

## **Data Collections**

# **Report to the Welsh Regulators' Forum**

**LBRO**  
Prosperity and Protection



**Creating Efficient Information Exchange  
Between Regulators and With Citizens**

**Data Collections Project**

**Report to the Welsh Regulators' Forum**

September 2011

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## Foreword

This is the first report of work done by the Welsh Regulators' Forum to tackle the issue of how to collect and use information efficiently and effectively, and provide greater transparency for citizens and businesses in Wales. These are challenges that affect regulators across the UK.

The Forum was created in April 2010 and reflects the common aspiration shared by local and national regulators in Wales to remove duplication and achieve greater efficiency whilst delivering enhanced regulatory outcomes. At the time the Forum came together the burden of data collections on the local authorities in England and Wales had been quantified by LBRO and CIPFA, and this report sets out the findings of a project to address this burden through collective understanding and action. This report illustrates how Wales is leading the way on tackling this issue.

The Welsh Government has been pleased to support the LBRO in undertaking this task as part of its Programme of Work in Wales. This report, and the subsequent products that will flow from it, provides tangible support for the Welsh Government's Public Service policies, and provides a solid platform to develop outcome measures that will provide a robust assessment of the contribution Regulatory Services make to the beneficial outcomes the people of Wales have a right to expect.

A key finding of the Study is that where data sharing is for collective benefit – for both those providing the data as well as those collecting it – there is a greater sense of shared purpose and focus on the outcomes that regulations are designed to achieve. All must play their part in making sure that data gathering is justified, efficient and mutually beneficial, and that database systems support information sharing where possible. Those collecting data remain acutely aware of the burdens they impose on local authorities, and will continue to make clear why data is needed and what it is used for.

The next phase of this project is to provide greater transparency of what regulators do and what they achieve for citizens and businesses. Opening up accountability is the key driver for further collective work by the Forum on this issue, as smarter use of data can help to encourage consumers to become more interested and, in this way, support enhanced consumer confidence.

This report is a significant and concrete step by the Welsh Regulators' Forum, driving forward with shared purpose, and a clear understanding of the benefits of efficient and effective collaboration between regulators.

We thank those who have supported this project to date, and we commend it to national regulators and local authority regulatory services in Wales and elsewhere in the UK regulatory system.



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Joint Sponsors of the Welsh Regulators' Forum

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## Executive summary

1. This report summarises the results of a project undertaken under the auspices of the Welsh Regulators' Forum (WRF). The WRF was created jointly by the Local Better Regulation Office (LBRO) and the Welsh Government to provide a means of engaging and coordinating national and local regulators in Wales to foster a more streamlined regulatory system. At its inaugural meeting the WRF agreed to tackle the issue of data sharing between local authorities, national regulators and the Welsh Government after reviewing the findings of work done by LBRO and the Chartered Institute of Public Finance and Accountancy (CIPFA). In 2009 CIPFA, on behalf of LBRO, identified 59 separate data collections from local authorities by national organizations, creating an administrative burden costing in the order of £6 million per annum across England and Wales. The WRF agreed that this was a problem that could and should be tackled collectively.
2. LBRO and the Welsh Government published the first set of National Enforcement Priorities for local authority regulatory services in Wales in July 2010. The national priorities are designed to provide a focus for local regulatory activity and collaborative working with partner organisations, delivering national outcomes through local action. They recognize that local authorities and local service boards are best placed to understand and respond to issues facing local communities. However the priorities provide an important opportunity for local authorities and their regulatory services to demonstrate the critical role they play in delivering protection and prosperity for citizens and business at a local and national level.
3. With this in mind, the WRF tasked LBRO to undertake a project to examine ways to reduce the administrative burden of data reporting on local authorities; ways to foster effective data sharing across the regulatory system, and ways to make better use of data collections in order to evidence the contribution to the national priorities. Importantly, this third objective was explicitly outward facing to use data to engage citizens and businesses and increase the transparency of the contribution of regulatory services to their beneficiaries.
4. It is clear that information flows are the glue that links the central and local parts of the regulatory system together. This project involved both sides of the data exchange through the Welsh Regulators' Forum and through a dedicated Local Authority Steering Group. As a result LBRO was able to analyse the attitudes from those requesting the data as well as those providing it, giving the findings a fully rounded perspective. Twenty-seven individual data collections were examined in the project and this report is the product of a concerted effort by all the organisations involved.
5. The organisations collecting data from local authorities in Wales fall into three types: national regulators that either share enforcement powers with local authorities, or who delegate enforcement to local authorities on their behalf; policy departments that have a direct relationship with local authority public protection services; and the Data Unit Wales, which is unique in this landscape as it collects data on behalf of the Welsh Local Government Association.
6. This report was submitted to the Welsh Regulators' Forum to consider the conclusions and recommendations and how they can be taken forwards to achieve the objectives of the project. It is worth noting that during the drafting of this report several changes to remove or reduce data collections were made in response to the recommendations.

## **Objective 1: Finding ways to free up frontline resources**

7. This report seeks to build on the changes that organisations collecting data want to make in line with their existing consultation mechanisms with the local authorities that provide data. This report addresses the issues around data burdens in a cross-cutting way through looking across the 27 collections in scope and where possible drawing out common themes. Examples of the issues common across many collections are:
  - Investments in database systems or software codes to allow automation of data collections have not always been taken up by local authorities;
  - Certain types of detailed analysis were found to be onerous by the Local Authority Steering Group;
  - Frequency rates on all prosecutions data could be harmonized to an annual frequency;
  - Smoke free compliance is largely achieved removing the need for a monthly data collection.
8. It is notable that where local authorities perceive data collection to be about *data sharing* for their collective benefit as well as for the requirements of a central body, the perception of a burden is virtually eliminated. The level of buy-in to what are often voluntary, web-based systems for the sharing of data, that 'give back' to local authorities, is indicative of an approach that all central bodies should consider taking to their data collections where possible. In this report the collections made by the Office of Fair Trading and several of those made by the Health and Safety Executive and Animal Health and Veterinary Laboratories Agency are highlighted as examples of these.
9. The over-arching message from the Local Authority Steering Group is that data collectors should continue to take ownership for the burdens on frontline services that their collections impose, and continue to keep a close eye on the balance between costs – on themselves as well as local authorities – and benefits. There should also be shared ownership across the Welsh Regulators' Forum of the cumulative burden that data collections pose.

## **Objective 1: Recommendations**

### **Quick wins**

- The Welsh Government should consider removing the voluntary 'Smoke Free' return.<sup>1</sup>
- In their review of 'Service Improvement Data' the Welsh Local Government Association and Data Unit should follow the principle that performance indicators should draw from existing data collections as far as possible to keep any duplication and 're-work' to a minimum.
- The Animal Health and Veterinary Laboratories Agency and the Welsh Government should consider removing the six-monthly frequency for the Animal Health 134 Return of Convictions to an annual collection frequency.<sup>2</sup>

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<sup>1</sup> During the drafting of this report, the Welsh Government agreed that collection of the smoke free return can cease although they will still need to keep track of the sanctions issued.

<sup>2</sup> During the drafting of this report, AHVLA explained that it should be possible to move to an annual collection frequency for AH 134 in line with the relevant legislation.

- Local authorities should make every effort to implement electronic systems that central bodies have invested in to make the task of data capture and entry more efficient, for example by ensuring the AMEs database is accurate and up to date so that the Animal Health and Veterinary Laboratories Agency can pre-populate their data collections, or through adoption of coding to allow incorporation of data processing software into existing management systems for collating the Integrated Pollution Control Statistical Survey.

### **Longer-term**

- Continued priority should be given by central bodies to the implementation of new database or automated systems so that the efficiency gains can be fully realised.
- The Welsh Regulators' Forum should aim to maintain common systems as far as possible between themselves and with local authorities in order to enable effective sharing of information.
- Voluntary, web-based systems for the collection of data that 'give back' to local authorities, such as those monitored by the Office of Fair Trading, should be the norm wherever possible.
- The burdens of data collection should be the subject of a continual dialogue between collectors and those providing the information. Collecting bodies should instigate periodic reviews of the costs and benefits of them, in consultation with local authorities. Local authorities for their part should do as much as they can to assist central bodies in understanding where the specific issues are.
- The Welsh Regulators' Forum should build upon the links between this project and similar exercises being carried out by HM Treasury and others identified by LBRO.
- The Welsh Regulators' Forum should consider carrying out a follow up exercise in 2012-13 to re-cost the administrative burden of these data collections on local authorities in Wales. Welsh Government returns contain a 'cost of collection' page, which other collecting bodies could emulate.

## **Objective 2: Effective working across the national and local parts of the regulatory system**

10. The key theme is of a need for greater transparency and clarity of purpose for data collections as there appears to be a fundamental difference in central and local perceptions of what information should be shared to enable effective regulation and enforcement. At the heart of this divergence in views between data collectors and providers is that data collections are also in place to give central bodies a tool to affect *how* regulation and enforcement is carried out locally but this is not always made explicit. Whilst data collections have a genuine purpose to enable national performance monitoring, collecting bodies should be clearer where the purpose is also to improve how the work is done.
11. There are however some signs of alignment in local and national accountabilities. Fostering a 'golden thread' between accountability to the European Commission, governmental accountability to the Welsh public (and UK), accountability to elected members and, crucially, to local citizens and businesses offers huge potential to join up the system through smarter use of data collections.
12. Many central bodies are rightly looking for evidence that a control system, based on local authority delivery, is functioning effectively at a national level; the perception of burdens by local authorities may be alleviated significantly if they can see exactly where and how their work fits in the national control system and what role their data plays in that.

## **Objective 2: Recommendations**

- Where central bodies are collecting information to enable benchmarking, to monitor consistency or to promote best practice, innovative ways of communicating this back to local authorities should be considered, such as through online forums. Tailored findings about how each control system is functioning as a whole across Wales (and the UK if relevant), with key points of best practice or risks emerging, as shown by the data collections, should be actively disseminated to local authorities and presented at Directors of Public Protection of Wales meetings.
- Where retrospective data is needed, central bodies should give greater transparency of how this data is used by them to local authorities.
- The Welsh Regulators' Forum should consider how these data collections fit into accountability chains that include citizens and businesses locally and link to any future work to develop 'dashboards' to highlight performance in meeting the National Enforcement Priorities.

## **Objective 3: Accessible information for citizens and businesses**

13. The LBRO Outcomes and Impacts Toolkit<sup>3</sup> was chosen to address the third objective of the project as the Toolkit has received widespread interest from local authorities across Wales. It was also felt that taking a 'bottom up' approach was most appropriate as a first step towards identifying ways data collections can be opened up to citizens and businesses locally. However the examples in this report are very much a first step towards achieving the objective, and further consultation with the Welsh Regulators' Forum, local authorities and wider stakeholders is required.
14. This report has discussed in detail the role of data collections in the regulatory system in Wales. For this third objective of the project, these existing data collections have a crucial part to play as they provide much of the data behind the performance 'dashboards'. An important finding is that much of the outcomes data that local authorities rely on to demonstrate their impact is collected nationally. The local authorities on the steering group felt that broader outcomes data that drills down to individual localities should be collected nationally to marry up with the activities and outputs locally, where they are best placed to monitor.

## **Objective 3: Next steps**

- a. The lists of indicators should be refined and added to through further consultation with local authorities and members of the Welsh Regulators' Forum.
- b. These indicators should draw from existing data collections to avoid increasing the data gathering work-load. The lists should be mapped across to the data collections examined in this report.
- c. The input measures need to be thought through and standardised to enable comparison between authorities.
- d. The Welsh Regulators' Forum should consider who is best placed to collect impacts data.

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<sup>3</sup> See the LBRO website. <http://www.lbro.org.uk/resources/delivering-sustainable-outcomes.html>



- e. In terms of developing performance 'dashboards', the Welsh Regulators Forum should consider:
- Testing different options with different audiences.
  - Whether there scope to develop an over-arching dashboard for each Priority, with key cross-cutting indicators.

## **Way forward**

15. In their discussion of the report and recommendations, the WRF agreed that this project should continue in order to secure the benefits of addressing this issue collectively. Whilst this project has resulted in several changes to reduce the burden of data reporting, the WRF recognize that ownership of data burdens imposed on local authorities ultimately rests with those collecting the data. The WRF now intends to focus on further development of performance 'dashboards' to open up regulatory information to citizens and businesses. Members of the WRF agreed that opening up accountability and an outward looking focus should be the drivers for the next stages of the project. Having a citizen view will ensure better use of data to provide consumer confidence.
16. The WRF will however regularly monitor the progress of implementing all of the recommendations of this project, keeping in mind that the regulatory system may have to respond to significant changes in how regulation is delivered over the medium-term. Better discipline in data collections and constantly questioning why data is needed through dialogue with those providing the information will help to foster effective working between local and national parts of the regulatory system.

# Chapter 1. Introduction

## Objectives

- 1.1 The Welsh Regulators Forum, facilitated by the Local Better Regulation Office (LBRO) and the Welsh Government agreed to undertake this project to examine data collections from local authority regulatory services in the round.
- 1.2 As part of its vision, the Forum works on the principle that more can be achieved collectively than individually, and its membership is committed to the removal of unnecessary duplication, the delivery of greater efficiency and the reduction of regulatory costs whilst delivering enhanced regulatory outcomes. Furthermore, the Forum aspires to provide the means for minimizing the uncoordinated demands national regulators can place on local regulators.
- 1.3 The Forum agreed three high level outcomes for the project:
  1. To find ways to free up scarce resources for frontline regulatory services, primarily through keeping the additional administrative burden on local regulatory services of data reporting to a minimum;
  2. To foster effective working across the national and local parts of the regulatory system, through creating mutual understanding of why data is collected and the use to which it is put; and
  3. To provide accessible information for citizens and businesses, through finding ways to support the assessment of regulatory performance in a streamlined, outcomes-focused way.
- 1.4 As such the project had an efficiency focus, picking up from a report commissioned by the LBRO from the Chartered Institute of Public Finance and Accountancy (CIPFA) in 2009<sup>4</sup>, an effectiveness focus in terms of better mutual understanding between national and local parts of the system, and a transparency focus respectively.
- 1.5 The project brought together the UK-wide drive for efficiency and the impetus in Wales to provide better, more accessible information to the public about performance. It also reflected a desire to innovate, identify and implement good practice, to empower citizens and to release the energy of front-line staff<sup>5</sup>.

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<sup>4</sup> Data Collections from Local Authority Regulatory Services: Data Mapping and Costing the Administrative Burden, CIPFA on behalf of the LBRO, 2009. This identified 59 separate data collections from local authorities by national regulators, policy departments and others across England and Wales, creating an administrative burden costing in the order of £6 million per annum.

<sup>5</sup> Better Outcomes for Tougher Times: The Next Phase of Public Service Improvement, Welsh Government, December 2009.

## Scope

- 1.6 The regulatory community in Wales has seen the publication of the first set of National Enforcement Priorities for Wales<sup>6</sup>. These represent a single statement of the high level outcomes that local regulation is expected to deliver, articulated by the Welsh Government after consultation with national regulators and stakeholders. Following their publication in July 2010, the Welsh Regulators Forum saw an opportunity to see how data collections can be used to embed the priorities in practice. The priorities are listed below and set out the broad context for this project.
- 1.7 The National Enforcement Priorities for Wales are as follows:
- Promoting a fair and just trading environment for citizens and business
  - Improving the local environment to positively influence quality of life and promote sustainability
  - Protecting individuals from harm and promoting health improvement
  - Ensuring the safety and quality of the food chain to minimise risk to human and animal health.
- 1.8 The data collections in the scope of the project are those that pass between the members of the Welsh Regulators' Forum, whose membership is listed below. For this project, the Healthcare Inspectorate Wales and the Care and Social Services Inspectorate Wales were excluded as they are not business facing. A full list of the data collections examined in the project is given at Annex 1.

**Table 1. Members of the Welsh Regulators Forum**

Organisation	UK remit
Local Better Regulation Office	England and Wales
Welsh Government Performance and Governance Team	Wales
Welsh Government Farming Development Division	Wales
Welsh Government Office of the Chief Veterinary Officer	Wales
Healthcare Inspectorate Wales (HIW)	Wales
Care and Social Services Inspectorate Wales (CSSIW)	Wales
Directors of Public Protection Wales	Wales
Food Standards Agency	GB
Health and Safety Executive	GB
Office of Fair Trading	GB
Animal Health and Veterinary Laboratories Agency	GB
Environment Agency	England and Wales

<sup>6</sup> Local authorities in Wales must have regard to the priorities when allocating resources to their regulatory functions. However these do not undermine local priorities; they are designed to provide a focus for local regulatory activity and collaborative working with partner organisations. National enforcement priorities are a mechanism to simplify the multiple messages coming from the centre to local regulatory services, an issue originally identified in the UK-wide review of enforcement done by Sir Philip Hampton in 2005 and work done by the LBRO subsequently – see *Mapping the Landscape* 2009 and 2010.

- 1.9 The approach LBRO took to obtaining local authority input to the project was via a Local Authority Steering Group comprised of the following organisations:

**Table 2. Local Authority Steering Group**

Local Authority Steering Group Members
Caerphilly Borough Council
Cardiff City Council
Gwynedd County Council
Welsh Local Government Association
Data Unit Wales

- 1.10 This project is the first time that local and national perspectives on data collections have been simultaneously gathered across a number of areas of regulation. Furthermore, this is the first time that senior local authority managers and heads of service have had a chance to reflect on their needs for data and how far these are driven by central information requests. The inputs to this project represent a concerted effort by all the organisations involved.

### **Approach to achieving objectives**

- 1.11 The project was split into two approaches: the approach to keeping the burdens of data collection to a minimum and fostering better understanding between local and national parts of the system, and the approach to finding ways to measure performance that could be made transparent to citizens and businesses. Each is described in turn below.
- 1.12 The data collections element was tackled by asking collecting bodies, referred to as 'central bodies' throughout the report, to set out their reasons for collecting information from local authorities. In parallel, and at the same level of detail, the three local authorities on the steering group gave their views on why they collect information and in what ways central information requests are burdensome. The findings are presented in Chapters 2 and 3.
- 1.13 The performance measures element was tackled through a workshop facilitated by RAND Europe, commissioned by LBRO to produce the Impact and Outcomes Toolkit for local authority regulatory services<sup>7</sup>. The workshop took place with the Local Authority Steering Group and the findings are presented in Chapter 4.
- 1.14 Further details about the method and approach can be found in the supplementary volume to this report.

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<sup>7</sup> <http://www.lbro.org.uk/resources/delivering-sustainable-outcomes.html>

## Chapter 2. Finding ways to free up frontline resources

- 2.1 All the collecting bodies in this project consult local authorities on data requirements with a view to keeping burdens to a minimum. The Food Standards Agency for example has a Joint Working Group of 20 local authorities from across the UK to advise both on data collection and how the data is used. Similarly, the Health and Safety Executive consults local authorities through its HELA group and the Welsh Government has regular contact with local authorities on local authority pollution control issues and the survey.
- 2.2 The local authority steering group for this project comprised three Welsh local authorities, the Welsh Local Government Association and Data Unit Wales. The views of three local authorities are not representative of the views of all 22 authorities in Wales; however it should be borne in mind that the steering group looked at the 27 returns in the scope of this project in considerable detail, an exercise not feasible by all 22 authorities in the time available for the project. The aim of this approach is to draw out common themes across returns, whilst highlighting particular areas within returns that may cause extra work for local authorities.
- 2.3 In most cases the analysis relates to very specific data points within individual returns and it is therefore not possible to generalize these findings to the level of whole returns. The analysis that has been done should help collecting bodies to focus in on the parts of their returns that local authorities might find burdensome, for further consultation via their existing local authority groups. The detailed analysis will be made available alongside this report.
- 2.4 The inputs provided by the local authorities on the steering group were analysed to look for where there might be duplication between returns, where the frequency might impose a burden and where additional processing or analysis is required. Table 3 in Annex 2 sets these out in more detail.
- 2.5 Some returns have a combination of issues. There was consensus across the three local authorities that the voluntary 'Smoke Free' return contains data that would not already be collected by them, the monthly frequency of the collection is too often and where data is already held it must be processed for the purposes of the return. The local authorities reported that compliance rates with the smoke free legislation are very high. The Welsh Government noted in its reasons for this data collection that the ban on smoking in public places has been successful in protecting workers and the public from the risks of exposure to second-hand tobacco smoke and that the legislation has achieved its main objective with compliance rates at 98 per cent<sup>8</sup>. The Welsh Government is considering whether aspects of the return are still necessary and if the collection should be quarterly rather than monthly with a view to implementing changes from April 2012. In light of the local authorities views, the recommendation is that the Welsh Government considers taking phasing the return out altogether.

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<sup>8</sup> See supplementary volume for full details.

- 2.6 There was consensus that the Wales Performance Indicators, now ‘owned’ by the local government sector in Wales<sup>9</sup>, are there to improve service quality and effectiveness. Two of them however have to be processed differently. As the WLGA and Data Unit begin the process of reviewing the ‘Service Improvement Data’ in use across local government in Wales, a principle for performance indicators is that they should draw from existing data collections as far as possible.
- 2.7 A common thread between the aspects of data collections that were felt by the local authority steering group to involve considerable extra work is that they require detailed analysis of interventions by premise or installation type or by sub-categories relevant to that legislative area, analysis that is not needed to be done locally.
- 2.8 The local authorities also find the collection of full-time equivalent (FTE) data onerous, the reason being that services tend not to be organized or delivered in a way where staffing of individual regulatory functions can be split out. However, they noted that this type of data is input data for measuring impact and outcomes and this is discussed further in Chapter 4. In the HSE’s recent consultation on reductions to its LAE1 return, local authorities expressed concerns about over-simplification of FTE data – this indicates that there may actually be a broad acceptance of the need to collect FTE data. Similarly, the Food Standards Agency has found through its local authority audits that those that do not identify their regulatory services staffing resource by function struggle to resource their teams.
- 2.9 Several of the returns routinely collect data on prosecutions and convictions, notably the health and safety Return of Conviction, the Central Register of Convictions and the Animal Health 134 return. The animal health return stands out, as it is inconsistent with the other two by requiring data on a six-monthly basis; the others are voluntary and have no fixed reporting schedule. Whilst the requirements of legislation may make this a statutory requirement from local authorities, there was consensus that the reporting frequency is too often and that it is simpler for local authorities to return this information annually.
- 2.10 There is a small amount of duplication between the LAEMS Food Hygiene return, specifically in relation to enforcement action and complaints, and the return collected by the Chartered Institute for Finance and Accountancy (CIPFA). CIPFA is not part of the Welsh Regulators’ Forum and the Food Standards Agency is already involved with the CIPFA Statistics Working Group on this issue to agree that CIPFA source this information from the FSA rather than from individual local authorities. The Health and Safety Executive have a data sharing agreement in place with CIPFA.
- 2.11 Investment has been made in database systems to make the process of reporting data, information and intelligence easier, notably the Food Standards Agency LAEMS system, the Animal Health AMES system and the Office of Fair Trading Consumer Regulation Website and National Intelligence Management Database. Whilst continued priority should be given to ironing out local authority re-work and implementation issues in relation to most of these databases, the local authority steering group identified some specific issues with the LAEMS system – given in the supplementary volume – and were not clear on the purposes of the AMES database and the extent to which it can pre-populate data returns. For their part the Animal Health and Veterinary Laboratories Agency and the Welsh Government explained that in some cases local authorities had not fully implemented the new database system or taken up software codes intended to make data entry easier.

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<sup>9</sup> PPN/009 ‘Broadly Compliant’ food businesses is a Public Accountability Measure for 2011-12 approved by the WLGA Improvement Board in February 2011. The other PIs are now part of the ‘Service Improvement Data’ used across local government for local accountability or for business management locally.



- 2.12 In closing this chapter it is notable that where local authorities perceive data collection to be about *data sharing* for their collective benefit as well as for the requirements of a central body, discussed further in Chapter 3, the perception of a burden is virtually eliminated. This is most evident in the consensus around all of the Office of Fair Trading data collections: local authorities agreed that they aren't collections but data sharing tools. The level of buy-in to these voluntary, web-based systems for the sharing of data, that 'give back' to local authorities, is indicative of an approach that all central bodies should consider taking to their data collections. The HSE for example is exploring an improved method of collecting prosecution information that will enable the immediate sharing of this data among local authorities.
- 2.13 The over-arching message from the local authority steering group is that data collectors should continue to take ownership for the burdens on frontline services that their collections impose, and continue to keep a close eye on the balance between costs – on themselves as well as local authorities - and benefits. There should also be shared ownership across the Welsh Regulators' Forum of the cumulative burden that data collections pose.

## **Chapter 3. Effective working across the national and local parts of the regulatory system**

- 3.7 This Chapter sets out the findings from the analysis of purposes for data collection provided by both the collecting bodies and local authorities on the steering group. This is in order to understand the extent to which there are common views about the role of data collections across the national and local parts of the regulatory system in Wales, a system that in many cases is UK-wide. Central bodies were asked to give the reasons for their data collections according to a number of categories, which are listed in the supplementary volume to this report. Similarly, local authorities were asked to do the same, using a set of categories agreed with them to represent the range of reasons why they might hold or collect this information. The use of standard categories in both cases ensured a level of consistency in responses and enabled comparisons to be made<sup>10</sup>.
- 3.8 It is important to point out that both the collecting bodies and local authorities were asked to give their top two reasons for collecting data. As a consequence, the analysis does not necessarily reflect all of the reasons that might exist for a data collection, although where possible supplementary information is reflected in this report. In addition, the methodology for this project was based on collecting bodies and local authorities examining data collections at the same level of detail. In most cases each return was split up into constituent parts in order to give a level of granularity to the research. Much of the analysis relates to individual data points within the returns and it is therefore not possible to generalize to the level of the whole return. The detailed analysis will be made available alongside this report.

### **Central reasons for data collection**

- 3.9 Table 4 in Annex 2 presents the reasons for data collection given by the central bodies, in order of prevalence. This is possible as in most cases central bodies used the same reason across all lines of data in their returns. It shows that the most prevalent reason is to enable data sharing across local and national regulators in order to carry out effective regulation and enforcement; this was a primary or secondary reason in relation to over four fifths of the returns (19 or 86 per cent<sup>11</sup>).
- 3.10 The second most prevalent reason is to fulfill legal obligations, cited as a primary or secondary reason in relation to nearly three fifths of the returns (13 or 59 per cent), which demonstrates the impact of the EU on the regulatory system in Wales. These two reasons are discussed later this Chapter.
- 3.11 Next is the need to provide national level statistics, given as the first or second reason in just over a quarter of cases (6 or 27 per cent). These national statistics are made available by the central bodies on their websites and generally relate to enforcement actions taken and the results of them, spanning the range of sanctioning tools used by local authorities from fixed penalty notices to prosecutions.

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<sup>10</sup> In the case of the categories for the central bodies, they were also selected in order to ensure consistency with a similar exercise being done elsewhere in the UK.

<sup>11</sup> The five Wales Performance indicators are excluded from this analysis as they are owned by the local government sector in Wales. This leaves 22 returns in the scope of this section.

- 3.6 The remaining reasons – national interest, governmental accountability and local accountability, were given as primary or secondary reasons in relation to three (14 per cent), two (9 per cent) and two (9 per cent) cases respectively. Interestingly, the three returns collected to protect national interest, defined as where local accountability is insufficient, are in relation to issues that by their nature cross local authority boundaries – air quality, pollution and fair trading. Whilst the air quality and fair trading returns are quite different in character to the other returns examined in this project, it appears that all three aim to provide a national overlay to enable the monitoring of issues that aren't necessarily 'owned' by any one local authority all of the time. The Welsh Government advises that the Pollution Control survey is fed back to local authorities via a local authority Community of Practice. It is also funded by the fees and charges levied by local authorities from the operators they regulate under this regime<sup>12</sup>.
- 3.7 It is also interesting how infrequently governmental accountability and local accountability were cited as primary and secondary reasons – in relation to animal health returns in both cases – although they were cited in the additional information supplied for many of the food control returns. It is difficult to tell how far governmental accountability is related to legal obligations, but it is notable that central bodies in the main see their data collections primarily as about reporting to Europe and not about enabling central government to be held to account by the public.
- 3.8 The need to collect data to administer funding was not given as a first or second reason, but was given in the additional information relating to six returns – food control and smoke free. The use of data collections in this way shows they are being used to the maximum extent possible to avoid the creation of additional data flows for purely administrative matters and also to target funding effectively.

### **Local reasons for holding data**

- 3.9 At the outset, the wider purposes of data collections were discussed by the local authority steering group and seven returns were unanimously agreed to be for *data sharing* for the benefit of the regulatory system as a whole and thus of a different nature to the other returns. These seven returns, listed in Table 5 in Annex 2, were in effect removed from the analysis as there was consensus that they are necessary data sharing tools to enable effective regulation and enforcement. Furthermore, the Office of Fair Trading CRW Investigation and Intelligence Management Database are in fact primarily intelligence sharing tools, and were not deemed to be 'returns' at all. A further three collections were deemed to be, either wholly or in part, primarily for data sharing and in the case of the Local Air Quality Management System for sharing of local assessments.
- 3.10 The reasons local authorities might use the data are listed below starting with the most unanimous first. It is important to bear in mind that the local authorities applied these reasons to individual lines of data within each return.
- Annual service planning and budgeting, cited in relation to nine returns or 45 per cent<sup>13</sup>
  - Improving service quality and effectiveness, cited in relation to eight returns or 40 per cent

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<sup>12</sup> The results from the 2010 Pollution Control survey allowed the Welsh Government to demonstrate, for the first time in Wales, that all permits received their amount of full inspections showing that there is a level playing field across businesses and sectors.

<sup>13</sup> Of the total of 20 returns analysed in this way - the seven returns unanimously deemed to be 'data sharing' were excluded as the rationale for using them was self-evident in the opinion of the local authorities.

- Accountability to elected members, cited in relation to seven returns or 35 per cent
- Planning interventions, cited in relation to five returns or 25 per cent
- Monitoring staff performance, cited in relation to four returns or 20 per cent
- Monitoring resource use (finance), cited in relation to two returns or 10 per cent
- Monitoring resource use (staff), cited in relation to two returns or 10 per cent
- Risk assessment, cited in relation to two returns or 10 per cent

## **Comparison**

- 3.11 There appears to be little commonality in the central and local perceptions of how far these data collections support data sharing to enable effective regulation and enforcement, by some margin the most prevalent reason given by the central bodies. The differences may be due to differing interpretation of the idea of 'data sharing' as opposed to 'data collection', which the local authorities focused quite closely on. Whilst standard categories are used to limit inconsistencies in interpretation, it is possible that they can still be misinterpreted. Notwithstanding this however, when looking at the local and central interpretations side by side in Table 7 in Annex 2, there is read across in just under a third of cases (6 of 19).
- 3.12 This lack of read across points to the existence of a very fundamental difference in perceptions of what is needed to be shared to enable effective regulation and enforcement – in the main the local authorities see prosecutions data and intelligence as key in this regard, exemplified in the returns they classified as data sharing tools in Table 5 in Annex 2. Central bodies see data collections as a way of monitoring how regulation and enforcement is carried out as well as for monitoring local authority performance in delivering outcomes.
- 3.13 The central bodies provided further details about what this means for them in their narrative responses to this project, given in full in the supplementary volume. For them, these data collections enable identification of enforcement priorities, monitoring of consistency and provide evidence for targeted sampling, which go to the heart of the role of central bodies in a system that is delivered locally. Other reasons were to enable comparison, provide a stimulus to local authorities, or to promote improvements 'from within'. It appears that, for local authorities, fuller transparency of these uses for data collection need to be given as part of a greater dialogue between the different parts of the regulatory system.
- 3.14 The discussion here is intended to highlight that central bodies appear to have interpreted the 'data sharing' category as meaning 'data sharing to enable the centre to monitor how enforcement is carried out' or 'data sharing to stimulate service improvement locally' and not 'to enable effective regulation and enforcement to be carried out'. These are subtle but important distinctions as they go to the heart of whether the central and local parts of the system are working together to achieve common goals, or whether one part is overseeing the other.
- 3.15 There is scope for further analysis of individual data points that are categorized locally as giving accountability to elected members, and those categorized by national bodies as fulfilling legal obligations or to provide government accountability. If the same lines of data help to provide accountability locally and nationally this could provide a 'golden thread' and clear point of commonality between local and national parts of the regulatory system.

## **Issues to consider**

- 3.16 This Chapter sheds some light on the central and local reasons for using the data within these collections. It is important to bear in mind that the National Enforcement Priorities for Wales, as the statement of common purpose between local and national parts of the system, have only been in place for a short time.
- 3.17 Whilst further work is needed, in some areas there are signs of alignment in accountabilities – at governmental level and to the EU – with those locally. Having a ‘golden thread’ of this kind may give much greater transparency of the role local authorities play in providing protections for the nation as a whole to all parties in the system, including the recipients – citizens and businesses.

## Chapter 4. Accessible information for citizens and businesses

- 4.1 This Chapter presents the results of the local authority steering group workshop to develop example ‘dashboards’ of performance indicators focused on the National Enforcement Priorities for Wales. The workshop followed the Outcomes and Impacts Toolkit developed by LBRO. In summary, the Toolkit sets out a staged process to identifying the inputs, key activities and impacts of a particular regulatory approach – the pathway – and to identifying the key performance data that can be pulled together into a snapshot of progress in achieving an outcome – the dashboard. The approach draws on performance management approaches used elsewhere in the public and private sectors and at its core, the dashboard is intended to be a tool that local authority public protection managers and service heads can use to demonstrate performance to senior management and elected members.
- 4.2 The Outcomes and Impacts Toolkit was chosen to address the third objective of the project as the Toolkit has received widespread interest from local authorities across England and Wales. It was also felt that taking a ‘bottom up’ approach was most appropriate as a first step towards identifying ways data collections can be opened up to citizens and businesses locally.
- 4.3 It is important to note that the dashboards are very much a first step towards achieving the objective, and further consultation with the Welsh Regulators’ Forum, local authorities and wider stakeholders is required. In particular, more work is needed to match the performance indicators identified here with existing data collections. The local authority steering group pointed out that much of these data are already collected either through existing central data collections, discussed in Chapters 2 and 3 of this report, or through individual local authority satisfaction surveys. The message is that building performance indicator dashboards to demonstrate progress towards National Enforcement Priorities should not increase the amount of data collection already being done, but make full use of existing data collection with the support of central bodies.

### Identifying performance indicators

- 4.4 The task set at the local authority steering group workshop was to identify ways to measure progress towards achieving the National Enforcement Priorities in Wales. The steering group members were split into two groups and asked to select one regulatory activity that was identified as contributing to delivering a national priority. The activities selected by the group are set out in the table below and reflect the list of activities underpinning each Priority.

National Enforcement Priority for Wales	Regulatory activity that contributes to delivery
Protecting individuals from harm and promoting health improvement	Improving health, safety and wellbeing in the workplace
Ensuring the safety and quality of the food chain to minimize risk to human and animal health	Safety and wholesomeness of foodstuffs
Promoting a fair and just trading environment for citizens and business	Supporting business through advice
Improving the local environment to positively influence quality of life and promote sustainability	Controlling nuisance and anti social behaviour



4.5 Each group looked at two regulatory activities and worked through developing impact and outcome pathways for each mapping out the inputs, activities, outputs, outcomes and impacts. Once this was completed a discussion followed about what performance indicators are relevant for each activity. The tables overleaf present an initial list of indicators for each element of each pathway.

**Table a: Protecting individuals from harm and promoting health improvement – safer workplaces/environment – initial list of indicators**

Input	Output	Outcome	Impact
<ul style="list-style-type: none"> <li>Gross budget</li> <li>FTEs</li> <li>Base workload</li> <li>Number of premises by risk band</li> <li>Complaint numbers</li> <li>Satisfaction surveys of businesses</li> </ul>	<ul style="list-style-type: none"> <li>Complaints response times, completion and conclusion time</li> <li>Number of website hits</li> <li>Percentage of accidents investigated by type</li> <li>Number of significant breaches detected</li> <li>Number of inspections by risk category and types of premises</li> <li>Contacts with new businesses</li> <li>Percentage compliance (businesses)</li> <li>Number of accidents per business</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of satisfied customers (customer survey)</li> <li>Satisfaction surveys of consumers</li> <li>Level of employee morale (both LA staff and business staff)</li> <li>Number of significant breaches rectified</li> </ul>	<ul style="list-style-type: none"> <li>Reductions in sickness absence</li> </ul>

**Table b: Ensuring the safety and quality of the food chain to minimize the risk to human and animal health - Safe foods – initial list of indicators**

Input	Output	Outcome	Impact
<ul style="list-style-type: none"> <li>Gross budget</li> <li>FTEs</li> <li>Base workload</li> <li>Number of premises by risk band</li> <li>Number of Freedom of Information (FOI) requests – volume</li> <li>Number of significant breaches rectified</li> </ul>	<ul style="list-style-type: none"> <li>Number of FOI requests responded to within 21 days</li> <li>Complaint numbers</li> <li>Complaints response times</li> <li>Complaint completion and conclusion time</li> <li>Number of website hits</li> <li>Percentage of accidents investigated by type</li> <li>Number of significant breaches detected</li> <li>Number of inspections by risk category and types of premises</li> <li>Contacts with new businesses</li> <li>Percentage compliance (businesses)</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of satisfied customers (customer survey)</li> <li>Percentage of rescors as improvement</li> <li>Number of accidents per business</li> <li>Percentage of confident consumers</li> <li>Satisfaction surveys of businesses</li> <li>Satisfaction surveys of consumers</li> <li>Tourist views</li> </ul>	<ul style="list-style-type: none"> <li>Improvements in tourist economies</li> </ul>

**Table c: Promoting a fair and just trading environment for citizens and business - supporting business through advice – initial list of indicators**

Input	Output	Outcome	Impact
<ul style="list-style-type: none"> <li>Measurement of resources input – staff time/money</li> <li>Number of complaints</li> </ul>	<ul style="list-style-type: none"> <li>Number of training events held</li> <li>Number of businesses attending training</li> <li>Number of website hits</li> <li>Number of new businesses visited and advised</li> <li>Number of follow up visits/inspections</li> <li>Number of press releases</li> <li>Number of enforcement actions</li> </ul>	<ul style="list-style-type: none"> <li>Number of requests for advice (new/existing/repeat)</li> <li>Proportion of compliant businesses</li> <li>Business satisfaction with service</li> <li>Business confidence - quality of advice</li> <li>Business confidence – economic wellbeing/survival/profit ability</li> </ul>	<ul style="list-style-type: none"> <li>Employment data – Labour Force Survey</li> <li>Consumer Confidence – Office of Fair Trading</li> </ul>

**Table d: Improving the local environment to positively influence quality of life and promote sustainability – Controlling nuisance and anti-social behaviour – initial list of indicators**

Input	Output	Outcome	Impact
<ul style="list-style-type: none"> <li>Number of complaints based on nuisance behavior</li> </ul>	<ul style="list-style-type: none"> <li>Number of checks/test purchases done</li> <li>Number of inspections</li> <li>Number of diversionary activities (one-off/on-going)</li> <li>Extent of joined-up working/collaboration</li> <li>Number of Anti-Social Behaviour Orders issued</li> </ul>	<ul style="list-style-type: none"> <li>Customer satisfaction (complainant satisfaction/resolution of problems/speed of response)</li> <li>Communities – safety/happiness</li> <li>Cleanliness of streets</li> <li>Level of youth engagement – satisfaction/participation</li> </ul>	<ul style="list-style-type: none"> <li>Level of improved health – regional/sub-regional</li> </ul>

## Next steps for performance indicators

- 4.6 These are initial lists of indicators and the local authority steering group identified the following tasks:
- The lists of indicators should be refined and added to through further consultation with local authorities and members of the Welsh Regulators' Forum.
  - These indicators should draw from existing data collections to avoid increasing the data gathering work-load. The lists should be mapped across to the data collections examined in this report.
  - The input measures need to be thought through and standardised to enable comparison between authorities. For example numbers of complaints alone are not very useful for benchmarking as there is no indication of context – numbers of complaints as a proportion of local residents, or of risk-rated business types, or of visitors to a local area would be more useful to enable comparisons to be drawn.
  - 'Getting at' the outcomes data can be very difficult locally, as the data capture of often much broader issues needs to be done by national bodies that are resourced to collect data of this kind. The Welsh Regulators' Forum should consider who is best placed to collect impacts data.

## **Presenting performance data**

- 4.7 Two suggestions were made on how to present the above indicators in an accessible form for decision-makers – using a dashboard, or a radar chart, and an example of each is given overleaf. The idea of management dashboards has become increasingly popular in recent years. Dashboards are executive information systems that present a small set of performance measures on a regular and structured basis to strategic decision-makers in order to provide an overview of an organisation's performance and thereby identify areas of particular success or concern for more detailed examination.
- 4.8 The key challenge for a dashboard lies in the selection of data sources and indicators. Criteria for the prioritization of indicators and measurements are both systematic and pragmatic. They include the following: do they cover a key causal chain identified by the pathways; do they cover an input, output, outcome, or impact; are they being collected already; are data held by the local authority or external partners; and will new data need to be collected? The filtering process is presented in more detail in the supplementary volume.
- 4.9 The local authority steering group thought it was useful to split the indicators across the inputs, outputs etc but worried that the outcome quadrant of the dashboard could get lost as the solid link with specific activities is diluted – inevitable when considering broader outcomes that cut across public services.

## **Next steps for presenting performance data**

- 4.10 The examples given overleaf are purely indicative to illustrate ways in which these data could be presented. The audience is key to selecting the most appropriate way of presenting data. The Welsh Regulators Forum could consider:
- Testing different options with different audiences
  - The level of detail of measuring performance – each activity that contributes to each National Enforcement Priority would result in a large number of individual dashboards. Is there scope to develop an over-arching dashboard for each Priority, with key cross-cutting indicators?

Figure 1. Example dashboard

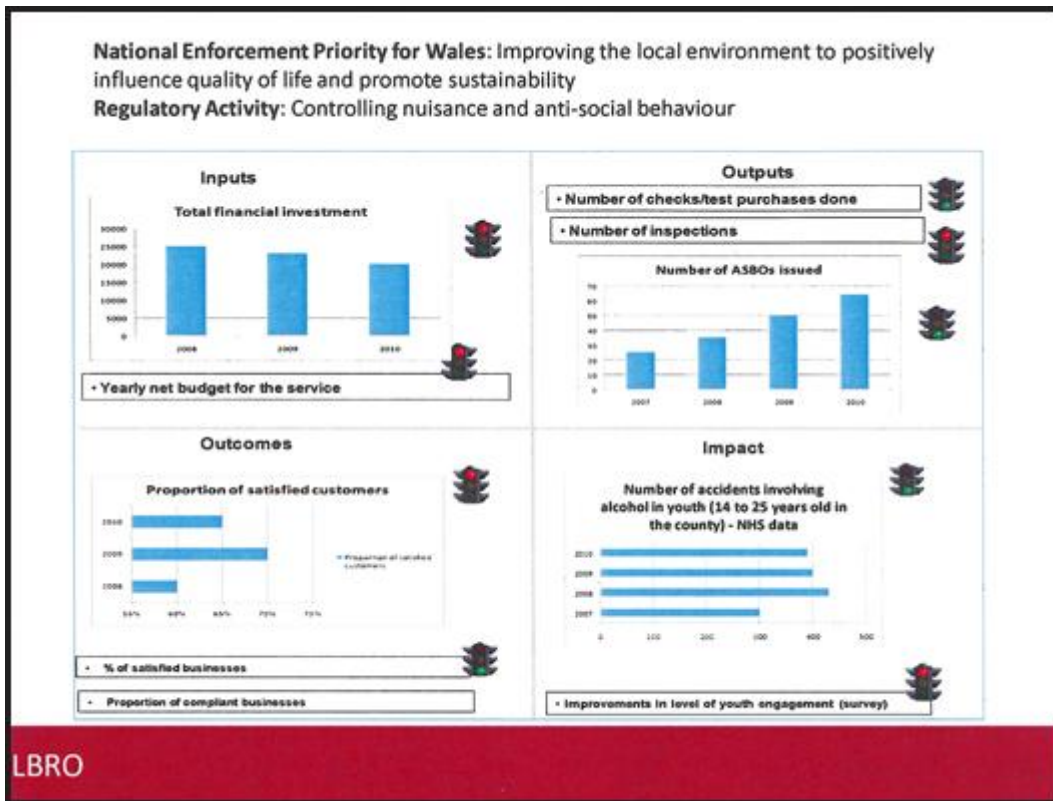
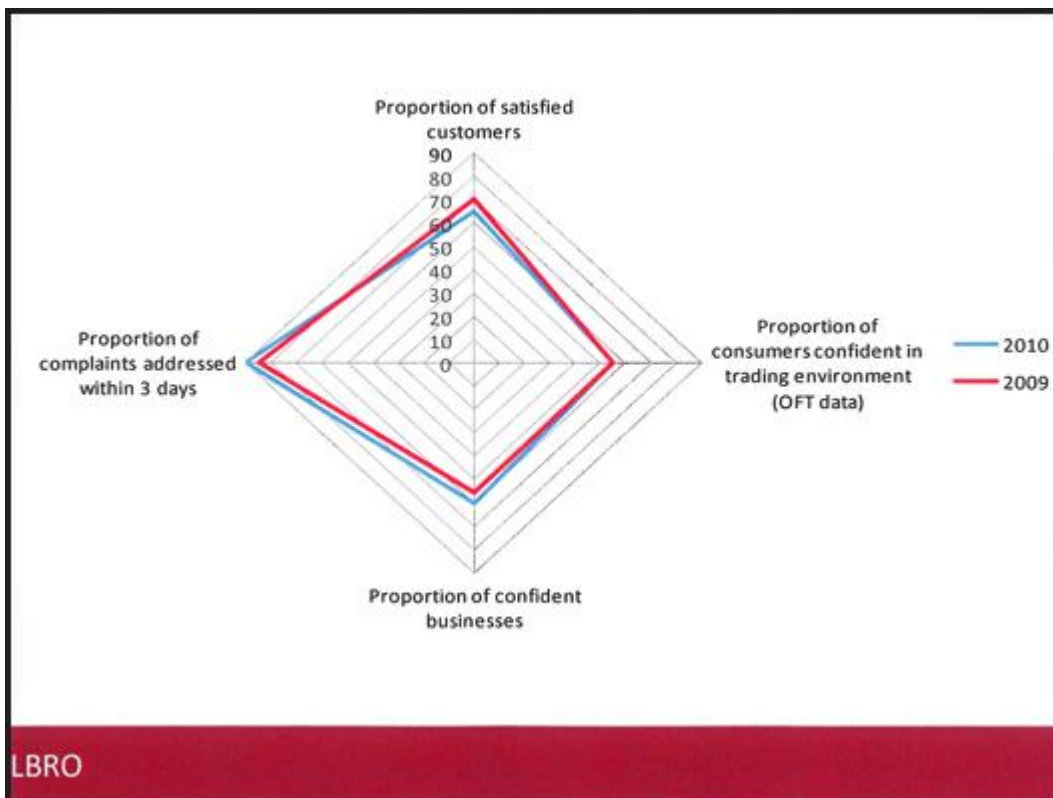


Figure 2. Example radar chart



## Annex 1. Full list of data collections subject to detailed analysis

1	Data Unit – PPN/001 Programmed inspections of high risk businesses
2	Welsh Government/DEFRA – Local Air Quality Management (LAQM) System
3	Welsh Government/DEFRA – Fixed Penalties
4	Welsh Government/DEFRA – Local Pollution Control Statistical Survey
5	Welsh Government/EA – Fly capture
6	FSA – LAEMS: Animal Feed
7	FSA – LAEMS: Food Hygiene
8	FSA – LAEMS: Food Standards
9	FSA – LAEMS: Imported Food
10	Welsh Government/AHVLA – Animal Health 134 (Return of Convictions)
11	Welsh Government/AHVLA – WT22 (Welfare of Animals in Transport Order)
12	FSA – Approved feed premises
13	FSA – Approved food premises
14	OFT – Consumer Regulation Website / Central Register of Convictions (Notice of Intended Proceedings, Return of Convictions & Formal Cautions return)
15	OFT – Enterprise Act Notice of Intended Action
16	HSE – LAE1
17	Welsh Government – Demolitions and Hazards Return
18	Data Unit – PPN/009 'Broadly Compliant' Food Businesses
19	Data Unit – PPN/007 Significant breaches rectified by intervention
20	Data Unit – PPN/008 New businesses subject to enforcement activity
21	Data Unit – STS/007 Enforcement activity - fly tipping incidents
22	HSE – Return of Conviction
23	Welsh Government/AHVLA – Profile - Animal Health Framework
24	Welsh Government/AHVLA – Service Delivery Plan - Animal Health Framework
25	Welsh Government/AHVLA – Smoke free legislation compliance return
26	OFT – Consumer Credit License (views on application)
27	OFT – Intelligence Management database
	<b>KEY</b>
	Mandatory, Regular
	Mandatory, As Required
	Voluntary, Regular
	Voluntary, As Required

## Annex 2. Analysis tables

**Table 3. Summary of the types of burdens identified from individual local authority responses**

Type of burden
Original work – interpretation or explanation – is required by the return. This picks up where explanatory text or comments are requested.
Collection of the data is duplicated.
The frequency of the return does not suit the local authority.
The data is held and collected by the local authority but must be processed or manipulated for the purposes of the return. This refers to where additional analysis or coding is required.
The return requires an overly onerous level of detail. This refers to what local authorities find to be complex additional analysis, which is a long way from what they would use the core data for.

**Table 4. The reasons central bodies collect this data**

Predominant Reason <sup>14</sup>	Return (status) *denotes an additional reason
<p>Effective regulation and enforcement</p> <p><i>To enable data sharing across local and national regulators in order to carry out effective regulation and enforcement</i></p>	<p>Fixed Penalties (statutory)</p> <p>Local Pollution Control Statistical Survey (statutory)</p> <p>Flycapture (statutory)</p> <p>LAEMS: Animal Feed (statutory)</p> <p>LAEMS: Food Hygiene (statutory)</p> <p>LAEMS: Food Standards (statutory)</p> <p>LAEMS: Imported Food (statutory)</p> <p>Health and Safety LAE1 (voluntary)</p> <p>Approved Feed Premises (statutory)</p> <p>Approved Food Premises (statutory)</p> <p>Central Register of Convictions (statutory)</p> <p>Enterprise Act Notice of Intended Action (statutory)</p> <p>Health and Safety Return of Conviction (voluntary)</p> <p>Animal Health Framework – Profile (voluntary)</p> <p>Animal Health Framework - Service Delivery Plan (voluntary)</p> <p>Smoke Free Compliance (voluntary)</p> <p>Consumer Credit Licence (voluntary)</p> <p>Intelligence Management Database (voluntary)</p> <p>Hazards and Licences (voluntary)</p>
<p>Legal obligations</p> <p><i>Fulfill legal obligations under EU and international law and directives, and domestic law</i></p>	<p>Local Air Quality Management System (statutory)</p> <p>Local Pollution Control Statistical Survey (statutory)</p> <p>LAEMS: Animal Feed (statutory)</p> <p>LAEMS: Food Hygiene (statutory)</p> <p>LAEMS: Food Standards (statutory)</p> <p>LAEMS: Imported Food (statutory)</p> <p>Animal Health 134 Return of Convictions (statutory)</p> <p>Animal Health WT22 Welfare of Animals in Transport (statutory)</p> <p>Approved Feed Premises (statutory)</p> <p>Approved Food Premises (statutory)</p> <p>Central Register of Convictions (statutory)</p> <p>Enterprise Act Notice of Intended Action (statutory)</p> <p>Consumer Credit Licence (voluntary)</p> <p>*Flycapture (statutory)</p>

<sup>14</sup> Full definitions can be found in the supplementary volume.



National level statistics  <i>Aggregation into national level statistics</i>	Fixed Penalties (statutory) Flycapture (statutory) Health and Safety LAE1 (voluntary) Health and Safety Return of Conviction (voluntary) Smoke Free Compliance (voluntary) Hazards and Licences (voluntary) <i>*LAEMS: Animal Feed (statutory)</i> <i>*LAEMS: Food Hygiene (statutory)</i> <i>*LAEMS: Food Standards (statutory)</i> <i>*LAEMS: Imported Food (statutory)</i> <i>*Approved Feed Premises (statutory)</i> <i>*Approved Food Premises (statutory)</i>
National interest  <i>Protect national interest where local accountability is insufficient</i>	Local Air Quality Management System (statutory) Local Pollution Control Statistical Survey (statutory) Intelligence Management Database (voluntary)
Government accountability  <i>Departmental indicators to enable central government to be held to account by public</i>	Animal Health 134 Return of Convictions (statutory) Animal Health WT22 Welfare of Animals in Transport (statutory) <i>*Flycapture (statutory)</i> <i>*LAEMS: Food Hygiene (statutory)</i> <i>*LAEMS: Food Standards (statutory)</i> <i>*LAEMS: Imported Food (statutory)</i> <i>*Approved Food Premises (statutory)</i>
Local accountability  <i>Required to be published by all local authorities to support local accountability</i>	Animal Health Framework – Profile (voluntary) Animal Health Framework – Service Delivery Plan (voluntary) <i>*LAEMS: Food Hygiene (statutory)</i> <i>*LAEMS: Food Standards (statutory)</i> <i>*Approved Food Premises (statutory)</i>
Administration of funding  <i>Required to support effective administration of funding</i>	<i>*LAEMS: Animal Feed (statutory)</i> <i>*LAEMS: Food Hygiene (statutory)</i> <i>*LAEMS: Food Standards (statutory)</i> <i>*LAEMS: Imported Food (statutory)</i> <i>*Approved Feed Premises (statutory)</i> <i>*Smoke Free Compliance (voluntary)</i>

Note: Central bodies were asked to give their primary and secondary reasons for collecting portions of data within each of their returns, and these are shown in the table. In many cases reasons were cited as either primary or secondary in relation to different portions of data in the same return, so it is not useful to draw this distinction when looking across the return as a whole. Where further reasons were given in the narrative responses supplied by central bodies, these are highlighted in the table by an asterisk. See supplementary volume for full details. The Wales Performance Indicators are excluded as they are under the umbrella of local government in Wales.

**Table 5. Returns local authorities felt were primarily for data sharing for the benefit of the regulatory system as a whole**

Return (number of local authorities citing this)
Animal Health 134 Return of Convictions (3)
Consumer Regulation Website (Central Register of Convictions) (3)
Enterprise Act Notice of Intended Action (3)
Health and Safety Return of Conviction (3)
Animal Health Framework – Profile (3)
Consumer Credit Licence (3)
Intelligence Management Database (3)
*Local Air Quality Management System (1)
*LAEMS: Food Hygiene (1)
*Hazards and Licences (1)

Note: The returns highlighted with an asterisk were looked at in more detail and hence also appear in Table 3. Only one local authority was able to comment on the Local Air Quality Management System and in discussion with LBRO felt that this return could fall into the data sharing category as it is the system for sharing local assessments.

**Table 6. Local and central interpretation of where collections allow data sharing to enable effective regulation and enforcement**

Defined by all three local authorities as ‘to enable data sharing across local and national regulators in order to carry out effective regulation and enforcement’	Defined by central bodies as ‘to enable data sharing across local and national regulators in order to carry out effective regulation and enforcement’
Animal Health 134 Return of Convictions Consumer Regulation Website (Central Register of Convictions) Enterprise Act Notice of Intended Action Health and Safety Return of Conviction Animal Health Framework – Profile Consumer Credit Licence Intelligence Management Database	Fixed Penalties (statutory) Local Pollution Control Statistical Survey (statutory) Flycapture (statutory) LAEMS: Animal Feed (statutory) LAEMS: Food Hygiene (statutory) LAEMS: Food Standards (statutory) LAEMS: Imported Food (statutory) Health and Safety LAE1 (voluntary) Approved Feed Premises (statutory) Approved Food Premises (statutory) Central Register of Convictions (statutory) Enterprise Act Notice of Intended Action (statutory) Health and Safety Return of Conviction (voluntary) Animal Health Framework – Profile (voluntary) Animal Health Framework – Service Delivery Plan (voluntary) Smoke Free Compliance (voluntary) Consumer Credit Licence (voluntary) Intelligence Management Database (voluntary) Hazards and Licences (voluntary)