

**PRIMARY AUTHORITY EVALUATION:  
TECHNICAL APPENDICES**

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## Appendix A: Methodology

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This evaluation involved the use of three key methods: semi-structured interviews at the scoping stage, three online surveys to collect data across the whole population involved in and affected by Primary Authority and a number of case study “pairs” of a participating business with their primary authority to explore the costs and benefits of Primary Authority in more depth as well as other aspects of Primary Authority needed to enable its successful implementation and ongoing maintenance (i.e. issues such as relationships with businesses and enforcing authorities; barriers and enablers of organisational change, etc). This evaluation also involved a cost-benefit analysis which built on all of these data sources. These data have been provided to the Better Regulation Executive as an input to the post evaluative review of the Primary Authority Impact Assessment.

The research methodology was designed in order to facilitate and enable an ongoing assessment of progress as Primary Authority develops. This report focuses on the findings after a little over one year of the operation of the scheme. It is important to note that this is still an early stage for Primary Authority, as evidenced by the fact that only 5 of the primary authority businesses included in our online survey had been in the scheme for more than 12 months. Almost half of the business respondents had been involved in Primary Authority for between 5 and 9 months. Therefore, all of the findings reported in this phase of the evaluation must be considered with this in mind. In particular, some of the underlying aims of Primary Authority including a fundamental shift in thinking about local regulation and the development of new working relationships between businesses and enforcement authorities take time to produce medium and long term impacts and outcomes.

In summary, the main elements of the research contributing to this output are as follows:

- 30 stakeholder interviews with local authorities, businesses and others;
- Three online surveys undertaken with participating businesses, primary authorities and enforcing authorities (enforcing authorities)
- Case studies with 6 organisations (3 ‘pairs’ of businesses and their associated primary authority)

## 1.1 Scoping interviews

A total of 30 semi-structured interviews with local authorities, businesses and other stakeholders were carried out between February and April 2010 in order to gather their views on Primary Authority to date. The table below provides a breakdown of interviews carried out with stakeholders in three groups: local authorities, businesses and other stakeholders.

**Table 0-1 Breakdown of stakeholder interviews by stakeholder type**

<b>Businesses</b>	<b>local authorities (local authorities)</b>	<b>Other stakeholders</b>
Participating businesses (5)	Enforcing authorities (3)	LBRO (3)
Willing businesses but not in Scheme (3)	local authorities in primary authorities (7)	BRE (1)
Unwilling businesses (2)	Unwilling local authorities (2)	HSE (1)
		Local (1) /Local Govt Regulation (LGR)
		Other s (FARMA and BRC) (2)
<b>Total businesses: 10</b>	<b>Total local authorities: 12</b>	<b>Total other: 8</b>

SOURCE: RAND Europe, stakeholder interviews, February-April 2010

The questionnaires used for these interviews are included in Appendix A of this report. Appendix D presents the interview findings by stakeholder group and by “code”. Two RAND Europe researchers were involved in analysing the interview findings and in categorising them under a range of codes decided during an internal brainstorming session. The brainstorming session involved the whole research team. Each team member was tasked with reading a number of interviews (about 5 each) and the workshop session enabled a discussion of the main themes emerging from the interviews. These in turn resulted in a list of “code” used to draw out relevant arguments from the interview notes. These codes are shown in the right hand column of each table and include the main themes that emerged from the interview data as set out below:

- Attitudes of local authorities towards Primary Authority
- The benefits of Primary Authority
- Details of business/local authority relationship
- Capacity and skills of local authorities to deliver Primary Authority
- Charging arrangements under Primary Authority
- Compliance of enforcing authorities with Primary Authority
- Contractual issues

- Costs
- Inconsistencies
- Inspection plans
- Any mention of the LBRO and its role within Primary Authority
- Rationale for joining/not joining Primary Authority
- Scope and scale of Primary Authority
- Voluntary schemes

These findings were in turn used to develop the questions of the three online surveys directed at primary authorities, businesses participating in Primary Authority and enforcing authorities. These were launched in mid-September 2010 and were in place for 4 weeks. The questionnaires for each of three online surveys can be found in Appendix B.

## 1.2 Survey details

As mentioned above, three online surveys were carried out as part of this research. Each survey was directed at a distinct group of stakeholders: businesses participating in Primary Authority, local authorities acting as primary authorities and enforcing authorities. These surveys were sent out to the whole population of each of these groups and the following response rates were obtained:

- 27 participating businesses responded out of 74 businesses: 36% response rate
- 23 primary authorities responded out of 30 primary authorities: 77% response rate
- 121 enforcing authorities responded out of 375 enforcing authorities: 32% response rate

It was agreed that LBRO would directly send the link to respondents in order to maximise the response rate for the three surveys and to avoid any confidentiality issues with regard to respondents' contact details. This also contained information about the survey including the topics covered and how long it would take to complete as well as the URL link to follow for completion of the survey and the deadline for completing it. Respondents were sent one email reminder half way through the deployment of the survey in order to maximise the number of responses. The link to each survey was sent to the respondent deemed most appropriate to respond in each of the stakeholder groups. For participating businesses, the primary authority contact was emailed the link to the survey; for primary authorities, the person responsible for Primary Authority was emailed and for enforcing authorities, it was decided that it would be best to email the heads of regulatory services as these people would have the broader overview of their local authorities' involvement in Primary Authority across different areas of regulation.

Before launching the survey, it was piloted with a small number of participants in each of the three groups. These participants were drawn both from participants already contact during the scoping interview stage and also from LBRO's list of contacts. Participants were sent the link to the online survey in an email and once completed, were contacted by phone by a member of the research team in order to collect their feedback on the questions

and any issues experienced with the workings of the survey. In addition, we carried out an internal piloting round with three colleagues external to the research team to ensure the technical functionality of the survey was optimal. The piloting was deemed essential to make sure that the survey questions made sense and that the online survey tool was working optimally and was easy for respondents to use. Following the pilot, the survey was amended to take into account the comments made at the piloting stage before launching the survey in mid September 2010.

### 1.3 Case study “pairs”

Following on from the three online surveys, the research team undertook three case study “pairs” in order to explore in more depth the costs and benefits of Primary Authority as well as other elements involved in implementing the scheme for different partnerships. The data collected through these case studies was used to supplement that collected by the surveys to build the cost and benefits analysis of Primary Authority. These case study “pairs” were carried out by means of a telephone interview of approximately one hour. Participants were sent the questions in advance of the telephone conversation to enable them to prepare for the interview and give them time to look for data on the costs and benefits of the scheme in cases where these were not readily available to them. A copy of the questionnaires used for interviewing primary authorities and businesses are included in Appendix C.

Given the small number of case study “pairs”, it was not possible to achieve a representative sample of respondents. However, it was the intention of the research team to include a range of businesses and local authorities in these case studies in order to provide us with a better understanding of the varying costs and benefits of Primary Authority by type of business and local authority. In the business online survey, respondents were asked if they would be willing to take part in a case study. A total of 4 businesses volunteered through the survey and 2 of those have materialised into case study “pairs” with the participation of their primary authority. An additional case study “pair” was drawn out from a list of potential participants provided by LBRO. In choosing this additional case study “pair”, the study team was mindful of not including participants who had already been interviewed in the scoping stage of the research and also to ensure the characteristics of the business were sufficiently different from the 2 pairs previously selected. The table below provides an overview of the different criteria that were taken into account when selecting potential candidates for case study “pairs” and which criteria each case study fulfils.

**Table 0-2 Mapping of case study pairs by criteria**

	<b>Criteria</b>	<b>MotoWay and Central Bedfordshire County Council</b>	<b>Ladbrokes and Liverpool City Council</b>	<b>Hydes Brewery and Warrington Borough Council</b>
Area of regulation	age-restricted sales			
	Agriculture			
	animal establishments and companion animal welfare			
	consumer credit			
	environmental protection			
	explosives licensing			
	fair trading			
	farm animal health			
	food safety and hygiene	X		X
	food standards			
	general licensing			
	health and safety		X	
	Housing			
	Metrology			
	petroleum licensing			
	pollution control			
	product safety			
road traffic				
Type of business	Retail	Hotel/Catering	Betting and Gambling	Retail/Distribution
	Production			
	Large	X	X	
	SME			X
Geographical area covered by business		England, Wales, Scotland	Whole of UK, including Northern Ireland and Worldwide	UK
Number of employees		1,000+	1,000+	
How many local authorities business deals with		11 – 50	More than 100	
Type of local authority	Single tier (unitary, metropolitan, London borough)	Unitary	Met District	Unitary



Location of primary authority (region)		Bedfordshire - East Midlands	Liverpool - North West	North West
Experience in the scheme	< 1 year			
	> 1 year	X	x	
Previous (active) partnership	Home Authority	Business: Home Authority in the past		
	Lead Authority/LOPP			
	None		X	

# Appendix B: Questionnaires used for stakeholder interviews

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## 1.4 Master questionnaire for Businesses

This document contains all the questions we would like to ask businesses; each question is marked for which group it is relevant. The key categories are:

1. Business within Primary Authority (B-PA)
2. Business expressing interest to joining (B-EI)
3. Businesses not interested in joining(B-NI)

Question	Relevance
<b>1.4.1 Your role and position</b>	<b>all</b>
a) Could you please outline your role and position within your company? b) In which sector is your company operating and which areas of local regulation are in particular relevant for your company? c) What is the overall size of your business in the UK (revenue/employment)? d) Across how many local authorities do you operate? e) In how many local authorities do you have facilities	
<b>The issues of facing businesses operating across local authority boundaries</b>	<b>all</b>
a) In your view, what are the key issues businesses face in terms of complying with local regulation when they operate across local authority boundaries? b) What are the implications for local authorities in regulating businesses that operate in several local authorities? c) In your work have you come across cases of inconsistency in local regulation and enforcement practice? d) In this context what does the term inconsistency encompass for you? e) How common are cases of inconsistency? f) Could you give an example of inconsistency? g) What was the economic impact of this inconsistency? h) Could you estimate the costs of the last two inconsistencies which	

occurred to your business?	
<b>The Primary Authority Scheme</b>	<b>all</b>
a) How did you hear about the Primary Authority scheme? b) Have you or are you currently participating in one of the voluntary schemes such as the Home Authority or the lead authority scheme? c) What were the motivations for joining/or not joining into a primary authority partnership?	
<b>Joining a primary authority partnership</b>	<b>B-PA</b>
d) How was the partnership initiated? e) Did you actively approach a local authority? f) Did the partnership develop out of previous cooperation or a voluntary scheme (home or lead authority)? g) What were the reasons for selecting a specific local authority? h) Have you approached several local authorities to become your primary authority? i) What were the main motivations to join the new scheme? Did you produce a business case for joining the scheme? j) Could you describe the process of setting up the partnership? k) Is your local authority charging you for the costs they incur? Is the basis for these charges transparent to you? l) Which areas of regulation does the partnership cover? <ul style="list-style-type: none"> <li>• age-restricted sales</li> <li>• agriculture</li> <li>• animal establishments and companion animal welfare</li> <li>• consumer credit</li> <li>• environmental protection</li> <li>• explosives licensing</li> <li>• fair trading</li> <li>• farm animal health</li> <li>• food safety and hygiene</li> <li>• food standards</li> <li>• general licensing</li> <li>• health and safety</li> <li>• housing</li> <li>• metrology</li> <li>• petroleum licensing</li> <li>• pollution control</li> <li>• product safety</li> <li>• road traffic</li> </ul>	
<b>First experiences of working in a primary authority partnership</b>	<b>B-PA</b>
a) What are your first experiences of the scheme?	

<p>b) Have your internal processes been changed as a result of the scheme? How did you deal with local authorities prior to joining the scheme?</p> <p>c) Have you seen changes in workload?</p> <p>d) What are the key costs and benefit you expect from the scheme for your company?</p> <ul style="list-style-type: none"> <li>o Which of these costs do you expect to be one-off set up costs?</li> <li>o Which of them do you expect to be running costs in the future?</li> </ul> <p>e) How did your relationship to the local authority develop?</p> <p>f) How do you expect the primary authority partnership to affect the performance of your company in complying with regulation?</p> <ul style="list-style-type: none"> <li>o Better compliance?</li> <li>o Fewer inconsistencies?</li> <li>o Lower costs of compliance?</li> </ul> <p>g) Has your company been subject to enforcement action since joining the scheme?</p> <p>h) What is your experience of “enforcing authorities”?</p> <p>i) Do you experience local regulation as being more consistent?</p>	
<p><b>Practice and expectations before joining the Primary Authority Scheme</b></p>	<p><b>B-EI</b></p>
<p>a) How does your company currently interact with regulatory services?</p> <ul style="list-style-type: none"> <li>• How much time do you spend on dealing with local regulation?</li> <li>• How do you organise your interaction (centralised, decentralised)?</li> </ul> <p>b) Do you expect to adjust your processes once you have joined the scheme? If so, how?</p> <p>c) What is your previous experience with inconsistencies?</p> <p>m) What are the main motivations to join the new scheme? Did you produce a business case for joining the scheme</p> <p>n) Did you already approach a local authority to become a partner?</p> <p>o) What would be the rationale behind selecting a specific local authority?</p> <p>p) Would you approach several local authorities before deciding on a partner authority?</p> <p>q) Are you already participating in one of the voluntary schemes (home or lead authority)?</p>	
<p><b>Your decision not to enter into a primary authority Partnership?</b></p>	<p><b>B-NI</b></p>
<p>a) What were you reasons not to enter into a primary authority partnership?</p> <p>b) Did you produce a business case before taking a decision against the scheme?</p> <p>c) Have you been in a voluntary scheme before?</p> <p>d) What was your key motivation for not joining the scheme:</p> <ul style="list-style-type: none"> <li>• Does not provide additional value?</li> <li>• Voluntary scheme works well?</li> <li>• Geographic coverage?</li> <li>• Scope of the regulations covered?</li> </ul>	

<ul style="list-style-type: none"> <li>• Inconsistency isn't a great problem?</li> </ul>	1.5
e) What did you consider to be the cost and benefits of being in/outside the scheme?	1.6
f) Under which conditions would you consider joining the scheme?	
<b>Strengths and weaknesses of the Primary Authority Scheme, areas of improvement</b>	<b>all</b> 1.7
a) In your view, what are the strength and weaknesses of the Primary Authority Scheme?	1.8
b) How could the scheme be improved?	
<b>The future of the Primary Authority Scheme</b>	<b>all</b> 1.9
a) If you think about the future of the scheme, what do you think will be the key challenges?	
b) Is there a case for extending the scheme to new areas, such as alcohol licensing,	1.10
c) What should be the rationale for including new areas of regulation in the scheme?	1.11
d) Is there a need to widen the scope to Scotland and Northern Ireland?	
e) Could you imagine alternative solutions to increase consistency in regulation?	1.12
<b>Further questions</b>	<b>all</b> 1.13
a) Is there any further documentation relevant to the topics of this interview you could share with us?	
b) Are there data sources that might be relevant to the topics of this conversation	1.14
c) Would you be happy to be contacted again in the course of the research?	
o Follow up interview	
o Case study of changed processes	

### 1.15 Master questionnaire for local authorities

This document contains all the questions we would like to ask to local authorities; each question is marked for which group it is relevant. The key categories are:

1. Primary authorities (PA)
2. Enforcing authorities (EA)
3. "Unwilling" Authorities (UA)
4. All local authorities (all)

Question	Relevance
<b>Your role and position</b>	<b>all</b>
a) Could you please outline your role and position within your local authority?	

<p>b) What are the key characteristics of your local authority?</p> <ul style="list-style-type: none"> <li>▪ Population</li> <li>▪ Size of regulatory services;</li> <li>▪ Business structure</li> <li>▪ Membership in voluntary schemes</li> </ul>	
<p><b>Businesses operating across local authority boundaries</b></p>	<p><b>all</b></p>
<p>a) In your view, what are the key issues businesses face in terms of complying with local regulation when they operate across local authority boundaries?</p> <p>b) What are the implications for local authorities in regulating businesses that operate in several local authorities?</p> <p>c) In your work within regulatory services have you come across cases of inconsistencies in regulating these businesses?</p> <ul style="list-style-type: none"> <li>▪ Can you give an example?</li> <li>▪ How common are these cases?</li> </ul> <p>d) What is your view on the (cost) implications for businesses?</p> <p>e) What would constitute inconsistency of advice and enforcement for you?</p> <p>f) How do you explain differences in regulatory practice?</p>	
<p><b>The Primary Authority Scheme</b></p>	<p><b>all</b></p>
<p>a) How did you hear about the Primary Authority scheme?</p> <p>b) What were your opinion about the scheme when you first heard about it?</p> <p>c) Did this opinion change? If yes, how and why?</p> <p>d) What were the motivations for joining/or not joining into a primary authority partnership?</p>	
<p><b>Becoming a primary authority</b></p>	<p><b>PAs</b></p>
<p>a) In how many primary authority partnerships is your local authority currently engaged?</p> <p>b) How was the partnership initiated?</p> <p>c) Did business approach you?</p> <p>d) Did the partnership develop out of previous cooperation or a voluntary scheme (home or lead authority)?</p> <p>e) Which areas of regulation do the partnerships cover?</p> <ul style="list-style-type: none"> <li>• age-restricted sales</li> <li>• agriculture</li> <li>• animal establishments and companion animal welfare</li> <li>• consumer credit</li> <li>• environmental protection</li> <li>• explosives licensing</li> <li>• fair trading</li> <li>• farm animal health</li> <li>• food safety and hygiene</li> <li>• food standards</li> </ul>	

<ul style="list-style-type: none"> <li>• general licensing</li> <li>• health and safety</li> <li>• housing</li> <li>• metrology</li> <li>• petroleum licensing</li> <li>• pollution control</li> <li>• product safety</li> <li>• road traffic.</li> </ul> <p>f) What were the main motivations to enter into the partnership?</p> <p>g) Why did the business decide to enter into a primary authority partnership with your local authority?</p> <p>h) Was there a formal selection/tendering process from the business?</p> <p>i) Could you describe the process of setting up the partnership?</p> <p>j) How easy was the application process with LBRO? Were there any difficulties?</p> <p>k) As part of the partnership, do you recover costs from businesses?</p> <ul style="list-style-type: none"> <li>• What are your motivations for charging/not charging?</li> <li>• Which % of costs do you recover?</li> <li>• How do you calculate the rates, what is your charging model?</li> </ul> <p>l) Who made the decision to become a primary authority?</p> <ul style="list-style-type: none"> <li>• Head of Service?</li> <li>• Council?</li> </ul>	
<p><b>First experiences of being a primary authority</b></p>	<p><b>PA</b></p>
<p>a) What are your first experiences of the scheme?</p> <p>b) How often are you in contact with your partner business(es)? What are the reasons for these contacts?</p> <p>c) Have your internal processes been changed as a result of the scheme?</p> <p>d) How does being a PA affect your capacity? Did you have difficulties in providing services demanded by the business (such as drafting an inspection plan?</p> <p>e) Are you satisfied with the support and infrastructure provided by LBRO?</p> <ul style="list-style-type: none"> <li>• Advice?</li> <li>• IT?</li> </ul> <p>f) What are the key costs and benefits you expect from the scheme for your local authority?</p> <ul style="list-style-type: none"> <li>○ Which of these costs do you expect to be one-off set up costs?</li> <li>○ Which of them do you expect to be running costs in the future?</li> </ul> <p>g) How did your relationship to business develop?</p> <p>h) How do you expect the primary authority partnership to affect the performance of businesses in complying with regulation?</p> <ul style="list-style-type: none"> <li>○ Better compliance?</li> <li>○ Fewer inconsistencies?</li> </ul>	

<ul style="list-style-type: none"> <li>i) Did you have been in contact with enforcing authorities? How often?</li> <li>j) How would you describe these interactions?</li> <li>k) Did you have any disagreement about appropriate enforcement action?</li> <li>l) If so, how did you resolve any differences?</li> <li>m) How did the LBRO IT work to support the interaction with the EA?</li> </ul>	
<b>First experience of enforcement under the Primary Authority scheme</b>	<b>EA</b>
<ul style="list-style-type: none"> <li>a) How often have you taken enforcement action against a business that has been in a PA relationship with another local authority?</li> <li>b) In which area of regulation was this?</li> <li>c) Could you talk us through the process of taken enforcement action?</li> <li>d) Did you have direct contact with the PA?</li> <li>e) How would you describe these interactions?</li> <li>f) Did you have any disagreement about appropriate enforcement action?</li> <li>g) If so, how did you resolve any differences?</li> <li>h) Do you feel comfortable that the PA ensures an adequate level of enforcement and standards of regulation?</li> <li>n) How do you expect the primary authority partnership to affect the performance of businesses in complying with regulation? <ul style="list-style-type: none"> <li>o Better compliance?</li> <li>o Fewer inconsistencies?</li> </ul> </li> </ul>	
<b>Your decision not to become a primary authority</b>	<b>UA</b>
<ul style="list-style-type: none"> <li>g) Have you been approached by one or more business to become a primary authority?</li> <li>h) What were your reasons not to enter into a primary authority relationship when business approached you? <ul style="list-style-type: none"> <li>a. Resources?</li> <li>b. Capacity and skills?</li> <li>c. Responsibility and liability?</li> <li>d. Size of the service?</li> <li>e. Relationship with businesses?</li> <li>f. General concerns about the scheme</li> <li>g. Already a working voluntary relationship?</li> </ul> </li> <li>i) What did you consider to be the cost and benefits of being in/outside the scheme?</li> </ul>	
<b>Strengths and weaknesses of the scheme, areas of improvement</b>	<b>all</b>
<ul style="list-style-type: none"> <li>c) In your view, what are the strength and weaknesses of the Primary Authority Scheme ?</li> <li>d) How could the scheme be improved?</li> </ul>	
<b>The future of the scheme</b>	<b>all</b>
<ul style="list-style-type: none"> <li>f) If you think about the future of the scheme, what do you think will be the key challenges?</li> <li>g) Is there a case for extending the scheme to new areas, such as alcohol licensing?</li> <li>h) What should be the rationale for including new areas of regulation in the</li> </ul>	



<p>scheme?</p> <p>i) Is there a need to widen the scope to Scotland and Northern Ireland?</p> <p>j) Could you imagine alternative solutions to increase consistency in regulation?</p>	
<b>Further questions</b>	<b>all</b>
<p>d) Is there any further documentation relevant to the topics of this interview you could share with us?</p> <p>e) Are there data sources that might be relevant to the topics of this conversation</p> <p>f) Would you be happy to be conducted again in the course of the research?</p> <ul style="list-style-type: none"> <li>o Follow up interview</li> <li>o Case study of changed processes</li> </ul>	

### 1.15.1 Questionnaire used for interviews with the LBRO Primary Authority team

#### Section 1: Your role and position

Q.1 Could you please outline your role and position within LBRO's Primary Authority Team?

Q.2 What was your role in the development of the Primary Authority Scheme?

#### Section 2: The development of the Primary Authority Scheme

Q.3 What was the reason for developing the Primary Authority Scheme?

Q.4 Why was the PAS needed? What were the perceived problems and why was the Scheme set-up?

Q.5 What was the evidence used to define the initial problem of inconsistency in enforcement?

Q.6 What were the types of issues/ problems raised by a) businesses; b) local authorities before PAS was implemented? What were the weaknesses of the Voluntary Schemes?

Q.7 What were the key steps in the development of the scheme?

Q.8 What was the process of consultation before the approval of the PAS? Who was involved? What were the main issues raised?

Q.9 During the process two impact assessments were drafted by BRE:

- o What are the key strengths and weaknesses of these assessments?
- o How can the assumptions be explained?
- o Which role played these documents?

Q.10 Have schemes other than the binding PAS been considered at some point during the consultation process?

Q.11 Which lessons have been drawn from the piloting phase?

#### Section 3: The current Primary Authority scheme

Q.12 Could you please outline the key elements of the final Primary Authority scheme?

Q.13 What are the key roles and responsibilities for:

- o Businesses
- o Primary authorities
- o Enforcing authorities
- o LBRO?

- Q.14 What is the process that needs to be followed to form a primary authority partnership?
- Q.15 What is the number of Partnerships that have been established since the start of the Scheme? Examples of Partnerships (who with whom)
- Q.16 How many Partnerships do you expect will be formed in the next 1-3 years?
- Q.17 What types of businesses engage in the PAS?
- Q.18 What was the rationale behind the choice of regulatory areas the scheme applies to? What are the obstacles to extending the scheme?

#### **Section 4: The role of LBRO in administering the Scheme**

- Q.19 What are the tasks LBRO performs as part of the Scheme?
- Q.20 What resources does LBRO commit to the Scheme?
- Staff
  - Budget
  - Infrastructure (IT etc.)
- Q.21 Which share of these resources is related to the initial roll out and promotion of the scheme, what will be the resources needed for running the scheme once it is well established?
- Q.22 How is the involvement of LBRO perceived by businesses and primary authorities?

#### **Section 5: Voluntary schemes**

- Q.23 Which voluntaries schemes existed prior to the introduction of the PAS?
- What are the main objectives of these schemes?
  - How do they differ from PAS
  - Who is responsible for these schemes?
- Q.24 How does the PAS 'fit' with the Voluntary Schemes (in terms of possible conflicts of interest or inconsistencies)?
- Q.25 What are the incentives for businesses and local authorities to join into a voluntary scheme as opposed to PAS?
- Q.26 Is there a competition between the PAS and the voluntary schemes? If yes, how does this impact on PAS and LBRO?.

#### **Section 6: First experiences with the scheme**

- Q.27 For those not in the PAS:
- Why is the adoption of the PAS lower than expected?
  - What are the main obstacles to the PAS (by stakeholders group: PA, LA, businesses, other)?
  - What are the main drivers to the PAS (by stakeholder group)?
  - What measures are being adopted to promote and strengthen PAS adoption?
- Q.28 For those within a Partnership:
- What were the barriers or challenges to implementation of the scheme?
  - What are the strengths and weaknesses of the PAS (by stakeholder)?
  - How satisfied are stakeholders (businesses, LA's) that are within a PA partnership? Are there companies considering the exit from the scheme?
  - Is the PAS providing the desired outcomes (i.e. more consistent advice, savings)?

- Q.29 What do you expect to be the key costs and benefits of the scheme?
- Q.30 Did you experience/do you expect problems with strategic choice of local authorities?
- Q.31 Have there been cases of inconsistent advice between different businesses?
- Q.32 What are the main strengths and weaknesses of dispute resolution?

### **Section 7: The future of the scheme**

- Q.33 If you think about the future of the scheme, what do you think will be the key challenges?
- Q.34 Is there a case for extending the scheme to new areas?
- Q.35 Could you imagine alternative solutions to tackling the problem of inconsistency such as centralizing the function of providing guidance?

### **Section 8: Further documentation**

- Q.36 Is there any further documentation relevant to the topics of this interview you could share with us?

## **1.15.2 Questionnaire used for interview with a representative of the British Retail Consortium (BRC)**

### **Section 1: Your role and position**

- Q1 Could you please outline your role and position within the British Retail Consortium

### **Section 2: The issues of facing businesses operating across local authority boundaries**

- Q2 In your view, what are the key issues businesses face in terms of complying with local regulation when they operate across local authority boundaries?
- Q3 What are the implications for Local authorities in regulating businesses that operate in several local authorities?
- Q4 In your work have you come across cases of inconsistency in local regulation and enforcement practice?
- Q5 In this context what does the term inconsistency encompass for you?
- Q6 How common are cases of inconsistency?
- Q7 Could you give an example of inconsistency?
- Q8 What was the economic impact of this inconsistency?

### **Section 3: The development of the Primary Authority Scheme**

- Q9 What were the key steps in the development of the Scheme?
- Q10 Have other schemes been considered at some point during the decision process (e.g. voluntary or more centralised schemes)?
- Q11 What was BRC role in the development of the Primary Authority scheme?
- Q12 What were the key positions BRC took during the development of the Primary Authority scheme?
- Q13 Did BRC manage to shape the new scheme in its direction?

Q14 What was the evidence used to define the initial problem of inconsistency in enforcement?

#### **Section 4: First experiences with the Scheme**

Q15 What are BRC's impressions of the first experiences with the Scheme?

- For businesses
- For local authorities

Q16 Why is the adoption of the Scheme lower than expected?

Q17 What are the main obstacles and reasons for business to not to participate in the Scheme?

Q18 Do you expect problems with strategic choice of local authorities? How would you expect businesses to choose their primary authority?

Q19 Would businesses be willing to pay for Primary authority scheme? Under what conditions?

Q20 Would you expect an impact on compliance of businesses?

#### **Section 5: Voluntary schemes**

Q21 How does the Primary Authority Scheme 'fit' with the Voluntary Schemes (in terms of possible conflicts of interest or inconsistencies)?

Q22 What are the incentives for businesses and local authorities to join into a Primary Authority scheme as opposed to the voluntary schemes?

#### **Section 6: The future of the Primary Authority scheme**

Q23 If you think about the future of the Primary Authority scheme, what do you think will be the key challenges?

Q24 Is there a case for extending the scope of the scheme?

- More areas of regulation?
- Different organisations (e.g. national associations)

Q25 Could you imagine alternative solutions to tackling the problem of inconsistency?

#### **Section 7: Further documentation**

Q.37 Is there any further documentation relevant to the topics of this interview you could share with us?

#### **1.15.3 Questionnaire used for interview with a representative of local authorities Coordinators of Regulatory Services (LACORS – now renamed Local Government Regulation)**

#### **Section 1: Your role and position**

Q1 Could you please outline your role and position within LACORS?

## **Section 2: The development of the Primary Authority scheme**

- Q2 What were the key steps in the development of the Scheme?
- Q3 Have other schemes been considered at some point during the decision process (eg. voluntary or more centralised schemes)?
- Q4 What was LACORS role in the development of the Primary Authority scheme?
- Q5 What were the key positions LACORS took during the development of the Primary Authority scheme?
- Q6 Did LACORS manage to shape the new scheme in its direction?
- Q7 What was the reason for developing the Primary Authority scheme?
- Q8 What were the perceived problems and why was the Scheme set-up?
- Q9 What was the evidence used to define the initial problem of inconsistency in enforcement?

## **Section 3: First experiences with the Scheme**

- Q10 What are LACORS impressions of the first experiences with the Scheme?
  - For businesses
  - For local authorities
- Q11 Why is the adoption of the Scheme lower than expected?
- Q12 What are the main obstacles and reasons not to participate in the Scheme?
- Q13 Do you expect problems with strategic choice of local authorities?

## **Section 4: The Home Authority Scheme**

- Q14 Could you outline the key principles of the home authority scheme for us?
- Q15 What is the history of the home authority scheme?
- Q16 Why was it set up?
- Q17 How do you see the future of the home authority scheme?
- Q18 What do you think are the key advantages/disadvantages of the home authority scheme for local authorities/businesses?
- Q19 Will there be a space for voluntary schemes in the future?

## **Section 5: The future of the Primary Authority scheme**

- Q20 If you think about the future of the Primary Authority scheme, what do you think will be the key challenges?
- Q21 Is there a case for extending the Scheme to new areas?
- Q22 Could you imagine alternative solutions to tackling the problem of inconsistency?

## **Section 6: Further documentation**

- Q23 Is there any further documentation relevant to the topics of this interview you could share with us?

### **1.15.4 Questionnaire use for interview with a representative of the Health and Safety Executive (HSE)**

#### **Section 1: Your role and position**

- Q1 Could you please outline your role and position within LACORS?

## **Section 2: The development of the Primary Authority scheme**

- Q2 What were the key steps in the development of the Scheme?
- Q3 Have other schemes been considered at some point during the decision process (eg. voluntary or more centralised schemes)?
- Q4 What was HSE's role in the development of the Primary Authority scheme?
- Q5 What were the key positions HSE took during the development of the Primary Authority scheme?
- Q6 Did HSE manage to shape the new scheme in its direction?
- Q7 What was the reason for developing the Primary Authority scheme?
- Q8 What were the perceived problems and why was the Scheme set-up?
- Q9 What was the evidence used to define the initial problem of inconsistency in enforcement?

## **Section 3: First experiences with the Scheme**

- Q10 What are HSE impressions of the first experiences with the Scheme?
- For businesses
  - For local authorities
- Q11 Why is the adoption of the Scheme lower than expected?
- Q12 What are the main obstacles and reasons not to participate in the Scheme?
- Q13 Do you expect problems with strategic choice of local authorities?

## **Section 4: Voluntary schemes**

In this section we would like to talk about the voluntary approaches to partnership, including the:

- The Lead Authority Scheme
  - The Large Organisation Pilot
- Q14 Could you outline the key principles of the lead authority scheme for us?
- Q15 What is the history of the lead authority scheme?
- Q16 Why was it set up?
- Q17 Why did HSE decide to withdraw support from the scheme and transfer partnerships to join the Primary Authority scheme?
- Q18 What do you think are the key advantages/disadvantages of voluntary schemes for local authorities/businesses?
- Q19 Will there be a space for voluntary schemes in the future?
- Q20 Could you describe the Large organisation pilot to us?
- Motivation to create it?
  - Success?

## **Section 5: The future of the Primary Authority scheme**

- Q21 If you think about the future of the Primary Authority scheme, what do you think will be the key challenges?
- Q22 Is there a case for extending the Scheme to new areas?
- Q23 Could you imagine alternative solutions to tackling the problem of inconsistency?

## **Section 6: Further documentation**

- Q24 Is there any further documentation relevant to the topics of this interview you could share with us?
- Q25 Are there data sources that allow for the assessment of regulatory performance by business? (RIDDOR, other sources?)

### **1.15.5 Questionnaire used for interview with a representative of the Better Regulation Executive (BRE)**

#### **Section 1: Your role and position**

- Q2 Could you please outline your role and position within the Better Regulation Executive (BRE)?
- Q3 What was your role in the development of the Primary Authority scheme?

#### **Section 2: The development of the Primary Authority scheme**

- Q4 What was the reason for developing the Primary Authority scheme?
- Q5 What were the perceived problems and why was the Scheme set-up?
- Q6 What was the evidence used to define the initial problem of inconsistency in enforcement?
- Q7 What were the key steps in the development of the Scheme?
- Q8 Have other schemes been considered at some point during the decision process (eg. voluntary or more centralised schemes)?
- Q9 Who were the key actors in developing the Scheme?
- Q10 What was the process of consultation before the approval of the Scheme? Who was involved? What were the main issues raised?
- Q11 Have the proposal been substantially amended as a result of the consultation?
- Q12 Which lessons have been drawn from the piloting phase?

#### **Section 3: The impact assessments**

- Q13 During the process two impact assessments were drafted by BRE. Could you describe the key challenges you faced in drafting these impact assessments?
- Q14 What are the key strengths and weaknesses of these impact assessments?
- Q15 What data sources were available to you at this point in time?
- Q16 How did you arrive at the key assumptions?
- Number of participating businesses
  - Average cost of an inconsistency
  - Number of inconsistencies a year
- Q17 Where do you expect the key costs and benefits to occur in the Scheme as it is now being implemented?

#### **Section 4: First experiences with the Scheme**

- Q18 What are your impressions of the first experiences with the Scheme?
- For businesses
  - For local authorities
- Q19 Why is the adoption of the Scheme lower than expected?

Q20 What are the main obstacles and reasons not to participate in the Scheme?

Q21 Do you expect problems with strategic choice of local authorities?

### **Section 5: Voluntary schemes**

Q22 Which voluntary schemes existed prior to the introduction of the Primary Authority scheme?

- What are the main objectives of these schemes?
- How do they differ from the Primary Authority scheme
- Who is responsible for these schemes?

Q23 How does the Primary Authority scheme 'fit' with the Voluntary Schemes (in terms of possible conflicts of interest or inconsistencies)?

Q24 What are the incentives for businesses and local authorities to join into a voluntary scheme as opposed to the Primary Authority scheme?

### **Section 6: The future of the Scheme**

Q25 If you think about the future of the Scheme, what do you think will be the key challenges?

Q26 Is there a case for extending the Scheme to new areas?

Q27 Could you imagine alternative solutions to tackling the problem of inconsistency?

### **Section 7: Further documentation**

Q28 Is there any further documentation relevant to the topics of this interview you could share with us?



## Appendix C: Questionnaires used for surveys

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### 1.16 Survey questions for participating businesses

#### 1.16.1 Background information on your business

Q1. Which of the following industries does your business operate in? *Please tick one:*

- Hotel/Catering
- Manufacturing
- Management/Business Services
- Retail/Distribution
- Transport
- Other

Q2. Other, please specify:

--

Q3. Thinking of your business as a whole, in which of the following locations does it operate? *Please check all that apply.*

- Just in your local area (i.e. town/village)
- Just in your region
- England, Wales, Scotland
- Whole of UK, including Northern Ireland
- Don't know

Q4. Roughly how long has your company been in existence? *Please tick one:*

- 1 – 3 years
- 6 - 20 years
- More than 20 years
- Don't know

Q5. As far as you know, roughly how many staff are employed by the organisation you work for, excluding owners, partners and directors? Please include anyone who works for the organisation, even if they work in a different location or plant to you. *Please tick one:*

- 1 - 4
- 10 - 19
- 20 - 49
- 50 - 99
- 100 - 249
- 250-499
- 500 - 999
- 1,000+
- Don't know

Q6. Roughly what is your business' annual turnover? Please select the appropriate turnover size (£ thousand) for your business.

- 100 – 249
- 250 – 499
- 1,000 – 4, 999
- 5,000 +

#### 1.16.2 **Your business and the Primary Authority scheme**

Q7. Have you been the person responsible for managing the Primary Authority scheme since your business became involved in it?

- Yes
- No

Q8. If not, how long have you been responsible for managing the Primary Authority scheme on behalf of your business?

- 1-3 months
- 4-5 months
- 6 months to a year
- More than a year

Q9. Approximately, how many local authority areas does your business operate in? *Please tick one:*

- 2
- 3-5

- 6-10
- 11-50
- 51-100
- More than 100
- Don't know
- Other, please specify:

Q10. Have you or are you currently participating in one of the voluntary schemes such as the Home Authority or the Lead Authority scheme?

	Yes	No
My business is currently participating in the Home Authority scheme		
My business was participating in the Home Authority scheme in the past		
My business was participating in the Lead Authority scheme in the past		
My business was participating in the Large Organisation Partnership Pilot (LOPP)		

Q11. If you are currently participating in one of the voluntary schemes that could be covered by the Primary Authority scheme, please tell us why you have chosen not to adopt a primary authority partnership for these areas of regulation?

### 1.16.3 Joining the Primary Authority scheme

Q12. How many primary authority partnerships does your business have?

- 1
- 2
- 3
- 4

- 5 or more

If your business has more than one primary authority partnership, please answer the following questions in relation to the primary authority partnership you think is the most significant for your business.

Q13. For how many months has your business been in this primary authority partnership?

- 1 month or less
- 2 - 4 months
- 5 months - 9 months
- 10 months - a year
- More than a year
- Don't know

Q14. How was the primary authority partnership initiated? *Please tick one:*

- Local authority approached my business
- My business approached the local authority
- Transition from voluntary arrangement
- LBRO approached my business
- My business approached LBRO
- Don't know

Q15. In which one of the following areas of regulation is your business involved in a primary authority partnership? *Please tick one:*

- Age-restricted sales
- Agriculture
- Animal establishments and companion animal welfare
- Consumer credit
- Environmental protection
- Explosives licensing
- Fair trading
- Farm animal health
- Food safety and hygiene
- Food standards
- General licensing

- Health and safety
- Housing
- Metrology
- Petroleum licensing
- Pollution control
- Product safety
- Road traffic

Q16. Did you have to put together a business case for your organisation (i.e. internally) to justify your involvement in the Primary Authority scheme?

- Yes
- No
- Don't know

Q17. What were your main motivations for choosing to get involved in the Primary Authority scheme? *Please rate the options that apply in the order of importance (with 1 being most important and 5 least important)*

	1	2	3	4	5
The statutory standing of the scheme (i.e. dispute resolution and legally binding procedures)					
Better intelligence from inspections carried out by local authorities					
Improved relationship with local authority and other regulators					
Recognition of compliance efforts					
Other motivation, please specify:					

Q18. If you have selected “other motivation” in the above question, please specify below:

Q19. What were your main reasons for choosing your primary authority? *Please select the THREE most important options in the list below:*

- Proximity of local authority (e.g. near head office or other sites, convenient to get to)
- Previous involvement in a pilot or voluntary scheme with this local authority
- Good relationship with this local authority already

- Understanding of my business/sector by this local authority
- Capacity of local authority to deliver Primary Authority (expertise, staff, other resources)
- No charge made to my business for primary authority partnership by this local authority
- Charges applied by this local authority to my business are reasonable to deliver the Primary Authority scheme
- Other rationale, please specify:

Q20. In your view, how easy or difficult was it for your business to find a suitable primary authority? *Please tick one.*

- Very easy
- Easy
- Neither easy nor difficult
- Difficult
- Very difficult

Q21. If you found the process of finding a suitable primary authority difficult or very difficult, please give us a brief explanation of which that is:

Q22. Did you encounter any challenges when you began the process of establishing a primary authority partnership? *Please rate the options that apply in the order of importance (with 1 being the most important and 10 the least important)*

- Lack of corporate buy-in to Primary Authority
- Not enough information available about the scheme
- Not enough help available from LBRO
- Agreeing resourcing arrangements
- Lack of buy-in from local authority
- Difficulty understanding what services the local authority will provide
- Difficulty quantifying benefits
- Problems with reaching legal agreement
- Other challenges, please specify below:

Q23. If you have selected “other challenge” in the above question, please specify below:

**1.16.4 Perceptions of value/benefit derived from the Primary Authority scheme (compared to before the PA scheme)**

Q24. What would you identify as the main benefits of being involved with the Primary Authority scheme? *Please select the THREE most important options in the list below:*

- I receive advice from one local authority on how to comply that other local authorities will respect
- Single point of contact to deal with all local authorities
- Reduction in inconsistencies in the way my business is being regulated at the local level
- Reduction in the number of inspections carried out by local authorities overall
- Cost savings for my business
- The statutory standing of the scheme (i.e. dispute resolution and legally binding procedures)
- Better intelligence from inspections carried out by local authorities
- Improved relationship with local authority and other regulators
- Recognition of compliance efforts
- Other benefits, please specify:

Q25. What would you identify as the main challenges of participation in the Primary Authority scheme? *Please rate options that are applicable in their order of importance where 1 is the most important option and 6 is the least important.*

	1	2	3	4	5	6
Increased workload						
Bureaucracy of the scheme						
Lack of corporate buy-in to the scheme						
Lack of buy-in to the scheme by other local authorities						
Ownership structure of my business						
Other challenge, please specify below:						

Q26. If you have selected “other challenge” in the question above, please specify below:

**1.16.5 Costs of being part of the Primary Authority scheme for your business**

**Financial costs**

Q27. Is your business being charged for the primary authority partnership?

- Yes
- No

Q28. If so, which of the charging arrangements below have you and your primary authority adopted? *Please tick one:*

- Annual fee for unlimited hours
- Annual fee for agreed number of hours per annum
- Hourly rate based on agreed number of hours
- Hourly rate for services as and when needed
- Other, please specify:

Q29. Following on from your answer to the previous question, please tell us how much in £ you are being charged by your local authority (please enter a number in the relevant text box below):

*Please note that this information will be kept in confidence and will only be reported at aggregate level so that no individual business can be traced back to this information.*

	<b>Amount</b>
Annual fee for unlimited hours	£
Annual fee for agreed number of hours per annum	£
Hourly rate based on agreed number of hours	£
Hourly rate for services as and when needed	£
Other, please specify:	£

Q30. Roughly how many hours per year do you think your primary authority spends on your partnership?

Number of hours per year	
--------------------------	--

**Time and staff cost**

Q31. How many days work did your business spend on setting up the primary authority partnership?

- 1 day or less
- 2 – 4 days
- 5 – 9 days
- 10 – 15 days



- More than 15 days
- Don't know

Q32. Roughly how long did it take from the initial discussions stage to the start of the partnership?

- Less than a week
- From 1 week to 1 month
- From 1 month to 3 months
- From 3 months to 6 months
- More than 6 months

Q33. Has the amount of time your business spends dealing with compliance with local regulation since your involvement in a primary authority partnership changed?

- Increased
- Decreased
- Stayed the same
- Don't know

Q34. If the amount of time your business spends on dealing with complying with local regulation has changed *since your involvement in a primary authority partnership*, was this change...

- Directly linked to your business' involvement in a primary authority partnership
- Unrelated to your business' involvement in a primary authority partnership
- Don't know

Q35. How much time a week does your business dedicate to maintaining its primary authority partnership? *Please tick one.*

- 1 hour or less
- 2 – 4 hours
- 5 – 9 hours
- 10+ hours
- Don't know

Q36. How often and by which means of communication are you in contact with your primary authority?

	On a daily basis	On a weekly basis	On a two-weekly basis	On a monthly basis	Less frequently than on a
--	------------------	-------------------	-----------------------	--------------------	---------------------------

		basis	basis	basis	monthly basis
Email contact					
Phone contact					
Face to face meetings					

Q37. Do you think the primary authority partnership reduces or increases the burden for your business of complying with the relevant regulations covered by your partnership? *Please tick one:*

- Reduces the burden
- Increases the burden
- Neither reduces nor increases
- Too early to say
- Don't know

Q38. How many inspections have you had *since* your involvement in the Primary Authority scheme?

- 0
- 1-5
- 6-20
- 21-100
- 101-200
- More than 200
- Don't know

Q39. How many inspections have you had during the year *prior* to your involvement in the Primary Authority scheme?

- 0
- 1-5
- 6-20
- 21-100
- 101-200
- More than 200

- Don't know

**Consistency of advice before and after joining the Primary Authority scheme**

Q40. How inconsistent or inconsistent is the advice (e.g. requests to undertake compliance activities) that you currently receive from the various local authorities you have contact with? *Please tick one.*

- Very consistent
- Fairly consistent
- Fairly inconsistent
- Very inconsistent
- Don't know

Q41. In your opinion, have you experienced a more or less consistent approach to local authority regulation since your involvement in the Primary Authority scheme? *Please tick one:*

- More consistent approach
- Stayed about the same
- Less consistent approach
- Too early to say
- Don't know

Q42. Roughly, how many instances of inconsistent advice have you encountered *since your involvement in a primary authority partnership?*

- 0
- 1-5
- 6-20
- 21-100
- 101-200
- More than 201
- Don't know

Q43. Roughly, how many instances of inconsistent advice have you encountered *in the year prior to your involvement in a primary authority partnership?*

- 0
- 1-5
- 6-20
- 21-100

- 101-200
- More than 200
- Don't know

#### 1.16.6 Your business and enforcing authorities

The questions in this section ask you about your business's experience of dealing with Local authorities other than your primary authority (referred to as enforcing authorities in this survey) since your business joined the Primary Authority scheme. Where a question refers to specific areas of regulation, please answer it in relation to the area(s) of regulation under your current primary authority partnership(s) as far as possible.

#### Awareness of Primary Authority scheme by enforcing authorities

Q44. In your view, what is the level of awareness of enforcing authorities with regard to the Primary Authority scheme overall?

- Widespread awareness
- Some awareness
- Not aware at all
- Don't know

Q45. Since you joined the Primary Authority scheme, have you noticed any changes in the way enforcing authorities deal with your business?

- Yes
- No

Q46. Is so, which changes have you noticed? *Please check all that apply.*

- Less frequent contact with enforcing authorities
- More frequent contact with enforcing authorities
- Less frequent inspections by enforcing authorities
- More frequent inspections by enforcing authorities
- Improved relationship with enforcing authorities
- Worsened relationship with enforcing authorities

Q47. And how would you say those changes have impacted on your business overall?  
*Please tick one:*

- These changes have been very positive for my business
- These changes have been positive for my business
- These changes have been negative for my business
- These changes have been very negative for my business

*Inspection plans and enforcing authorities*

Q48. Have your business and your primary authority developed (or are you developing) an inspection plan?

- Yes
- No

Q49. Approximately how many hours did your business spend in developing the inspection plan? *Please tick one:*

- 1 hour or less
- 2-4 hours
- 5-9 hours
- 10-15 hours
- 16-30 hours
- 31-40 hours
- 41-50 hours
- More than 50 hours
- Don't know

Q50. Do you know if the inspection plan has been used by enforcing authorities in dealing with your business?

- Yes
- No

Q51. What impact, if any, do you think the inspection plan has had on the way enforcing authorities regulate your business? *Please check all that apply.*

- Quicker, more efficient inspections
- More targeted inspections (i.e. focus on risks identified in the inspection plan)
- Fewer inspections altogether
- More frequent inspections
- Lengthier inspections
- No impact
- Too early to say
- Other impact, please specify:

**1.16.7 Closing questions**

Q52. On the whole, how satisfied or dissatisfied are you with your involvement in the Primary Authority scheme? *Please tick one:*

- Very satisfied
- Fairly satisfied
- Neither satisfied nor dissatisfied
- Fairly dissatisfied
- Very dissatisfied
- Don't know

Q53. In your view, what could be done to improve the Primary Authority scheme?

Q54. The next stage of this research will involve 5 case study 'pairs' of businesses with their primary authority. In these case studies, the research team will seek to better understand the costs and benefits that businesses face when participating in the Primary Authority scheme. If you are interested in being contacted to take part in a case study, please include your email below and a member of the research team will contact you shortly:

Yes, I would be interested in taking part in a case study for this research and my email address is: \_\_\_\_\_

Q55. Please let us know if you would be willing to be contacted by the research team should the need arise. This would benefit the evaluation in instances where we might require further information on your responses, however, it is entirely voluntary on your part and we will not contact you for other purposes.

Yes, I am willing to be contacted regarding my response to this questionnaire. My email address is: \_\_\_\_\_

## 1.17 Survey questions for primary authorities

### 1.17.1 Background information on your local authority

Q1. What is the name of your local authority?

Q2. What is your role within your local authority?

- Head of regulatory services
- Manager of regulatory services
- Team leader of regulatory services
- Regulatory officer/inspector
- Support/technical officer

- Other, please specify:

#### 1.17.2 Your local authority and the Primary Authority scheme

Q3 Did your local authority take part in the Large Organisations Partnership Pilot (LOPP)?

- Yes
- No

Q4 What were your main motivations for getting involved in the Primary Authority scheme? *Please rate the following options that are applicable in their order of importance where 1 is the most important option and 7 is the least important.*

- Providing more effective support to local businesses to make compliance easier
- Improving relationships with local businesses
- Source of income for the local authority
- Part of transition from voluntary schemes
- Potential to reduce inconsistencies in the way businesses are regulated at the local level
- Playing a part in making the local regulatory system work more effectively
- Other motivation, please specify below:

Q5. If you selected “other motivation” in the question above, please specify:

--

Q6. Has your local authority agreed a specific strategy to offer the Primary Authority scheme to local businesses?

- Yes
- No

Q7. If yes, what approach have you agreed? *Please check all that apply:*

- Promoting Primary Authority to local businesses
- Transitioning existing voluntary arrangements to Primary Authority
- Providing Primary Authority when businesses request it
- Other, please specify:

The following questions ask you about the process your local authority had to go through to set up a primary authority partnership with a business.

Please answer these questions in relation to the Primary Authority scheme only and exclude any costs or time involvement from participation in the Large Organisations Partnership Pilot (LOPP) if applicable to your local authority.

If you are involved in more than one primary authority partnership, please answer the following questions by thinking about the *first partnership* you were involved in setting up.

Q8. Roughly how many hours' work did your local authority spend on setting up its *first primary authority partnership*. Please tick one.

- 1 hour or less
- 2-4 hours
- 5-9 hours
- 10-15 hours
- 16-30 hours
- 31-40 hours
- 41-50 hours
- More than 50 hours
- Don't know

Q9. Roughly how long did it take from the initial discussions stage to the start of your local authority's first primary authority partnership? Please tick one.

- Less than a week
- More than a week and less than a month
- From a month to three months
- From three months to six months
- More than six months
- Don't know

Q10. Thinking about your first primary authority partnership, please estimate roughly how much time a week you spend dealing with the primary authority business to maintain this partnership?

- None
- 1 hour or less
- 2-4 hours
- 5-9 hours
- 10+ hours
- Don't know

Q11. Did you encounter any of the following challenges when you began the process of establishing primary authority partnerships? Please select the options that are applicable and rate them by order of importance where 1 is the most important and 8 is the least important.



	1	2	3	4	5	6	7	8
Lack of buy-in from my local authority								
Not enough information available about the scheme								
Not enough help available from LBRO								
Agreeing resourcing arrangements								
Difficulty understanding what services the business wants								
Difficulty quantifying benefits to business								
Problems with reaching legal agreement								
Other challenge, please specify below:								

Q12. If you selected “other challenge” in the question above, please specify:

--

Q13. Were you involved in setting up more than one primary authority partnership?

- Yes
- No

If you were involved in setting up more than one primary authority partnership, please answer the following two questions in relation to the *most recent* partnership you set up.

Q14. Roughly how many hours’ work did your local authority spend on setting up *its most recent primary authority partnership*? Please tick one:

- 1 hour or less
- 2-4 hours
- 5-9 hours
- 10-15 hours
- 16-30 hours
- 31-40 hours
- 41-50 hours
- More than 50 hours
- Don’t know

Q15. Roughly how long did it take from the initial discussions stage to the start of *its most recent primary authority partnership*? Please tick one:

- Less than a week
- More than a week and less than a month
- From a month to three months
- From three months to six months
- More than six months

Q16. Thinking about your most recent primary authority partnership, please estimate roughly how much time a week you spend dealing with the primary authority business to maintain this partnership?

- None
- 1 hour or less
- 2-4 hours
- 5-9 hours
- 10+ hours
- Don't know

Q17. Still thinking about your most recent primary authority partnership, please estimate roughly how much time a week you spend dealing with enforcing authorities?

- None
- 1 hour or less
- 2-4 hours
- 5-9 hours
- 10+ hours
- Don't know

**1.17.3 Perceptions of value/benefit derived from the Primary Authority scheme**

Q18. What would you identify as the main benefits of being involved with the Primary Authority scheme? *Please rate the following options that are applicable in order of importance where 1 is the most important and 5 is the least important.*

	1	2	3	4	5
Supporting local businesses to make compliance easier for them					
Development opportunities for local authority staff					
Improved working relationships with local businesses					
Greater efficiency for the Local Authority Regulatory System					

Other benefit, please specify below:					
--------------------------------------	--	--	--	--	--

Q19. If you selected "other benefit" in the question above, please specify:

--

Q20. What would you identify as the main challenges of participation in the Primary Authority scheme? *Please check all that apply.*

- Increased workload
- Bureaucracy of the scheme
- Lack of confidence of officers to provide primary authority services
- Lack of business expertise/knowledge of officers to provide primary authority services
- Lack of buy-in to the scheme by this LA
- Lack of buy-in to the scheme by other LAs
- Other, please specify:

**1.17.4 Cost of using the scheme for the local authority**

Q21. Does providing the Primary Authority scheme require extra resources compared to the service you provided to business(es) in the partnership previously?

- Yes
- No
- Don't know

Q22. If so, could you please indicate below what type of resources it requires and quantify these where possible?

--

Q23. Have you had to take on additional staff to deliver the Primary Authority scheme?

- Yes
- No
- Don't know

Q24. If so, how many new staff are so employed? *Please tick one.*

- Less than 1 FTE
- 1 FTE

- Between 1 and 2 FTE
- More than 2 FTE
- Don't know
- Not applicable

Q25. Have you agreed inspection plans with one or more of the participating businesses in your area?

- Yes
- No
- Don't know

Q26. Approximately how many hours did your local authority spend on developing the Inspection Plan? *Please tick one.*

- 1 hour or less
- 2-4 hours
- 5-9 hours
- 10-15 hours
- 16-30 hours
- 31-40 hours
- 41-50 hours
- More than 50 hours
- Don't know

Q27. What cost recovery arrangements does your local authority have for primary authority partnerships? *Please pick one.*

- No cost recovery
- Recover some of the costs
- Full cost recovery
- Don't know

#### 1.17.5 Ongoing challenges

Q28. Are there any new challenges facing your local authority in relation to your ongoing participation in the scheme?

- Yes
- No
- Don't know

Q29. If yes, please specify which new challenges are facing your local authority in relation to your ongoing participation in the Primary Authority scheme. *Please rate the applicable options in order of importance where 1 is the most important and 6 is the least important.*

	1	2	3	4	5	6
Financial pressures on local authorities						
Relationships with enforcing authorities						
Taking up more resources than expected						
Less interest from businesses						
More interest from businesses						
Other new challenge, please specify below:						

Q30. If you have selected “other new challenge” in the question above, please specify:

#### 1.17.6 Closing questions

Q31. Overall, would you say your participation in the Primary Authority scheme has been...*[Please tick one]*

- Very positive
- Reasonably positive
- Neutral experience
- Somewhat negative
- Very negative
- Too early to say
- Don't know

Q32. In your view, what could be done to improve the Primary Authority scheme?

### 1.18 Survey questions for enforcing authorities

#### 1.18.1 Background questions

Q1. What is the name of your local authority:

--

Q2. What is your role within your local authority? *Please tick one.*

- 
- Head of regulatory services
- Manager of regulatory services
- Team leader of regulatory service
- Regulatory officer/inspector
- Support/technical officer
- Other, please specify:

Q3. How does your local authority provide support to local businesses in complying with local regulation? *Please check all that apply:*

- Provision of advice during inspections
- Provision of a business advice helpline
- Engagement with business representative organisations
- Organisations of business 46seminars
- Provision of Home Authority
- Provision of Primary Authority
- Taking part in Trading Places
- Other, please specify:

Q4. Are you aware of the Primary Authority scheme?

- Yes
- No

Q5. Have any businesses approached you about the possibility of forming a primary authority partnership with your local authority?

- Yes
- No
- Don't know

Q6. Have you offered the Primary Authority scheme to businesses you work with?

- Yes
- No

- Don't know

Q7. How do you feel about the level of information available about the Primary Authority scheme? *Please tick one.*

- Too much
- About right
- Too little

Q8. In your opinion, how interested were the businesses you approached in the Primary Authority scheme? *Please tick one.*

- Very interested
- Somewhat interested
- Unsure
- Not very interested
- Not interested at all

Q9. Are you still in discussions regarding Primary Authority with any of the businesses you approached?

- Yes
- No
- Don't know

Q10. If you did not offer primary authority services to businesses in your local area, what were your main reasons for not doing so? *Please rate the applicable options in order of importance with 1 being the most important and 7 the least important.*

	1	2	3	4	5	6	7
Complexity of joining process							
Lack of available staff to resource partnership							
The value of the scheme is/was not clear							
My local authority does not offer Primary Authority to local businesses							
No different to Home Authority							
Lack of confidence of officers to provide primary authority services							
Other reason, please specify below:							

Q11. If you answered "other reason" in the question above, please specify:

--

**1.18.2 Involvement with local businesses**

Q12. Are any of the business premises in your local authority area covered by a primary authority partnership?

- Yes
- No
- Don't know

Q13. How did you become aware of participating businesses? *Please check all that apply.*

- Visits to the LBRO Primary Authority website
- Direct communication from the business
- Direct communication from the primary authority
- Email circulation list
- Other, please specify:

Q14. Have you noticed a change in compliance behaviour in primary authority businesses in your area?

- Yes
- No
- Don't know

Q15. If so, what changes have you noticed? *Please tick one.*

- Improved compliance
- Reduced compliance
- Other, please specify:

Q16. Has the way in which you deal with businesses changed in any way as a consequence of businesses in your area becoming members of the Primary Authority scheme?

- Yes
- No
- Don't know

Q17. If yes, what changes have taken place? *Please check all that apply.*

- More targeted inspection activity
- Compliance issues raised with primary authority or business head office rather than with local premises of the business



- Less frequent inspections of PA businesses
- More frequent inspections of PQ businesses
- Improved communications with relevant local authority acting as the primary authority for the business
- Easier resolution of compliance issues
- Unable to contact PA businesses directly
- Other, please specify:

Q18. Are you aware of businesses in your area having inspection plans?

- Yes
- No
- Don't know

Q19. If so, have you made use of these during your inspections of these businesses?

- Yes
- No

Q20. In your view, what is the impact of using inspection plans? *Please check all that apply.*

- Quicker, more efficient inspections
- More targeted inspections (i.e. focus on risks identified in the inspection plan)
- Fewer inspections altogether
- More frequent inspections
- Lengthier inspections
- Other impact, please specify:

### 1.18.3 Closing question

Q21. Please include any further comments you might have on the Primary Authority scheme in the text box below:



## Appendix D: Questionnaire used for case studies

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### 1.19 Questionnaire for businesses

#### 1.19.1 Section 1: General questions

These questions relate to all PA relationships your business might have.

Q1 What were your main **motivations** for joining the PA scheme? Was one of your motivations to move towards a more efficient way of interacting with local authorities (e.g. cost reduction; time reduction; improved efficiency; etc)?

Q2 Prior to joining the PA scheme, **was there resistance** to shifting to a new approach within your organisation? If yes, how was this overcome?

Q3 Since joining the PA scheme, have you found any ongoing or new **barriers to the change** from within your organisation? If so, which ones?

Q4 In your view, are there any **drivers or enablers** within your organisation helping your ongoing involvement in the PA scheme? If so, what are they?

Q5 Since joining the PA scheme, do you think your organisational **view of (local) regulatory services/regulation** has changed? If so, how?

Q6 Do you feel that being part of the PA scheme is a “**selling point**” to any stakeholders dealing with your business? If so, to which stakeholders and in what way is this demonstrated?

Q7 In your view, are businesses within the PA scheme “**different**” from those outside of the scheme, but still within your industry? If so, how (e.g. more or less compliant; more or less responsive, etc)?

Q8 Would you say that the local authorities you have PA partnership(s) with shows more or less **professionalism** in comparison with other LAs you deal with? If so, in what way?

Q9 In the context of regulation, do you find that your organisation adopts **different ways of working** according to which Local Authority Regulatory Services it is dealing with?

Q10 Does the Primary Authority scheme **change the relationship(s)** your business has with your primary authority(ies) and in particular do you think it changes the way your business has been dealt with by other regulatory services?

Q11 Has your business ever had to use the PA scheme’s **dispute resolution** procedure? If so, please explain further. If not, how would you feel about using it in the future?

Q12 What are your views on the way in which other local authorities interact with the Primary Authority scheme?

### 1.19.2 Section2: Cost questions

The following questions relate to your PA partnership with X council.

Q13 [*Only for those businesses that had to put together a business case to be part of PA*]: What **assumptions** did you use to build your business case? And would you say these assumptions have been broadly accurate since your involvement in PA so far?

[*For other businesses*]: What **considerations** did you take into account when you were looking at joining the PA scheme?

Q14 **How much time** is required (in person, by telephone and by email) in order to deal with interactions with your primary authority?

Q15 **How much time** is required (in person, by telephone and by email) in order to deal with interactions with enforcing authorities? How does it compare with the amount of time required to deal with local authorities in this area of regulation before the PA partnership was established?

Q16 **How much time** on average does an inspection take (e.g. number of hours, number of staff involved, etc)? How does that compare to before your involvement in the PA scheme?

Q17 Overall, would you say that there has been a **change in your business' compliance** since your involvement in the PA scheme (i.e. more or less compliant)? If so, what would you attribute this to?

Q18 Would you be able to estimate the **number of instances of non compliance** your business has been involved in since the start of the PA partnership? How does that compare to before your involvement in the PA scheme?

Q19 In cases when your business has been found to be non compliant, **how much would you say it cost** your business on average?

Q20 Overall, how much would you say it **costs your business to comply** with local regulation in the area covered by your PA partnership? How would you say that compares to before the primary authority partnership was established?

Q21 **How much time** (hours) do you spend on average dealing with requests from other local authorities to undertake compliance activity, which is inconsistent with advice from your PA? How many staff would typically be involved in dealing with it and what are the costs involved? How does that compare to before your involvement in the PA scheme?

Q22 Are there **any intangible costs and benefits** that you had not foreseen before your involvement in PA that have emerged since the start of your PA relationships? If so, what are they?

Q23 Is there anything we have not covered in our questions that you feel should be mentioned?

Many thanks for your time.

[End of interview]

## 1.20 Questionnaire for primary authorities

### 1.20.1 Section 1: General questions

These questions relate to all PA relationships your local authority might have.

Q1 What were your main **motivations** for joining the PA scheme? Was one of your motivations to move towards a more efficient way of interacting with businesses (e.g. cost reduction; time reduction; improved efficiency; etc)?

Q2 Prior to joining the PA scheme, **was there resistance** to shifting to a new approach within your organisation? If yes, how was this overcome?

Q3 Since joining the PA scheme, have you found any ongoing or new **barriers to the change** from within your organisation? If so, which ones?

Q4 In your view, are there any **drivers or enablers** within your organisation helping your ongoing involvement in the PA scheme? If so, what are they?

Q5 Since joining the PA scheme, do you think your organisational **view on regulating businesses as a whole** has changed? (i.e. has your LA's involvement in PA changed the way in which it deals with all businesses in your local area?)

Q6 Do you feel that being part of the PA scheme is a **“selling point”** to any stakeholders dealing with your business? If so, to which stakeholders and in what way is this demonstrated?

Q7 In your view, are businesses within the PA scheme “different” from those outside of the scheme? If so, how (e.g. more or less compliant; more or less responsive, etc)?

Q8 Overall, how **satisfied** are you with the professionalism of businesses in relation to the PA scheme? (e.g. compliant, providing timely response, proactive, etc)? Please explain your response.

Q9 In the context of regulation, do you find that there **are different ways of working** in your organisation compared with businesses?

Q10 Does PA **change the relationship** your local authority has with participating businesses and in particular, do you think it changes the way other regulatory services in your local authority deal with businesses participating in Primary Authority?

Q11 What are your views on the way in which other local authorities interact with the Primary Authority scheme?

### 1.20.2 Section2: Cost questions

The following questions relate to your PA partnership with X business.

Q12 *For those LAs charging businesses:* How did you work out how much you should charge businesses for the PA scheme (i.e. what process did you go through and which costs did you include in this process)?

*For those LAs not charging businesses:* How did you decide not to charge businesses for the PA scheme (i.e. what process did you go through, who was involved in this process)

Q13 How much does it cost your organisation to **provide advice** to a business in the PA scheme? What is this cost made up of?

Q14 How much **time is spent liaising with EAs** in the context of the PA scheme? What are the costs made up of? And how do these costs compared to your previous arrangement with the business (i.e. under Home Authority)?

Q15 How much time is involved in **maintaining your relationship** with businesses through the PA scheme? Could you estimate the costs of this time? What are the costs made up of?

Q16 Have you developed an **inspection plan** for this PA partnership? If so, what were the processes and costs involved in developing it? Are you aware of enforcing authorities using the inspection plan and what impacts this might have on inspections (shorter, longer, more focused, etc)?

Q17 Have you ever had to use the **dispute resolution** facility of the PA scheme? If so, could you briefly explain the reasons for it and what was the outcome?

Q18 How frequently do you think you will need to use the **dispute resolution** in the future?

Q19 Is there anything we have not covered in our questions that you feel should be mentioned?

Many thanks for your time.

[End of interview]

## Appendix E: Analysis of qualitative data from stakeholder interviews

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The RAND Europe research team carried out a total of 30 interviews with local authorities, businesses and other stakeholders between February and April 2010 in order to gather their views on the Primary Authority scheme to date. This document presents the interview findings by stakeholder group and by “code”. Two RAND Europe researchers were involved in analysing the interview findings and in categorising them under a range of codes decided during an internal brainstorming session. The brainstorming session involved the whole research team. Each team member was tasked with reading a number of interviews (about 5 each) and the workshop session enabled a discussion of the main themes emerging from the interviews. These in turn resulted in a list of “code” used to draw out relevant arguments from the interview notes. These codes are shown in the right hand column of each table below.

### Local authorities

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
Attitudes of LA towards PA	<ul style="list-style-type: none"> <li>PA was easy to set up</li> <li>Processes are similar to those on Home Authority Principle scheme</li> </ul>	<ul style="list-style-type: none"> <li>One LA adopted a neutral tone to PA and made businesses aware of PA but did not push</li> </ul>	<ul style="list-style-type: none"> <li>Worries over the sustainability of dedicating specific</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<ul style="list-style-type: none"> <li>• Enforcing authorities don't always let PA know about inspections they make of participating businesses</li> <li>• Some regulators have a negative attitude to PA so it's hard to get them on board</li> <li>• One LA felt that most EAs were aware that they operate PA with a local business</li> <li>• Some enforcing authorities expect the PA to deal with every detail including sending letters to company head office on their behalf</li> <li>• As a PA, direction can be provided to enforcing authorities but the job of the enforcing authorities can't be done for them by PA</li> <li>• One PA said they always had a positive opinion of the PA scheme because they could see how it could improve the way regulation is enforced</li> <li>• One PA had reorganised its services</li> </ul>	<p>them towards PA and no businesses have consequently joined</p> <ul style="list-style-type: none"> <li>• One LA said they would only take on businesses under PA if they already had a strong connection with them as they would find it "suspicious" if a business with no previous close relationship with them approached them</li> <li>• Some concern over the sustainability of PA and over having specifically trained staff that would be hard to replace if they left the local authority</li> <li>• Impression that setting up PA requires a lot of work and effort for few benefits on the side of the LA</li> <li>• One EA mentioned that they checked the LBRO PA website regularly for inspection plans, updates and to find out which</li> </ul>	<p>resources (staff) to PA if the scheme was to cease</p>



	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>so they now have dedicated staff for different partnerships and have different contacts in each company to make the process easier</p> <ul style="list-style-type: none"> <li>• Some LAs are unreasonable in the way they deal with businesses and send mixed messages to businesses</li> </ul>	<p>businesses are in a PA partnership</p>	
Benefits	<ul style="list-style-type: none"> <li>• Participating business is seeing benefits from less direct contact from regulators as PA is fielding contacts</li> <li>• Reduction in business workload to deal with regulators</li> <li>• Business improving their compliance with regulation</li> <li>• Collaborative relationship between PA and business by helping them review their documentation and publish them on the PA website</li> <li>• The statutory standing and formality of the scheme is a benefit</li> <li>• PA is a more proactive way to enforce local regulation as it involves gathering, sharing,</li> </ul>	<ul style="list-style-type: none"> <li>• PA could lead to a more process driven and better structure in LAs that are PAs</li> <li>• Too early to say if compliance of businesses will improve, especially since many of those were under Home Authority beforehand</li> </ul>	<ul style="list-style-type: none"> <li>• Benefits of PA accrue to businesses by protecting them from undue enforcement action</li> <li>• No advantages of PA for Trading Standards although PA might be beneficial in other areas of regulation</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>analysing intelligence as well as proactively managing EAs</p> <ul style="list-style-type: none"> <li>• Not always easy to see the benefits of PA for local authorities</li> <li>• Both communication and compliance are improved through PA</li> <li>• Businesses get protection from enforcement action when they receive regulatory advice</li> <li>• Inspection plans saves a lot of time</li> <li>• The inspection plan will be used to cut down on the number of visits</li> <li>• In the long run, resources will be saved by PA</li> <li>• PA means getting a direct line to the appropriate person in the business at a very high level in many cases</li> <li>• PA has gained a better understanding of businesses and how they operate (i.e. much quicker than regulators)</li> </ul>		
Business/LA	<ul style="list-style-type: none"> <li>• Having a single point of contact</li> </ul>	<ul style="list-style-type: none"> <li>• PA makes it more difficult to</li> </ul>	<ul style="list-style-type: none"> <li>• LAs' interaction with</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
relationship	<p>between businesses and local authorities is beneficial</p> <ul style="list-style-type: none"> <li>• In most cases, the LA has approached the businesses rather than the other way around</li> <li>• Main consideration before starting PA is whether business is willing to collaborate</li> <li>• Previous relationship with business through LOPP or voluntary scheme</li> <li>• Some reluctance from businesses to take part in PA, especially smaller businesses</li> <li>• Some businesses have welcomed PA as it shows they are working cooperatively with regulators and they know they will get some support from PA if they are taken to court</li> <li>• It seems that businesses taking on PA are the good businesses that are generally compliant with regulation</li> <li>• Frequency of interaction has</li> </ul>	<p>deal with businesses as unsure which businesses are or aren't in PA so difficult to know whom to deal with</p>	<p>businesses will impact businesses differently according to their characteristics. For example, small businesses want exact instruction, middle sized businesses like inspection and advice, etc.</p>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>increased under PA and working relationship with the business is a lot more cooperative and geared towards positive change</p> <ul style="list-style-type: none"> <li>• LAs often lack understanding of how businesses operate and issue unreasonable demands on them (e.g. expect a large business to respond very quickly to their demands)</li> </ul>		
Capacity and skills of LA	<ul style="list-style-type: none"> <li>• Concern about capacity to deliver PA if many businesses signed up at once</li> <li>• Staff under PA need specific knowledge and training so there will be a point when LA is no longer able to offer PA because they are reluctant to use agency staff</li> <li>• Knowledge and expertise gained from PA partnership rests with the LA staff working with the participating business and this knowledge would be hard to pass</li> </ul>		<ul style="list-style-type: none"> <li>• Concerns over the capacity to deliver PA, the need for additional staff and what could happen to those staff if PA was to be scrapped or abandoned by some businesses</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>on or replace</p> <ul style="list-style-type: none"> <li>• Sometimes lack of specific knowledge from LA can focus a business on an area that is not the most beneficial</li> <li>• LAs lack specific knowledge about particular businesses (i.e. high risk businesses, swimming pools, health clubs) and difficult for them to issue the most appropriate guidance and action.</li> <li>• Maintaining expertise requires a lot of commitment from LAs</li> <li>• Implementing PA with businesses that have consistent operations across their different sites is fairly straightforward but it becomes difficult when different sites are different or inconsistent</li> <li>• Some LAs fail to recognise when issues with businesses should be dealt with locally or centrally</li> </ul>		
Charging	<ul style="list-style-type: none"> <li>• More guidance and support could be provided to PAs because some</li> </ul>	<ul style="list-style-type: none"> <li>• One LA said businesses in their area were generally small and</li> </ul>	<ul style="list-style-type: none"> <li>• Charging is not a key issue, what matters is</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>companies feel they should be getting PA for free (e.g. forum to share experience or training)</p> <ul style="list-style-type: none"> <li>• Difficult for some LAs to work out how much PA will cost them to deliver, especially because the cost incurred also depends on the type of the participating business</li> <li>• Because LAs have different levels of resources, there will be discrepancies in the service the councils can provide which could impact on the competitiveness of the business</li> <li>• Businesses can't be charged for everything related to PA so, for example, publicity for the scheme is funded by the local authority even though it takes a lot of time</li> <li>• One PA did not charge businesses to start with because it did not anticipate the amount of time it would have to dedicate to PA</li> <li>• If charges were judged by business</li> </ul>	<p>content with the voluntary scheme. This LA felt businesses would therefore not be willing to pay for PA in their area.</p>	<p>whether it creates added value for the business</p>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>to be too high for PA, businesses would probably stick with HA</p> <ul style="list-style-type: none"> <li>• Some PAs only charge businesses for services additional to those they were delivering under HA</li> <li>• Different charging methods: some PAs charge per hour, others per day a week, others charge a yearly fee</li> <li>• One LA hired agency staff to provide additional support when other staff are working on PA</li> <li>• LOPP helped some local authorities gauge the cost of delivering PA so they knew roughly how much to charge businesses. This PA said involvement in LOPP helped them because they had recorded the time spent on the scheme over time in order to calculate the number of days they would have to dedicate to PA. However, they found that workload for PA “peaked” in the beginning.</li> </ul>		

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<ul style="list-style-type: none"> <li>• One LA put together a business case explaining why they were charging them for PA. In order to build the business case, the LA looked at the number of complaints, volume of advice given to the business in the past as well as time required for inspections and getting to grips with PA</li> <li>• Issue of fairness: you can't charge one business and not charge another one</li> <li>• As a result of charging, one PA said their processes had had to become faster and more efficient</li> </ul>		
Compliance of EAs	<ul style="list-style-type: none"> <li>• Some EAs are carrying out inspections in participating businesses without informing the PA either because they do not know the business is in PA or because they haven't read the statutory guidance of PA or the inspection plan</li> <li>• Some EAs send letters to highlight</li> </ul>		



	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>problems with participating business but fail to issue guidance</p> <ul style="list-style-type: none"> <li>• Enforcement by EAs vary but some feedback from businesses suggests it is not as inconsistent as it's made out to be and differences in enforcement action are linked to different local pressures and priorities.</li> <li>• At the onset of PA, many EAs didn't know about PA or about the notification process but awareness is improving</li> <li>• EA officers use a variety of methods to inspect and report on premises, some of which are not well thought-out</li> </ul>		
Contractual issues	<ul style="list-style-type: none"> <li>• Contractual issues have been difficult to deal with, in particular in relation to liability and confidentiality</li> <li>• One PA said their business wanted to transfer commercial risk onto them in case they gave them</li> </ul>		

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	negligent advice that led to prosecution of the business		
Costs	<ul style="list-style-type: none"> <li>• Didn't expect PA to require the operational changes and resources that were actually needed to deliver it so offered it for free originally</li> <li>• Cost of PA for LAs include additional time spent getting to grips with PA and delivering it as well as investing in training staff and hiring additional staff in some cases</li> <li>• Formalisation of partnership (i.e. contractual agreement) between LAs and businesses are worrying some businesses because they were comfortable with voluntary agreement</li> <li>• Cost tend to be high up-front for setting up PA but they decrease in the long term</li> <li>• Because of the different resources available to different PAs, there will be different levels of service</li> </ul>	<ul style="list-style-type: none"> <li>• PA is overly bureaucratic and requires a lot of time and commitment to set-up</li> <li>• Concern over the economics of PA and whether LAs will be able to recoup the costs rather than subsidise businesses</li> </ul>	<ul style="list-style-type: none"> <li>• Would expect needing more staff to deliver PA</li> <li>• One LA felt that PA was something that "ties them down" unnecessarily to specific processes and timescales with businesses and as introducing a new level of bureaucracy</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	delivered by different PA and it might impact on businesses' competitive advantage		
Inconsistencies	<ul style="list-style-type: none"> <li>• Inconsistencies impact on businesses by costing them more money and frustrating businesses that want to comply with regulation</li> <li>• Inconsistency in the way different LAs inspect and report to businesses</li> <li>• LA officers misinterpret regulation from time to time , there are also differences in approaches to legislation and enforcement. One PA mentioned they dealt with this type of inconsistency several times a week</li> <li>• Not all inconsistencies can be addressed, some are linked to the fact that LAs vary in size, management style, level of expertise, local pressures and</li> </ul>	<ul style="list-style-type: none"> <li>• Businesses are faced with inconsistencies of enforcement and inconsistencies of interpretation of regulation</li> <li>• One LA felt inconsistencies were fairly infrequent</li> <li>• There is not one single solutions for inconsistencies and PA is only one of them, LBRO should offer a range of options for businesses and not just one</li> </ul>	<ul style="list-style-type: none"> <li>• Inconsistencies stem from difficulties in interpreting regulation</li> <li>• Some areas of regulation like Trading Standards are less contentious and produce less inconsistencies than other regulatory areas</li> <li>• Inconsistencies are fairly rare ( a few times a year) but can be very costly for a business if it leads to unnecessary prosecutions</li> <li>• Inconsistencies result from different applications of the law rather than different interpretations of it</li> <li>• Different types of action</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>priorities and others are linked to the fact that LAs have to regulate a wide variety of businesses</p> <ul style="list-style-type: none"> <li>• Sometimes inconsistencies result from LAs delivering services in an uncoordinated way</li> <li>• Officers in isolated areas might not see the bigger picture of the company and issue unjustified demands as a result</li> <li>• Because of inconsistencies, businesses never know what kind of action to expect from different LAs and this can be frustrating for them</li> <li>• Issue of officers not always recognising local versus national issues – in some cases, officers addressing a “national problem” (e.g. problem with manufactured equipment throughout the country) at the local level can lead to the business wasting time and resources addressing the issue</li> </ul>		<p>taken in the face of similar problems</p> <ul style="list-style-type: none"> <li>• One LA felt that when other LAs are challenging their advice, it acts like an audit of their work</li> <li>• Another LA felt that inconsistencies were not that common and that when they arise, they can often be solved by talking to the LAs and businesses involved</li> <li>• One LA felt PA did not address inconsistencies effectively and that this problem should be addressed through training and exchanges between LAs as well as through the development of the right culture in LAs to make sure they're all working on the same</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>locally rather than nationally</p> <ul style="list-style-type: none"> <li>• Different types of businesses are often regulated differently. For example, a large supermarket operating across the UK is more likely to get prosecuted for relatively minor things compared with smaller firms operating outside the retail sector which are more likely to be issued with guidance on basic fair trading issues such as pricing and consumer product safety</li> </ul>		<p>basis</p> <ul style="list-style-type: none"> <li>• One LA felt inconsistencies might remain under PA because similar companies operating under different PAs might still get inconsistent advice</li> </ul>
Inspection plans	<ul style="list-style-type: none"> <li>• Inspection plans have to be approved by LBRO</li> <li>• Inspection plan as a means to ensure that EA inspectors take the necessary steps during their inspection of the business, cover the main areas that could lead to issues and assess management competences</li> <li>• Inspection plans are tailored in order to make inspections more</li> </ul>	<ul style="list-style-type: none"> <li>• One LA said that they checked for updates on inspection plans regularly as some of the participating businesses they are an EA for did not currently have an inspection plan</li> </ul>	

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>focused and efficient so it can save time for the business and for the EA</p> <ul style="list-style-type: none"> <li>• One LA felt inspection plans could eventually lead to “self-autonomy” for compliant businesses that don’t require regular inspections because their risk-rating is low and that this could change the nature of PA in the long run</li> </ul>		
LBRO	<ul style="list-style-type: none"> <li>• Good support from LBRO in setting up PA</li> <li>• One PA felt disputes between LAs under PA should get referred to the court rather than to LBRO</li> <li>• Concerns over the sustainability of LBRO and consequently the sustainability of PA</li> <li>• One LA felt LBRO and the set-up of PA were very bureaucratic but the process of getting PA set-up should become more straightforward with time as improvements are made</li> </ul>		<ul style="list-style-type: none"> <li>• One LA felt that the opportunity it was given to advise and comment on the development of PA was beneficial and that some of their suggestions were adopted</li> <li>• Concerns over the fact that LBRO might not be moving fast enough in the face of the future financial situation of LAs and that LAs are concentrating on their</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<ul style="list-style-type: none"> <li>• Another LA felt the process of setting up a PA was really straightforward and quick</li> <li>• PA carries more weight than other voluntary schemes because it benefits from LBRO's backing</li> </ul>		<p>finances rather than on trying to improve the delivery of regulation</p>
Rationale for joining/not joining	<ul style="list-style-type: none"> <li>• PA seen as a natural extension to voluntary schemes for some businesses so makes sense for businesses to join</li> <li>• Good existing relationship between the participating business and the PA was one of the reasons for forming a PA partnership</li> <li>• Statutory nature of PA is attractive to businesses and the formal procedures result in more consistency of advice</li> <li>• PA has the potential to improve the way local regulation is delivered because it provides more structure to the process</li> <li>• Companies that are not compliant with regulation have no incentive</li> </ul>	<ul style="list-style-type: none"> <li>• PA is overly bureaucratic and requires a lot of time and effort to set up</li> <li>• PA could make local regulation more process driven and better structured but it could also make it more bureaucratic</li> <li>• PA has obvious benefits for businesses operating across LA boundaries as it engenders a more organised approach to the delivery of local regulation</li> <li>• Challenge for adoption of PA is convincing LAs that it is the way forward and that they could benefit from PA because consumer protection would improve and so would the</li> </ul>	<ul style="list-style-type: none"> <li>• Delivering PA would require additional staff</li> <li>• One rationale for joining PA would be if it helped retain businesses in the area</li> <li>• PA seen by one LA as something that could "tie them down" to specific processes and that is overly bureaucratic. Also seen as complicating the landscape because unlike Home Authorities, it does not cover all areas of regulation</li> <li>• Concern over the workability of PA if all</li> </ul>

	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<p>to join PA and the precondition for PA to work is that companies will listen to PA advice</p> <ul style="list-style-type: none"> <li>• Cost recovery under PA was an incentive to deliver PA</li> <li>• One LA felt PA would eventually lead to resource savings</li> </ul>	<p>compliance of businesses</p> <ul style="list-style-type: none"> <li>• Statutory standing of PA is both an advantage and a disadvantage because although it can be beneficial to businesses, it also makes PA bureaucratic. Also questionable whether it is really necessary since voluntary schemes can work well also</li> </ul>	<p>businesses joined PA</p>
<p>Scope and scale of PA</p> <p>N.B.: Businesses were prompted about whether extending the scheme to other areas of regulation or to Northern Ireland and Scotland would make PA more attractive to them.</p>	<ul style="list-style-type: none"> <li>• Discussion with participating business around which areas of regulation would be most useful to the business and whether the PA can deliver those (i.e. those where PA feels it has the relevant expertise)</li> <li>• It would make sense to extend the scheme to Scotland and Northern Ireland as the systems are similar although some legislation differ. However, it would be good for businesses but would also mean more work for the PA</li> </ul>	<ul style="list-style-type: none"> <li>• Extending PA to other regulatory areas might not necessarily provide additional benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Not all businesses would like to see PA extended to Scotland and Northern Ireland</li> </ul>



	Primary authorities (7 interviews)	Enforcing authorities (3 interviews)	Unwilling authorities (2 interviews)
	<ul style="list-style-type: none"> <li>• It would be difficult to extent PA to alcohol licensing as this is really a local issue</li> <li>• The fact that some regulatory areas are currently excluded can be confusing for businesses</li> </ul>		
Voluntary schemes	<ul style="list-style-type: none"> <li>• Voluntary schemes are working well, especially for trading standards and they deliver the service for free, have established processes and don't require formalisation. However, could see improvements for health and safety with PA</li> <li>• Some businesses find it hard to see the difference between a free voluntary scheme and PA</li> </ul>	<ul style="list-style-type: none"> <li>• PA is more prescriptive than Home Authority</li> <li>• Generally LAs are compliant with HA</li> </ul>	<ul style="list-style-type: none"> <li>• Home Authority is less demanding in terms of LA staffing and provides a one-stop portal for communication about particular cases but PA can engender a closer relationship with the business and is more proactive and transparent</li> <li>• One LA viewed HA as an agreement between LAs rather than an agreement between a business and an LA</li> </ul>

**Businesses**

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
Attitudes of LA towards PA	<ul style="list-style-type: none"> <li>• One business was faced with an EA that ignored PA completely and was very uncooperative and another business said that EAs were not checking the PA website and continued to issue enforcement actions against them</li> <li>• One business had to steer EAs towards their PA to make sure the PA processes were carried out</li> <li>• EAs lack understanding of how large businesses work and make unreasonable demands on them</li> <li>• EAs need to have due regard to inspection plan and advice from PA otherwise it doesn't work</li> </ul>	<ul style="list-style-type: none"> <li>• One business approach an LA to be their PA and they think the PA felt overwhelmed when they realised the amount of work that would be required for PA</li> </ul>	<ul style="list-style-type: none"> <li>• General lack of knowledge and awareness of PA from both LAs and businesses' sides</li> </ul>

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<ul style="list-style-type: none"> <li>• PA helps deal with EAs and keeps them “on their toes”</li> <li>• One business mentioned it had to remind EAs that they were part of PA and some EAs are simply unwilling to take part in PA and cooperate</li> <li>• Awareness and understanding of PA by EAs is an issue and some EAs still serve enforcement action on participating businesses without contacting their PA</li> <li>• Some EAs feel that PA is part of a “hidden agenda”</li> <li>• One business noticed a recent reduction in the number of queries coming through from EAs although some are</li> </ul>		

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>still bypassing PA</p> <ul style="list-style-type: none"> <li>• Some confusion from LAs about PA because of the existence of multiple schemes</li> <li>• One business approached an LA to be their PA and effectively had to explain the PA scheme to them. It took this particular LA several months to decide to become a PA because of capacity and skills concerns</li> </ul>		
Benefits	<ul style="list-style-type: none"> <li>• PA can enable businesses to champion good procedures and guidelines by showcasing them on the website</li> <li>• PA helps out when EAs' actions are mixed, it helps deal with EAs generally</li> <li>• Role of LBRO as a third</li> </ul>	<ul style="list-style-type: none"> <li>• PA enhances the uniformity of the processes followed by LAs</li> <li>• PA has the statutory power to challenge advice given by EAs</li> <li>• PA has the potential to save money for businesses if it decreases the number of challenges from EAs</li> </ul>	

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>party for dispute resolutions is reassuring</p> <ul style="list-style-type: none"> <li>• One business said its costs had decreased as a result of their PA helping them deal with EAs</li> <li>• Increase consistency of regulation across different stores</li> <li>• PA can increase confidence of businesses in regulators</li> <li>• PA is beneficial because it provides one point of contact in the PA</li> <li>• PA has an advantage over voluntary schemes in that it is legally binding</li> <li>• One business hoped PA would reduce the frequency of inspections in some of its stores which would in turn result in cost and time</li> </ul>	<ul style="list-style-type: none"> <li>• PA has the potential to reduce inconsistencies</li> <li>• PA could build up business and sector expertise for LAs</li> <li>• PA could provide more consistency in cases where a criminal investigation is taking place</li> </ul>	

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>savings</p> <ul style="list-style-type: none"> <li>• PA could free up resources for LAs so that they concentrate on high risk businesses instead</li> <li>• Being in PA shows the willingness of the business to cooperate and comply with regulation</li> </ul>		
Business/LA relationship	<ul style="list-style-type: none"> <li>• One business said they were still receiving correspondence from EAs under PA and were keeping their PA contact aware of all their interactions with EAs</li> <li>• One business felt they still had to educate LAs about stores policies and procedures</li> <li>• A good pre-existing relationship between the business and its PA is very important for the</li> </ul>	<ul style="list-style-type: none"> <li>• PA could solve the issue of lack of knowledge of LAs by building up expertise in the business/sector</li> <li>• The selection of the right PA is very important for the scheme to work</li> <li>• One selection criteria is the location of the LA and whether it is close to the head office of the business</li> <li>• One business approached a number of LAs for PA</li> </ul>	

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>scheme to work</p> <ul style="list-style-type: none"> <li>One business said their choice of PA was influenced by the fact that they had been on a pilot with them before and that the LA had a good understanding of their business and their sector</li> </ul>	<p>and even held a tendering process as they are looking for a partner with the right skills and willing to give them the right support.</p>	
Capacity and skills of LA	<ul style="list-style-type: none"> <li>Often businesses are more aware of the main risks in their businesses and LAs concentrate on risks that are not key so this wastes time for businesses</li> <li>One small business said they had had no concerns about the expertise of their PA</li> <li>One business mentioned they have to educate LAs about their store policies</li> </ul>	<ul style="list-style-type: none"> <li>Enforcement officers lack expertise generally</li> <li>The capacity of LAs to deliver PA effectively is an issue and some LAs are reluctant to get involved because of that, there are also funding issues impacting on that too</li> <li>One business said they would be looking to jointly recruit with their PA once they join to</li> </ul>	<ul style="list-style-type: none"> <li>Local government is often scattered, very focused and far too specialized with a focus on specific areas of regulation so it's often hard to know who to approach and LAs</li> <li>Need for LAs to acquire broader knowledge and process mapping skills</li> <li>One LA said their reason for not joining PA was that their chosen LA</li> </ul>

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>and procedures because of their lack of knowledge and expertise</p> <ul style="list-style-type: none"> <li>• One business mentioned they would rethink their involvement in PA if their PA's resources were cut back as it would compromise the scheme</li> <li>• Some LAs have unrealistic expectations from a large business whereby they expect responses straight away</li> <li>• One business felt some LAs were inefficient in the way they inspect because they often inspect many stores of the same business even though policies and procedures are company-wide</li> <li>• One business mentioned</li> </ul>	<p>ensure their PA contact has the right skills and knowledge for their business</p> <ul style="list-style-type: none"> <li>• Some LAs are overwhelmed by the amount of work required by PA</li> </ul>	<p>lacked the capacity to deliver it and would not be able to respond to their queries promptly</p>



	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>that it would not be feasible for all enforcement officers to be experts in their business</p>		
Charging	<ul style="list-style-type: none"> <li>• One business mentioned that working out costs for PA was really straightforward and that it was done within a day. The same business said they were being charged £650 per annum with an invoice every quarter</li> <li>• One business had to put together a business case that included costs to the PA. This business now pays an annual fee to their PA with some elements free of charge (advice given regardless of PA). The cost being charged is roughly the</li> </ul>	<ul style="list-style-type: none"> <li>• One business said they would be willing to pay for PA unless the LA asked them for a large sum of money that seemed disproportionate to the services provided</li> <li>• Paying for PA also means that businesses will have a certain level of expectation from services delivered under the scheme</li> <li>• One business in the process of setting up their PA mentioned they were being charged 20k per year by their PA for 3 to 6 months of work. This</li> </ul>	<ul style="list-style-type: none"> <li>• One business said cost was not a consideration when they decided not to join PA</li> <li>• One business said the LA they approached wanted full cost recovery from PA and that seemed like a lose-lose situation for them</li> </ul>

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>salary of one LA officer for 2 full days a week</p> <ul style="list-style-type: none"> <li>• Another business had to put a business case together including their predictions for return on investment. This business is being charged on a cost-recovery basis and pays a fixed amount every month during the duration of the contract (18 months). The charge covers 3 hour meetings every 2 weeks and reviews of company documents during these meetings.</li> <li>• One business pays an hourly rate on a case by case basis</li> <li>• One business felt the original charges discussed with their PA in a first instance were</li> </ul>	<p>business also mentioned they expected a return on investment within 9 months</p>	

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>extortionate. The same business felt completely in the dark because they didn't know what other LAs were charging or what an acceptable charge would be.</p> <ul style="list-style-type: none"> <li>• One business gets invoiced from their PA based on the amount of time they spend on the scheme so the amounts to pay fluctuate over time</li> <li>• Charging could be a weakness of PA for small businesses that might not see the added value compared with voluntary schemes</li> </ul>		
Compliance of EAs	<ul style="list-style-type: none"> <li>• One business -that had hoped PA would help manage their EAs- was prosecuted by one of their EAs. The business</li> </ul>		

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>feels the EA had no regard for PA and it cost them a lot of money to deal with this issue (£20k to £40k).</p> <ul style="list-style-type: none"> <li>• Some EAs feel PA is infringing on their powers and react by being more forceful towards businesses with more enforcement action</li> <li>• Some LAs are not aware of PA and others are unwilling to cooperate “even though it’s at odds with the whole better regulation agenda”</li> <li>• One business was faced with some EAs ceasing inspections of their premises altogether and others inspecting more frequently</li> </ul>		
Contractual issues	<ul style="list-style-type: none"> <li>• One business has a 12</li> </ul>		

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>months contract with their PA and another has an 18 month contract that is being revised every 6 months. The latter thinks that their costs might decrease over time</p>		
Costs	<ul style="list-style-type: none"> <li>• EAs not respecting LAs can incur important costs for businesses</li> <li>• Costs of PA decrease after a while especially because less contact time is needed between PA and businesses once the partnership is put in place</li> <li>• Main costs are payment to PA (tangible cost) and time cost</li> <li>• PA is not well adapted to some types of businesses such as holding businesses so it takes time</li> </ul>	<ul style="list-style-type: none"> <li>• One business felt PA needed more funding for LAs because it is very labour intensive</li> <li>• One business felt that the cost of PA to businesses would be a barrier to the take up of PA for as long as free voluntary schemes exist</li> <li>• One business felt PA could substantially reduce their costs of dealing with LAs</li> </ul>	<ul style="list-style-type: none"> <li>• One business looked at PA in detail including costs and decided not to join because they felt they would not be able to recoup their costs</li> </ul>

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	to set up the PA in those cases		
Inconsistencies	<ul style="list-style-type: none"> <li>• Each LA seems to drive their own agenda which leads to inconsistencies</li> <li>• Inconsistencies can be very costly for businesses, especially if they have to involve solicitors</li> <li>• Huge disparities in approaches to food law enforcement, competence of different EAs and knowledge of food safety</li> <li>• Differences in interpretation of the regulation result in inconsistencies</li> <li>• Inconsistencies result from each LA driving their own agenda and having different priorities</li> <li>• Sometimes local variations in regulation</li> </ul>	<ul style="list-style-type: none"> <li>• Different enforcement officers have different approaches to health and safety that result in inconsistencies. Some of these inconsistencies also result from lack of business expertise on the part of LAs</li> <li>• Inconsistencies are difficult to quantify. However, one business mentioned they employed 4 full time staff to deal with regulatory issues</li> </ul>	<ul style="list-style-type: none"> <li>• Some LAs are more inclined to take direct action whilst other give businesses more time to implement changes</li> <li>• Different interpretations of regulation and legislation by different LAs</li> <li>• Inconsistencies are time-consuming and frustrating for businesses</li> </ul>

	<b>Participating businesses (5 interviews)</b>	<b>Willing businesses not in PA (3 interviews)</b>	<b>Unwilling businesses (2 interviews)</b>
	<p>are justified (e.g. vehicle inspections and store plans) when risks are localised and context-specific</p> <ul style="list-style-type: none"> <li>• Some inconsistencies result in notices that are not deserved and this costs a lot of money for businesses. One business mentioned that it takes them weeks to resolve some of these undeserved notices</li> <li>• Some areas of regulation are quite open to different interpretations and that creates inconsistencies</li> <li>• One business mentioned that inconsistencies happened about twice a week taking into account letters and inspections</li> </ul>		

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	and that it most typically required frequent communication and discussion with the LAs rather than considerable investment in machinery or business procedure to resolve		
Inspection plans	<ul style="list-style-type: none"> <li>• Inspection plans can save time for LAs</li> </ul>		
LBRO	<ul style="list-style-type: none"> <li>• One business felt LBRO should intervene more strongly to make EAs comply with PA</li> <li>• LBRO's support and role in dispute resolutions is reassuring to businesses</li> <li>• One business felt that if LBRO managed to get the main regulatory bodies on board, there would be a snowballing effect in the adoption of PA</li> </ul>	<ul style="list-style-type: none"> <li>• Two businesses mentioned they had been approached by LBRO to join PA and that they felt LBRO was supportive</li> <li>• One business felt there was a lack of coordination at LBRO regarding PA because they had been contacted by different people at LBRO. This business also felt there should be a system put in place to</li> </ul>	<ul style="list-style-type: none"> <li>• One business mentioned they had a very positive experience of dealing with LBRO but that they felt their feedback on the pilot was not taken into account</li> </ul>



	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
		<p>identify which LA is best suited to which business. Also, this business mentioned the need for LBRO to raise the understanding of PA amongst businesses and LAs.</p>	
Rationale for joining/not joining	<ul style="list-style-type: none"> <li>• One business had hoped that PA would mean less interference from one EA but this did not materialise</li> <li>• One business said PA was a natural progression for them because their chosen LA was as keen as them to go forward with it</li> <li>• A good relationship between a business and its local LA is conducive to an LA partnership being formed</li> </ul>	<ul style="list-style-type: none"> <li>• PA could build up expertise in LAs</li> <li>• PA could provide more consistency</li> <li>• If PA decreases interaction with LAs then cost savings can be achieved for businesses</li> </ul>	<ul style="list-style-type: none"> <li>• Concern that PA is too prescriptive for LAs</li> <li>• One business had a close look at PA and whether it could work for them but decided that HA was a better fit for them in the end</li> <li>• One business decided not to join PA because of the cost and because they could not see the added value compared with HA</li> </ul>

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<ul style="list-style-type: none"> <li>Some businesses were involved in pilots and/or voluntary schemes before PA and felt PA was a good way forward especially since they had formed close relationships with their LA</li> <li>One business was attracted by the prospect of having one single point of contact, consistency of advice and shared responsibility with their PA</li> </ul>		
<p>Scope and scale of PA</p> <p>N.B.: Businesses were prompted about whether extending the scheme to other areas of regulation or to Northern Ireland and Scotland would make PA more attractive to them.</p>	<ul style="list-style-type: none"> <li>Some businesses would welcome the extension of PA to Scotland and Northern Ireland and to other regulatory areas</li> <li>One business felt including fire safety under PA would be more</li> </ul>	<ul style="list-style-type: none"> <li>One business said they would like PA to cover all areas of regulation because it would simplify the process and produce economies of scale</li> <li>One business felt that due to the scale of their business, they would not be able to</li> </ul>	<ul style="list-style-type: none"> <li>One business felt extending the scheme to other areas of regulation and other countries would make PA much more attractive whilst another business said it would make no</li> </ul>

	Participating businesses (5 interviews)	Willing businesses not in PA (3 interviews)	Unwilling businesses (2 interviews)
	<p>helpful than including alcohol licensing</p> <ul style="list-style-type: none"> <li>One business mentioned that having one PA cover all regulatory areas would be much simpler and cost efficient</li> </ul>	<p>form PA partnerships across all regulatory areas anyway</p>	<p>difference</p>
Voluntary schemes	<ul style="list-style-type: none"> <li>One business felt that the Lead Authority Scheme was similar to PA although the main difference was that it the Lead Authority Scheme is not binding</li> <li>Different businesses were part of different voluntary schemes and/or pilot schemes</li> <li>There is some confusion linked to the number of schemes on offer</li> </ul>	<ul style="list-style-type: none"> <li>One business mentioned that HA is considered to be understaffed and that turnaround time are slow and service levels are insufficient</li> </ul>	<ul style="list-style-type: none"> <li>One business felt HA was a better fit for them than PA</li> <li>One business felt HA was working well for them and that other LAs generally respond positively when they explain the advice they have been given by their HA. This business could also not recall any disputes with LAs</li> </ul>

**Other stakeholders**

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
Attitudes of LA towards PA	<ul style="list-style-type: none"> <li>• It is difficult to differentiate PA from the free voluntary schemes and some LAs are still promoting voluntary schemes and telling businesses that PA is like HA but with added charges</li> <li>• LAs are slowly gaining confidence in PA. They were completely hostile to PA to start with because they felt it was too bureaucratic and they didn't like the fact that a PA could block their enforcement actions</li> <li>• A lot of LAs are reluctant to charge for PA and are difficult to get onboard because they are wary of LBRO as "another layer of government telling them what to do"</li> <li>• Level of engagement of LAs varies a lot with some very enthusiastic LAs</li> <li>• Some LAs are uncomfortable with a more formal scheme like PA where policing liabilities are involved</li> </ul>	<ul style="list-style-type: none"> <li>• One stakeholder felt the bill for PA was weakened by LA pressure</li> <li>• LAs generally support HA much more than PA and think things should be left as they are</li> <li>• LAs are reluctant to join PA because they like to keep things within their boundaries</li> </ul>
Benefits		<ul style="list-style-type: none"> <li>• PA can motivate better compliance from businesses although more</li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
		<p>compliant businesses are also more likely to join</p> <ul style="list-style-type: none"> <li>• PA is a formal arrangement and has a strong legal framework compared with HA</li> <li>• PA builds on existing infrastructure within LAs and on the professional standards and capacity of enforcement officers</li> <li>• PA can lead to less communication from LAs (i.e. one notice instead of many)</li> <li>• One stakeholder felt PA had heavily built on voluntary schemes and was showing some benefits for health and safety</li> </ul>
Business/LA relationship	<ul style="list-style-type: none"> <li>• Little evidence of businesses strategically choosing their PA and most choose an LA they have worked closely with in the past</li> <li>• Shopping around for a PA does happen and businesses are generally looking for quality of service, competence and expertise rather than</li> </ul>	<ul style="list-style-type: none"> <li>• LAs often only communicate what is wrong with a business (i.e. test purchasing) rather than give regular feedback</li> <li>• Choice of LA for PA is often based on good HA relationship where the business is satisfied with the LA and also on proximity of LA to</li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
	a more lenient LA	<p>headquarters</p> <ul style="list-style-type: none"> <li>• One stakeholder felt that some strategic choice of PA might take place and LBRO will have to manage the selection process carefully and ensure that LAs are sufficiently resourced to deliver PA</li> <li>• Businesses and LAs often have different priorities with respect to risk (e.g. one supermarket might be more concerned with food poisoning and a LA being more concerned with employee safety)</li> <li>• One stakeholder felt that in a minority of cases, businesses do not want to take advice on certain issues</li> <li>• One stakeholder had seen no evidence of businesses strategically picking their LA but felt LBRO would have to address this issue if it came up</li> </ul>
Capacity and skills of LA		<ul style="list-style-type: none"> <li>• LAs should have enough resources and staff to deliver PA but they also have to be willing</li> <li>• LA inspectors often have a narrow</li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
		perspectives of businesses and do not see the company-wide picture
Charging	<ul style="list-style-type: none"> <li>• Some businesses are cynical towards PA because of the charging elements</li> <li>• Only 55% of all PAs charge businesses for their services and not all of them charge full costs although this might be due to the intensity of the partnerships (some only require periodic advice whilst others have frequent interactions)</li> <li>• The PA scheme needs more cost recovery to provide its service and for this to be achieved, LAs have to demonstrate added value for businesses</li> <li>• Some businesses are worried about paying for PA and find it hard to understand why they should pay for services they were getting free of charge</li> </ul>	<ul style="list-style-type: none"> <li>• Some businesses are reluctant to pay, are happy with HA or are reluctant to enter into a contract with the regulator as this is a new relationship for them that requires a new approach</li> <li>• Fees can be hard to justify for businesses</li> <li>• Charging was implemented because the government wanted it but businesses don't understand why they should pay a fee in addition to their taxes</li> <li>• One stakeholder felt low charges might not be a problem for some LAs as it might make sense for them to favour a local business with headquarters in their area</li> <li>• One stakeholder mentioned that central charging was not a possibility under PA as charges depend greatly on what type of services the</li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
		businesses require
Compliance of EAs		
Contractual issues	<ul style="list-style-type: none"> <li>Difficulties around the drafting of the legislation in particular around issues of liability. Under PA, LAs are protected if they give wrong information to a business which means that they cannot be made legally responsible in those cases</li> </ul>	
Costs	<ul style="list-style-type: none"> <li>Only 55% of PAs charge businesses and not all of those charge full costs</li> <li>Set-up costs include: investment in IT infrastructure and other costs include LBRO staff (account management for PA and people to stimulate set up)</li> <li>Running costs should hopefully be relatively low in the longer run</li> </ul>	<ul style="list-style-type: none"> <li>Businesses have to justify the costs of PA even though the fees are relatively low compared to business profits</li> <li>One stakeholder mentioned they had expected businesses to have relatively high set-up costs with PA initially</li> <li>One stakeholder mentioned that the ability of LAs to recover costs for PA was very important</li> <li>One stakeholder felt that a lot of resources had been spent on PA compared with HA when not many partnerships had been set up</li> </ul>



	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
Inconsistencies	<ul style="list-style-type: none"> <li>• One stakeholder mentioned that the key problem PA was attempting to address to start with were inconsistencies although it was unclear at the time and still somewhat now what inconsistency actually means</li> <li>• One stakeholder also mentioned that inconsistencies were never really defined</li> <li>• Inconsistency can result from differences in interpretation and enforcement within the same enforcing authority. This could happen under PA if within the same locality, two different companies are under two different PAs and get different advice.</li> <li>• One stakeholder felt that the impact assessment conducted by LBRO on inconsistencies was narrowly focused on inconsistency of advice and based on weak evidence base: the DTI study asked 6-7 businesses who reported</li> </ul>	<ul style="list-style-type: none"> <li>• Inconsistencies can result from: lack of consistency in approach to enforcement, lack of understanding of systems at the local level, different interpretations of the legislation</li> <li>• Some LAs accept some actions from businesses (e.g. labelling of a new product) whilst others contest it</li> <li>• Difficult to cost inconsistencies</li> <li>• Inconsistencies can also result from differences in rule and process enforcement across a business</li> <li>• One stakeholder felt that if inconsistencies were as bad as BERR and BIS have said they were, there would be a lot more PA partnerships</li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
	<p>that inconsistency of advice caused them from £2,000 to 1 million GBP costs thus they came up with the 15 000 GBP as average number. One of the further problems behind this evolved around the types and nature of inconsistencies: are these emanating from temporal differences, various levels of activity in local authorities, or differences in interpretation?</p> <ul style="list-style-type: none"> <li>• The frequency of inconsistency of advice is also problematic</li> </ul>	
Inspection plans		
LBRO	<ul style="list-style-type: none"> <li>• LBRO has 3 key roles in relation to PA: (1) sales or marketing of PA, (2) operations, i.e. running PA, and (3) developing PA further</li> <li>• To get LAs interested in PA, LBRO organised seminars across the country and about 92% of all LAs attended</li> <li>• LBRO is responsible for the IT system for PA and also for dispute</li> </ul>	<ul style="list-style-type: none"> <li>• LBRO resisted a target for the number of participants and therefore agreed a range for new participants with BRE.</li> <li>• LBRO acts as a fair administrator of PA</li> <li>• One stakeholder perceived LBRO as having done a hard sale to convince LAs to move from voluntary schemes to PA</li> <li>• One interviewee felt that LBRO's involvement in PA in the long run should</li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
	<p>settlement</p> <ul style="list-style-type: none"> <li>• LBRO is now concentrating on the roll out of PA</li> <li>• LBRO's decisions can be challenged in a judicial review</li> </ul>	<p>be minimal as their purpose in PA will mainly be to be in charge of arbitration</p> <ul style="list-style-type: none"> <li>• One stakeholder mentioned that a strong government lobby tried to curb LBRO's powers and shape the new scheme</li> </ul>
Rationale for joining/not joining	<ul style="list-style-type: none"> <li>• It seems that if a company is important locally it is more likely to sign up to PA</li> <li>• LAs and regulators look at PA with caution. Hence, there is a lot of 'wait and see'. Furthermore, some LAs are too small and argue that they do not have enough resources and that businesses do not want PA</li> </ul>	<ul style="list-style-type: none"> <li>• PA can stop enforcement action in cases where prior advice has been given</li> <li>• Choice of joining PA is often based on previous good relationship with LA</li> <li>• PA provides strong incentives for joining as it is a more formal arrangement and purports strong legal framework compared to HA</li> <li>• Some businesses are reluctant to join PA because they don't understand why they should have to pay for the scheme</li> </ul>
<p>Scope and scale of PA</p> <p>N.B.: Stakeholders were prompted about whether extending the scheme to other areas of regulation or to Northern Ireland and Scotland would make PA more attractive to them.</p>	<ul style="list-style-type: none"> <li>• Even if PA scheme is successful, there will still be room for voluntary schemes for the Port Authorities for example because they cannot come under the current scheme</li> <li>• Fire Safety, Alcohol Licensing and</li> </ul>	<ul style="list-style-type: none"> <li>• One stakeholder felt that licensing and fire safety should be included in PA</li> <li>• One stakeholder suggested that it could be a possible extension to PA to allow SMEs to form formal relationship with a PA so that they receive the same advice.</li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
	<p>Alcohol are excluded from the Scheme because lobbying from various parties meant that their inclusion was not feasible</p> <ul style="list-style-type: none"> <li>• The fact that PA does not cover Scotland and Northern Ireland is a disincentive for some large businesses</li> </ul>	<p>This would defend their competitive interests.</p> <ul style="list-style-type: none"> <li>• One stakeholder mentioned that alcohol licensing and fire safety were not included in PA due to political pressures</li> <li>• Some areas of regulation are too “localised” like alcohol licensing and could not easily be integrated into PA</li> </ul>
Voluntary schemes	<ul style="list-style-type: none"> <li>• There are about 10,000 home authority partnerships which raises a serious scale question for PA. LBRO could imagine having 9 to 10,000 business in PA. Similarly, there are about 100 Lead Authority partnerships. LBRO could imagine all these die out and PA being the only or dominant partnership type.</li> <li>• Difference between Home and Lead schemes is that advice under these schemes does not have to be implemented whereas it does under the PA scheme</li> <li>• Impetus for these voluntary schemes came directly from businesses because they were concerned about inconsistency of advice</li> </ul>	<ul style="list-style-type: none"> <li>• One stakeholder felt there was strong dissatisfaction with HA, some businesses feel it is not sufficient. A study also showed that 10% of businesses consistently ignore HA</li> <li>• LAs support HA more than PA because they feel things should be left “as they are”</li> <li>• HA is respected in Scotland which can be an argument for some businesses not to move to PA</li> <li>• History of Home Authority was originally just for trading standards because when it was first set up, LACORS only dealt with trading standards 25 years ago. There was a perceived need for better</li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
	<p>giving in different areas</p> <ul style="list-style-type: none"> <li>• The HSE agreed that the Lead Authority Scheme is no longer needed with PA coming into play</li> <li>• LACORS is not as willing to cooperate</li> <li>• LACORS' own research has shown that 1/3 of the businesses registered in the database did not even know that they were in a HA relationship with an LA.</li> <li>•</li> </ul>	<p>communication and reduced duplication of effort between different authorities, so it wasn't envisaged as a scheme to help businesses. But it helped local councils help local businesses. HA then expended when LACORS took on food.</p> <ul style="list-style-type: none"> <li>• HA does not require an established relationship, you are assumed to be part of HA if a business is in the LA's area. HA had another angle that PA will never have, and that is intelligence gathering and sharing.</li> <li>• Lead Authority came about 8 years ago. It was a joint scheme between HSE and LACORS to provide a similar set up for health and safety through Lead Authority. It was also slightly more formal in the way HSE set it up, they had formal agreements and formal training. Now since HSE decided to close their sponsorship of Lead Authority down as of April 2011, LACORS have said that all that have Lead Authority and do not want PA will be merged into the voluntary</li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
		<p>scheme and carry on with Lead Authority and HA as a single voluntary scheme.</p> <ul style="list-style-type: none"> <li> <p><u>Large organisations pilot (LOPP)</u>: part of the Lead Authority scheme, and a small group of the biggest businesses had specific issues such as workplace transport which involved a complex mix of investment from the company (training, infrastructure etc.) and therefore had a much more intense relationship with their LA, developed collectively a work plan about how they would tackle a particular issue. This work plan was then communicated to the local authorities who would be asked to take all this into account when carrying out health and safety inspections. It is important for these businesses to get it right because of cost, not because of fines, but implementing changes across the whole business</p> </li> <li> <p>One stakeholder felt that because businesses vary in nature, there needs to be a choice of schemes. For example, a business selling on the internet would not</p> </li> </ul>

	LBRO PA team (3 interviews)	Other stakeholders (5 interviews)
		be suitable for PA but might find a suitable voluntary scheme

## Appendix F: Key tables/data summary from 3 surveys

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### 1.21 Evaluation of the Primary Authority scheme – Business Survey

#### 1.21.1 Background information on your business

**Table E. 1 Q 1 Which of the following industries does your business operate in? Please tick one.**  
(n=27)

Options	Count of respondents	Proportion of respondents
Hotel/Catering	4	14.8
Manufacturing	4	14.8
Management/Business Services	2	7.4
Retail/Distribution	16	59.3
Transport	1	3.7
Total	27	100.0

**Table E. 2 Q 1 Other, please specify (n=27)**

Options	Count of respondents	Proportion of respondents
No response	22	81.5
Betting & Gaming Leisure	1	3.7
Computer systems and services	1	3.7
Leisure/Fitness and Retail	1	3.7
Membership, training, IT solutions	1	3.7
Travel - we are a Tour Operator	1	3.7
Total	27	100.0



**Table E. 3 Q 2 Thinking of your business as a whole, in which of the following locations does it operate? Please check all that apply. (n=27)**

Options	Count of respondents	Proportion of respondents
Just in your local area (i.e. town/village)	1	3.7
Just in your region	3	11.1
England, Wales, Scotland	2	7.4
Whole of UK, including Northern Ireland	21	77.8
Europe	5	18.5
Worldwide	7	25.9
Total	12	44.4
No response	1	3.7
Total	27	100.0

**Table E. 4 Q 3 Roughly how long has your company been in existence? Please tick one. (n=27)**

Options	Count of respondents	Proportion of respondents
1 – 3 years	1	3.7
6 - 20 years	7	25.9
More than 20 years	18	66.7
Total	26	96.3
No response	1	3.7
Total	27	100.0

**Table E. 5 Q 4 As far as you know, roughly how many staff are employed by the organisation you work for, excluding owners, partners and directors? Please include anyone who works for the organisation, even if they work in a different location or plant to you. Please tick one (n=27)**

Options	Count of respondents	Proportion of respondents
1 - 4	1	3.7
10 - 19	1	3.7
20 - 49	1	3.7
50 - 99	2	7.4
100 - 249	4	14.8
250-499	1	3.7
500 - 999	1	3.7
1,000+	16	59.3
Total	27	100.0

**Table E. 6 Q 5 Roughly what is your business' annual turnover? Please select the appropriate turnover size (£ thousand) for your business (n=27)**

Options	Count of respondents	Proportion of respondents
100 – 249	1	3.7
250 – 499	1	3.7
1,000 – 4, 999	5	18.5
5,000 +	19	70.4
No response	1	3.7
Total	27	100.0

### 1.21.2 Your business and Primary Authority scheme

**Table E. 7 Q 6 Have you been the person responsible for managing the Primary Authority scheme since your business became involved in it? (n=27)**

Options	Count of respondents	Proportion of respondents
No	3	11.1
Yes	24	88.9
Total	27	100.0

**Table E. 8 Q 7 If not, how long have you been responsible for managing the Primary Authority scheme on behalf of your business? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	24	88.9
4 - 5 months	1	3.7
6 months to a year	1	3.7
More than a year	1	3.7
Total	27	100.0

**Table E. 9 Q 8 Approximately, how many local authority areas does your business operate in? Please tick one. (n=27)**

Options	Count of respondents	Proportion of respondents
1	1	3.7
2	1	3.7
3 - 5	3	11.1
6 - 10	1	3.7
11 – 50	5	18.5
51 – 100	2	7.4
More than 100	12	44.4
Don't know	2	7.4
Total	27	100.0

**Table E. 10 Q 9 Have you or are you currently participating in one of the voluntary schemes such as the Home Authority or the Lead Authority scheme? (n=27)**

Option	Yes	Yes	No	No	No response	No response	Total
	Count	%	Count	%	Count	%	
My business is currently participating in the Home Authority scheme	8	29.6%	11	40.7%	8	29.6%	27
My business was participating in the Home Authority scheme in the past	11	40.7%	8	29.6%	8	29.6%	27

My business was participating in the Lead Authority scheme in the past	6	22.2%	8	29.6%	13	48.1%	27
My business was participating in the Large Organisation Partnership Pilot (LOPP)	1	3.7%	11	40.7%	15	55.6%	27

**Table E. 11 Q 10 If you are currently participating in one of the voluntary schemes that could be covered by the Primary Authority scheme, please tell us why you have chosen not to adopt a primary authority partnership for these areas of regulation? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	24	88.9
For Trading Standards we have a very good relationship with our Home Authority and therefore it was not perceived that entering into a PA agreement would add any value at this time	1	3.7
Lead Authority on Health and safety works well	1	3.7
To provide our stores with a better directive with regard to the legislation and to improve overall working practice and customer service	1	3.7
Total	27	100.0

### 1.21.3 Joining the Primary Authority scheme

**Table E. 12 Q 11 How many primary authority partnerships does your business have? (n=27)**

Options	Count of respondents	Proportion of respondents
1	20	74.1
2	5	18.5
5 or more	2	7.4
Total	27	100.0

**Table E. 13 Q 12 For how many months has your business been in this primary authority partnership? (n=27)**

Options	Count of respondents	Proportion of respondents
1 month or less	2	7.4
2 - 4 months	5	18.5
5 months - 9 months	13	48.1
10 months - a year	2	7.4
More than a year	5	18.5
Total	27	100.0

**Table E. 14 Q 13 How was the primary authority partnership initiated? Please tick one. (n=27)**

Options	Count of respondents	Proportion of respondents
LBRO approached my business	3	11.1
Local authority approached my business	10	37.0
My business approached LBRO	4	14.8
My business approached the local authority	5	18.5
Transition from voluntary arrangement	5	18.5
Total	27	100.0

**Table E. 15 Q 14 In which one of the following areas of local regulation is your business involved in a primary authority partnership? Please tick one. (n=27)**

Options	Count of respondents	Proportion of respondents
Explosives licensing	1	3.7
Fair trading	7	25.9
Food safety and hygiene	6	22.2
Food standards	1	3.7
Health and safety	8	29.6
Petroleum licensing	1	3.7
Product safety	2	7.4
Road traffic	1	3.7
Total	27	100.0

**Table E. 16 Q 15 Did you have to put together a business case for your organisation (i.e. internally) to justify your involvement in the Primary Authority scheme? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	2	7.4
Don't know	1	3.7
No	15	55.6
Yes	9	33.3
Total	27	100.0

**Table E. 17 Q 16 What were your main motivations for choosing to get involved in the Primary Authority scheme? Please rate the options that apply in the order of importance (with 1 being most important and 5 least important). (n=27)**

Option	No response		1		2		3		4		5		Total	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
The statutory standing of the scheme (i.e. dispute resolution and legally binding procedures)	2	8.0%	14	51.9%	7	28.0%	1	4.2%	1	4.3%	2	18.2%	27	20.0%
Better intelligence from inspections carried out by local authorities	4	16.0%	2	7.4%	6	24.0%	5	20.8%	7	30.4%	3	27.3%	27	20.0%
Improved relationship with local authority and other regulators	2	8.0%	6	22.2%	5	20.0%	10	41.7%	4	17.4%	0	0.0%	27	20.0%
Recognition of compliance efforts	2	8.0%	1	3.7%	6	24.0%	7	29.2%	10	43.5%	1	9.1%	27	20.0%
Other motivation	15	60.0%	4	14.8%	1	4.0%	1	4.2%	1	4.3%	5	45.5%	27	20.0%
Total	25	100.0%	27	100.0%	25	100.0%	24	100.0%	23	100.0%	11	100.0%	135	100.0%

**Table E. 18 Q 17 If you have selected "other motivation" in the above question, please specify below: (n=27)**

Options	Count of respondents	Proportion of respondents
No response	20	74.1
Access into the knowledge of the lead authority	1	3.7
Continued relationship	1	3.7
Increased visibility on the way we manage H&S	1	3.7
Level playing field between different authorities	1	3.7
So that TS round the country would know that we take our obligations seriously.	1	3.7
Standard, consistent approach to regulation and inspections	1	3.7
The home authority concept was being removed so it was the only viable option	1	3.7
Total	27	100.0

**Table E. 19 Q 18 What were your main reasons for choosing your primary authority? Please select the THREE most important options in the list below. (n=27)**

Option	Not selected		Selected		Total
	Count	%	Count	%	Count
Proximity of local authority (e.g. near head office or other sites, convenient to get to)	15	55.6%	12	44.4%	27
Previous involvement in a pilot or voluntary scheme with this local authority	17	63.0%	10	37.0%	27
Good relationship with this local authority already	5	18.5%	22	81.5%	27
Understanding of my business/sector by this local authority	15	55.6%	12	44.4%	27
Capacity of local authority to deliver Primary Authority (expertise, staff, other resources)	20	74.1%	7	25.9%	27
No charge made to my business for primary authority partnership by this local authority	22	81.5%	5	18.5%	27
Charges applied by this local authority to my business are reasonable to deliver the Primary Authority scheme	24	88.9%	3	11.1%	27
Other	25	92.6%	2	7.4%	27

**Table E. 20 Q 19 Other rationale, please specify (n=27)**

Options	Count of respondents	Proportion of respondents
No response	25	92.6
Home Authority partner	1	3.7
Largest local authority in England outside of London	1	3.7

Total	27	100.0
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**Table E. 21 Q 20 How easy or difficult was it for your business to find a suitable primary authority?  
(n=27)**

<b>Options</b>	<b>Count of respondents</b>	<b>Proportion of respondents</b>
Easy	3	11.1
Neither easy nor difficult	6	22.2
Very easy	18	66.7
Total	27	100.0



**Table E. 22 Q 21 Challenges during the process of establishing a primary authority partnership? Please rate the options that apply in the order of importance (with 1 being the most important and 10 the least important) (n=27)**

Option	No res po ns e		1		2		3		4		5		6		7		8		9		10		Tot al	
	Co unt	%	Co unt	%	Co unt	%	Co unt	%	Co unt	%	Co unt	%	Co unt	%	Co unt	%	Co unt	%	Co unt	%	Co unt	%	Co unt	%
Lack of corporate buy-in to Primary Authority	13	19.7%	1	2.2%	0	0.0%	1	7.7%	1	6.7%	2	18.2%	1	9.1%	1	7.7%	1	9.1%	3	23.1%	3	30.0%	27	12.5%
Not enough information available about the scheme	3	4.5%	11	24.4%	0	0.0%	1	7.7%	2	13.3%	2	18.2%	2	18.2%	1	7.7%	2	18.2%	3	23.1%	0	0.0%	27	12.5%
Not enough help available from LBRO	0	0.0%	13	28.9%	0	0.0%	2	15.4%	2	13.3%	1	9.1%	0	0.0%	2	15.4%	2	18.2%	3	23.1%	2	20.0%	27	12.5%
Agreeing resourcing arrangements	14	21.2%	1	2.2%	3	37.5%	2	15.4%	2	13.3%	0	0.0%	0	0.0%	1	7.7%	4	36.4%	0	0.0%	0	0.0%	27	12.5%
Lack of buy-in from local authority	0	0.0%	15	33.3%	1	12.5%	1	7.7%	1	6.7%	0	0.0%	2	18.2%	2	15.4%	1	9.1%	0	0.0%	4	40.0%	27	12.5%
Difficulty understanding what services the local authority will provide	12	18.2%	1	2.2%	1	12.5%	4	30.8%	1	6.7%	4	36.4%	2	18.2%	1	7.7%	0	0.0%	1	7.7%	0	0.0%	27	12.5%
Difficulty quantifying benefits	13	19.7%	1	2.2%	1	12.5%	0	0.0%	3	20.0%	1	9.1%	3	27.3%	3	23.1%	1	9.1%	1	7.7%	0	0.0%	27	12.5%

Problems with reaching legal agreement	11	16.7%	2	4.4%	2	25.0%	2	15.4%	3	20.0%	1	9.1%	1	9.1%	2	15.4%	0	0.0%	2	15.4%	1	10.0%	27	12.5%
Other	21	31.8%	2	4.4%	2	25.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	9.1%	0	0.0%	1	10.0%	27	12.5%
Total	66	100.0%	45	100.0%	8	100.0%	13	100.0%	15	100.0%	11	100.0%	11	100.0%	13	100.0%	11	100.0%	13	100.0%	10	100.0%	21	100.0%

**Table E. 23 Q 22 If you have selected "other challenge" in the above question, please specify below: (n=27)**

Options	Count of respondents	Proportion of respondents
No response	24	88.9
Cost	1	3.7
Getting sign off from Local Council	1	3.7
Our local authority had an ongoing noise pollution dispute with us and so kept pulling out of the talks as they said it was a conflict of interests	1	3.7
Total	27	100.0

**Table E. 24 Q 23 What would you identify as the main benefits of being involved with the Primary Authority scheme? THREE most important options. (n=27)**

Options	Count of respondents	Proportion of respondents
I receive advice from one local authority on how to comply that other local authorities will respect	15	55.6
Single point of contact to deal with all local authorities	20	74.1
Reduction in inconsistencies in the way my business is being regulated at the local level	14	51.9
Reduction in the number of inspections carried out by local authorities overall	1	3.7
Cost savings for my business	1	3.7
The statutory standing of the scheme (i.e. dispute resolution and legally binding procedures)	8	29.6
Better intelligence from inspections carried out by local authorities	3	11.1
Improved relationship with local authority and other regulators	7	25.9
Recognition of compliance efforts	6	22.2

**Table E. 25 Q 24 What would you identify as the main challenges of participation in the Primary Authority scheme? Rate options in order of importance (1 - most important option, 6 - least important). (n=27)**

Option		No response	1	2	3	4	5	6	Total
Increased workload	count	12	1	2	6	3	0	3	27
	%	44.4	3.7	7.4	22.2	11.1	0.0	11.1	100.0
Bureaucracy of the scheme	count	13	2	1	3	5	1	2	27
	%	48.1	7.4	3.7	11.1	18.5	3.7	7.4	100.0

Lack of corporate buy-in to the scheme	count	15	3	1	1	0	4	3	27
	%	55.6	11.1	3.7	3.7	0.0	14.8	11.1	100.0
Lack of buy-in to the scheme by other local authorities	count	9	7	4	2	0	3	2	27
	%	33.3	25.9	14.8	7.4	0.0	11.1	7.4	100.0
Ownership structure of my business	count	0	13	2	1	3	3	5	27
	%	0.0	48.1	7.4	3.7	11.1	11.1	18.5	100.0
Other	count	24	2	0	0	0	0	1	27
	%	88.9	7.4	0.0	0.0	0.0	0.0	3.7	100.0

**Table E. 26 Q 25 If you have selected "other" in the above question, please specify below: (n=27)**

Options	Count of respondents	Proportion of respondents
No response	24	88.9
Cost imposed which we did not have before.	1	3.7
No involvement form LBRO in validating the processes being developed with PA	1	3.7
Nothing has really changed since we had a Home Authority relationship except we now have to pay!	1	3.7
Total	27	100.0

#### 1.21.4 Cost of being part of the Primary Authority scheme for your business

## Financial cost

**Table E. 27 Q 26 Is your business being charged for the primary authority partnership? (n=27)**

Options	Count of respondents	Proportion of respondents
No	13	48.1
Yes	14	51.9
Total	27	100.0

**Table E. 28 Q 27 Which of the charging arrangements below have you and your primary authority adopted? (n=27)**

Options	Count of respondents	Proportion of respondents
Annual fee for agreed number of hours per annum	1	3.7
Annual fee for agreed number of hours per annum	8	29.6
Annual fee for unlimited hours	1	3.7
Hourly rate based on agreed number of hours	1	3.7
Hourly rate for services as and when needed	2	7.4
Total	13	48.1
No response	14	51.9
Total	27	100.0

**Table E. 29 Q 28 Following on from your answer to the previous question, please tell us how much in £ you are being charged by your local authority (n=27)**

Options	Count of respondents	Mean
Annual fee for unlimited hours	2	11100.00
Annual fee for agreed number of hours per annum	7	4456.43
Hourly rate based on agreed number of hours	1	14.00
Hourly rate for services as and when needed	2	44.00

**Table E. 30 Q 29 How many hours per year do you think your primary authority spends on your partnership? (n=27)**

Options	Count of respondents	Proportion of respondents
5.00	2	7.4
6.00	1	3.7
10.00	1	3.7
20.00	1	3.7
24.00	1	3.7
34.00	1	3.7
40.00	2	7.4
50.00	3	11.1
60.00	3	11.1
70.00	1	3.7
95.00	1	3.7
100.00	1	3.7
150.00	1	3.7
200.00	1	3.7
250.00	1	3.7
900.00	1	3.7
Total responses	22	81.5
No response	5	18.5
27	100.0	27

## Time and staff cost

**Table E. 31 Q 30 How many days work did your business spend on setting up the primary authority partnership? (n=27)**

Options	Count of respondents	Proportion of respondents
1 day or less	8	29.6
2 – 4 days	10	37.0
5 – 9 days	3	11.1
10 – 15 days	4	14.8
More than 15 days	1	3.7
Don't know	1	3.7
Total	27	100.0

**Table E. 32 Q 31 How long did it take from the initial discussions stage to the start of the partnership? (n=27)**

Options	Count of respondents	Proportion of respondents
Less than a week	3	11.1
From 1 week to 1 month	5	18.5
From 1 month to 3 months	10	37.0
From 3 months to 6 months	5	18.5
More than 6 months	4	14.8
Total	27	100.0

**Table E. 33 Q 32 Has the amount of time your business spends dealing with compliance with local regulation since your involvement in a primary authority partnership changed? (n=27)**

Options	Count of respondents	Proportion of respondents
Decreased	7	25.9
Don't know	1	3.7
Stayed the same	19	70.4
Total	27	100.0

**Table E. 34 Q 33 If the amount of time changed, why? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	21	77.8
Directly linked to your business' involvement in a primary authority partnership	4	14.8
Don't know	1	3.7
Unrelated to your business' involvement in a primary authority partnership	1	3.7
Total	27	100.0

**Table E. 35 Q 34 How much time a week does your business dedicate to maintaining its primary authority partnership? (n=27)**

Options	Count of respondents	Proportion of respondents
None	8	29.6
1 hour or less	10	37.0
2 – 4 hours	3	11.1
5 – 9 hours	3	11.1

10+ hours	1	3.7
Don't know	2	7.4
Total	27	100.0

**Table E. 36 Q 35 How often and by which means of communication are you in contact with your primary authority? Email contact (n=27)**

Options	Count of respondents	Proportion of respondents
No response	3	11.1
Less frequently than on a monthly basis	9	33.3
On a daily basis	2	7.4
On a monthly basis	6	22.2
On a two-weekly basis	2	7.4
On a weekly basis	5	18.5
Total	27	100.0

**Table E. 37 Q 36 How often and by which means of communication are you in contact with your primary authority? Phone contact (n=27)**

Options	Count of respondents	Proportion of respondents
No response	2	7.4
Less frequently than on a monthly basis	14	51.9
On a monthly basis	4	14.8
On a two-weekly basis	1	3.7
On a weekly basis	6	22.2
Total	27	100.0

**Table E. 38 Q 37 How often and by which means of communication are you in contact with your primary authority? Face to face meetings (n=27)**

Options	Count of respondents	Proportion of respondents
Less frequently than on a monthly basis	16	59.3
On a monthly basis	5	18.5
On a two-weekly basis	2	7.4
Total	27	100.0

**Table E. 39 Q 38 Do you think the primary authority partnership reduces or increases the burden for your business of complying with regulations? (n=27)**

Options	Count of respondents	Proportion of respondents
Neither reduces nor increases	12	44.4
Reduces the burden	9	33.3
Too early to say	6	22.2
Total	27	100.0

**Table E. 40 Q 39 How many inspections have you had since your involvement in the Primary Authority scheme? (n=27)**

Options	Count of respondents	Proportion of respondents
0	8	29.6
1-5	9	33.3

21-100	3	11.1
6-20	3	11.1
Don't know	4	14.8
Total	27	100.0

**Table E. 41 Q 40 How many inspections have you had during the year prior to your involvement in the Primary Authority scheme? (n=27)**

Options	Count of respondents	Proportion of respondents
0	5	18.5
1-5	10	37.0
101-200	1	3.7
21-100	4	14.8
6-20	2	7.4
Total	27	100.0

**Table E. 42 Q 41 How consistent or inconsistent is the advice that you currently receive from the various local authorities you have contact with? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	2	7.4
Don't know	3	11.1
Fairly consistent	11	40.7
Fairly inconsistent	4	14.8
Very consistent	6	22.2
Very inconsistent	1	3.7
Total	27	100.0

**Table E. 43 Q 42 Have you experienced a more or less consistent approach to local authority regulation since your involvement in the Primary Authority scheme? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	1	3.7
More consistent approach	6	22.2
Stayed about the same	12	44.4
Too early to say	8	29.6
Total	27	100.0

**Table E. 44 Q 43 How many instances of inconsistent advice have you encountered since your involvement in a primary authority partnership? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	1	3.7
0	14	51.9
1-5	7	25.9
6-20	2	7.4
Don't know	3	11.1
Total	27	100.0

**Table E. 45 Q 44 How many instances of inconsistent advice have you encountered in the year prior to your involvement in a primary authority partnership? (n=27)**



Options	Count of respondents	Proportion of respondents
No response	1	3.7
0	10	37.0
1-5	8	29.6
21-100	1	3.7
6-20	3	11.1
Don't know	4	14.8
Total	27	100.0

**Table E. 46 Q 45 What is the level of awareness of enforcing authorities with regard to the Primary Authority scheme overall? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	1	3.7
Don't know	2	7.4
Not aware at all	2	7.4
Some awareness	20	74.1
Widespread awareness	2	7.4
Total	27	100.0

**Table E. 47 Q 46 Since you joined the Primary Authority scheme, have you noticed any changes in the way enforcing authorities deal with your business? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	1	3.7
No	14	51.9
Yes	12	44.4
Total	27	100.0

**Table E. 48 Q 47 If yes, which changes have you noticed? (n=27)**

Options	Count of respondents	Proportion of respondents
Less frequent contact with enforcing authorities	3	11.1
More frequent contact with enforcing authorities	1	3.7
Less frequent inspections by enforcing authorities	2	7.4
More frequent inspections by enforcing authorities	0	0.0
Improved relationship with enforcing authorities	5	18.5
Worsened relationship with enforcing authorities	0	0.0

**Table E. 49 Q 48 If yes, which changes have you noticed? Other, please specify (n=27)**

Options	Count of respondents	Proportion of respondents
No response	23	85.2
Increased likelihood to approach us via PA	1	3.7
There is some resistance by some LA's	1	3.7
They liaise with the primary authority	1	3.7
Too early to access but most LAs know about the PAP	1	3.7

Total	27	100.0
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**Table E. 50 Q 49 How would you say those changes have impacted on your business overall? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	14	51.9
These changes have been positive for my business	10	37.0
These changes have been very positive for my business	3	11.1
Total	27	100.0

**Table E. 51 Q 50 Have your business and your primary authority developed (or are you developing) an inspection plan? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	1	3.7
No	17	63.0
Yes	9	33.3
Total	27	100.0

**Table E. 52 Q 51 How many hours did your business spend on developing the Inspection Plan? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	18	66.7
2 – 4 hours	3	11.1
10 – 15 hours	1	3.7
16 - 30 hours	1	3.7
41 – 50 hours	1	3.7
Don't know	2	7.4
More than 50 hours	1	3.7
Total	27	100.0

**Table E. 53 Q 52 Do you know if the inspection plan has been used by enforcing authorities in dealing with your business? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	18	66.7
Don't know	3	11.1
No	4	14.8
Yes	2	7.4
Total	27	100.0

**Table E. 54 Q 53 What impact, if any, do you think the inspection plan has had on the way enforcing authorities regulate your business? Quicker, more efficient inspections (n=27)**

Options	Count of respondents	Proportion of respondents
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Quicker, more efficient inspections	1	3.7
More targeted inspections (i.e. focus on risks identified in the inspection plan)	2	7.4
Fewer inspections altogether	1	3.7
More frequent inspections	0	0.0
Lengthier inspections	0	0.0
No impact	0	0.0
Too early to say	7	25.9
Total	27	100.0

**Table E. 55 Q 54 On the whole, how satisfied or dissatisfied are you with your involvement in the Primary Authority scheme? (n=27)**

Options	Count of respondents	Proportion of respondents
Neither satisfied nor dissatisfied	6	22.2
Fairly satisfied	10	37.0
Very satisfied	10	37.0
No response	1	3.7
Total	27	100.0

**Table E. 56 Q 55 In your view, what could be done to improve the Primary Authority scheme? (n=27)**

Options	Count of respondents	Proportion of respondents
No response	14	51.9
To be honest I never really understood how it could help us from the start and that view hasn't changed given that nothing in the relationship seems to have changed except that we are now charged for advice/help. Going the primary authority route seemed to be the only way to maintain to continue the excellent relationship we have with our local TS which we wanted to do as we have issues from time to time from other TS authorities and it's v. useful to be able to discuss those issues with our local contact. with our local TS office and	1	3.7
The idea behind the Primary Authority is sound and supported by a prime piece of legislation RESA 2008. All local authorities should embrace the organisations who have demonstrated a proper due diligence process and support these business's thus allowing them to concentrate on businesses whom require the necessary support or indeed sanctions if not properly compliant.	1	3.7
Although I have focussed on the Trading Standards side, I am aware that there is still a very poor level of awareness of PA with EHO's. TSO's are more aware but some are taking some very strong positions regarding whether they are in favour or against it	1	3.7
A great deal more advertising and awareness in local authority	1	3.7
The primary puthority is only too aware of the resources they have, and they had doubts as to whether they could operate the scheme. They decided they could, but had the cost been higher this would have outweighed the	1	3.7

potential benefits of moving ahead with it.		
Continued promotion of the scheme to local authorities, to ensure compliance with its requirements	1	3.7
Further engagement by LBRO to ensure that our engagement with the primary authority is consistent with good practice and as effective as it could be	1	3.7
I have no comment. We are at the very, very early stage	1	3.7
A clearer way for this to be apparent to other local Authorities would be beneficial as some are unaware before attending site so do not view the business in this light from the offset, I think that the Primary Authority scheme is very positive for a company to hold and shows that they are doing their utmost to comply with health and safety regulations/legislation and guidance and I think that it is important for local authorities to know this prior to attending.	1	3.7
A quarterly/bi-annual update to all members giving some examples of complaints encountered and practical advice given to avoid such complaints (all on a no names basis of course and perhaps by sector). This would be a useful way of sharing experiences and allowing us members to learn from each other's mistakes or follow the example of other businesses in our sector.	1	3.7
The process should be quicker.	1	3.7
Capacity to address inconsistencies across European boundaries	1	3.7
Better understanding throughout the enforcement community of the scheme and recognition of advice already given	1	3.7
Total	27	100.0

## 1.22 Evaluation of the Primary Authority scheme – Primary Authority Survey

### 1.22.1 Background information on your local authority

**Table E. 57 Q 1 What is the name of your local authority? (n=23)**

Name of local authority
Bolton Council
Breckland District Council
Bristol City Council
Central Bedfordshire Council
Eastleigh Borough Council
Essex County Council
Hertfordshire
Leeds City Council
Liverpool City Council
London Borough of Sutton
London Fire and Emergency Planning Authority
Milton Keynes

Nottinghamshire County Council
Renfrewshire Council
Test Valley BC
Wakefield MDC
Warrington BC
Watford Borough Council
Wealden DC
WEST OXFORDSHIRE DISTRICT COUNCIL
Westminster City Council
Wigan council
Winchester city council

**Table E. 58 Q 3 What is your role within your local authority? (n=23)**

Options	Count of respondents	Proportion of respondents
Manager of regulatory services	9	39.1
Team leader of regulatory services	3	13.0
Regulatory officer/inspector	10	43.5
Head of primary authority	1	4.3
Total	23	100.0

**Table E. 59 Q 4 role\_other (n=23)**

Options	Count of respondents	Proportion of respondents
No response	22	95.7
Head of Petroleum (primary authority)	1	4.3
Total	23	100.0

**Table E. 60 Q 5 Did your local authority take part in the Large Organisations Partnership Pilot (LOPP)? (n=23)**

Options	Count of respondents	Proportion of respondents
No response	2	8.7
Don't know	3	13.0
No	14	60.9
Yes	4	17.4
Total	23	100.0

**Table E. 61 Q 6 What were your main motivations for getting involved in the Primary Authority scheme? Rate options in their order of importance (1 - most important, 7 - least important). Providing more effective support to local businesses to make compliance easier (n=23)**

Option	No response		1		2		3		4		5		6		7		Total
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count
Providing more effective support to local businesses to make compliance easier	1	5.3%	8	29.6%	3	13.0%	4	17.4%	3	13.0%	3	23.1%	1	5.3%	0	0.0%	23
Improving relationships with local businesses	0	0.0%	2	7.4%	5	21.7%	7	30.4%	6	26.1%	2	15.4%	1	5.3%	0	0.0%	23
Source of income for the local authority	2	10.5%	1	3.7%	1	4.3%	3	13.0%	3	13.0%	2	15.4%	4	21.1%	7	50.0%	23
Part of transition from voluntary schemes	0	0.0%	4	14.8%	1	4.3%	2	8.7%	1	4.3%	2	15.4%	8	42.1%	5	35.7%	23
Potential to reduce inconsistencies in the way businesses are regulated at the local	0	0.0%	1	3.7%	12	52.2%	4	17.4%	5	21.7%		0.0%	1	5.3%	0	0.0%	23
Making the local regulatory system work more effectively	1	5.3%	7	25.9%	0	0.0%	3	13.0%	5	21.7%	4	30.8%	3	15.8%	0	0.0%	23

Other	15	78.9 %	4	14.8 %	1	4.3%	0	0.0%	0	0.0%	0	0.0%	1	5.3%	2	14.3 %	23
Total	19	100.0 %	27	100.0 %	23	100.0 %	23	100.0 %	23	100.0 %	13	100.0 %	19	100.0 %	14	100.0 %	161

**Table E. 62 Q 7 Other motivations, please specify (n=23)**

Options	Count of respondents	Proportion of respondents
No response	17	73.9
None	1	4.3
Political pressure to end voluntary schemes	1	4.3
Request by partner business	1	4.3
Request for primary authority partnership from Local Business	1	4.3
Trader requested a PA relationship as a protection against prosecution	1	4.3
We were involved in 5 Lead Authority Partnerships, and are recognised as a centre of expertise in the field of the enforcement of Petroleum Legislation. We realised that we would be approached to become a primary authority and therefore wanted to provide	1	4.3
Total	23	100.0

**Table E. 63 Q 8 Has your local authority agreed a specific strategy to offer the Primary Authority scheme to local businesses? (n=23)**

Options	Count of respondents	Proportion of respondents
No	18	78.3
Yes	5	21.7
Total	23	100.0

**Table E. 64 Q 9 If yes to the above, what approach have you agreed? (n=23)**

Options	Count of respondents	Proportion of respondents
Promoting primary authority to local businesses	3	13.0
Transitioning existing voluntary arrangements to Primary Authority	3	13.0
Providing Primary Authority when businesses request it	3	13.0

**Table E. 65 Q 10 Other strategy (n=23)**

Options	Count of respondents	Proportion of respondents
Selective promotion of Primary Authority to targeted businesses for which we think PA is suitable	1	4.3
The provision of the service must be on the basis of full cost recovery.	1	4.3

**Table E. 66 Q 11 How many hours' work did your local authority spend on setting up its first primary authority partnership? (n=23)**

Options	Count of respondents	Proportion of respondents
2 – 4 hours	3	13.0



5 – 9 hours	2	8.7
10 – 15 hours	2	8.7
16 - 30 hours	4	17.4
31 – 40 hours	3	13.0
41 – 50 hours	3	13.0
More than 50 hours	5	21.7
Total	22	95.7
No response	1	4.3
Total	23	100.0

**Table E. 67 Q 12**How long did it take from the initial discussions stage to the start of your local authority's first primary authority partnership? (n=23)

Options	Count of respondents	Proportion of respondents
Less than a week	1	4.3
More than a week and less than a month	2	8.7
From a month to three months	8	34.8
From three months to six months	4	17.4
More than six months	7	30.4
Total	22	95.7
No response	1	4.3
Total	23	100.0

**Table E. 68 Q 13** How much time a week do you spend dealing with the primary authority business to maintain this partnership (first primary authority partnership)? (n=23)

Options	Count of respondents	Proportion of respondents
1 hour or less	13	56.5
2 – 4 hours	5	21.7
5 – 9 hours	2	8.7
10 + hours	3	13.0
Total	23	100.0

**Table E. 69 Q 14** How much time a week do you spend dealing with the enforcing authorities to maintain this partnership (first primary authority partnership)? (n=23)

Options	Count of respondents	Proportion of respondents
None	3	13.0
1 hour or less	14	60.9
2 – 4 hours	1	4.3
5 – 9 hours	3	13.0
10 + hours	1	4.3
Don't know	1	4.3
Total	23	100.0

**Table E. 70 Q 15 Which of the following challenges did you encounter when establishing primary authority partnerships? Select the applicable options and rate them by importance (1 - most important, 8 - least important). (n=23)**

Option	No response		1		2		3		4		5		6		7		8		Total	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	%	Count
Lack of buy-in from my local authority	11	12.4%	0	0.0%	0	0.0%	3	20.0%	0	0.0%	0	0.0%	0	0.0%	3	25.0%	6	66.7%	23	12.5%
Not enough information available about the scheme	11	12.4%	1	7.7%	3	20.0%	0	0.0%	1	8.3%	2	22.2%	2	20.0%	3	25.0%	0	0.0%	23	12.5%
Not enough help available from LBRO	12	13.5%	2	15.4%	1	6.7%	1	6.7%	2	16.7%	0	0.0%	3	30.0%	2	16.7%	0	0.0%	23	12.5%
Agreeing resourcing arrangements	9	10.1%	1	7.7%	5	33.3%	4	26.7%	3	25.0%	0	0.0%	1	10.0%	0	0.0%	0	0.0%	23	12.5%
Difficulty understanding what services the business	11	12.4%	1	7.7%	3	20.0%	3	20.0%	2	16.7%	2	22.2%	0	0.0%	1	8.3%	0	0.0%	23	12.5%
Difficulty quantifying benefits to business	8	9.0%	2	15.4%	1	6.7%	3	20.0%	3	25.0%	2	22.2%	2	20.0%	2	16.7%	0	0.0%	23	12.5%
Problems with reaching legal agreement	7	7.9%	5	38.5%	2	13.3%	1	6.7%	1	8.3%	2	22.2%	2	20.0%	1	8.3%	2	22.2%	23	12.5%
Other	20	22.5%	1	7.7%	0	0.0%	0	0.0%	0	0.0%	1	11.1%	0	0.0%	0	0.0%	1	11.1%	23	12.5%
<b>Total</b>	<b>89</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>184</b>	<b>100.0%</b>

**Table E. 71 Q 16 Other, please specify (n=23)**

Options	Count of respondents	Proportion of respondents
Getting the agreement through Committee due to other Agenda demands	1	4.3
identifying accurately the resources needed to develop and maintain a relationship	1	4.3

**Table E. 72 Q 17 Were you involved in setting up more than one primary authority partnership? (n=23)**

Options	Count of respondents	Proportion of respondents
No	18	78.3
Yes	5	21.7
Total	23	100.0

**Table E. 73 Q 18 How many hours' work did your local authority spend on setting up its most recent primary authority partnership? (n=23)**

Options	Count of respondents	Proportion of respondents
2 – 4 hours	2	8.7
5 – 9 hours	2	8.7
16 - 30 hours	1	4.3
Total	5	21.7
No response	18	78.3
Total	23	100.0

**Table E. 74 Q 19 How long did it take from the initial discussions stage to the start of your local authority's most recent primary authority partnership? (n=23)**

Options	Count of respondents	Proportion of respondents
More than a week and less than a month	4	17.4
From a month to three months	1	4.3
Total	5	21.7
No response	18	78.3
Total	23	100.0

**Table E. 75 Q 20 How much time a week do you spend dealing with the primary authority business to maintain this partnership (most recent primary authority partnership)? (n=23)**

Options	Count of respondents	Proportion of respondents
1 hour or less	3	13.0
2 – 4 hours	2	8.7
Total	5	21.7
No response	18	78.3
Total	23	100.0

**Table E. 76 Q 21 How much time a week do you spend dealing with the enforcing authorities to maintain this partnership (most recent primary authority partnership)? (n=23)**

Options	Count of respondents	Proportion of respondents
none	2	8.7
1 hour or less	3	13.0
Total	5	21.7

No response	18	78.3
Total	23	100.0

### 1.22.2 Perceptions of value/benefit derived from the primary authority scheme

**Table E. 77 Q 22 What would you identify as the main benefits of being involved with the Primary Authority scheme? (n=23)**

Option		No response	1	2	3	4	5	Total
Supporting local businesses to make compliance easier for them	count	2	6	9	4	2	0	23
	%	8.7	26.1	39.1	17.4	8.7	0.0	100.0
Development opportunities for local authority staff	count	4	2	2	7	5	3	23
	%	17.4	8.7	8.7	30.4	21.7	13.0	100.0
Improved working relationships with local businesses	count	1	7	7	6	2	0	23
	%	4.3	30.4	30.4	26.1	8.7	0.0	100.0
Greater efficiency for the Local Authority Regulatory System	count	1	4	4	3	9	2	23
	%	4.3	17.4	17.4	13.0	39.1	8.7	100.0
Other	count	20	1	0	0	0	2	23
	%	87.0	4.3	0.0	0.0	0.0	8.7	100.0

**Table E. 78 Q 23 Other, please specify (n=23)**

Options	Count of respondents	Proportion of respondents
political goodwill	1	4.3
PR	1	4.3
No response	21	91.3
Total	23	100.0

**Table E. 79 Q 24 What would you identify as the main challenges of participation in the Primary Authority scheme? (n=23)**

Options	Count of respondents	Proportion of respondents
Increased workload	9	39.1
Bureaucracy of the scheme	4	17.4
Lack of confidence of officers to provide primary authority services	3	13.0
Lack of business expertise/knowledge of officers to provide primary authority services	2	8.7
Lack of buy-in to the scheme by this local authority	1	4.3
Lack of buy-in to the scheme by other local authorities	11	47.8
Other	8	34.8

**Table E. 80 Q 25 Other main challenge, please specify (n=23)**

Options	Count of respondents	Proportion of respondents
No response	15	65.2
Although it provides an income, it is difficult to spend this money on replacement staff to make up for the time the PA officers have spent on PA work to the detriment of other work	1	4.3
Business do not want to pay for scheme	1	4.3
Getting the agreement documentation approved by the businesses lawyers.	1	4.3
Lack of consistency in levels of compliance by other businesses in the same sector. Licensed Betting Offices	1	4.3
no challenges	1	4.3
Other LAs not always aware of existence of PA	1	4.3
The use of excellent officers which takes them away from regulatory duties and the need to back fill their positions by temporary agency staff to fulfil statutory duties inc numbers of Food Hygiene inspections	1	4.3
We are in the very early stages of this type of partnership working (around 6 weeks). We have 5 signed partnerships; we are negotiating with 4 other national operators. The issues with the 4 under negotiation are changes in personnel within the companies	1	4.3
Total	23	100.0

### 1.22.3 Cost of using the scheme for the local authority

**Table E. 81 Q 26 Does providing the Primary Authority scheme require extra resources compared to previously? (n=23)**

Options	Count of respondents	Proportion of respondents
Don't know	2	8.7
No	9	39.1
Yes	12	52.2
Total	23	100.0

**Table E. 82 Q 27 If yes to the question above, please indicate the type of resources required (n=23)**

Options	Count of respondents	Proportion of respondents
No response	17	73.9
Formalised recording and administration	1	4.3

requirements relating to advice and meetings (though this is good practice and can only benefit all concerned). - Increased officer time in complaints handling as other LA's no longer deal with PA business direct		
Additional staffing resource for additional partnerships and where the scope of previous partnerships has been extended. A small extra resource for setting up the scheme.	1	4.3
More officer time to work with the business and time spent dealing with other LAs in the future	1	4.3
More staff time to carry out more in depth audits of the company process, which are necessary to gain fuller confidence in the company, also we need to buy in technical expertise when examining the product testing and QA procedures.	1	4.3
Our initial resourcing was based on having sufficiently competent staff available to respond to the 5 day limit when dealing with proposed enforcement action by other authorities to cover leave sickness etc. we arrived at 3 members of staff with this level	1	4.3
We now spend additional time supporting a business which as a broadly compliant premises would generally receive significantly less	1	4.3
Total	23	100.0

**Table E. 83 Q 28 Have you had to take on additional staff to deliver the Primary Authority scheme? (n=23)**

Options	Count of respondents	Proportion of respondents
No	19	82.6
Yes	4	17.4
Total	23	100.0

**Table E. 84 Q 29 How many additional staff are so employed? (n=23)**

Options	Count of respondents	Proportion of respondents
No response	8	34.8
Between 1 and 2 FTE	2	8.7
Less than 1 FTE	2	8.7
Not applicable	11	47.8
Total	23	100.0

**Table E. 85 Q 30 Have you agreed inspection plans with one or more of the participating businesses in your area? (n=23)**

Options	Count of respondents	Proportion of respondents
No	18	78.3
Yes	5	21.7
Total	23	100.0

**Table E. 86 Q 31 How many hours did your local authority spend on developing the Inspection Plan? (n=23)**

Options	Count of respondents	Proportion of respondents
No response	18	78.3
10 – 15 hours	2	8.7
16 - 30 hours	1	4.3
41 – 50 hours	1	4.3
5 – 9 hours	1	4.3
Total	23	100.0

**Table E. 87 Q 32**What cost recovery arrangements does your local authority have for Primary Authority partnerships? (n=23)

Options	Count of respondents	Proportion of respondents
Full cost recovery	11	47.8
No cost recovery	3	13.0
Recover some of the costs	9	39.1
Total	23	100.0

#### 1.22.4 On-going challenges

**Table E. 88 Q 33** Are there any new challenges facing your local authority in relation to your ongoing participation in this scheme? (n=23)

Options	Count of respondents	Proportion of respondents
Don't know	1	4.3
No	7	30.4
Yes	15	65.2
Total	23	100.0

**Table E. 89 Q 34 New challenges: Rate the applicable options in order of importance where 1 is the most important and 6 is the least important. (n=23)**

Option		No response	1	2	3	4	5	6	Total
Financial pressures on local authorities	count	8	11	3	0	0	0	1	23
	%	34.8	47.8	13.0	0.0	0.0	0.0	4.3	100.0
Relationships with enforcing authorities	count	0	19	2	1	0	0	1	0
	%	0.0	82.6	8.7	4.3	0.0	0.0	4.3	0.0
Taking up more resources than expected	count	18	1		1	2	1	0	23
	%	78.3	4.3		4.3	8.7	4.3	0.0	100.0
Less interest from businesses	count	19	1	1	1	0	1	0	23
	%	82.6	4.3	4.3	4.3	0.0	4.3	0.0	100.0
More interest from businesses	count	0	20	0	0	2	0	1	23
	%	0.0	87.0	0.0	0.0	8.7	0.0	4.3	100.0
Other	count	17	2	3	1	0	0	0	23
	%	73.9	8.7	13.0	4.3	0.0	0.0	0.0	100.0



**Table E. 90 Q 35 Other new challenges, please specify (n=23)**

Options	Count of respondents	Proportion of respondents
No response	17	73.9
Authority is considering expanding the scheme with consequences unknown at present.	1	4.3
Confusion over working with a national representative body	1	4.3
Overlap between normal home authority type work and new PA work. When should we charge? We only charge for new PA work but it is difficult to decide where to make the distinction.	1	4.3
Partner company is in the throes of being taken over, not known if partnership will be able to continue under the new ownership	1	4.3
Restructuring and shared working	1	4.3
See comments in previous answers plus the learning of new skills and practices i.e. the LBRO Web based information and familiarisation of this by other LA's	1	4.3
Total	23	100.0

### 1.22.5 Closing questions

**Table E. 91 Q 35 Overall, would you say your participation in the Primary Authority scheme has been. ..Please tick one**

Options	Count of respondents	Proportion of respondents
No response	1	4.3
Very negative	1	4.3
Neutral experience	3	13.0
Reasonably positive	8	34.8
Very positive	9	39.1
Too early to say	1	4.3
Total	23	100.0

**Table E. 92 Q 36 In your view, what could be done to improve the Primary Authority scheme? (n=23)**

Options	Count of respondents	Proportion of respondents
No response	6	26.1
Buy in & awareness amongst most LAs is very low. Hardly an inspecting authorities check whether a PA arrangement exists before inspecting/visiting. Many of the benefits to other LAs are therefore lost. Knowledge of the PA arrangement may have influenced their decision to inspect the site at all or whether to visit somewhere else instead - somewhere where their attentions may prove more	1	4.3

productive		
Greater awareness of the scheme to LAs. A less clunky PA website	1	4.3
If the statutory guidance remains unamended then the message to LA'S needs to be re-enforced so that Inspectors are informed of the pit falls of not following the guidance.	1	4.3
We believe that more could be done to raise the awareness of the scheme, and the benefits to both LA's and businesses. An example would be that during our introductory presentations to other Petroleum Licensing Authorities, some have indicated that due to their lack of resources they would deprioritise enforcement inspections at premises where the business has entered into a PAP, and possibly not inspect at all. This could have benefits to both LA's and the businesses.	1	4.3
Give existing HA advice on policies/procedures/interpretation PA status. It seems unnecessarily bureaucratic to have to re-issue previous HA advice under the new PA agreement for the advice to count officially, even though the advice would have had influence if it was produced in court. Send out regular reminders via email to all enforcement staff reminding them to check for PA agreements before dealing with a company. Too many colleagues do not even think about it.	1	4.3
In our case I am not sure if it was needed.	1	4.3
Add fire, break down boundaries between devolved administrations and lose voluntary schemes which don't offer the same advantages/protection cause confusion amongst the enforcement and business communities and facilitate restrictive inertia.	1	4.3
Need to provide ongoing support to account managers - should have twice yearly meetings of account managers from local authorities and / or those from business as per the LOPP scheme and Home/Lead authority for example. Also recommend leadership /persuading & influencing training for Account Managers. The use of LBRO solicitors was very useful when devising a contract and would like to extend this as LA solicitors are not specifically experienced in such matters.	1	4.3
Further training for enforcing officers	1	4.3
Would there be a way of ensuring that all areas of the business that becomes part of the Primary Authority scheme are made aware that they are in the scheme. Our experience was that branches of the business were unaware that the company was in the scheme	1	4.3
Primary authority partnership should to be restricted to agreements between the authority and businesses which have their head office or main manufacturing base within the authority. This would enable a close working relationship to develop between both parties and allow the regulatory authority to visit the business premises and gain a thorough understand of their processes and procedures etc. The present system allows businesses to form a primary authority partnership with a 'remote' local authority which may not be the	1	4.3

best option in developing a good working relationship, giving advice and resolving issues.		
Don't try to oversell it, it is not a soft option for either party.	1	4.3
Improvements to the database would be of benefit. Too slow, not very easy to navigate.	1	4.3
Increase awareness and participation by Environmental Health Services	1	4.3
Better publicity nationally and through business organisations and groups, such as Federation of Small Businesses. Close down the voluntary Home and Lead Authority schemes, which have no statutory status or support	1	4.3
The scheme needs to be sustained and to attain a "critical mass" of businesses and regulators who are involved. The central coordinating role of LBRO is essential to this and this central resource to continue to promote PA and assist regulators needs to be maintained.	1	4.3
An inspection plan template would be useful	1	4.3
Total	23	100.0

## 1.23 Evaluation of the Primary Authority scheme – Survey of enforcing authorities

### 1.23.1 Background questions

**Table E. 93 Q 1 What is the name of your local authority? (n=121)**

<b>Name of local authority</b>
Allerdale Borough Council
Babergh District Council
Barnsley MBC
Barnsley Metropolitan Borough Council
Barrow Borough Council
Bath & N E Somerset
Bath and North East Somerset Council
birmingham city council
Borough of Broxbourne
borough of telford and wrekin
Bournemouth
Bracknell Forest
Bracknell Forest Council
Brent and Harrow
Bridgend County Borough Council
Brighton & Hove City Council
Buckinghamshire County Council
Bury Council
Caerphilly Council
Cambridge City Council
cambridgeshire
Cardiff
chiltern district council
City of London
City of Stoke on Trent Council
City of York Council
Coventry
Craven District Council
Cumbria County Council
Dartford BC
Derbyshire County Council
Devon County Council
Dorset County Council
Dudley MBC
East Cambridgeshire DC
East Hampshire District Council
East Hertfordshire District Council
East Riding of Yorkshire Council
East Sussex CC
Gedling Borough Council
Guildford Borough Council
Hampshire County Council
Havant Borough Council
High Peak BC
Horsham District Council
Huntingdonshire
Islington
Kensington and chelsea
Kettering Borough Council
L B Richmond upon Thames
LB Bexley
LB Enfield
LB Greenwich
LB Haringey
LB richmond-upon-Thames
LB Wandsworth
Leeds City Council
Leicester
Liverpool City Council
London Borough of Hillingdon
London Borough of Merton
London Borough of Newham
London Borough of Southwark
London Borough Wandsworth

Maldon District Council
Malvern Hills DC
Mendip District Council
Mid Suffolk District Council
Mid Sussex District Council
North Dorset District Council
NORTH DOWN BOROUGH COUNCIL
North East Lincolnshire Council
North Lincolnshire Council
Northamptonshire County Council
Oadby & Wigston Borough Council
Plymouth City Council
Portsmouth City Council
Preston City Council
RBWM
Redcar & Cleveland Borough Council
royal borough of kensington and chelsea
Runnymede Borough Services
Sefton MBC
Sevenoaks DC
Shepway DC
shropshire council
Slough Borough Council
South Gloucestershire Council
South Lakeland District Council
South Northamptonshire Council
South Ribble Borough Council
South Tyneside Council
St Edmundsbury BC
Stafford Borough Council
Staffordshire County Council
Staffordshire Moorlands District Council
Stockton on Tees UA
STROUD DISTRICT COUNCIL
Suffolk County Council
Sunderland City Council
Surrey County Council
Swale Borough Council
Tameside MBC
Telford & Wrekin
Tonbridge & Malling BC
Torbay Council
Walsall Council
Warrington BC
Waverley BC
West Berkshire / Wokingham
West Lancashire Borough Council
West Sussex County Council
westminster
Weymouth & Portland Borough Council
Wiltshire Council

**Table E. 94 Q 2 What is your role within your local authority? (n=121)**

Options	Count of respondents	Proportion of respondents
Head of regulatory services	45	37.2
Manager of regulatory service	45	37.2
Other, please specify:	9	7.4
Regulatory officer/inspector	2	1.7
Team leader of regulatory service	20	16.5
Total	121	100.0

**Table E. 95 Q 3 Other role, please specify (n=121)**

Options	Count of respondents	Proportion of respondents
Not relevant	112	92.6
Assistant Director, Public Protection	1	0.8
Assistant Director, Regulatory Services	1	0.8
EH Manager	1	0.8
EH Manager - Head of Service	1	0.8
Head of Customer & Environmental Services	1	0.8
Head of Environmental Health Services	1	0.8
Head of Environmental Health and Trading Standards	1	0.8
Head of Health and Housing	1	0.8
Head of Public Protection	1	0.8
Total	121	100.0

**Table E. 96 Q 4 How does your local authority provide support to local businesses in complying with local regulation? (n=121)**

Options	Count of respondents	Proportion of respondents
Provision of advice during inspections	119	98.3
Provision of a business advice helpline	41	33.9
Engagement with business representative organisations	78	64.5
Organisation of business seminars	62	51.2
Provision of Home authority	85	70.2
Provision of Primary Authority	16	13.2
Taking part in Trading Places	25	20.7
Other	41	33.9

**Table E. 97 Q 5 Other, please specify (n=121)**

Options	Count of respondents	Proportion of respondents
No response	80	66.1
Ad hoc training events	1	0.8
Advice & guidance to new businesses	1	0.8
Approved Trader Scheme, Dedicated Business Support Team, "Made in X" /initiative, website advice and information	1	0.8
Bespoke business advice service with full cost recovery	1	0.8
Business pack for new businesses	1	0.8
Cheap training on HS, Food etc	1	0.8
Comprehensive business advice on web site, provision of age-restricted sales training book	1	0.8
contribution to business newsletters, production of business advice packs in relation to Regulatory Services matters	1	0.8
Correspondence on issues as they arise; web site.	1	0.8
ERWIN website development	1	0.8
Estates Excellence	1	0.8
I have volunteered for Trading Places but received no placement offer from LBRO	1	0.8
In discussion with a number of business about adopting the Primary Authority scheme	1	0.8
Information on our many web pages and links to other organisations.	1	0.8
Invite businesses to seminars and go out to them to hold advice sessions	1	0.8
Lead Authority, website advice, training, new business advice, breakfast sessions, business	1	0.8

Forums, business newsletters, Link to ERWIN website	1	0.8
Local Forum	1	0.8
Newletters	1	0.8
Newsletters, Awareness Days	1	0.8
newsletters, web-based advice, direct phone advice.	1	0.8
Production of advice leaflets	1	0.8
Promotion of a 'Buy with confidence' scheme	1	0.8
Provision of and contribution to the ERWIN web resource	1	0.8
Provision of guidance documents and material via website	1	0.8
Provision of Lead Authority	1	0.8
Responding to over 2,000 requests for advice each year; promoting a county wide good trader scheme with over 1,000 local businesses - mainly SME's	1	0.8
Service specific bulletins	1	0.8
Support & Buy With Confidence Approved Trader Schemes	1	0.8
Targeted training and advice events.	1	0.8
Through Worcestershire Regulatory Shared Service	1	0.8
Trader schemes	1	0.8
training courses	1	0.8
Training events for businesses	1	0.8
We can provide a range of advice and training through BRS our arms length company .	1	0.8
We support Primary Authority if a business request it. We provide training for employees of local businesses	1	0.8
Web and advice service	1	0.8
Web based advice. Buy with Confidence Trader Approval Scheme, Specific trader advice packs, eg Age Restricted Sales	1	0.8
Web based information on the full range of Trading Standards Regulation, attendance as business group meetings, exhibitions and displays.	1	0.8
Web site, newsletter, loan library, leaflets, workbooks, training courses	1	0.8
Website	1	0.8
Total	121	100.0

**Table E. 98 Q 6 Are you aware of the Primary Authority scheme? (n=121)**

Options	Count of respondents	Proportion of respondents
Yes	121	100.0

**Table E. 99 Q 7 Have any businesses approached you about the possibility of forming a primary authority partnership with your local authority? (n=121)**

Options	Count of respondents	Proportion of respondents
No	77	63.6
Yes	44	36.4
Total	121	100.0

**Table E. 100 Q 8 Have you offered the Primary Authority scheme to businesses you work with? (n=121)**

Options	Count of respondents	Proportion of respondents
Don't know	1	.8
No	65	53.7
Yes	55	45.5

Total	121	100.0
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**Table E. 101 Q 9 How do you feel about the level of information available about the Primary Authority scheme? (n=121)**

Options	Count of respondents	Proportion of respondents
No response	66	54.5
About right	44	36.4
Too little	6	5.0
Too much	5	4.1
Total	121	100.0

**Table E. 102 Q 10 How interested were the businesses you approached in the Primary Authority scheme? (n=121)**

Options	Count of respondents	Proportion of respondents
No response	66	54.5
Not interested at all	11	9.1
Not very interested	18	14.9
Somewhat interested	17	14.0
Unsure	6	5.0
Very interested	3	2.5
Total	121	100.0

**Table E. 103 Q 11 Are you still in discussions regarding Primary Authority with any of the businesses you approached? (n=121)**

Options	Count of respondents	Proportion of respondents
No response	66	54.5
Don't know	1	.8
No	30	24.8
Yes	24	19.8
Total	121	100.0



**Table E. 104 Q 12 If you did not offer primary authority services to businesses, what were your main reasons for not doing so? (n=121)**

Option		No response	1	2	3	4	5	6	7	Total
Complexity of joining process	count	71	1	10	11	13	7	5	3	121
	%	58.7	.8	8.3	9.1	10.7	5.8	4.1	2.5	100.0
Lack of available staff to resource partnership	count	67	22	13	6	3	5	4	1	121
	%	55.4	18.2	10.7	5.0	2.5	4.1	3.3	.8	100.0
The value of the scheme is/ was not clear	count	73	10	12	10	8	2	4	2	121
	%	60.3	8.3	9.9	8.3	6.6	1.7	3.3	1.7	100.0
My local authority does not offer Primary Authority to local businesses	count	79	5	0	4	3	10	8	12	121
	%	65.3	4.1	0.0	3.3	2.5	8.3	6.6	9.9	100.0
No different to Home Authority	count	75	8	7	7	11	8	5	0	121
	%	62.0	6.6	5.8	5.8	9.1	6.6	4.1	0.0	100.0
Lack of confidence of officers to provide primary authority services	count	80	1	3	2	3	7	12	13	121
	%	66.1	.8	2.5	1.7	2.5	5.8	9.9	10.7	100.0
Other	count	97	13	2	2	2	0	0	5	121
	%	80.2	10.7	1.7	1.7	1.7	0.0	0.0	4.1	100.0

**Table E. 105 Q 13 Other, please specify (n=121)**

<b>Options</b>	<b>Count of respondents</b>	<b>Proportion of respondents</b>
No response	94	77.7
Awaited approach from interested businesses. Home Authority Scheme adequate for our local needs	1	0.8
Aware of differences to HA do not believe that PA offers additional value to local business community as a whole	1	0.8
Business decided to pursue PA with another authority (H&S)	1	0.8
Business was not prepared to pay	1	0.8
Completely satisfied with Home Authority Scheme	1	0.8
Doesn't offer anything by way of 'added value' and business can be too selective as to what they want the PA to include.	1	0.8
In flexibility in scheme to be adapted to local/business needs	1	0.8
it is a ridged and dictatorial process	1	0.8
Lack of multi-site businesses whose core or head office functions are in our area. We would have capacity issues if there were. For example, for all food safety regulation we have 2.6FTE and even this may fall with cuts.	1	0.8
Lack of support by businesses in our area	1	0.8
Local businesses were consulted and unanimously indicated that they preferred the existing home authority relationship	1	0.8
Matter for some other organisation acting on our behalf	1	0.8
Most businesses in our area regulated by TS are SMEs and this authority offers free business advice which meets their needs as evidenced by low non-compliance rates	1	0.8
No added value for any businesses here, most are small	1	0.8
No appropriate businesses	1	0.8
No business opportunity within the District	1	0.8
Not a legal requirement in Northern Ireland	1	0.8
Not sure many businesses want to form any arrangement in current economic climate.	1	0.8
Our home authority relationships are very well developed . The cost/benefit of the Primary Authority scheme is not readily apparent.	1	0.8
The Home Authority is a reasonable option for smaller businesses and relatively few suitable business plus it would not be viable from a staff resource perspective to offer this if more than one suitable operation existed	1	0.8
The Home Authority scheme works very well for us and our business partners.	1	0.8
The risk of underwriting the responsibilities of duty holders and the reliance on continued financial commitment from private business	1	0.8
Too resource intensive and business indicated unwilling to cover full costs.	1	0.8
Unnecessary when existing effective schemes available.	1	0.8
We are already Home Authority to one company and this works well - there is no advantage in changing this to a PA partnership	1	0.8
We have no suitable businesses	1	0.8
We have successfully run a Home Authority relationship and the business and our selves wanted this arrangement to continue	1	0.8

Total	121	100.0
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### 1.23.2 Involvement with local businesses

**Table E. 106 Q 14 Are any of the business premises in your local authority area covered by a primary authority partnership? (n=121)**

Options	Count of respondents	Proportion of respondents
Don't know	13	10.7
No	39	32.2
Yes	69	57.0
Total	121	100.0

**Table E. 107 Q 15 How did you become aware of participating businesses? (n=69)**

Options	Count of respondents	Proportion of respondents
Visits to the LBRO Primary Authority website	56	46.3
Direct communication from the business	8	6.6
Direct communication from the primary authority	7	5.8
Email circulation list	15	12.4
Other	9	7.4

**Table E. 108 Q 16 Other, please specify (n=69)**

Options	Count of respondents	Proportion of respondents
No response	112	92.6
Check prior to any enforcement action	1	.8
Common sense really e.g. we have B & Q's in our area	1	.8
Communication from LBRO	1	.8
Discussed during inspections	1	.8
Environmental Health News	1	.8
Information from colleagues and professional organisations	1	.8
Just in the process of signing up our first PA's with more in the pipeline	1	.8
LGR and newsletters	1	.8
We instigated the issue following a meeting with the business	1	.8
Total	121	100.0

**Table E. 109 Q 17 Have you noticed a change in compliance behaviour in primary authority businesses in your area? (n=69)**

Options	Count of respondents	Proportion of respondents
Not applicable	52	43.0
Don't know	12	9.9
No	57	47.1
Total	121	100.0

**Table E. 110 Q 18 If so, what changes in compliance behaviour have you noticed? (n=69)**

Options	Count of respondents	Proportion of respondents
No response	121	100.0

**Table E. 111 Q 19 Has the way in which you deal with businesses changed in any way as a consequence of businesses in your area becoming members of the Primary Authority scheme? (n=69)**

Options	Count of respondents	Proportion of respondents
Not applicable	52	43.0
Don't know	3	2.5
No	44	36.4
Yes	22	18.2
Total	121	100.0

**Table E. 112 Q 20 If yes, what changes have taken place? Please check all that apply (n=69)**

Options	Count of respondents	Proportion of respondents
More targeted inspection activity	5	4.1
Compliance issues raised with primary authority or business head office rather than with local premises of the business	8	6.6
Less frequent inspections of PA businesses	1	0.8
More frequent inspections of PA businesses	0	0.0
Improved communications with relevant local authority acting as the primary authority for the business	2	1.7
Easier resolution of compliance issues	4	3.3
Unable to contact PA businesses directly	0	0.0
Other	7	5.8

**Table E. 113 Q 21 Other, please specify (n=69)**

Options	Count of respondents	Proportion of respondents
Not relevant	114	94.2
Checking for inspection plans prior to visits to PA businesses	1	0.8
Generally easier to resolve compliance issues	1	0.8
Gives us the opportunity of not inspecting these businesses if they earn recognition	1	0.8
It can in theory add a significant amount of red tape to our regulatory activity. The saving grace for us is that very few businesses in our area are subject to it (probably fewer than five) and those that are already have good compliance records. Consequently, the extensive liaison protocols for any proposed regulatory activity are not invoked.	1	0.8
It has changed in respect of it including reference to primary authority in preparations / actions	1	0.8
Will review action when inspection due	1	0.8
Work instructions changed to ensure compliance	1	0.8
Total	121	100.0

**Table E. 114 Q 22 Are you aware of businesses in your area having inspection plans? (n=69)**

Options	Count of respondents	Proportion of respondents
No response/not relevant	53	43.8
Don't know	17	14.0
No	28	23.1
Yes	23	19.0
Total	121	100.0

**Table E. 115 Q 23 If so, have you made use of these during your inspections of these businesses? (n=23)**

Options	Count of respondents	Proportion of respondents
Not relevant	99	81.8
No	7	5.8
Yes	15	12.4
Total	121	100.0

**Table E. 116 Q 24 What is the impact of using inspection plans? (n=23)**

Options	Count of respondents	Proportion of respondents
Quicker, more efficient inspections	2	1.7
More targeted inspections (i.e. focus on risks identified in the inspection plan)	11	9.1
Fewer inspections altogether	3	2.5
More frequent inspections	0	0.0
Lengthier inspections	2	1.7
Other impact	6	5.0

**Table E. 117 Q 25 Other, please specify (n=23)**

Options	Count of respondents	Proportion of respondents
Not relevant	115	95.0
Debatable benefit as local inspection is still necessary to ensure that procedures are being followed. Along with many others, inspections are targeted following intelligence gathered.	1	0.8
No change to inspection time or outcomes	1	0.8
Not directly aware	1	0.8
Only relevant visit was following a complaint. Inspection plan checked to see whether area was addresses in plan.	1	0.8
Premises has not been due for an inspection but I believe it will make the inspection less effective as it will hamper inspectors discretion.	1	0.8
Too early to say as minimal contact, but could focus on identified risks if helpful to PA and business	1	0.8
Total	121	100.0

### 1.23.3 Closing question

**Table E. 118 Q 26 Please include any further comments you might have on the Primary Authority scheme. (n=121)**

Options	Count of respondents	Proportion of respondents
No response	56	46.3
While it has some value in promoting consistency of enforcement, the existing home/lead authority schemes worked well in most cases and the cost & bureaucracy involved in the PA scheme has outweighed perceived benefits so far.	1	0.8
The feedback from businesses approached by us was that they were very happy with the service we provided through the home authority scheme	1	0.8

and could see no benefit in moving from it.		
The concept is well-intentioned, but does not take account of the practicalities of the relationship between a business and a local government team. There are few Trading Standards Services that can absorb the strain on resources of a primary authority agreement, and so it will be common for the business to pay something towards the costs as a condition of the agreement. The TS Service will be reluctant to do anything that might jeopardise a very welcome cash flow. The business will always be much larger than the TS Service, and is likely to possess technical knowledge that Ts staff will not have. There is inevitably going to be rubber stamping of procedures and a temptation to defend the company against criticisms. I wouldn't put this as bleakly as an opportunity for large companies to buy immunity, but it is a significant step along this road. Please believe me, I am not an old-fashioned TRS officer who just believes in "knicking people". I'm very much in favour of working with businesses as it's the most efficient way of enforcing the law, and I can tell you I have spent hours assisting small businesses to understand and comply with complex legislation like food labelling. I just think once money passes hands, objectivity goes out of the window. The Home Authority principle is much more flexible, cheaper and gives both parties greater independence.	1	0.8
We are taking part not because we feel it's needed but because that's the way the world seems to be going. It remains our view that such a scheme is unnecessary.	1	0.8
The primary area of dispute is that of cost recovery. Whilst LBRO are now being more up front with this information it is still an area where more advice and structure would be helpful, particularly in the area of what we can and cannot charge for. LBRO do not seem to be aware that the criminal side of Home Authority work can sometimes be very much the lesser aspect of HA work with some companies. With the way the scheme is set up companies could enter into PA agreements getting the benefit of guaranteed advice and avoiding paying for the heavy civil demand that they put onto the Authority.	1	0.8
I do not think many businesses will be interested in paying to resource a PA scheme, particularly where they already have a home or lead authority arrangement (why pay for what is already free?).	1	0.8
Our Home Authority links with local businesses are established and valued by both parties. As they are not broke, I don't really see the point in fixing them with the Primary Authority scheme. Sorry	1	0.8
Difficult for a local authority to estimate the amount of time involved in the initial set up and ongoing commitment. This is a real barrier to taking Primary Authority forward. My council would seek to levy a fee for this discretionary service, which would seek to recover costs, but again difficult to set without an idea of workload.	1	0.8
Concerns about the inconsistency and unfairness created by offering additional support and resources to what in practice will generally be the larger businesses as opposed to local SMEs.	1	0.8
I believe that elements of the Primary Authority scheme - particularly with respect to legal actions fetter the decision making of a democratically elected body with respect to legal actions. I can see some value with respect to some issues such as health and safety or design and construction and procedures for food safety but in respect of trading standards my feeling is that it is a solution in search of a problem. NOTE: These are my personal views.	1	0.8
The LBRO constantly pushed the scheme and applied pressure for involvement when there was little appetite for it by local businesses who were very happy with home authority arrangements	1	0.8
The Home Authority Scheme fulfils our local requirements.	1	0.8
Given that the Primary Authority scheme had its origins in perceptions by businesses of enforcement inequalities across LAs, the scheme offers a unique ability to quantify these through the LA/PA liaison stats, when any differences in approach should be self-evident. Do the LBRO intend to publish these? I am not a fan of the scheme although in theory it has many good points. The Home Authority scheme was far from perfect and the need for something with more universally applied principles was clear - it is just that what has been set up seems to be a scheme that has created its own complex bureaucracy and seems to have attracted businesses who rarely give my authority any enforcement dispute issues anyway. My staff have to be trained in the PA process, only for it to be so rarely invoked that each time they have to go back to first principles to check that the rules are	1	0.8

being followed. I also have grave reservations about some of the basic principles involved. In theory, a LA might wish to serve an improvement notice to remedy what it perceives as a legal contravention but be prevented from doing so if the primary authority, or the LBRO on appeal of the business, determine otherwise. While the PA's or LBRO's reasons may be valid, I am not happy that a quango has the power to decide on what constitutes compliance with legislation rather than a court of law. If the enforcing authority disagrees with the LBRO decision there is no appeal process that permits any scrutiny of it or the original notice by the judiciary. Furthermore, this unique and almost anonymous (in the sense that there is no publicity attached to this process) way of countering enforcement action appears only to be available to primary authority businesses. These tend to be larger undertakings. Small businesses that operate in just one local authority area who are not covered by the Primary Authority scheme cannot appeal to the LBRO if they think a notice is inappropriate and have it withdrawn. They can only do so via a court appeal with all its attendant cost and publicity, which may have an adverse effect on their trade even if they win.		
I concur with the submissions LG Regulation have made on the subject of primary authority.	1	0.8
My understanding was that the PA scheme was brought in to give businesses some certainty over the advice that they had received from their HA (ie statutory backing) - this should avoid other authorities taking enforcement action in contradiction to the advice received. In reality, how often did that actually happen? My guess would be single figures. To remedy this, a whole new scheme was devised, for which business could be charged! From an enforcing authority's point of view, it is an additional hurdle to negotiate before any work is even carried out (i.e. checking database etc). Lack of knowledge of the scheme and officers' responsibilities there under has been exacerbated by slow take-up so I suggest a new round of (free) seminars so that we can all get up to speed again.	1	0.8
Very complex process and delays any enforcement and decision making	1	0.8
I remain concerned that this scheme takes away local control and delays things.	1	0.8
The scheme may be suitable for a small number of businesses, but the cost of the scheme is unjustifiable.	1	0.8
After full participation in the pilot for the Primary Authority scheme it was decided by the business and authority jointly that it provided no benefit over the Home Authority Principle.	1	0.8
Generally we support the principles of the scheme. I think that there is some cautiousness on the part of business and concern about potential costs.	1	0.8
Only one business seemed interested in having us as a PA, and we met with them supported by the LBRO. However, they pulled out as they did not want to pay for the service. I think the PA service is a very costly (in comparison to the Home Authority) scheme, which of no interest to businesses other than those that are very large and sit at the very top of the 'food chain'.	1	0.8
Question the value thereof as not really seeing the level of take-up from 'national' business.	1	0.8
Those Businesses that we approached have shown no sustained interest. We have however found the LBRO have undertaken some unusual approaches to businesses in this area that was perhaps misguided or not followed through correctly. The concept of Primary Authority has some good elements and could benefit all parties however local business has not been keen to take this up and LBRO's recent approach to it has been undermining of the Home Authority process. Consequently I am disappointed in the LBRO approach. I suspect had the LG Regulation been running the scheme it would have had more success.	1	0.8
The Primary Authority scheme needs to be seen as providing further choice for businesses in relation to the type of support appropriate to their organisation rather than as the primary and sole mechanism for doing this. Despite knowing about PAP, businesses in my area have expressed no interest in the scheme which has nevertheless been 'pushed' here by LBRO consultants. This is not an appropriate way to develop the PAP scheme.	1	0.8
The current financial climate creates financial risk in entering a PA partnership. Reliance on continuing financial commitment from a private	1	0.8

business feels precarious.		
Unfortunately the system is clumsy and onerous for local authorities. No advantage in reducing Officer inspection times. At present no links to improving standards in the food businesses	1	0.8
See little benefit of scheme compared to HAP and LAP which is less prescriptive in terms of process but just as effective	1	0.8
Although it has added to bureaucracy for the LA in keep having to check for inspection plans very few PA businesses in our district have a plan.	1	0.8
This LA and its home authority businesses have always been happy with the home authority approach / partnership and the support from LACORS now LGR.	1	0.8
We would respond positively to approaches by businesses but we are concerned that the benefits of the scheme are being mis-sold to businesses or that promotion of the scheme is being politically motivated.	1	0.8
We were contacted by a business who were very interested until they were told the likely cost at which stage they lost interest. It seems slightly unfair that businesses who can pay it get the protection afforded by the scheme when the rest do not.	1	0.8
There was never a need for this scheme. The Home Authority scheme works well; and there has never been any issue of rogue TSD taking action against our HA businesses without consultation. The PA scheme is too complex, not needed and our HA businesses do not want to pay for it.	1	0.8
The cost of the scheme for businesses is likely to be a major factor in their decision to be interested.	1	0.8
Larger businesses are aware of the scheme and some operate it. So far it has had little effect on compliance but we have not had any major incidents to test the procedures. Some pubs owned by management companies who are part of the scheme know nothing about it and are very confused. Overall the scheme has had little effect in our area.	1	0.8
The more informal approach offered by the Home Authority Scheme seems to be valued by local businesses.	1	0.8
Businesses we have approached are quite happy with the services we currently offer under the HA scheme and can see no practical advantages moving to a primary authority arrangement.	1	0.8
I don't know about inspection plans as I am a Head of Service and don't carry out inspections. I think a very valid question is how many primary authority relationships in relation to Trading Standards work result in the provision of a service over and above what previously existed under a Home Authority relationship?	1	0.8
Local businesses are not particularly interested in pursuing the scheme and many of the businesses that have become primary authority are businesses that present low or no Trading standards risk and therefore were unlikely to feature on an inspection plan anyway.	1	0.8
I found the survey questionnaire to be somewhat biased towards promotion of the Primary Authority scheme. It adds little by way of added value to the existing home authority schemes for food and lead authority for health and safety. Councils wouldn't have been keen to use the Primary Authority scheme had it not been for financial incentives. The majority of PA partnerships have been for Trading Standard rather than food safety or health and safety. The cost to the 'public purse' to date has been extremely high and does not represent value for money.	1	0.8
In our area there seems little interest in the scheme, particularly in view of the cost involved. Local members are also concerned about the scheme as they see it as removing local decision making in enforcement matters.	1	0.8
It is our opinion that this scheme, accepting that it is still relatively early days, has not made any difference to the way we work with businesses. We have not had any formal contact from local businesses wanting to set up a partnership and remain unconvinced that the PA scheme will offer anything in the way of additional benefit to our existing relationships with businesses in our area. The prevailing opinion from officers and businesses is that existing relationships through the Home Authority arrangements (even these are informal) work well. Businesses seem to see little reason to consider paying for what they already receive for "free". If this is truly the case, then there would appear to be something missing in the message that is being given by the LBRO to businesses, and we certainly do not have the resources, or the inclination at this stage, to commit to actively promoting the PA scheme.	1	0.8
We are a small authority with limited resources. I am not convinced that there will be a significant advantage to either us or any of our businesses	1	0.8



over and above Home Authority status.		
Local authority and business were unclear what the advantages would be, when taking into account the administration. There were many uncertainties with no examples of how the PA scheme worked in detail and with few PA agreements in place to back this up.	1	0.8
I think the scheme should be quietly abolished.	1	0.8
The Home authority Scheme has operated for many years with a great deal of success and businesses in the area are reluctant to change unless they can see a good reason for doing so. They have always had a good service so why would 'primary authority' improve this. Acting as primary authority would also put a little more pressure on authorities which in the current climate would be difficult to maintain.	1	0.8
Following Hampton we have been concentrating on increasing the compliance of business and have linked this to the City Region Economy and the economic downturn. Primary Authority is one example of how we can deliver this combined with our Seminars to businesses and additional consultancy work to improve compliance.	1	0.8
Q9 is unclear. No company based in our area has a PA relationship with this authority, although I am aware that several companies that have premises and trade in our area have a PA relationship with a local authority. I believe that PA Scheme is unnecessary and a waste of money that would have been better spent on improving compliance in other ways.	1	0.8
I think it is easier to promote the scheme with businesses that are subject to interventions from a number of different authorities i.e. supermarkets, home improvement stores, retailers etc. In addition most businesses have received an excellent service from the HA scheme and are reluctant to pay for Primary Authority. If we were unable to continue providing the level of advice and support under the Home Authority scheme or withdrew our HA liaison work this would force businesses to consider the PA route. We would consider the Primary Authority scheme and we will approach businesses again soon to promote the benefits. If any businesses approached us we would of course be willing to set up a partnership.	1	0.8
The PA scheme may well improve matters at the corporate level but local monitoring is still necessary to evaluate local conditions. Inspections have reduced dramatically over the last few years but this is due more to reduced enforcement resources than improved compliance by businesses or improving systems.	1	0.8
Our businesses seem to appreciate the Lead Authority approach as they would class themselves as small businesses even though some may be national organisations	1	0.8
PAS has significant potential but must be on a fee charging basis.	1	0.8
The major stumbling block is that there is an element of money involved whereas previously, HA advice as free. Therefore, there are the financial pressures and also they would like to see how this works in practice before committing to a PA relationship.	1	0.8
Although we have none yet we hope to sign up between 2-5.	1	0.8
We have not inspected a business which is covered by the Primary Authority scheme. Whilst I am not against the principle of the scheme, our working capacity means we would not be actively seeking out a partnership with a business. We are Home authority for 2 companies, which works well.	1	0.8
This is a predominantly rural local authority and although we do have businesses within the area which are part of larger chains, they already benefit from Home /primary authorities elsewhere. We do not have appropriate businesses where it would be beneficial to offer the PAS.	1	0.8
Please direct future surveys on this topic to X which delivers Regulatory Services on behalf of all councils in our area.	1	0.8
We have very effective Home and Lead Authority Partnerships already operating and we review these on an annual basis and encourage a partnership approach. Primary Authority should complement and not compete with these arrangements. The scheme seemed to be introduced following a limited pilot exercise and the business case has not at present been effectively demonstrated. The scheme seems to only fit the multiple retailer type trader. The retailer business for whom we act as lead authority does not wish to enter a primary authority relationship as current arrangements are considered to be working well.	1	0.8

This is a rural Authority and although we do have businesses part of larger chains, Home/Primary Authority arrangements are already in place. We do not think we currently have any businesses whereby it would be appropriate/beneficial to consider setting up a PAS arrangement.	1	0.8
Scheme not needed - home/lead authority schemes perfectly adequate	1	0.8
Some issues are much easier to deal with through the PA however businesses still need to implement the corporate procedures locally and this is not always the case.	1	0.8
There is no evidence in our area that the Primary Authority scheme has contributed anything of value that wasn't already there with 'Home Authority'.	1	0.8
The awareness of the existence of PA partnerships amongst many LAs & inspectors is very poor. Few are aware of the existence of a PA partnership before arriving at their premises for inspection or investigation. A certain amount of intentional disregard for PA exists amongst some inspectors "This is my patch and I decide on enforcement here, not someone in another council somewhere else!"	1	0.8
It is difficult to assess - at the last review X has had on request for a primary authority relationship which has not come to fruition. Traditionally this Authority has favoured the "Home Authority" scheme and continues to do so. The introduction of the Primary Authority scheme has only added confusion and if scrapped would not be missed!!	1	0.8
The concept of a PA is a very good one. Regulatory officers have to work at strategic and operational levels. This requires a level of knowledge and experience which is currently rare within regulatory services. This level of sophistication must be matched by businesses.	1	0.8
We made decision to stop home authority and only go forward with PA agreements. As such we have a wide range of PA agreements. It is noticeable that the businesses themselves have reduced the volume of contact with the local authority which may well be linked in part to the fact that such contact comes at a cost. It would be interesting to look into this across all schemes that moved from home to primary authority .	1	0.8
Total	121	100.0