



Department for  
Communities and  
Local Government

# Better Business Compliance Partnerships

Programme Evaluation



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# Executive Summary

The Cabinet Office better business compliance partnership programme started in October 2014. It was designed to make joint working between national and local agencies more systematic, to strengthen the response to hidden and illicit economic activity and improve how agencies support businesses to comply with regulatory and other statutory regimes. The programme comprised five local authority-led partnerships in Cheshire West and Chester, Cornwall, Ealing, Hertfordshire and Manchester and Salford. These partnerships included local and national agencies that co-designed a range of innovative ways to make joint working between local and national agencies more systematic.

The partnerships developed new ways to share intelligence and compliance data and also changed how they arranged and targeted enforcement and compliance activities, often using joint visits. Of the range of changes implemented by the partnerships, the following activities have the potential to be transformative:

- Combining and analysing intelligence and compliance data from multiple agencies can identify those businesses that are non-compliant in multiple areas. Doing this manually is very resource intensive. Data science tools that can access and link multiple data sets offer a more effective, accurate and efficient way of combining, comparing and analysing information from a range of agencies.
- When agencies combine intelligence and compliance data, and then use the subsequent analysis to target and plan their inspections, these require fewer officers per agency per visit and reduce the number of inspections that result in limited impact on non-compliance.
- Well-planned multiple agency visits have the potential to be more powerful than inspections by a single agency, as the full extent of non-compliance can be addressed in a single intervention.
- Routine, single-agency enforcement and compliance visits have the potential, with the right training and support, to become a valuable source of intelligence to exchange with the other agencies in the partnership - being each other's 'eyes and ears'.

Whilst the partnerships have shown that a co-design process (where partners jointly design changes) results in changes suited to local situations, they have also indicated at what might not work. The programme highlighted inefficiencies in data sharing rules which potentially restrict agencies from being able to identify and act on rogue businesses, and that if a range of joint visits are targeted with data from a single agency they may have limited relevance to other agencies. The geographical spread of national agencies was seen as an enabler when located close to local authorities and a barrier to joint working when not located closely.

# Introduction

1. In October 2014 the Cabinet Office, working with the Home Office, Department for Business Innovation and Skills (BIS), Department for Communities and Local Government (DCLG) and Her Majesty's Revenue and Customs (HMRC), launched an eight-month programme of five partnerships with local authorities. The partnerships were led by Cheshire West and Chester Council, Cornwall Council, Ealing Council, Hertfordshire County Council and Manchester and Salford City Councils, representing rural and urban areas, unitary authorities and two tier systems.
2. This report presents the evaluation of the programme and is based on forty nine face-to-face, semi-structured interviews with programme staff from the national and local agencies. The evaluation also incorporates information from workshops held during a conference in April 2015 with representatives from all the five sites, observations and discussions with the sites during the programme period, and a review of documentation from the partnership sites. This report includes case studies and examples that demonstrate the potential impact of the innovations, and makes a judgment of their effectiveness. The evaluation methodology used is included in Annex A.
3. The programme was designed to develop and test new ways of working between local and national agencies to improve business compliance with regulatory and other statutory regimes, including the response to illegal working, worker exploitation and hidden or illicit economic activity. These issues cause difficulties for legitimate businesses, individuals and places, and potentially create a pull factor for illegal migration. Legitimate businesses may be undercut and find it difficult to compete, employees may be exploited by unscrupulous employers, working for little or no pay or living in poor conditions, and may find it difficult to seek redress. Members of the public are put at risk, and authorities may lose legitimate revenue.
4. The public sector is generally designed to address these issues individually. For example: HMRC is focused on ensuring the correct tax is paid and that workers receive the National Minimum Wage (NMW); Home Office Immigration Enforcement (HOIE) enforces immigration laws. Local authorities are responsible for enforcement and compliance activities of a wide range of regulation owned by several government departments<sup>1</sup>. However, front line officers often see evidence of non-compliance outside of their remit. Health and safety or environmental health inspectors may come across signs that could indicate illegal workers are present in the workplaces they inspect, or immigration officers may see poor quality or overcrowded housing.
5. The partnerships were challenged to develop a range of innovations to make joint working between agencies more systematic and find ways to: improve how the public sector helps

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<sup>1</sup> Department for Business Innovation and Skills, Department for the Environment and Rural Affairs, Department for Work and Pensions, Department of Health, Home Office, Her Majesty's Revenue and Customs, and the Department for Communities and Local Government all place statutory duties on local authorities. These duties include: ensuring product safety, and consumer protection through trading standards; environmental health; food safety; water safety; pest control; animal health and welfare; health and safety; alcohol licensing; housing standards; building control; and planning.

businesses to comply, reduce burdens on compliant businesses, effectively address those who choose not to be compliant and reduce the cost of compliance and enforcement activity.

6. The programme was resourced by a small cross-Whitehall team based in the Cabinet Office made up of Home Office, BIS and DCLG officials. Central government funding consisted of a small grant of £5,000 paid to each partnership and the Cabinet Office invested £100,000 on data science with the Health and Safety Laboratory (part of the Health and Safety Executive). This built on an existing data science tool, trialled previously by the Better Regulation Delivery Office (BRDO) in Leicestershire<sup>2</sup> and DEFRA with farming regulators.

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<sup>2</sup> The data science tool, known as the Intelligent Regulatory Information System (IRIS), was developed by the Health and Safety Laboratory for the Better Regulation Delivery Office and piloted by regulators in the Leicestershire area. The pilot evaluation report is available here: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/416624/15-212-data-sharing-iris-report.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/416624/15-212-data-sharing-iris-report.pdf) The tool uses technology developed by HSL to combine premises level data for the Health and Safety Executive.

# What the partnership areas did

7. The Cabinet Office encouraged each area to take a co-design approach led by the local authority. This design approach follows the principles set out by the Public Service Transformation Network<sup>3</sup> where the objectives and activities of each partnership are decided jointly by partner agencies.
8. The five partnerships developed a range of innovations to improve how local and national agencies work together (see Box 1.). The innovations developed by each of the partnerships ranged from simple changes such as Immigration Enforcement officers training local authority officers to spot fraudulent identity documents, to more complex changes developed around multi-agency data and intelligence sharing. A detailed description of each partnership is given in Annex B. A brief description of their approach and what they did is given here.

## Cheshire West and Chester

9. The Cheshire West and Chester partnership had two interventions focused on food businesses regulated by the local authority and on off-licences. The Council compiled and shared a list of food businesses classed as being at high risk of non-compliance and off-licences where there was evidence of associated anti-social behaviour. A large number of enforcement visits were conducted in a short period of time with all members of the partnership represented at most visits. The partnership developed a training package to help frontline officers identify the key compliance indicators that would interest other agencies.

## Cornwall

10. The Cornwall Partnership operated across the whole of the county, building on a number of existing multi-agency networks targeted at illegal working. They reviewed data and intelligence from across partner agencies to identify areas of joint risk, and build an understanding of patterns of offender behaviour to indicate potential intervention points. They used a newly developed data tool to compare records of businesses using records from local services. To improve how intelligence was shared at an operational level, the partnership developed and conducted awareness training for front line officers on key indicators for partner agencies, culminating in a 'Concern Card' for use during compliance visits. They introduced an events calendar as a way of sharing information about planned visits to reduce duplication and disruption to businesses.

## Ealing

11. The Ealing Partnership focused on two wards where there were high levels of non-compliance in food businesses regulated by the local authority. It aimed to build on previous partnership working with an enforcement and immigration focus. The partnership designed a data sharing memorandum of understanding, and systematically combined and reviewed large data sets manually, and later by automated means, to identify particularly high levels of non-compliance in particular businesses, as a basis for intervention. It held frequent meetings to review the data and develop joint tasking. Officers were trained to recognise trigger indicators for other agencies. Using the combined data to customise the makeup of the visit team, partners carried out 23 joint visits, resulting in enforcement action and arrests.

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<sup>3</sup> <http://publicservicetransformation.org/>

## Hertfordshire

12. The Hertfordshire partnership focused on food businesses regulated by the local authorities in two district authority areas. They combined and reviewed data and intelligence from across partner agencies to identify potential high-risk businesses of interest. They conducted six joint enforcement visits to detect and address non-compliance issues. To establish a more systematic approach to sharing intelligence at an operational level, the partnership developed and conducted awareness training for frontline officers on key indicators for partner agencies. They developed a case management tool to record and share information observed during inspections likely to be of potential interest to other agencies. The partnership also trained taxi-licensing officers to identify fraudulent documents.

## Manchester and Salford

13. The Manchester and Salford partnership focused on a small area straddling the councils' shared boundary. There was considerable prior experience of partnership working with an enforcement focus from police-led programmes such as Operation Challenger (targeting organised crime). The partnership covered a wide range of issues, including misuse of commercial property through to the distribution of counterfeit goods, fraud and money laundering. The partnership combined and reviewed data and intelligence from across partner agencies to target inspections more effectively. They conducted joint enforcement visits to detect and address non-compliance issues in the identified premises, and held two intensive "weeks of action" with the intention to disrupt networks of businesses and individuals who were known to be non-compliant in multiple areas.
14. Reflecting the different starting points, the partnerships implemented their changes at different times. Some were operational before Christmas 2014. Manchester and Salford, for example, were already aware of serious trading standards violations in the partnership area, and so were keen to intervene with counterfeit goods traders before the Christmas shopping period. Most of the innovations were, however, implemented in January and February 2015. In some cases the innovations were only trialled for a month before the evaluation interviews, for example the use of a data science tool in Ealing to automate data sharing. Taking these variations into account, it is therefore not possible to measure the impact of the changes on local businesses or undertake a cost benefit analysis of what they did. The evaluation has focused on developing an understanding of how the changes impacted on partner agencies.
15. This section provides a programme level overview of changes made in the partnerships across four specific themes:
  - i. **Sharing compliance data and intelligence at scale:** new ways of pooling and merging information held by national and local agencies to improve targeting.
  - ii. **Collecting and sharing intelligence at an operational level:** changes designed to help frontline officers act as eyes and ears for each other.
  - iii. **Carrying out joint visits:** changes made by the partnerships to how business visits were coordinated among national and local agencies.
  - iv. **What it was like to develop the partnerships:** co-design resulted in five different partnership models, and five different interpretations of how to run a partnership.



## Box 1. Partnership Innovations

| Innovations  | Cheshire West | Cornwall    | Ealing    | Hertfordshire | Manchester and Salford |
|--|---------------|-------------|-----------|---------------|------------------------|
| <b>Collecting and sharing intelligence at an operational level</b>   |               |             |           |               |                        |
| Development of a system to share intelligence across agencies  | ✓             | ✓           | ✓         | ✓             | ✓                      |
| <ul style="list-style-type: none"> <li>• Providing contact list</li> <li>• Daily intelligence sharing phone calls</li> <li>• Sharing information at meetings</li> <li>• Questionnaire during visits</li> <li>• Case management system</li> </ul> | -             | ✓           | ✓         | -             | -                      |
|  | -             | -           | ✓         | -             | -                      |
|  | -             | -           | -         | ✓             | ✓                      |
|  | ✓             | -           | -         | -             | -                      |
|  | -             | -           | -         | ✓             | -                      |
| Development of 'golden indicators': signs that indicate non-compliance.  | ✓             | ✓           | ✓         | ✓             | -                      |
| Circulation of an aide memoire card  | -             | ✓           | -         | -             | -                      |
| Formal training of officers in 'golden indicators' or 'compliance triggers'  | -             | ✓           | ✓         | ✓             | -                      |
| Training taxi licensing officers to recognise fraudulent IDs and immigration statuses.   | -             | -           | -         | ✓             | -                      |
| <b>Sharing compliance data and intelligence at scale</b>   |               |             |           |               |                        |
| Manual comparison of data sets   |               |             |           |               |                        |
| <ul style="list-style-type: none"> <li>• &lt;150 records</li> <li>• &lt;1500 records</li> </ul>  | ✓             | ✓           | -         | ✓             | ✓                      |
|  | -             | -           | ✓         | -             | -                      |
| Automated comparison of data sets  |               |             |           |               |                        |
| <ul style="list-style-type: none"> <li>• LA data only</li> <li>• LA and national agency data</li> </ul>  | -             | ✓           | -         | -             | -                      |
|  | -             | -           | ✓         | -             | -                      |
| <b>Joint agency visits to businesses</b>   |               |             |           |               |                        |
| Number of joint visits carried out   | <b>106</b>    | <b>None</b> | <b>23</b> | <b>6</b>      | <b>More than 30</b>    |
| Joint visits integrated into business as usual   | -             | -           | ✓         | ✓             | -                      |
| Intensive period of visits targeting:  |               |             |           |               |                        |
| <ul style="list-style-type: none"> <li>• persistent high risk non-compliance</li> <li>• low risk non-compliant businesses</li> </ul>   | -             | -           | -         | -             | ✓                      |
|  | ✓             | -           | -         | -             | -                      |
| Visits tailored to each case in terms of agencies attending and approach?  |               |             |           |               |                        |
| <ul style="list-style-type: none"> <li>• yes</li> <li>• no</li> </ul>  | -             | -           | ✓         | ✓             | ✓                      |
|  | ✓             | -           | -         | -             | -                      |
| Approach: Enforcement  | -             | -           | ✓         | ✓             | ✓                      |
| Supportive/ educative  | ✓             | -           | -         | -             | -                      |

# Sharing compliance data and intelligence at scale

16. All of the partnerships sought to share and compare compliance data and intelligence to create an enriched picture of non-compliance in their areas. The partnerships wanted to test whether pooling information would increase the likelihood of identifying hidden or illicit economic activity, or those businesses that were non-compliant with multiple rules. The partnerships also expected that pooling this data would enable them to target resources more effectively and help identify:
  - Which businesses were non-compliant for several agencies, suggesting a joint approach to enforcement might be beneficial
  - Which businesses were known to some but not all agencies
  - Illicit activities that businesses and individuals were attempting to hide.

## Rules governing information sharing

17. Sharing and combining intelligence and compliance data proved to be transformative in how agencies identified businesses that were non-compliant in multiple areas. The partnerships used existing legal data sharing gateways between agencies to ensure data was shared lawfully and securely. Each partnership took a different approach to pooling and comparing information; in all cases, systematic information matching and analysis had not taken place before.
18. The partnerships shared different amounts and types of data and encountered a range of problems, which are explored in subsequent sections of this report. One of the most important areas that the partnerships needed to discuss and clarify was what information each partner held, and how it could lawfully be handled and shared among them.
19. There are many legal information gateways available to agencies, all requiring specific conditions to be met which are detailed in the relevant legislation to each organisation. Gaining a clear understanding of these was essential for the smooth running of joint working. Two of the sites (Cornwall and Ealing) developed formal Memoranda of Understanding (MoUs), firstly with HSL and then within the partnership, to ensure protocols to share data were clear to all partners. The MoUs detailed why information was being shared, how it could be shared and what it could be used for. MoU development took a significant amount of time to develop and agree in Ealing, and this learning was shared with Cornwall to avoid duplicating effort and delays. Other sites felt that they did not need to have a MoU because existing arrangements were already clear.
20. From the outset partners across the 5 areas hoped they could use HMRC's data on all businesses - compliant and non-compliant - to confirm business owner, number of employees, and to improve the accuracy of partner information. HMRC's statutory framework safeguarding the use of individuals' data meant that it was not possible for this data to be shared in all the instances envisaged by the partners. Where the framework allowed data to be shared, it was done so, and in many instances the partnership structure enabled both local and national agencies to speed up the usual national agency data request process, from several weeks to a few days, through the use of an assigned named contact. The increased

ease of access to national data and resource was beneficial in, for example, quickly securing the critical information needed for successful warrant applications for immigration enforcement:

*“The magistrate won't issue a warrant if we don't have a named offender at a business premises, and all our intel is there are several offenders working at this address, we never have that much detail [i.e. the name of an offender] in the initial intel. So being able to request that from anyone, so it might be the food safety team, it might be HMRC, and then get that information back enables us to get a warrant which means we can get into the address more effectively. So I mean that's huge for us.” Ealing, HOIE*

## Pooling intelligence and compliance records

21. Each partnership compared different sources of information. For example, Cornwall compared records from local agencies (food, fire, housing, trading standards and police) whereas Ealing compared information from national agencies (Gangmasters Licensing Authority (GLA) and Home Office) and local agencies (food safety, enviro-crime, fire, trading standards, police). Some partnerships compared small numbers (less than 150 for each agency) of known high risk businesses (e.g. Hertfordshire) while others looked at all businesses within the target area (e.g. Ealing compared records of more than 1000 businesses). Most areas compared information manually, but in two, Cornwall and Ealing, the Cabinet Office engaged the Health and Safety Laboratory<sup>4</sup> to trial new data science techniques to automate the process of matching large numbers of records across a range of databases.

### Box 2. Summary of the different information sharing approaches trialled by each partnership

| What the sites did   | Results   |
|--|---|
| <p><b>Cheshire West and Chester</b></p> <p><u>Manual analysis</u><br/>Manually compared records of 133 food businesses identified as high risk by food hygiene standards against records from fire, immigration enforcement, trading standards, police and HMRC.</p> <p>The selection of off-licence premises in the Ellesmere Port area was informed by testimony given at a range of licensing hearings. The intelligence related principally to underage off licence sales, and street drinking. Sites with a primary authority partnership (BRDO led scheme to simplify engagement between authorities and businesses) were removed from the</p> | <p><u>Manual analysis</u><br/>The results of the analysis were used to inform agency tasking. Virtually all 133 cases had some information on the police systems however nothing of note for non-compliance. HMRC identified two cases of interest. HOIE identified 24 businesses of interest.</p> <p>25 off-licence premises were identified and 20 were visited during the week of the second intervention.</p> |

<sup>4</sup> The Health and Safety Laboratory (HSL) is an agency of the Health and Safety Executive. [www.hsl.gov.uk](http://www.hsl.gov.uk)

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|--|---|
| <p>programme.</p>  |   |
| <p><b>Cornwall</b></p> <p><u>Manual analysis</u><br/>Manually compared 12 cases identified as high risk by the Council housing officers.</p> <p><u>Automated analysis</u><br/>Used HSL technology to compare records of 3975 businesses. Records were from local services only including: Devon and Cornwall Police, trading standards, licensing, housing, health and safety, fire safety, prosecutions and notices, food standards, and environmental protection.</p>  | <p><u>Manual analysis</u><br/>HMRC investigated the 12 cases provided by the partnership; outcomes not yet known at time of writing.</p> <p><u>Automated analysis</u><br/>The results of the analysis were not used to inform agency tasking.<br/>Automated data comparison found 2257 businesses with potential non-compliance across two or more agencies.<br/>Cornwall Council were unable to share the comparison with partners as there was no legal gateway enabling them to do so and a MoU required agreement.</p>  |
| <p><b>Ealing</b></p> <p><u>Manual analysis</u><br/>Comparison of records to identify businesses likely to be multiply non-compliant.<br/>Compared 1189 records of non-compliant businesses from: food hygiene, London Fire and Rescue, the Gangmasters Licensing Authority and Home Office Immigration Enforcement.</p> <p><u>Automated analysis</u><br/>Used advanced computer algorithms from the Health and Safety Laboratory to compare business records using probabilistic data matching in the HSE Find-IT data tool.<br/>Automatic comparison of the same records as manual analysis. Automated comparison of 3,000 records, across national and local agencies using Find-IT.</p> | <p><u>Manual analysis results</u><br/>The results of the analysis were used to inform agency tasking.<br/>Manual data comparison found 213 business records that matched across data from two or more agencies. The analysis took 3.5 days of a full time intelligence officer.<br/>This list was then narrowed to a sub-list of 52 businesses that had non-compliance in three or more regulatory areas and were therefore deemed as high risk. The 10 businesses with the most serious risks were incorporated in the weekly tasking meetings.</p> <p><u>Automated analysis</u><br/>Automated data comparison found over 1900 matches between two agencies. The analysis took approximately 1 day to prepare the data and write the data query that would match the different data sets. Future matching of these same data types would be instantaneous.<br/>Of the 1900 matches, 335 businesses had potential non-compliance in three or more regulatory areas.</p> |
| <p><b>Hertfordshire</b></p> <p><u>Manual analysis</u><br/>Manually compared high risk premises between partner agencies to identify potentially multiply non-compliant food businesses for enforcement visits.</p> <p>Approach 1. High risk businesses compared.</p>   | <p><u>Manual analysis</u></p> <p>Two food businesses were identified as</p>   |

|  |   |
|--|---|
| <p>Approach 2. Agencies submitted a long-list of 100 highest risk food businesses.</p>   | <p>potentially non-compliant with two or more agencies. The comparison was not complete as agencies provided different numbers of records to compare and the list was only 15 premises.</p> <p>This attempt identified 12 food businesses. The results of the analysis were used to inform agency tasking.</p>  |
| <p><b>Manchester and Salford</b><br/>Manual comparison of the top ten high risk businesses between Trading Standards and HMRC.</p> <p>Manually combined existing information on properties in target area to create a reference database. Included data from complaints or requests for services, council and business tax records, records held by Companies House and information from a commercial waste audit conducted in the area.</p> | <p>The results of the analysis were used to inform agency tasking.</p> <p>HMRC reported that the top 10 comparison was useful. The partnership began trialling this in other business areas including hotels, car washes and money service businesses.</p> <p>The database enabled police and HOIE quickly to establish the identity of the responsible persons when they were carrying out enforcement visits. Having names of business owners meant that HOIE knew who would be liable for financial penalties for employing illegal workers. It also helped them to get warrants.</p> <p>The database was used to inform targeting of non-compliant landlords.</p> |

22. All of the sites reported benefits from sharing and comparing information on potentially non-compliant businesses. The main benefit for all agencies was improving the identification of businesses that were potentially non-compliant in multiple regulatory sectors, allowing efficient use of resources by focusing on these rogue businesses. In addition, by focusing on the worst offenders, partnership agencies could demonstrate a commitment to securing a better business environment for compliant businesses:

*“The key for us was we have a lot of people here who keep coming back in as non-compliant or poor compliance and not raising the standard. ... how do we tackle those persistently poor businesses....we want to help them comply but if they don’t want to comply we also don’t want them contributing to the local economy in a negative way.” Ealing Council*

*Manual data and intelligence sharing*

23. Manually combining data was universally resource intensive for the partnerships. It took time both to source data from different databases and to match records of individual businesses (e.g. Ealing took 3.5 days to compare records of around 1200 businesses, and the Manchester and Salford partnership took some two weeks to develop a common business database for the Strangeways and Broughton area, that was quickly out of date). The partnerships found that records were not consistent across datasets: names of businesses could be written differently and risk assessments were particularly problematic to compare as each agency used their own risk scales:

*“..using their data sets and bringing all that data together...you would think that would be quite straightforward to do but it’s quite shocking how different people input data about addresses, for instance, .... an address that we might have as The Chicken Shop, 12, The Broadway, the fire service might record as just 12, The Broadway, you know, or just The Chicken Shop, The Broadway.” Ealing Council*

24. Manually comparing records allowed the partnerships to identify businesses that were of interest, or at high risk of non compliance, with two or more agencies - confirming the existence of potential multiple rule breakers (see Table 1). This information was then used by some partnerships to inform tasking and visit activities (see next section).

*“We’ve had access to intelligence that we wouldn’t otherwise have had to enhance any pictures of risk that we’re building up, [...] So it just helps in, first of all, identifying the areas that are of interest to us and then in enhancing the picture that we have of what may be going on so that we’re better prepared when we go out on the ground to address those issues.” Manchester and Salford, HMRC*

25. However, there were drawbacks with this approach. Although the partnerships identified potential multiple rule breakers, it generally required large numbers of records to be compared. When small numbers of businesses were compared (fewer than 20) few matches were found. As demonstrated in Hertfordshire (see box 2), it was more productive to compare risks over longer lists of businesses. Furthermore, as manual data sharing took data out of existing databases, the combined data became quickly out of date. Regular refreshing was not feasible due to the resource required to source and manually match new data. Consequently, large scale manual data sharing methods developed by the partnerships would be unsustainable.

## **Automated data and intelligence sharing**

26. The Cabinet Office commissioned HSL to work with the Ealing and Cornwall partnerships to develop a way to compare front line officers’ business records quickly across multiple datasets and sources (see Box 3).
27. The resulting data tool brought together local authority data on food safety, enviro-crime, health, health and safety, fire, housing<sup>5</sup> and national immigration data and care quality commission data.<sup>6</sup> It enabled the two partnerships to run queries to identify those businesses that were likely to be non-compliant across two or more agency remits.

### **Box 3. Health and Safety Laboratory data tool explained**

The Health and Safety Laboratory (HSL) was commissioned to create a tool that enabled agencies to compare compliance across multiple datasets, enabling a single data view of a company and providing an enriched picture of business compliance. The HSL Find-IT data science tool is specifically designed for the purpose of sharing and comparing intelligence and compliance data. The HSL team have developed two key areas to enable data matching work to be undertaken in a way that can be adapted to the needs of different regulatory areas:

- a data engine which contains a variety of algorithms to join disparate datasets without the need for common identifiers; and
- a customisable web based platform that allows users without specialist IT knowledge to

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<sup>5</sup> Cornwall only

<sup>6</sup> Ealing only

interrogate and exploit the combined data.

This technology has been developed for a number of government departments e.g. Health and Safety Executive (HSE), DEFRA, the Better Regulation Delivery Office and Cabinet Office, the first of which was the HSE. The HSE project demonstrated significant economic benefits, including:

- Reduction in wasted inspection visits by at least 20% by targeting enforcement activity at those businesses creating the most harm
- Approximately £2m p.a. saved through more effective use of inspectors' time
- A reduction in time to plan inspections from about 1 day to 15 minutes
- Identifying areas of surplus and scarce resource, enabling efficient staff redeployment.

**Table 1. This table shows the number of potentially multiple non-compliant business identified using data science techniques in Cornwall and Ealing**

|                           | Number of individual businesses | Number of records compared | Number of businesses matched with an interest by two or more agencies (% of businesses) | Time taken to compare the different data sets                         |
|---------------------------|---------------------------------|----------------------------|---|---|
| <b>Cornwall</b>           | 3975                            | 8088                       | 2257 (57%)  | 1 day initially to write the query, subsequent would be instantaneous |
| <b>Ealing - manual</b>    | 1189                            | 2700                       | 213 (18%)   | 3.5 days each time the manual data matching is carried out            |
| <b>Ealing - automated</b> | 2229                            | 3579                       | 781 (35%)   | 1 day initially to write the query, subsequent would be instantaneous |

28. The HSL data tool was able to overcome the data matching issues the partnerships experienced when they compared records manually. Where businesses had no common identifiers, the tool used intelligent searches to match records from different databases enabling the matching of variations on spelling. It also enabled linking of previously unrelated businesses using, for example, a contact mobile telephone number or contact name.

29. HSL were able to include more business records when running the automated data matching for Ealing. Additional data sources included Companies House (including closed businesses used to identify premises with non-compliant history), Care Quality Commission, environmental crime, and police licensing. Automated data matching enabled almost twice as many business data sets to be compared in a fraction of the time (see Table 1) with more accurate results.

30. Automating data and intelligence matching using the HSL tool was beneficial to Ealing and Cornwall in the following ways:

- **Faster:** data cleaning and analysis took the Ealing analyst approximately 3.5 days, and HSL 5 hours. This would be reduced to approximately 2.5 days and 1 hour respectively for subsequent analysis

- **More effective:** accuracy was improved with over twice as many links found by the HSL analysis compared to the Ealing manual analysis, including for crossovers with HO data
- **Scalable:** an automated system was able to deal with large increases in data records without costs increasing. Manual analysis required increased resource in line with quantity of data
- **More flexible:** allowing a variety of data queries to be run, including analysis over time
- **More accessible:** manual analysis was only accessible by one agency at a time, whereas the HSL tool could be developed to allow multiple queries to be run simultaneously
- **Lower opportunity cost:** manual analysis using existing resource impacted much more on other work than when automate.

31. All in all, there were clear benefits to data sharing across partnerships, as it enabled agencies to develop a better picture of compliance patterns they needed to respond to. However, automating data sharing requires upfront initial investment. The use of the Find-IT tool in Ealing and Cornwall was developed late in the partnership programme and was not used to inform joint tasking and visits. Consequently, a full cost benefit analysis was not possible. Further work is required beyond the scope of this evaluated phase to fully explore the potential benefits of this new technology.

## What we have learnt

- **Matching intelligence and compliance data from different agencies has confirmed that some businesses break multiple rules, and identifying these rogue businesses is easier when information is pooled and analysed together**
- **As information can be sensitive some agencies have legal restrictions on what they can share. Early in the co-design process, partner agencies should work out what type of information they can share, as this will speed up the design of a data sharing system**
- **It is possible to compare information from across agencies manually, but it is laborious and it is not as effective as an automated system**
- **Automated systems are more accurate, spotting previously unidentified links between information and therefore improve the ability of agencies to uncover hidden illicit economic activity**
- **Even without formal databases, the partnership structure can help agencies share information, simply by improving knowledge of what information is held by each agency and having a single point of contact**



# Collecting and sharing intelligence at an operational level

## Intelligence gathering

32. Early in the programme, each partnership took considerable time to understand the remit, powers and activities of each partner agency. This led the partnerships to conclude that they needed to develop ways to ensure frontline officers understood what each agency was trying to achieve, and clarify the characteristics of non-compliance for each agency.
33. The partnerships generally wanted to transform intelligence sharing from an ad-hoc process to a day-to-day feature of how local and national agencies worked together. This was often described as officers acting as ‘eyes and ears’ for partner agencies (and is the generic term used in this report). Respondents in the evaluation consistently pointed to the significant unused potential in the visits that officers made:

*“my entire patch [is] Avon and Somerset, Wiltshire, Devon and Cornwall – 8,000km<sup>2</sup> ... Cornwall Council alone has 200 licensing enforcement officers, and they’re all in various different roles, ... that’s 200 extra eyes and ears on the ground.” Cornwall, HOIE*

34. Although each partnership developed their own way of implementing an ‘eyes and ears’ approach, all the innovations were based around improving frontline officers’ knowledge across the range of statutory enforcement activities, and formalising the process of sharing intelligence. As a first step, Hertfordshire and Cornwall independently developed the concept of ‘Golden Indicators’ which were the signs of potential non-compliance that officers looked for. Table 2 lists the indicators developed by the Hertfordshire partnership. The sites developed different ways of training officers to recognise and report these indicators:
- Training front line officers to identify what information was valuable to pass on to other agencies to identify non-compliance, using key or ‘golden indicators’ (Cornwall, Ealing, Cheshire, Hertfordshire)
  - Distributing aide memoire cards with ‘golden indicators’ that suggested signs of possible non-compliance and agency contact points (Cornwall)

**Table 2. Golden indicators developed by the Hertfordshire partnership**

- |   |
|---|
| <ul style="list-style-type: none"><li>• <b>Immigration:</b> Workers acting nervously when law enforcement officers/government officials attend premises on official business, number of workers living in the business premises or above, workers not being allowed to speak for themselves when being spoken to by government officials</li><li>• <b>HMRC:</b> Poor record keeping, unexpectedly high volume of trade, shops with two tills (only one for legitimate business)</li><li>• <b>Fire protection:</b> Inappropriate / dangerous sleeping conditions, exits blocked or locked when occupied</li><li>• <b>Trading standards:</b> Repeated failure to heed compliance advice, evasive behaviour concerning the identity of legal entity / ownership of a business</li><li>• <b>District Council:</b> Inappropriate disposal of commercial waste, locked rooms/doors in commercial premises, evidence of sleeping/living/washing including mattresses/towels etc in commercial premises, evidence or presence of rats, mice or cockroaches, smoking in business premises, locks on bedroom doors and/or kitchen cupboards</li></ul> |
|---|

35. Golden indicators were coupled with training in Cheshire, Cornwall, Ealing and Hertfordshire, the most intensive of which was run by Cornwall. Around 200 officers in Cornwall were trained to understand the roles and key indicators of local and national agencies. The training in Cornwall was supported with aide memoire cards (Concern Card - see Figure 1) that summarised the key indicators and, importantly, provided officers with details of how to contact the right representative in each agency. Ealing undertook similar training on a smaller scale, training a representative from each agency to cascade the knowledge to their colleagues. In general, training was well received by front line officers:

*"What the partnership was doing was trying to educate staff as to what other agencies do [...] So working smarter in that way, do you need everybody to go or can one agency or two agencies go and collect the information and then disseminate that information back to interested parties." Cornwall, GLA*

*"All those other things that go around illegal working ... I'm more aware of, and would think, straightaway, to pass on those indicators, which we have done already, to immigration, on a couple of occasions." Hertfordshire, Fire Protection*

*"Since the project we've got about 200 officers now who are specifically briefed as to some of the tell-tale signs to look for while they're out visiting businesses in Cornwall. And more importantly they've all got contact cards with all of the relevant identified means for passing information onto other agencies where they do have concerns. And we have seen a number of referrals already as a result." Cornwall, Cornwall Council*

36. In Cornwall the training resulted in 26 referrals among partner agencies, with the Council, Immigration Enforcement and HMRC being the main beneficiaries (numbers of referrals in previous years were not recorded). In addition to general training, Immigration Enforcement provided specialist training to taxi licensing officers in Hertfordshire on the current visa system, right to work rules and how to spot fraudulent identity documents. Officers reported afterwards that they felt more confident checking documentation during the licensing process:

*"We don't say, give the benefit of the doubt. ... you sound confident and you have demonstrated to them that you are very confident in what you require of them, and I think that's the training reinforces that and that is a really... that's a good thing really." Hertfordshire, taxi licensing team*

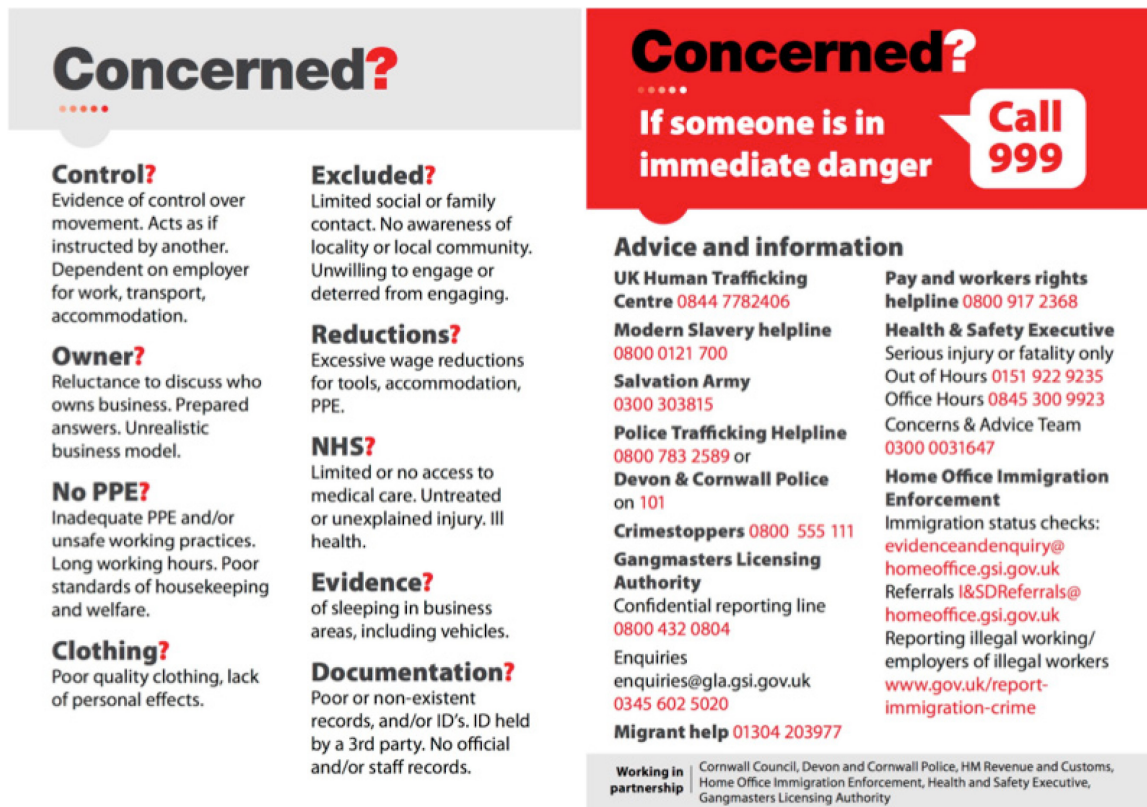


Figure 1 - Concern card developed by the Cornwall partnership

37. The partnerships showed there was clear potential to make more use of the interactions between officers and businesses:

*"...this is a really good way of tapping into intelligence that does exist, albeit with other agencies, so that's been quite an eye opener for us, and that's the bit that I would like to keep after the pilot has become business as normal." Cheshire West and Chester, HOIE*

38. The Fire and Rescue Service in Manchester and Salford also highlighted that sharing data meant that they were better able to do risk assessments for their officers going into unknown premises.
39. Sharing information also took place between national agencies. In Manchester and Salford, Immigration Enforcement reported that obtaining data from HMRC was greatly improved by the partnership working. Similarly, in Ealing, Immigration Enforcement found that HMRC could provide real time information showing who was registered as working in a premises. This provided the important evidence required to get a warrant:

*"We may just have a brief snippet of intel saying that there are three Pakistani immigration offenders working at this butchers in Southall, we don't know the names so it makes it difficult for [the] team to get the warrant to go to the address, but now we can go to HMRC and say can you provide the RTI - real time information - of the people working at that butchers, we get the information back, do the checks, yes, these people are offenders, and then it makes it easier to go through that process." Ealing, HOIE*

## Box 4. Hertfordshire: Immigration Enforcement and Environmental Health case study

**The Situation:** Home Office Immigration provided intelligence to agencies in the partnership concerning an Indian restaurant in the Borehamwood area where there was suspected illegal working.

**The Intervention:** Following discussions between the partners establishing the likelihood of food safety violations, Hertsmere Borough Council's environmental health team joined Immigration Enforcement officers in carrying out a raid on the business in question.

**The Outcome:** The visit resulted in two immediate arrests for immigration offences, including one for illegally entering the UK, and a further arrest at a nearby residence for overstaying visa conditions, which was a direct result of intelligence gained in the initial visit. Environmental health officers found no serious food safety concerns but did identify an unsafe, multiply-occupied tenanted property above the restaurant, and discovered the property had been sub-let without the landlord's knowledge. As a result, the Council took over management of the property and five others of which the landlord ceded control. These properties are now being used to house local homeless people. Without the joint visit taking place, the sublet property was likely to have remained undiscovered. Due to the immigration offences discovered, the restaurant faced financial penalties of up to £40,000.

### Intelligence sharing processes

40. The partnerships found that clear structures and processes were required to enable front line officers to share operational intelligence. The partnerships created new formal processes for officers to facilitate the sharing of day-to-day intelligence, these were:

- Holding ad-hoc intelligence sharing meetings when officers had intelligence to share (Manchester).
- Holding daily intelligence calls among agencies for front line officers to share any intelligence they had gathered during the previous day's enforcement or compliance visits (Ealing).
- Questionnaires to be used during visits (Cheshire).
- Using an electronic case management system for agencies to record information about potential cases of non-compliance and share with partner agencies (Hertfordshire).

41. The most structured approach was taken by Ealing which carried out daily intelligence conference calls between national and local agencies to update partnership members on all new intelligence relating to businesses at high risk of non-compliance. This regular contact between front line officers positively changed attitudes to sharing intelligence and improved how intelligence was shared:

*"It's building up that sense that you don't have to go through team leaders; you can just email someone or ring someone directly and say... if you have any bit of advice or information that you need." Ealing, Food Safety Team*

42. There were limitations to the approach taken in Ealing as HMRC could not participate in the daily intelligence calls. Statutory restrictions on data and intelligence sharing prevented HMRC representatives from discussing non-compliance when it could not be guaranteed who was engaged in the telephone call. Daily calls in the partnership were considered to be very resource intensive, but the partners agreed that the principle of systematic exchange of

intelligence was worthwhile. The calls have been changed to a more manageable weekly cycle and adopted as business as usual.

43. Hertfordshire trialled an electronic case management system called Safety Net that was originally designed and used to ensure agencies could work together to address anti-social behaviour. The expectation was that information on non-compliant businesses would be collated, and that participating agencies would have access to it. The system was adapted for recording information on businesses by different agencies, but by the time of the evaluation interviews there was not sufficient information on the system to reach the critical mass to make it useful. Interviewees felt that it could be difficult to get the required buy-in for the system to operate, as some users lacked confidence in using databases and data entry duplicated existing systems and was therefore inefficient and resource intensive.
44. The Cheshire partnership used a form to prompt officers to ask questions to establish compliance information relevant to agencies who were absent at a joint visit. Some partners reported that there were too many indicators listed, and checking these during visits was laborious. Others advised that the intelligence gathered in the questioning process lacked sufficient detail to be useful for establishing compliance in a given area, and created additional work in identifying exactly what issues needed action:

*“The second officers, they were asking the fire questions, HMRC questionnaire, immigration staff list if we could get one. So there’s quite a lot of work involved in getting that information together.” Cheshire West and Chester, Food Standards*

45. Furthermore, some officers in Cheshire said they felt uncomfortable when they asked questions about immigration on their checklist. Local authority officers did not feel that these questions fitted in with the purpose of their visit. Also, some officers felt they were simply being asked to carry out investigations on behalf of others. This highlighted the importance of clarifying objectives and responsibilities when training to act as ‘eyes and ears’, to ensure that expectations were managed. However, all five partnerships reported that just knowing the officers from other agencies by name enabled some to refer potential non-compliance quickly:

*“Trading Standards and HMRC went because there was [...] intelligence around some alcohol. They didn’t quite know the details of it and then, when they arrived, it was established it was a non-duty paid alcohol. In that instance it was deemed that because it was non-duty paid and not counterfeit or illegal alcohol, it would be best for HMRC to take forward action rather than Trading Standards. So, it’s just about having the networks to make that choice and make that decision, really. I think that’s really been important for the pilot.” Manchester and Salford, Manchester City Council*

## What we have learnt

- Officers acting as 'eyes and ears' for each other has the potential to increase the range of intelligence drawn from each compliance visit, and send a message to rogue businesses that they are unlikely to get away with hidden or illicit activity.
- It is evident that front line officers from different agencies are interested in supporting each other, but prior to the partnerships their knowledge of other agencies' work, powers, remit and scope was limited.
- Training officers to understand the type of non-compliance that other agencies are looking for can produce a new source of intelligence, and maximise the benefit of the large number of visits officers carry out.
- Inflexible lists of questions are likely to be less useful than training officers in the skills and knowledge to use initiative and ask appropriate questions themselves.
- Agencies must make it easy for their officers to share intelligence gathered from visits to businesses. There is no perfect way, but agencies could use a mixture of prompt cards, or regular meetings or calls between agencies.
- Managers need to ensure that expectations of what an 'eyes and ears' approach can actually deliver is clearly communicated to their officers.
- When intelligence is passed on, officers need to know if it is helpful or not. A feedback process will enable officers to improve the quality of intelligence they share.
- The key to successful new databases is to secure officer buy-in to their use by avoiding duplicate data entry and ensuring users have adequate database skills

# Joint agency visits to businesses

46. The partnerships wanted to test whether joint enforcement and supportive visits would be a more efficient and effective use of resources in tackling rogue businesses than each agency continuing to act separately. Each partnership took a different approach to organising joint visits (Table 3). For example, some conducted visits with a large number of agencies, while others were more selective using pooled intelligence and compliance data to target visits. The approach of the partnerships can be generally divided into two types: a “big bang” approach visiting a large number of businesses in a short period, or incorporating visits into normal agency work plans.

*“Potentially you’ve got the fact that word of mouth dictates that a business community is now aware that local and national government is working closer, and sharing intel. That might have an impact. Now I don’t know if you could measure that.” Cheshire, HMRC*

**Table 3 - This table describes each partnership's approach to multi agency visits.**

| Area                      | Number of visits                               | Characteristics   |
|---------------------------|--|---|
| Cheshire West and Chester | 106<br>(86 food businesses<br>20 off-licences) | <p>Visits targeted at businesses assessed as poorly performing on the basis of one set of data (scoring 2 or below on food safety or being in an area with problems with licensing compliance). Standardised visit carried out at each premises, and same agencies visited each and asked same questions following a check list. Only IE were selective about which premises they attended. Approach of visits was supportive and educative. The partnerships wrote to each targeted businesses informing them that partners would be inspecting them and indicating what standards were expected by each and where the business could get help to comply if it needed it.</p> <p><b>Results:</b><br/> <b>Food intervention:</b> improved scores (since last visit) on food safety in 60% of cases, 30 Hygiene Improvement Notices were issued, HMRC taking two cases forward for investigation, 8 enforcement packages being developed by HOIE, 30 cases of concern raised on fire safety (and 43 were no concerns raised which was helpful intelligence), additional residential accommodation identified (11 premises).<br/> <b>Off-licence interventions:</b> Sites of interest identified for action from Food Safety (5), housing interest (11), HMRC (6) and fire and rescue (3). All 20 sites advised on best practice to prevent retail violence and checked for new tobacco sales rules. 3 sites were assessed as poor for licensing.</p> |

| Area                   | Number of visits                           | Characteristics   |
|------------------------|--|---|
| Cornwall               | -  | Did not carry out joint visits.   |
| Ealing                 | 23   | <p>Visits targeted at the highest risk of non-compliance as determined by large scale analysis of intelligence and compliance data. Selective about which agencies attended based on discussion of powers and likely problems. Typically 2 or 3 agencies attended each visit carrying out a mixture of compliance and enforcement activity.</p> <p><b>Results:</b> IE: at least 11 arrests and 3 employer referral orders for employing someone illegally, HMRC: at least 2 cases of interest from visits, and 38 cases at various stages of assessment identified by the partnership, Food: action on at least 7 cases from written warnings to closing down the business, 3 referrals to HMO licensing, 2 referrals to HSE, GLA: 8 enforcement notices affecting 400 workers.</p> |
| Hertfordshire          | 6  | <p>Visits targeted at the highest risk of non-compliance as determined by shared intelligence. Selective about which agencies attended based on discussion of powers and likely problems. The visits were mostly between Home Office Immigration Enforcement and selected local authority officers. Carrying out a mixture of compliance and enforcement activity.</p> <p><b>Results:</b> 3 premises were satisfactory. Other 3 premises: IE 2 arrests and interest in another case, Fire and Rescue: enforcement notices at 2 premises and verbal advice at another, HMRC: following VAT issues in 1 case and following 9 cases identified by the partnership, Environmental Health: issues in 1 case, HMOs: issues in 1 premises (leading to several others).</p>                 |
| Manchester and Salford | At least 27, partner agencies not recorded | Carried out short periods of intensive action focused on specific geographical area or specific network of individuals which presented repeated and multiple non-compliance. Targets determined by combination of intelligence across agencies. Selective about which agencies attended based on discussion of powers and likely problems. Aim of visits was enforcement and disruption of illegal activity.  |



| Area   | Number of visits | Characteristics   |
|--|------------------|---|
| <b>Manchester and Salford - continued.....</b> |                  | <p>Also carried out smaller scale visits targeting individual premises based on shared intelligence. Selective about which agencies attended based on discussion of powers and likely problems.</p> <p>Results: (Incomplete information but the following are examples): Intensive action on network of individuals: police and immigration enforcement undertook 27 multi-agency visits to brothels, car washes, takeaways and businesses linked to organised crime groups. Led to the arrest of 26 individuals for immigration offences and as a derived outcome, the seizure of £2,000 cash and a large quantity of illicit tobacco.</p> <p>Visits to 9 businesses resulted in Trading Standards advice given to 6 of the businesses and approximately 100 counterfeit game console accessories and around 400 novelty, unsafe lighters were seized. IE: 2 arrests. Food safety: identified 1 unregistered food business. Business rates: 4 premises found not registered or in arrears. 1 business was £26,000 in arrears and details were obtained to ensure payments could be taken.</p> <p>3 visits to individual businesses resulted in action on NMW by HMRC (3), 1 arrest by IE and action by regulatory services on a car hire/ garage business.</p> |

47. Partnerships reported that when multi-agency visits were well targeted and well managed, they could have several benefits in terms of effectiveness and efficiency. The Ealing partnership reported that by sharing information, agencies were able to reduce the number of officers deployed from each agency when carrying out a joint visit. This was both because they were better informed of what they are likely to find and also they could rely on the manpower of other agencies, for example, to help secure a building:

*"...the butchers for example, I send two officers, if that intel had just come to me in the normal way, I probably would have sent a team of eight out so I would have wasted my time because we would have only served on one person." Ealing, HOIE*

48. In addition, they were able to reduce the number of visits they attended as they had better information on where immigration offenders were working:

*"This is not about the visits we've done necessarily, it's about the ones we haven't had to do because we've had the information, which obviously won't show up as readily in any kind of performance stats but it's still quite important in terms of resource." Ealing, HOIE*

49. In Ealing, HMRC also highlighted a number of benefits from the joint visits, particularly for the Hidden Economies team. A food safety led visit in which they were involved identified a business that was not registered for VAT despite having a turnover in excess of the VAT threshold. Without information from the partnership this business would not have been visible to HMRC.

50. Ealing and Hertfordshire also found that choosing the right agency to lead a joint activity impacted positively on both processes and outcomes. For example, in Ealing HMO Licensing could enter licensed premises without a warrant, as could food standard officers, but this was not the case for Immigration Enforcement. Where warrants were needed, Immigration Enforcement gained entrance by being named on the HMO licensing team warrant, and Real Time Information (RTI) from HMRC also enabled the successful application for warrants by quickly obtaining names and dates of birth of employees. Without a warrant, Immigration Enforcement relied on the consent of the business to allow them access to the premises, which they could not guarantee.

51. Manchester and Salford reported that one of the key benefits from the partnership was finding out more about each agency's powers, priorities and resources which enabled them to decide which agency was best placed to visit the premises and apply powers to make them compliant. This could make enforcement quicker and more efficient:

*"What we've been able to do is appraise what powers each partner at the table has to select the most appropriate and the most disruptive. So, in some cases HMRC may have led on imposing sanctions, in some cases the local authority. So, it's just knowing who's best positioned to have an effect to take forward things." Manchester and Salford, Manchester City Council*

52. Examples of this included:

- HMRC being able to recover civil property as a duty evasion offence, negating the need for trading standards to prosecute when there was no guarantee they would get the money back;
- Police obtained warrants where trading standards were unable to do so because they lacked up to date intelligence, leading to a joint visit with police and trading standards which would not otherwise have been possible; and,
- In Manchester and Salford trading standards officers shared compliance and enforcement data with HMRC through appropriate legal gateways. HMRC then used 'tainted building' powers to take action, imposing deposits against potential tax bills for new occupying businesses in buildings frequently used for business in breach of trading standards regulations.

53. In another example, Manchester and Salford trading standards mapped potential stakeholders for their work on commercial property misuse. This prompted contact with the Insolvency Service and the realisation that using this new partner could improve trading standards action against businesses bankrupting repeatedly and then re-opening as a new businesses entity (often called phoenix companies). It showed that working together and applying the right powers could resolve problems and potentially stop them from recurring:

*"I've been in trading standards 15 years, and I wouldn't have thought of using the Insolvency Service. [...] Our legal team have never used these powers before, [...] and you know, you kind of think why? Why have we not had this? I'd have loved over the years to disqualify people from being a director. It's been there since I was seven years old in law, and I've never done it." Manchester and Salford, Trading Standards*

54. For Manchester and Salford, working together on the joint visits meant agencies were able to combine resources to address a level of non-compliance that could not be taken on by individual agencies. For instance, the police support enabled smaller agencies such as the trading standards team to resolve practical difficulties arising from large operations, such as removing the large amount of stock of suspected counterfeit goods:

*"I can call on the mighty force resources, because sometimes all [Trading Standards] wants is 50 officers that can go and search somewhere. Well, I can get hold of that. And you could just sort of see the willingness was there then, when you start building these bridges." Greater Manchester Police*

55. The partnership felt that sharing powers was a major strength of the partnership and could be used in a very overt and visible way to send a powerful message to illicit businesses:

*"I want to get the message across that...we might be a trading standards person but we do speak with other agencies and we will pass on details and it will come back. We're not a stand alone regulatory team any more". Manchester and Salford, Trading Standards*

56. Interviewees in Hertfordshire were generally positive about doing joint visits. Immigration Enforcement in Hertfordshire felt that the joint visits they had done there were about as effective as normal practice in terms of making arrests, but going in together meant immigration issues identified at the business premises could be dealt with immediately, rather than having the delay of receiving and checking a referral.

57. In Cheshire West and Chester, the benefits of joint visits were not so clear-cut. They were able to reach large number of premises and saw improvements in food hygiene scores, although this could have been the result of the advance letter or another factor and not attributable to the partnership intervention. There was a positive impact on off-licence premises where simple compliance issues, such as displaying age restrictions, could be resolved immediately, but it was not possible to measure the impact of the intervention on the anti-social behaviour associated with off-licenses in the area. There was a mixed response to the 'whole team visit approach': some businesses said they preferred having everyone visit at one time, but for others multiple officers was too much at one visit.

58. The experience of the partnerships demonstrated that joint visits could allow agencies to have a bigger impact on non-compliant businesses than when acting alone, by combining their powers and sanctions to make non-compliant behaviour less rewarding. However, this worked best when partnerships:

- Used information from across agencies to identify their targets and understand what compliance issues were likely to arise; and
- Took time to discuss and plan which agency/agencies were best placed to deal with the potential non-compliance.

#### *Visit scale*

59. The partnerships experimented with multi-agency visits on different scales of operation. Manchester and Salford, and Cheshire West and Chester went for a 'big bang' approach of intensive activity visiting many premises over a short time frame. Ealing and Hertfordshire developed joint visits as part of their business as usual work, doing visits as they were required on a case-by-case basis.

60. The 'big bang' approach in Manchester and Salford was used to address longstanding networks of rogue businesses. This was planned with the input of all partners, including police resources, available due to links with Operation Challenger. Cheshire West and Chester also carried out a large number of visits in a small amount of time, with the aim of bringing a large percentage of poorly performing businesses in food safety up to expected standards.

61. Both sites found that for large scale joint visits, it was critical to plan for follow-up activities such as further investigations, enforcement notices and starting prosecutions. Cheshire West and Chester food safety team found that they fell behind with inspections of new businesses as a result of the resource required following the food premises operation, and they had to bring in extra assistance to catch up. Large scale activities were considered unlikely to be sustainable in the long term unless they are incorporated into the long term resource planning for front line teams:

*“...the aftermath of all the inspections, [has been the] potential for six prosecutions. So we’ve had six PACE interviews to get organised and all the evidence gathered, collated, for the interviews to actually take place. So to set yourself up for that has been quite time consuming as well to some extent. Which has had a knock-on effect of your day job.” Cheshire West and Chester, Food safety*

*“The first week of action in November and my team were very involved in that for three of the days out of that week, executing a number of warrants on premises, seizing millions of pounds worth of goods. That then ties up a lot of my team now for months, sort of, cataloguing the goods, obviously doing the interviews with a view to there being more prosecutions. So, that will keep us busy now for 12 months potentially by the time things come to court.” Manchester and Salford, Manchester City Council*

#### *Approach: enforcement vs supporting compliance*

62. The approaches of different agencies to visits and enforcement were not always compatible and this should be considered during the planning phase of any business-facing visit. The partnerships reported that it was comparatively easy for front line officers to work together on enforcement activities, but it was more difficult if two or more agencies were on a joint visit with one agency focused on supporting compliance and the others on enforcement. The most visible example of this was seen during the Cheshire West and Chester partnership’s visits where the different approaches of uniformed and plain clothed officers caused some tensions. Similarly, Manchester and Salford found that partners had different cultures of focusing on community safety or enforcement. Agencies had to learn to acknowledge and balance these during joint operations and visits.

### **What we have learnt**

- **Joint visits enable wider enforcement resources to be applied to non-compliant rogue businesses.**
- **Joint visits work best when carefully targeted using shared intelligence and compliance data, and when only the most relevant officers are present.**
- **Joint visits had the potential to reduce the resources needed by each agency when they were carefully targeted.**
- **Large scale joint visits have their place but should only be used when all partner agencies see a need to disrupt rogue activity in this way.**
- **It is important to note that visits impact on a business; too many officers may be overwhelming, reducing their ability to trade during the visit and to take on board advice.**

# Developing the partnerships

63. The aim of the programme was to test new ways agencies could work together and to make joint working more systematic. The five partnerships were chosen to be diverse; they were all operating from different starting points and within different contexts. Each of the five developed partnerships in different ways, as shaped by local needs and situation. This was a consequence of the co-design approach, i.e. asking agencies to work together to develop with their own models of working that would suit the local area rather than imposing structures and requirements from the centre. Given the short programme period, a significant proportion of the time was dedicated to the set-up and design phase of the partnerships, followed by the implementation of innovations and testing the new ways of working from January or February 2015 until May 2015.

## Early stage set-up and planning

64. The first activity for the partnerships was for agency contacts to meet face-to-face and discuss the aims and plans for the partnership. At a practical level, the geographical spread of agencies greatly affected how easy this was. Manchester and Salford and Ealing had several agencies and teams co-located so could meet with relative ease. In contrast, Immigration Enforcement and the HMRC teams involved in the pilot were not permanently based in Cornwall and the partners are spread across county boundaries in Plymouth, Bristol and Truro. Consequently, arranging meetings was more challenging in Cornwall that hindered the development of the partnership. This suggests that for partnerships to operate effectively in large rural areas, different approaches must be taken, for example allowing longer lead times, using teleconferencing, creating virtual teams or working groups with seconded and co-located staff, or even more advanced re-organising of resources across the county and district boundaries.

65. The partnerships benefited from taking time to understand each other's powers, remits, priorities and ways of working. It was also useful to find out what behaviours each agency was seeking to identify and address. Several interviewees commented that this was one of the most useful elements of the programme, usually involving several meetings which although resource heavy formed the bedrock of each agency's knowledge of partner requirements:

*"One thing that I do think really does work, is [...] having an understanding of what the other people do in the other departments and other teams and just building some of those contacts." Cheshire West and Chester, Licensing team*

66. Sites with experience of partnership working were able to build on and refine their ways of working, and extend their links to new teams. For example, in Manchester and Salford, previous experience of working closely with the police, Immigration Enforcement and other local councils through Operation Challenger meant points of contact were already known, data sharing protocols were in place and agencies understood what information they could share and under what circumstances. With the partnership, they were able to extend this to working across two local authorities. Sites with less experience of working together had to spend more time establishing these core relationships and processes, leaving less time for developing and implementing the innovations.

67. Where the sites took time at the beginning of the programme, all agencies were able to input into the design of the partnership. This co-design process helped to ensure buy-in from partner agencies by embedding the aims and objectives of all agencies:

*"I think all the agencies in this one, felt that they could get something out of it and I think that's helped enthuse them into working together." Manchester and Salford, Manchester City Council*

68. On reflection, Cheshire West and Chester found that they had not spent enough time planning and discussing how different teams worked, which led to some problems with the way they carried out joint visits:

*"I would have locked our partners in a room for two days, because of some of the little golden nuggets, as I'd call them, which could give value to different partners around understanding [...] where whatever agency can add value to another agency." Cheshire West and Chester, Council*

69. Also in Cheshire not all agencies considered that they benefited equally from the partnership: some interviewees (HMRC, police and Immigration Enforcement) did not think running the partnership through the 'prism' of food safety was the best use of their resources. They received intelligence from the activities, but there were not enough hard 'hits' to be able to make a long-term business case. In Ealing the police made few arrests, but saw the partnership work as contributing to their safer communities objectives.

70. Members of the partnerships agreed that securing senior buy-in and leadership was crucial for enabling the development of the project, giving them the freedom to spend time on activities that were outside of their daily tasks. Having the support and 'leadership' of the Cabinet Office also helped. For example, a member of the Manchester and Salford partnership reported how he had previously tried to feed ideas for sharing information up to HMRC but that he had *"never got anywhere"*. However, now *"that the Cabinet Office has put its shoulder behind it, it's running."*

71. Some of the personnel in the local agencies felt that there was a lack of understanding between the local and national agencies. This was frequently in relation to obtaining information, particularly from HMRC, which was common to several sites. Hertfordshire also had some difficulties with arranging joint enforcement visits. On one occasion, a joint visit with Immigration Enforcement was cancelled. This was due to resource constraints and high-risk activity taking place elsewhere, but local partners viewed this as a sign that the partnership was not seen as a priority by national agencies.

72. Some national agencies were better structured than others to enable them to take part in the partnership. For example, HMRC did not have teams dedicated to local areas, rather their officers specialised in types of tax, therefore representatives were drawn from different teams and had a different level of knowledge and experience in working with local agencies and tax compliance, including in how much information they could share. The GLA had a very small team and therefore had to limit their involvement with the partnerships. In contrast, Immigration Enforcement have a regionalised structure so it was easier for them to identify who would take part in the partnerships, although, as noted above, resources could still be reallocated at short notice to meet wider priorities.

## Implementing joint working

73. The partnership sites unanimously felt that the programme period was too short and that they had not had sufficient time to test out their new ways of working together. At the time of the evaluation interviews many of the sites were reassessing their models and deciding what needed to change to make the partnerships more sustainable. However, even within this short time, there were lessons on what made a partnership work more effectively.

74. Having administration and project management resource was important. Manchester and Salford was the only site to have a dedicated full-time project manager. All other project managers took on the role in addition to their day job, which brought limitations and pressures on their time. Building a partnership, organising meetings, coordinating data and liaising with the Cabinet Office and partner agencies all took time, and sites highlighted that resource for these roles were essential for sustainability. For example, one of the reasons Cornwall's development of data sharing work with HSL was delayed was because the project manager was doing the partnership work in addition to his day job. In Ealing the Safer Communities analyst estimated spending two days per week on the project, plus managing on-going daily tasks. Much of her daily work was delayed until the end of the project, creating a significant backlog:

*"...without...admin support it's nigh impossible to get this off the ground." Ealing, HOIE*

75. Personal relationships were essential to the partnerships, and all the sites felt these were key to sharing information and working together, but there was concern that these links were vulnerable to personnel changes. For instance, in April 2015 the Immigration Enforcement contact for the Hertfordshire partnership was moved to another post following reorganisation of services in the region. This meant the partnership had to develop a new relationship with this person's replacement that they thought would set back the work of the group. The partner agencies in several sites discussed ways to try to make the partnership more resilient to personnel changes but were aware that the more impersonal the system, potentially the less effective it would be:

*"We always try and say it's not about individual relationships but ultimately it is because without that relationship there, it doesn't always work." Manchester and Salford, Manchester City Council*

*"We were trying to organise it as such that if [personnel changes] did happen, [...], that we could have some resilience around that and set up structures around strategic groups, etc, to carry this on." Hertfordshire County Council*

76. One of main benefits of having agencies in a partnership, meeting and communicating frequently and understanding what each other was doing, was that it revealed new, creative ways in which agencies could work together and share information to improve their working. The programme saw several examples, for instance in Hertfordshire the taxi licensing team started liaising with the child sexual exploitation team to ensure they were aware of risk factors and any useful information they could pass on. In Manchester and Salford, the Investigation and Inspection Manager at Salford City Council suggested that by getting employee records from HMRC for council tax non-payers, an earnings attachment to reclaim the debt could be made. This suggestion was actively pursued with support from the Cabinet Office and will be implemented once legislation has been agreed:

*"It looks at the 10, 15, 20,000 people who may not pay, or may try to avoid paying, who are in full time employment, and if we can get that information from HMRC about where they work, we can attach their earnings, we'll get the money. They've got no choice in it. It could be worth about, well, I'd have to do*

*some detailed digging, but it could be worth one and a half, two million pounds a year in extra council tax collection from Manchester alone.” Manchester City Council*

77. Partnership design is not static. Each continued to adapt their activity based on what had worked well, or not so well in the programme period. The process of design is iterative as adjustments are made to meet local needs, to maintain involvement from partner agencies and to ensure that partnership achieves its maximum benefit.

## **What we have learnt**

- **There is no one size fits all partnership model. All areas are different and a co-design approach enables partnerships to be developed to meet the local needs and circumstances. Interaction with national agencies needs to be flexible enough to adapt to different requirements.**
- **Taking time at the beginning of the partnership to understand the powers, remits and priorities of each agency is essential. This may seem resource intensive but it benefits the design of the partnership by ensuring opportunities are identified and differences in ways of working are worked through before innovations are implemented.**
- **Partnerships need to be developed with input from all agencies to ensure buy-in and that activities provide value for the different partners.**
- **Getting senior level buy-in from agencies is important, as is having enthusiastic leaders championing the partnerships.**
- **Dedicated administration and project management support is needed.**
- **Continuing co-design and flexibility of approach enables the partnership to address new priorities and take advantage of new opportunities that develop.**
- **Co-location, shared training in core skills, and/ or merger of some enforcement teams into more generic enforcement working could be potential ways forward.**



# Conclusions

78. The partnership programme was designed to develop new ways of co-operative working between local and national agencies with the aim of improving how the public sector identifies and responds to hidden or illicit economic activity. From the outset the Government recognised that developing, testing and then embedding new ways of working would take time. Accordingly, these partnerships were intended primarily to test the potential of changed practices. The assessment of their impact on reducing non-compliance or creating efficiency savings would be indicative.
79. The programme showed that some of the changes implemented by the partnerships have the potential to be transformative. There is appetite for drawing partnership members from a wide pool of agencies and the systematic involvement of national agencies - Immigration Enforcement, HMRC and the GLA - was a step change and positive development, providing new insights to patterns of non-compliance and new ways to identify and disrupt rogue businesses. Prior to this partnership programme, joint working between national and local agencies had been largely ad hoc, dependent on national agency programmes or personal contacts between frontline officers.
80. The programme has also shown that it is both possible and beneficial to make joint working more systematic and efficient, but that this requires resources, at least at the start-up stage. Furthermore, systematising joint working has the potential to improve the response of the public sector towards non-compliant businesses and may enable agencies to use their resources more efficiently and effectively. More formal pooling of local enforcement resources and expertise was already being tried in some areas, and this needs further testing and measurement to develop a robust working model.

## Gathering and sharing information

81. When agencies systematically combined intelligence and compliance data it enabled them to identify those businesses that were potentially breaking multiple rules. Some of the processes developed were time consuming (e.g. daily intelligence meetings) but they showed that sharing compliance data and intelligence has the potential to enable agencies to make better-informed decisions about where to target their activity.
82. While sharing data and intelligence is proven to be of benefit to all partner agencies, there are legalities that must inform data sharing protocols at all times. Not all partners had either the awareness or understanding of these different legal gateways therefore these issues need to be discussed early in the co-design process and with an experienced lead agency.
83. There are many ways to share information, and this programme trialled several manual methods and developed an automated system. While no single way of sharing information was without drawbacks, the programme showed that comparisons could be made more accurately and quickly when new data science techniques were used to search and identify trends across multiple databases and data sources.
84. Most of the partnerships developed some way to make more use of the many visits frontline officers make each day, in particular by acting as 'eyes and ears' for each other to enrich

intelligence flows. The most successful approaches combined training to improve knowledge of partner agency remit and powers, and to spot indicators of non-compliance with a very simple way of reporting this new intelligence back to other agencies. Where partnerships applied more rigid systems they were less successful, echoing the results from the Retail Enforcement Pilot<sup>7</sup>. To ensure the high quality of intelligence gathered in this way, the programme has shown that feedback is needed on the quality and usefulness of shared intelligence.

## **Using shared information**

85. Systematically combined intelligence and compliance data had the largest impact in those partnerships that used it to target visits. The programme showed that well managed joint agency tasking had the potential to improve the effectiveness of interventions by ensuring the full range of non-compliance was addressed in a single visit. The partnerships that selectively chose which agencies to investigate and address the behaviour of non-compliant businesses found potential for greater effectiveness. This was because the agencies with the most relevant powers visited suspected rogue businesses at the right time, carried out the right interventions and deployed the right number of officers. This demonstrates to rogue businesses that the authorities will address the totality of their non-compliance.
86. The programme demonstrated the potential of well-targeted visits to improve the efficiency of enforcement resources. This could be by reducing the number of officers required at each visit or potentially through a reduction in the number of visits made to lower risk premises. Joint agency tasking was less successful when partnerships did not tailor their visits to reflect the improved picture of intelligence and compliance, and select the most appropriate agencies for the joint visit.

## **Multiple non-compliance**

87. Where partnerships systematically shared data, they were able to locate businesses that were of interest or had risk factors for several agencies, which could then be targeted for further action. The partnerships consistently demonstrated that some businesses were potentially non-compliant with multiple rules, including combinations of breaches of immigration, fire safety and food safety rules, unpaid duty and other tax avoidance, counterfeiting, commercial property scams, food hygiene breaches and links with exploitative landlords. Tackling this type of non-compliant business in a single intervention could, potentially, result in a much more effective enforcement operation, thereby sending a much more effective deterrent message to other offenders.

## **Making partnerships work**

88. There is no one size fits all partnership model. All areas are different and a co-design approach enables partnerships to be developed to meet the local needs and circumstances, and national agency priorities. Design is iterative; the partnership needs to be flexible to respond to changing priorities to ensure continuous improvement.

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<sup>7</sup> LBRO (2010) Lessons Learnt: Retail Enforcement pilot.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/262040/10-1407-rep-lessons-learned.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/262040/10-1407-rep-lessons-learned.pdf)

89. During the evaluation, the partnerships consistently reported that having the Cabinet Office and other departments' support enabled them to demonstrate the importance of the programme to local leadership teams and to devote time to developing and implementing innovations. Having local leadership support was also a key benefit. This would suggest that tying new compliance partnerships to key local authority and national objectives will be more likely to secure top level local buy-in.
90. Geographical, organisational and cultural issues all impacted the set-up and development of partnerships comprising local and national agencies. For example, those national agencies with geographically organised teams like Immigration Enforcement could engage with local partnerships more easily than those organised by sector across the country like HMRC. In cultural terms, blending uniformed and non-uniformed officers on visits required careful planning and execution to be successful. This is where the co-design process was critical; it enabled these local and national differences to be drawn together into shared objectives and activities.

## **Overall assessment**

91. The partnerships were challenged to develop a range of innovations to make joint working between agencies more systematic and find ways to: improve how the public sector helps businesses to comply, reduce burdens on compliant businesses, effectively address those who choose not to be compliant and reduce the cost of compliance and enforcement activity. This report shows that the partnerships approached this in different ways with varying success.
92. Ealing, and Manchester and Salford clearly benefited from having partnership experience and structures in place from previous operations which enabled them to develop and implement new ways of working in a short space of time, demonstrating that working jointly can improve the identification and addressing of business non-compliance. Cheshire West and Chester successfully engaged all the partners in activities and visited a high number of businesses. However, feedback from partners suggested that in order to be sustainable, this model of joint working required adapting to fit with other agency work demands. The Hertfordshire partnership managed to test several small-scale innovations but found it challenging to create and develop effective links between the national and local agencies in the short timeframe of the programme. The geographical location of agencies may have limited the Cornwall partnerships but the partnership implemented large-scale training and developed an aide memoire card that would help secure a greater degree of engagement and intelligence sharing across widespread partner agencies.
93. The partnerships started this programme with varying degrees of experience of working jointly with local and national agencies and this was reflected in the different outcomes from the programme period. No partnership achieved the full range of innovations they outlined in their plans at the start of the programme. However, given that partnership activities were often in addition to officers' normal daily tasks and the short time span of the programme, the range of activities undertaken was a positive indication of the potential of this way of working. The programme was limited in geographical scope and by time, but it has clearly demonstrated that systematic working between local and national agencies has the potential to improve how agencies identify and address non-compliance.

# Annex A: Evaluation methodology

1. The evaluation of the Better Business Compliance Partnerships aimed to answer the following research questions:

## Process questions

- What were the pilot partnerships trying to achieve and what was the logic behind their innovations?
- What structures and processes have the agencies put in place to manage the partnership?
- What change did the partnerships introduce in:
  - ways of gathering and sharing information
  - ways of analysing information
  - ways of working together to visit businesses/ deal with non-compliant businesses
  - other areas of working together?
- What barriers and good practice were discovered in the process?
- What could have made the innovations more effective?
- What resources were used?

## Impact questions

- What was the impact on the target businesses?
- What was the impact on the agencies involved in the partnership?
- What was the impact on compliance/ non-compliance in the pilot areas?

2. The evaluation methodology adopted was a qualitative, largely concentrating on process. This allowed the evaluation team to work closely with partners in each of the sites to explore the way the partnerships developed, including understanding the structure and management of their partnerships, how they implemented their new ways of working and what consequences these had. As the sites were very diverse this flexible approach could capture a rich picture of how the pilots worked. Given the short time scales of the evaluation, impact was difficult to measure. The qualitative approach allowed an exploration of impact of the pilots through people's opinions, case studies and use of output data. The detailed information on process enabled the evaluation to explore why certain outcomes may have occurred but cannot provide quantitative measures of impact resulting from the partnerships.

3. The evaluation team explored whether it was possible to measure outcomes and impact quantitatively however it was found that:

- **The timescale was too short:** the sites were active for a maximum of three months, but some for only six or seven weeks during the evaluation period. This time period was insufficient to test if improvements in performance are short term or sustainable.
- **Time lag on impacts:** some of the expected impacts would not be seen for several months (especially outcomes for HMRC investigations).
- **Low throughput:** numbers would not be sufficient to do any statistical analysis.
- **Geographical area difficult to isolate:** the pilot areas were not coterminous with those used for reporting performance data.
- **Data lag:** data was sometimes only available months after the event due to reporting and quality assurance procedures.
- **Resource intensive:** data was held on different databases and would take a significant amount of time to source, clean, quality assure and analyse the data.

- **Confounding factors:** the pilot boundaries were fluid, there were other active operations targeting similar problems and the observer effect could lead to agencies improving their performance simply because of the additional scrutiny.
4. Partnerships were encouraged to consider evaluation from the beginning and were introduced to the concept of logic model early in the process. The CO team asked the sites to consider and record the aims of their programmes and then break these down into expected inputs, outputs, outcomes and impacts. In February 2015 each site (except Cornwall) met with the evaluation lead for the CO and discussed how their partnership plans had developed. The CO team then developed a logic model diagram for each site which was validated with the partnerships.
5. The sources of data for the evaluation were:
- 49 face-to-face, qualitative, semi-structured interviews with strategic and frontline staff involved from the national and local agencies (conducted between April and May 2015);
  - results from workshops held during a conference with representatives from all the five sites and policy makers;
  - observations and discussions with the sites during the pilot period;
  - surveys of staff undertaking training (in Hertfordshire and Cornwall);
  - information on activity undertaken and the resulting outputs (e.g. number of visits undertaken, arrests or seizures or notices given as a result);
  - a review of documentation from the pilot sites. The documents reviewed included: joint statements of intent; minutes from meeting where available (although few had these); records of visits and outcomes where available; and self-assessment reports on interventions (especially Cheshire West and Chester).

| <b>Table A1: Number of interviews conducted</b> |           |
|---|-----------|
| Cheshire West and Cheshire                      | 9         |
| Cornwall  | 8         |
| Ealing  | 10        |
| Hertfordshire                                   | 10        |
| Manchester and Salford                          | 10        |
| National (HMRC and HSL)                         | 2         |
| <b>Total</b>                                    | <b>49</b> |

6. The majority of interviews were conducted on a one-to-one basis, although some involved up to 5 people. In total, 71 people were interviewed. The interviews were recorded and transcribed verbatim. The transcript for each site were analysed and written up in the site reports (see annex B - published on the Public Service Transformation Network website<sup>8</sup>). The main report brings together findings from across the sites and investigates the cross-cutting themes.

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<sup>8</sup> <http://publicservicetransformation.org>