, such as partnership management.

Salt Shaker – Greater Manchester[8]

Following on from research by Gateshead Council that showed salt intake via takeaway meals could be reduced by up to 75 per cent by reducing the number of holes in a salt shaker from 17 down to five, in 2009 Greater Manchester authorities commissioned such shakers and replaced the existing ones at 959 chip shops and other takeaways, with particular emphasis on those located in areas with high health deprivation.

After six months, research showed over half the businesses were still using the shakers and 32 per cent of these reported that their salt usage had decreased by between 25 per cent and 50 per cent. Forty eight per cent of customers had not noticed the difference, 40 per cent were 'all' or 'mostly' in favour of the change, ten per cent were 'mainly against' it and two per cent were 'all against it'.

By extrapolating national statistics regarding reduction of salt intake, research suggested that over 850 deaths could be avoided in Greater Manchester and over 7,000 'quality adjusted life years' gained from this one measure.

Derbyshire's Trusted Trader

Derbyshire's Trusted Trader scheme is open to any business based in the county or doing at least half its work there. Before its establishment four years ago, trading standards had spent a lot of time advising mainly elderly members of the public about unsolicited and rogue traders as well as tackling the perpetrators. The Council's adult care service was keen to support trading standards with an initiative to put good businesses in touch with consumers and so assist its strategic aim of helping to achieve independent living and improve wellbeing; from this association the Trusted Trader concept was borne.

Recognising the importance of evaluation to the sustainability of the scheme, Derbyshire made it a condition of membership that a feedback card is left with the customer. These are returned directly to the County Council and provide a means to monitor the performance of members. They have 1,350 members from a wide cross section of businesses and in the 12 months to the end of December 2012, had received 10,000 feedback cards.

http://www.derbyshire.gov.uk/community/trusted_trader/default.asp

Community Alcohol Partnerships

Community Alcohol Partnerships bring together local retailers and licensees, trading standards, police, health services, education providers and other local stakeholders to tackle the problem of underage drinking and associated anti-social behaviour. Community Alcohol Partnerships are community interest companies with an independent Chair and an expert Advisory Board that includes retailers, members from the voluntary and charity sectors, the police and trading standards. This partnership approach recognises that retailers and licensees are part of the solution.

Focusing on engagement ensures that local businesses are supported in their efforts to be compliant. In addition, other specific local activities will involve a mix of education, enforcement, public perception, communication and diversionary activities.

Funding for Community Alcohol Partnerships is provided by major alcohol retailers and a number of alcohol producers. Collectively, industry is investing nearly £1 million over three years. This level of investment means it is important to demonstrate the effect of the programme. All Community Alcohol Partnership initiatives are subject to mandatory evaluation, normally based on an evaluation 'toolkit' developed by London Metropolitan University. This encourages collection of data on key indicators, for example, local crime and anti-social behaviour statistics, hotspot drinking areas, complaints and incidents reported to partner agencies, ambulance pick-ups for underage alcohol related incidents, hospital admission for under 18s and public perception surveys.

As an example, the first pilot in St Neots delivered the following improvements:

- Anti-social behaviour decreased by 42 per cent.
- Underage people found in possession of alcohol reduced by over 90 per cent.
- The volume of alcohol related litter was reduced by 92 per cent.

Together these improvements signal a positive contribution to improving the local environment for businesses and improving the health and wellbeing of young people.

http://www.communityalcoholpartnerships.co.uk/

Theme 3: Selecting the Right Partnership

A feature of many of the examples cited in this report is that they are undertaken by a number of organisations working together. These working arrangements or partnerships may be focussed on a small geographic area but include a wide variety of partners, or be cross local authority border relationships with colleagues undertaking the same role. This final theme looks at the need for collaboration between regulatory services and public health partners which provides synergy and enables more to be done with existing resources.

Different localities have developed ways of working in partnership to share good practice, gain access to funding and facilitate training and working. Collaborative partnerships also provide benefits to businesses in the form of consistent approaches across authority boundaries. Partnership models provide opportunities for work across areas or organisations, opportunities for coordinated working on particular initiatives including illicit alcohol and tobacco, and improved communications, helping to spread best practice and innovative ideas.

There are a range of high profile schemes that operate across the country that harness the skills, knowledge and resources of a number of services in order to protect and support consumers and legitimate businesses, while also having an impact on public health. Building the necessary working partnerships can be challenging and it needs determination to overcome administrative, logistical and cultural barriers to collaborative working. Project funding can assist to provide the resources to establish ways of working and any necessary information sharing agreements, and is a catalyst for cooperation.

In addition to regional approaches and cross agency working, there are many examples of successful collaboration with business to deliver improved outcomes, including the example of workplace health and wellbeing. The costs to business of workforce illness are well-known and substantial; an average London firm of 250 employees loses around £250,000 a year due to ill-health[9] calculated by sickness absence. Across the UK, regulatory services and public health professionals are working with local businesses to improve the health of their workforce, including Wakefield Council's Health Working Community[10], Sheffield's initiative to work through businesses to reduce smoking rates, Kirklees Council's 'Better Health at Work' programme[11], the Liverpool Workplace Wellbeing Charter[12] and the Cardiff's Healthy City Programme[13].

The benefits of regional groupings

NPOANS Toolkit

The NPOANS (No proof of age, no sale) toolkit is one of a number of resources from SWERCOTS, the South West Trading Standards Partnership of 15 local authority trading standards services. It is now in its third edition and is available to businesses as a toolkit on annual subscription. It aims to cover all products and services that are age restricted through legislation, and gives clear guidance to businesses on what their responsibilities are in order to meet these requirements. Use of the resource helps businesses to stay successful whilst reducing exposure to health risks by young people.

The NPOANS toolkit is run via the film and an interactive video player which allow the viewer to access materials at various intervals throughout the film. The toolkit now includes an 'Ask the Experts' function allowing subscribers to pose questions to a Trading Standards support team.

The cost of production is shared between the members and the materials are structured so that they can be locally branded. For businesses, the partnership provides the benefit of consistent regulatory practice throughout the region.

Collaboration allows SWERCOTS to share the costs and effort of developing a range of resources that can then be used by all members, and its website lists a large number of joint projects.

http://swercots-partners.org.uk/npoans-demo

North East Public Protection Partnership

NEPPP held a public health summit for the North East in 2012, looking at what needed to be done and by whom. As a result, a working group[14] was set up to define a strategy and agreed priorities around obesity and housing. NEPPP has used the Joint Strategic Need Assessments to help understand baselines for particular issues in the region.

Getting the relevant partners together

Better Health at Work

Kirklees Council's Better Health at Work Initiative is a partnership between Kirklees Environmental Services, the Health and Safety Executive (HSE), local Primary Care Trusts and Jobcentre Plus. The programme originated in 2004, working with companies to help them understand their health and safety responsibilities, and with GPs who could refer individuals to the team which would then work with the individual and his or her employer (with the individual's permission) to encourage a return to work.

The programme now works with individuals and small and medium-sized enterprises. Dedicated Workplace Safety Advisers and Health at Work Advisers provide free, confidential advice to businesses and individuals to improve health and safety in the workplace. They help firms to encourage employees to have healthy lifestyles, to carry out health MOTs, and to improve productivity by reducing the costs associated with sickness and absence, such as additional recruitment and overtime payments. By doing so they engage with companies that otherwise wouldn't come into contact with public health.

http://www.betterhealthatwork.org.uk/index.htm

Safe as Houses

Safe as Houses is an environmental health initiative for the States of Jersey, facilitated by a private sector agency which is working in close association with local regulators and other services. The programme is an initiative to raise the profile of poor housing conditions and their contribution to ill-health. If a health professional believes that a patient or client's home is contributing to his or her ill-health, a system is now in place to prioritise a full inspection with enforcement action taken where this is appropriate. If occupants of privately rented housing apply for social housing and give poor housing conditions or overcrowding as the reason for application, the Environmental Health Team will carry out a full inspection and enforcement action will be taken, where appropriate, in some cases obviating the need for the social housing application.

The programme also facilitates hospital discharge and reduces readmissions. Where a GP or Hospital Doctor believes that any patient over 70 would benefit from a Home Safety Check, the patient is referred to Environmental Health and a full housing survey is carried out. As a result, onward referrals may be made to Occupational Therapists for adaptations and equipment, or to the Fire Service for the fitting of Smoke detectors.

Any disrepair issues in rented accommodation are also dealt with.

Ambulance, Police and Fire Services, together with Citizens Advice are also now able to refer directly to Environmental Health on housing issues.

Responsible Retailers

Responsible Retailer Award

Sheffield City Council, in partnership with Sheffield Health Action Zone, launched the Responsible Retailer Award Scheme. This was in response to the issue of underage sales and in recognition of the difficulties of accurately assessing age. The scheme is aimed at retailers and businesses and provides education and staff training to make retailers aware of their responsibilities in avoiding illegal sales and support them in upholding the law. It aims to reduce problems such as underage smoking, drinking and solvent abuse by denying young people access to these dangerous products.

It offers free training, an award ceremony and a certificate; a programme of direct mails, newsletters and website content engenders a sense of belonging to a club. Sheffield has evidence from test visits that participating businesses are less likely to sell to underage customers, indicating that 'responsible retailers' are more compliant than others. Feedback from the fire service is that it resulted in a lower incidence of bin and other fires.

The scheme benefits businesses in a number of ways. It acknowledges and rewards good practice in what can often be difficult circumstances, it provides basic staff training which itself helps to prevent underage sales, it can help to prove due diligence in court and it discourages children from even attempting to purchase age restricted products illegally.

In areas where the scheme has been running for several years, a survey of retailers who succeeded in gaining an award showed that the number of requests from underage children attempting to purchase age restricted products had declined.

http://www.tradingstandards.gov.uk/sheffield/responsible%20retailer.htm

Poole Safe

The Borough of Poole and Dorset Police are working in partnership with licensees to cut alcohol-related crime and disorder in the Borough. The scheme builds on Poole's reputation as a safe place to live, work and visit by encouraging responsible attitudes to alcohol sales and consumption. Poole Safe officers conduct regular visits to licensed premises to offer advice on the prevention and reduction of violent crime and alcohol related crime. The scheme aims to help licensees provide a safe environment in which people can drink.

Poole Safe initiatives include subsidised professional training for staff from licensed premises, taxi marshals in the town centre, new Pub Watch groups, 'safer drinking' programmes and awards to accredit well-run venues. Premises that meet the scheme's standard will automatically be eligible to become a Poole Safe participating premises and will receive a certificate and window sticker showing that the premises have met an appropriate standard.

http://www.poole.gov.uk/business/licences-and-street-trading/poole-safe-scheme/

References

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8   www.gmphnetwork.org.uk/writedir/5106GM%20Salt%20Shaker%20Project%20Report.pdf

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10 www.wakefield.gov.uk/Business/HealthyWorking/default.htm

11 www.betterhealthatwork.org.uk/

12 www.wellbeingcharter.org.uk

13 www.healthchallengecardiff.co.uk/eng/index.php

14 Member only discussion group at
    www.communities.idea.gov.uk/comm/landing-home.do?id=9297651

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