Impacts and Outcomes of Local Authority Regulatory Services

LBRO
Better Local Regulation

Final Report

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Foreword

Local authority regulatory services check whether our air is clean, food is fit to eat, workplaces are safe and companies trade fairly.

All this vital work and more, supports businesses in delivering economic prosperity and protecting consumers from harm and fraud - a complex task delivered within a complex environment.

Yet historically there has been very little research around the wider impacts and outcomes of local regulatory activity and officers have not been able to measure the difference they make.

As a result local regulatory services have been unable to prove their value to their local authorities, their communities and local businesses and this has been reflected in difficulties around budget and priority setting.

This report commissioned by the public body for better local regulation, LBRO, and delivered by RAND, shows that regulatory services do have demonstrable quality of life outcomes and provides a toolkit for identifying, measuring and managing them.

For the first time local regulatory services have the tools for priority planning, profile raising and budgeting based on a total of 48 benefits to communities and business and this outcome focussed approach has already been adopted by encouraging numbers of authorities.

This report and toolkit represent significant steps forward in both the improvement of local authority regulatory services and enhancing the regulatory system. We look forward to Government Departments promoting this initiative and national regulators using it to gain greater understanding of local priorities.

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Chair
Local Better Regulation Office

Graham Russell
Chief Executive
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Preface

The Local Better Regulation Office (LBRO) commissioned RAND Europe to undertake a study into the impact and outcomes of Local Authority Regulatory Services (LARS). The background to the study is the perceived lack of knowledge among policymakers about the added value of LARS and indeed the low visibility that such services have in local authorities. This report presents the findings of the study.

The report is likely to be of interest to officials involved in LARS and local authorities and wider policy-makers with an interest in local affairs and impact assessment.

RAND Europe is an independent not-for-profit research organisation that aims to serve the public interest by improving policymaking and informing public debate. Its clients are European governments, institutions and firms with a need for rigorous, impartial, multidisciplinary analysis. This report has been peer reviewed in accordance with RAND's quality-assurance standards.

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Acronyms

BIS	UK Department for Business, Innovation and Skills
BRE	Better Regulation Executive
BSE	bovine spongiform encephalopathy
BV	best value indicator
CAA	Comprehensive Area Assessment
CAP	Community Alcohol Partnership
CIEH	Chartered Institute of Environmental Health
CPA	Comprehensive Performance Assessment
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
FSA	Food Standards Agency
FTE	full-time equivalent(s|)
HMO	homes in multiple occupancy
HSE	Health and Safety Executive
LA	local authority
LAA	Local Area Agreement
LACORS	Local Authorities Coordinators of Regulatory Services
LARS	Local Authority Regulatory Services
LBRO	Local Better Regulation Office
LSP	Local Strategic Partnership
NHS	National Health Service
NI	National Indicator
OFT	Office of Fair Trading
PCT	primary care trust

PSA	Public Service Agreement
PSHE	personal, social and health education
RIA	regulatory impact assessment
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences at Work Regulations
TSI	Trading Standards Institute
TSS	trading standards services

Executive Summary

An understanding of impacts and outcomes becomes increasingly important for Local Authority Regulatory Services

Local authorities and their regulatory services today operate in a changing policy environment shaped by the forces of increasing devolution of responsibilities to the local level, the extension of the better regulation agenda to the local level and a shift to streamlined, more outcome-oriented and joined-up performance management systems. For Local Authority Regulatory Services (LARS), which are branches of local government that enforce national and often also European regulation at the local level, these changes create a number of challenges:

1. LARS often attract little attention and have a low profile in local government priority setting. Against a background of increasing responsibility for local authorities and of tightening of local budgets, it may become even more difficult for LARS to make a case for their services and defend their budgets.
2. With the emergence of the better regulation agenda and its extension to the local government level, LARS will increasingly need to be prepared to measure their impact on stakeholders and demonstrate that their activities create benefits and outcomes for local businesses and communities.
3. The move towards fewer and outcome-oriented and joined-up performance measures requires LARS to have a better knowledge about the outcomes to which they are contributing and how they can help in achieving local performance targets.

This study explores the impacts and outcomes of LARS

Against this background this study commissioned by the Local Better Regulation Office (LBRO) aims to explore the impacts and outcomes of LARS. The key objectives of this study were to:

1. establish what is currently known about the impacts and outcomes of LARS
2. develop an understanding of the intervention logic or 'theory of action' behind five different aspects of the work of LARS: fair trading, health and safety in the workplace, fly-tipping, smoking cessation, and reduction of alcohol harm
3. build a toolkit that could be used by LARS officials to assess the outcomes and wider impact of their activities.

LARS' share of total local government spending is small, despite performing a wide range of essential enforcement activities at the local level

LARS conduct a wide range of (primarily) enforcement activities at the local level, including enforcing food safety regulation, ensuring environmental protection, licensing the night-time economy and taxis, and supporting health and safety in workplaces. Despite a wide range of activities, LARS command only a small share of local government spending in the UK. In 2008 this spending amounted to about £1.24 billion or slightly less than 1 per cent of total local authority expenditure.

LARS are embedded in complex governance arrangements

LARS are embedded in complex governance arrangements at the local, national and even European level. Key partners and stakeholders are the national regulators in the fields of environmental health, trading standards, licensing and fire and safety, including, for example, the Food Standards Agency (FSA), the Health and Safety Executive (HSE) and the Environment Agency (EA). At the local level, they interact and operate with other local authority services as well as with external partners such as the police and the National Health Service (NHS). Finally there are specific sector organisations that support LARS in their activities, such as Local Authorities Coordinators of Regulatory Services (LACORS), the Trading Standards Institute (TSI) and the Chartered Institute of Environmental Health (CIEH).

Only half of all regulatory services collect outcome and impact information

To understand the current importance of outcome and impact information for LARS and to have an evidence base upon which to develop a toolkit, RAND Europe conducted interviews with LARS staff and an online survey of LARS in England and Wales. The findings show the following:

- A wealth of data and information is already collected by local authorities for a wide range of purposes (e.g. statutory obligations, performance and auditing requirements). However, a large proportion of these data remain focused on input and output measures rather than on wider outcomes and impacts. In fact, only slightly more than half of local authorities surveyed (55%) currently collect any information on the wider impacts of their regulatory services.
- The information on impacts that is collected generally relates to the impact of regulatory services on businesses in the local community, on the environment of the local community and on the general health outcomes for the local population. More particularly, such data are most likely to be documentation and information about their enforcement activities, about the impacts their services have on the local community and about the engagement of their services with stakeholders.
- Local authorities seek to collect data on the wider impacts of their regulatory services to allow management to assess the performance of their services and to consider the benefits of these services, and also to be better informed about the basic functioning of their services, partnership working or wider contribution to broader outcome/impact-based

measurement frameworks – such as Local Area Agreements (LAAs) (in England) and National Priorities.

- Local authorities face hurdles in collecting impact information. Amongst these the most prevalent ones are the availability of data, the evaluation and analysis capacity available at the local level and the issue of attribution of impacts. In terms of data, they are often not collected, not available at the right level of aggregation for the local authority or held only by partners. At the same time, the size of many LARS does not allow them to build up sufficient capacity to collect and analyse data themselves. The challenge of attribution is of a conceptual nature; it is often difficult or even impossible for services to dissociate the impact of partners and wider actors and other factors on a given outcome from the impacts of LARS.

The impacts and outcomes of LARS are not often a subject of study

After introducing LARS and mapping the current practice of using impact and outcome information and measurements, this study assessed what is currently known about the impacts and outcomes of LARS on the basis of the existing literature. Despite the rich literature on regulation and in specific policy fields, little is known about the impacts and outcomes of LARS at an aggregate level. This might be related to two key observations:

1. **LARS are not a subject of study.** LARS, trading standards, environmental health and fire safety are not usually the subject of academic and research studies. The overarching classification of the different enforcement activities at the local authority level into LARS is mostly used in official documents by the different government organisations and the other sector organisations.
2. **Enforcement is not covered as a specific stage of the regulatory chain.** The focus of many studies that explicitly study the impacts of regulation is not on local enforcement, but on the regulation as a whole, not differentiating between different elements of the regulatory chain.

A wide range of potential high-level impacts of LARS may be identified

Despite these difficulties, the use of an evaluation matrix allowed us to classify impact and outcomes in economic, social and environmental areas and sort them by affected stakeholders. Official reports and document, for instance the Rogers Review (2007a), formed the basis of this analysis. An initial list of 75 impacts was identified and aggregated into a final list of 48 impacts. These may be summarised by type of impact and stakeholders affected.

Both negative impacts (costs) and positive **economic impacts** may be observed for a wide range of stakeholders. Directly or indirectly, LARS activity contributes to:

- the administrative burden placed on business
- compliance costs of business
- productivity increases in the local economy

- reduction of unfair competition
- reduction in healthcare cost
- reduction in environmental cleaning costs.

These economic impacts are, however, not distributed evenly across the different categories of stakeholder. Businesses appear to carry most of the direct and short-term economic burden of LARS activity through administrative and compliance costs, while the longer-term benefits appear to accrue to wider society and the public. Nevertheless, local businesses also stand to benefit economically, through for instance increased productivity related to reduced work-related ill health or less unfair competition. A closer look at the economic beneficiaries shows that local authority and government services in particular benefit from the activities of LARS, through:

- reduced waste removal and cleaning costs for the local authority
- reduced healthcare costs for the NHS
- reduced costs from anti-social behaviour for the police authorities.

Finally, the general public also stands to benefit from LARS activity in economic turns, mainly as consumers who would be less exposed to scams and frauds.

Some examples of economic impacts include the following. In 2006 the administrative burden for food labelling regulation was estimated to be £7.2 million across the EU, albeit enforcement only partially contributes to these costs. In the area of fair trading, and in particular scams, LARS contribute to tackling a problem that currently costs consumers around £3.5 billion a year.

The **social impacts** of LARS are focused on the likely positive health effects of its activities, but also include less tangible aspects. Through the impact matrix the following social impacts were identified:

- safer food
- increased consumer confidence
- less anti-social behaviour, crime and violence
- reduction in infectious diseases
- healthier workforce
- reduced alcohol-related harm
- better standards of living and health in homes in multiple occupancy (HMO).

These benefits mostly accrue to the general public as a whole and can sometimes be attributed to specific subgroups. Our review identified children, consumers and employees as being impacted on in particular by LARS activities.

An example of a social and health impact is enforcing hygiene standards in food businesses. The size of the problem was estimated in 2005 to be at 765,000 cases of food-borne disease, resulting in 470 deaths and 17,300 hospitalisations.

Finally, **environmental impacts** were identified through the use of the impact evaluation matrix. Specifically these were:

- improved air quality
- reduced contamination of land
- increased cleanliness of public streets and spaces
- decreased noise pollution.

The whole local community benefits from cleaner air, land and water. Enforcing fly-tipping regulation is a typical example of how LARS are having an environmental impact on the local level. In 2007–2008 a total of 1.28 million cases of fly-tipping were dealt with by local authorities at cost of around £73.8 million.

Five case studies illustrate how LARS contribute to local impacts

The review of the literature and the compilation of information about impacts and outcomes in our evaluation framework proved to be difficult, and the attribution of outcomes and impacts to LARS emerged as a major challenge. One way of addressing this issue is to explore in more detail the pathways along which LARS affect the local community.

Five case studies on specific activities of LARS were conducted to uncover the intervention logic and to demonstrate how LARS contribute to local impacts. The case studies were chosen in close collaboration with LBRO and represent a sample of different types of local authority and a range of key activities performed by LARS. The case studies were:

1. tackling fly-tipping (East Cambridgeshire District Council)
2. reducing harm from smoking (Leicester City Council)
3. interventions to reduce alcohol-related harm (Cambridgeshire County Council)
4. ensuring health and safety in the workplace (London Borough of Islington)
5. fair trading (Northamptonshire County Council).

For each case study an interactive workshop using a logic modelling framework was conducted. Thus for each case study key inputs, activities, outputs and outcomes were identified. The long list of outcomes and impacts ranged from an increase in community cohesion to better local environmental quality as well as savings to taxpayers. Out of this information, five pathways or intervention logics were developed that link the elements. Figure 0.1 below provides the graphical representation of how LARS in East Cambridgeshire District Council address the problem of fly-tipping.

Dashboards provide an overview of LARS' progress in achieving impact

An impact dashboard was developed for each case study. These are based on the idea of management 'dashboards', which have become increasingly popular in recent years. Dashboards are executive information systems that present a small set of performance measures on a regular and structured basis to strategic decision-makers in order to provide an overview of the organisation's performance and thereby identify areas of particular success or concern for more

detailed examination. For each case study a selection of indicators that represent the key causal chains in how impacts are achieved was chosen.

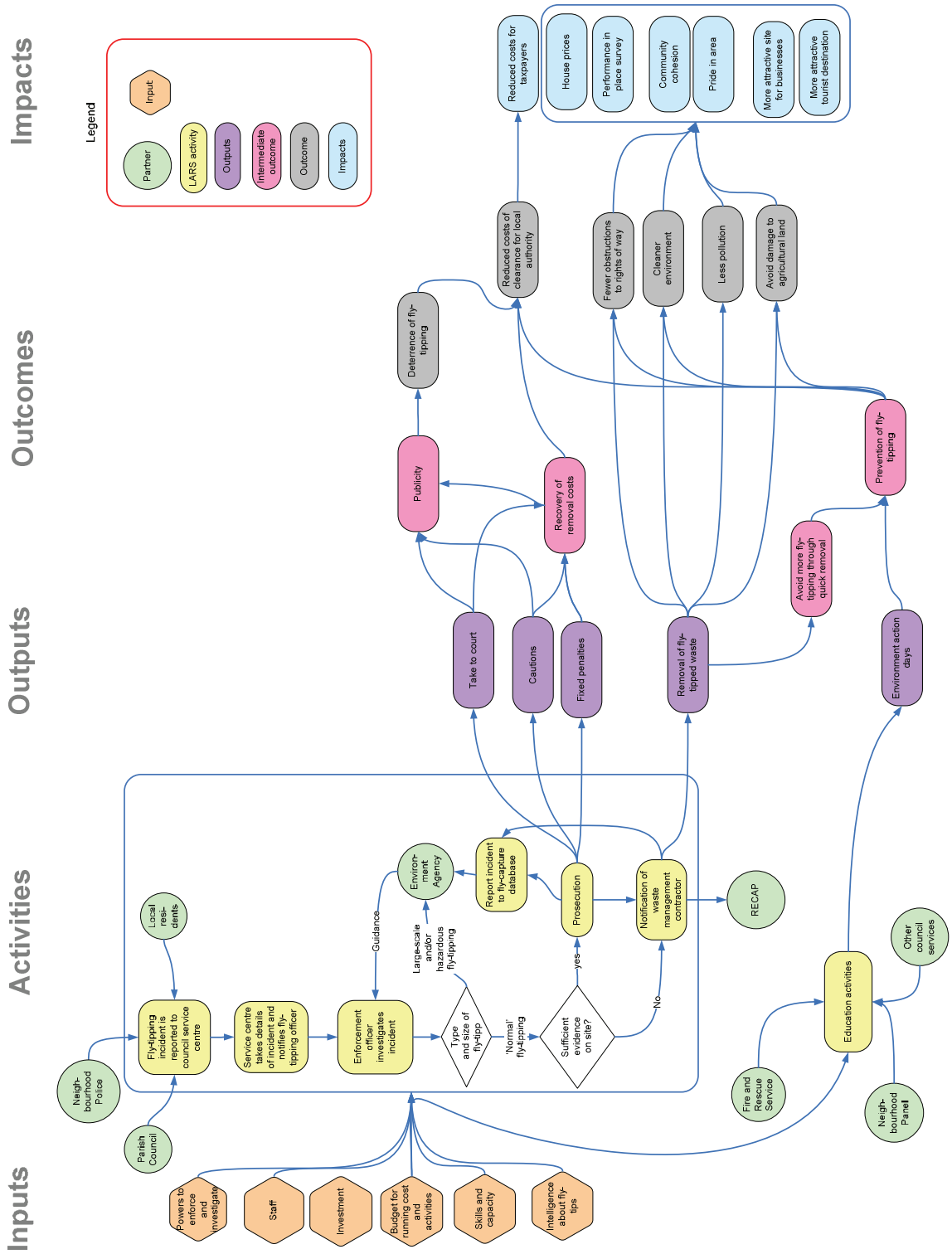


Figure 0.1: Example of a pathway: tackling fly-tipping in East Cambridgeshire

A toolkit will help LARS to think about outcomes and impacts in a structured and systematic way

The final purpose of this research project was to develop a toolkit for LARS to support them in understanding and assessing the impacts and outcomes to which they are contributing. The toolkit consists of step-by-step guidance for developing pathways and selecting indicators to include in a dashboard. The toolkit is structured into three stages, which loosely follow the research stages of the wider research project undertaken:

1. to establish the intervention logic of LARS
2. to identify indicators to measure LARS outcomes and impacts
3. to summarise the findings in a dashboard.

The toolkit developed by this research will provide LARS with an evaluation framework to enhance their thinking and understanding about the impacts and outcomes of their activities. Reflecting on the future application of such a toolkit, we see a number of uses:

1. The toolkit should allow LARS to engage in better informed discussions about the impacts and outcomes of their services at the local level. This will allow them to contribute better to and participate better in local partnerships set up as part of the performance management frameworks, as the benefits that can be delivered by LARS are often overlooked at the local level.
2. In a world with a plethora of performance information, an evaluation and prioritisation framework such as the toolkit presented here will enable LARS to choose indicators in addition to the national indicators (NIs) and local priorities that are most meaningful to assess the impacts their services have.
3. This toolkit might serve as a focal point for exchanging ideas and learning between regulatory services. Applying a common, but highly flexible framework, similar services could, for example, compare the results of their mapping activity and jointly define the most useful indicators to assess local impacts and outcomes. This will also be the first step towards an exchange of best practice and better benchmarking of LARS in the future.
4. Finally, the toolkit can be seen as a high-level evaluation framework to structure research and analysis of LARS impacts. Such a framework will allow the design of more detailed analysis of specific elements or causal chains discovered by the framework. These could range from more detailed qualitative case studies to full cost-benefit analysis, depending on the ultimate objective and the availability of data. A very good recent example of how such fine-grained analysis could be accommodated into our research framework is the evaluation of trading standards impact recently conducted by the Office of Fair Trading (OFT), which effectively maps out one of the specific causal links within the pathway mapped out in this study.

CHAPTER 1 Introduction

1.1 Local authorities in a changing environment

1.1.1 The policy context

In recent years, local authorities have become increasingly important players in delivering better regulation. As was highlighted by the Local Better Regulation Office (LBRO 2008) in its report 'Mapping the Local Authority Regulatory Services Landscape: Towards a Common Understanding', the regulatory agenda has been shaped by two major elements: 'an increased autonomy and devolution to local government alongside streamlined, sector-led performance'. The Lyons enquiry (Lyons 2007) set out the local authorities' important 'place-shaping role', which signified a move towards a more localised form of government in which central government would grant more control, discretion and choice to local authorities, whilst local authorities would take on more responsibility to engage with their local communities and make effective use of their existing powers.

Meanwhile, the Hampton review, 'Reducing Administrative Burdens: Effective Inspection and Enforcement' (Hampton 2005) outlined some important changes to be made to the regulatory services provided by local authorities by emphasising the need to reduce unnecessary administration for businesses whilst preserving the current regulatory regime. In particular, there is growing awareness of the cumulative burden of regulation, giving rise to such issues as multiple inspections and overlapping data requirements, the cumulative burden of bureaucracy, and inconsistent practice and decision-making between regulators and regulatory services (*ibid.*). This 'better' approach to regulation and local government was also highlighted in the Government White Paper 'Strong and Prosperous Communities' (Communities and Local Government 2006b), where it is stated that more freedom and space will be awarded to councils to respond in a flexible way to local needs and demands by radically reducing national targets, tailoring others to local circumstances and introducing a lighter touch to the inspection system. In order to achieve this approach, the White Paper introduced in England a new performance framework for use by local government, centred on the establishment of Local Area Agreements (LAAs) and subsequently supported by the introduction of Comprehensive Area Assessment (CAA).

LAAs constitute a delivery plan for the sustainable community strategy that local authorities have a duty to prepare in partnership with local partners such as the primary care trust (PCT) and the police. The sustainable community strategy designed for each local area serves to highlight how local authorities and their local partners intend to work together to improve the economic, social

and environmental well-being of the people in their area.[1] Under LAAs, local authorities are required to select up to 35 of the national indicators (NIs) to reflect priorities for their local area. These priorities are set in consultation with local partners in the so-called Local Strategic Partnerships (LSPs) for a period of three years. LSPs are non-statutory bodies that bring together partners such as local authorities and their regulatory services, the police, neighbourhood stakeholders and other groups. As LSPs are non-statutory bodies, they have primarily a leadership, oversight and coordination role. Binding decisions can be taken only by the constituent partners.

In addition, CAA was introduced as a new regime to deal with 'monitoring, support, assessment and intervention'; it builds on the success of the previous Comprehensive Performance Assessment (CPA). Whereas CPA focuses on the performance of local authorities and fire and rescue authorities, CAA is focused on the local services delivered in the local area. As such, 'CAA takes a much wider look across local public services, including PCTs, police and probation bodies and also focuses on how well people are being served by their local public services working together, not just how individual bodies perform'.[2] As stated by the Audit Commission, 'CAA is about areas as much as organisations, future rather than past performance, outcomes rather than ways of working, and local priorities as much as national targets' (*ibid.*). In addition, this new regime is designed to be 'a more proportionate risk-based regime which will cut bureaucracy and allow more targeted support or interventions when things go wrong' (Communities and Local Government 2006b), reducing administrative burdens on local authorities through a more targeted enforcement and inspection regime, as advocated by the Hampton review (Hampton 2005).

Both LAAs and CAA contribute to a radical simplification of the performance framework applied to local authorities. Whereas previously local authorities were asked by central government to report on many hundreds of indicators, there is now a single set of about 200 *outcome-based* indicators covering all important National Priorities such as climate change, exclusion and anti-social behaviour (Communities and Local Government 2006b). This indicator set also includes measures of citizen satisfaction and perception, and enables citizens and communities to compare how well their local area is performing in comparison with others (*ibid.*). These new measures signify a clear shift towards more outcome-based measures and forms of assessment in local government.

1.1.2 Challenges for Local Authority Regulatory Services

These changes in the environment of local government result in three key challenges for the regulatory services of local authorities. Local Authority Regulatory Services (LARS) are those departments of local government that enforce national and often also European regulation at the local level:

1. It is sometimes perceived that LARS attract little attention and have a low profile in local government priority setting. This may be because little systematic knowledge about the impacts and outcomes of LARS activities exists and because it is often difficult to

[1] Definition of sustainable community strategy from the Newcastle Partnership website: http://www.newcastlepartnership.org.uk/local-area-agreement-laa-sustainable-community-strategy-scs

[2] Audit Commission website, Comprehensive Area Assessment (CAA) FAQs: http://www.audit-commission.gov.uk/caa/faqs.asp#6

measure, prove and illustrate the positive contributions LARS make at the local level. Against a background of increasing responsibilities for local authorities and tightening local budgets, it may become even more difficult for LARS to make a case for their services and defend their budgets.

2. With the emergence of the better regulation agenda and its extension to the local government level, LARS will need to be increasingly prepared to measure their impact on stakeholders and demonstrate that their activities create benefits and outcomes for local businesses and communities. In addition, the terms 'regulation' and 'regulatory services' often have negative connotations for stakeholders, as noted by the Better Regulation Executive (BRE). Such negative sentiments place a particular responsibility on all regulatory services to show the positive impact that they are having.[3]
3. Finally, the move towards fewer, outcome-oriented and joined-up performance measures requires LARS to have a better knowledge about the outcomes to which they are contributing and how they can help in achieving the targets of the LAAs.

1.2 Objectives of this research

Against this background the LBRO commissioned RAND Europe to conduct research into the impacts and outcomes of LARS with the objective of contributing to:

- an evidence base for resourcing and budgetary discussions at the local level
- better visibility of LARS' activity, and association with wider outcomes that ultimately realises benefits to business and consumers
- better evidence of the impact of LARS in supporting policy decision-making processes (budget decisions, work priority decisions, etc.)
- potential for improved outcomes through better knowledge of where LARS can have an impact.

1.3 RAND Europe's research approach

To address these objectives, RAND Europe conducted research in three stages, combining a number of evaluation tools:

1. **Stage 1.** The aim of the first stage was to map impacts and outcomes of LARS systematically. To do this we used an **impact evaluation matrix**, and put the findings in a **searchable knowledge base**.
2. **Stage 2.** The next stage aimed to understand the intervention logic or theory of action of selected areas of LARS. The areas, which we selected in consultation with LBRO, consisted of fair trading, fly-tipping, health and safety, the reduction of alcohol harm, and smoking cessation. They represent a range of the different activities that LARS

[3] Conversation with a member of the BRE at the UK Department for Business, Innovation and Skills (BIS).

engage in. To represent the logic of intervention, we developed pathways combining **logic modelling** with **process mapping**.

3. **Stage 3.** In the final stage of the research project we developed a toolkit allowing LARS officials to assess the impacts and outcomes of their activities. This toolkit took the form of an **impact and outcome dashboard**, informed by the research results of the two earlier stages.

1.4 Defining key concepts: from inputs to impacts

Throughout this report the concepts of outcome and impact will play a pivotal role, so we should like to provide definitions of these key concepts here. Following a basic logic modelling approach, an intervention, a policy or a programme may be divided into five key elements, of which outcomes and impacts are two (see also section 4.1):

1. Every programme or policy will start with **inputs**. These are the resources needed to operate the programme. They typically include human resources (staff, volunteers, partners, etc.), financial resources (funds, grants, donations, user fees, etc.), and other inputs such as facilities and equipment, and involvement of collaborators (e.g. local and national agencies).
2. These inputs are then transformed during **activities** or clusters of activities needed to implement a programme. How activities are organised and performed depends on the nature of the programme, the structure of the organisation, and the environment in which the programme operates.
3. **Outputs** are the direct product of an activity and typically are tangible and countable. Outputs generally refer to what is being done or what is being produced. In principle, there is full control over the outputs produced. The type of output will depend on the activity under consideration. For example, the outputs of an advertising campaign typically include the number of local press adverts and of television adverts, website activity, and so on. The output of food standard work would be, for example, an inspection or a particular type of enforcement action. Compliance of food business, on the contrary, is already an outcome as it is beyond the immediate control and might (or might not) be the result of inspection activity.
4. **Outcomes** are the intended and unintended results and consequences of activities and outputs. Outcomes tend to be categorised into short-, medium- and longer-term results.
5. Often – and this report will follow this pragmatic approach – outcomes that are longer term have a wider impact on the community or environment are labelled **impacts**. They are the fundamental direct and indirect effects of activities over a long-term period on the wider community/environment. These include changes in economic/financial conditions, in social conditions (e.g. reduced violence or increased cooperation), and in environmental and political conditions (e.g. participation and equal opportunities).

1.5 Outline of this report

This report is divided into six chapters, including this chapter:

- **Chapter 1** provides a brief introduction to the policy context, including a broad overview of the main challenges faced by LARS.
- **Chapter 2** provides an overview of what LARS are and how they are organised, including a description of the regulatory landscape and details of the current role of impacts and outcomes in LARS practice. This is based on interviews we undertook with selected local authorities and national regulators, and an online survey to which all local authorities were invited to respond at the end of 2008.
- **Chapter 3** aims to map the impacts and outcomes of LARS in an impact matrix and to address the main conceptual issues that local authorities face when trying to assess the impacts and outcomes of their regulatory services.
- **Chapter 4** attempts to uncover the intervention logic of LARS through the development of five selected pathways in different LARS: fly-tipping, smoking regulation, alcohol regulation, health and safety in the workplace, and fair trading. These pathways are largely based on workshops we conducted with selected local authorities as well as on additional documents. Their aim is to identify the different causal chains at play in LARS and their various components (inputs, outputs, outcomes and wider impacts) to gain a better understanding of how each of these contributes to wider impacts in the local community.
- **Chapter 5** explores the issues associated with the development of a toolkit aimed at local authorities to help them assess the impacts and outcomes of their regulatory services. It covers two main areas: the relevance and demand for a toolkit to the stakeholders of LARS, and the practical implications of designing the toolkit (how to balance objectives, expectations and capacity, and how to select the key elements of the toolkit).
- Finally, **Chapter 6** provides an overall conclusion to the report.

CHAPTER 2 An overview of Local Authority Regulatory Services

Before starting the discussion of impacts and outcomes of LARS, this chapter provides a brief, but necessary introduction to LARS and the frameworks in which they operate. We also look at how LARS are currently using impact and outcome information which will also inform the development of the toolkit.

2.1 Local Authority Regulatory Services

Local Authority Regulatory Services, or LARS, is the umbrella term for those branches of local government that enforce national, and often also European, regulation at the local level, often with only very little discretion at the local level (LBRO 2008; Rogers Review 2007a). This is in contrast to other local activities like education, planning or social services, where local government has arguably greater autonomy.

2.1.1 Activities of Local Authority Regulatory Services

The activities carried out by LARS may be arranged very broadly into four groups, around which services are usually also organised:

1. environmental health
2. trading standards
3. licensing
4. fire and safety.

A more detailed breakdown of activities carried out by LARS may be found in Table 2.1 below.

Table 2.1: Activities of regulatory services

Regulatory service	Regulatory area
Environmental health	• Removal of unauthorised campers • Other anti-social behaviour (graffiti, local nuisance, etc.) • Air quality – local pollution control of specific point sources • Air quality monitoring and local air quality plans • Radiation monitoring • Noise nuisance, prevention and control • Statutory nuisance • Fly-tipping • Local street environment (formerly litter) • Contaminated land • Hygiene of premises selling and manufacturing food • Approval of food manufacturing premises • Safety and wholesomeness of food stuffs • Imported food • General health and safety at work • Chemicals • Ergonomics • Licensing of houses in multiple occupation (HMOs) for fire safety / standards and management • Management orders relating to HMOs • Health and safety of private rented housing • Area renewal areas • Empty property • Notification/prevention of infectious diseases • Dogs – control over fouling of land • Maintenance/safety of sewerage and drainage • Sufficiency of water supply to new/existing homes • Standards and availability of sanitary conveniences • Seizure of stray dogs
Trading standards	• Animal feedstuffs / fertiliser labelling and constitution • Grading/marking of agricultural produce • Animal movements/health • Underage sales and associated anti-social behaviour • Protection of consumer credit (advertising/agreements) • Tenancy (advertising/payment offences) • Packaging requirements (relating to refuse) • Trade description / trade marking / misdescription / doorstep selling • Sunday trading hours • Business names use and display (using prohibited business name) • Publication of car fuel consumption, approval markings on energy-consuming appliances • Unfair contract terms and cancellation and call-off periods • Consumer transactions – restrictions of statements (protection of statutory rights of customers) • Food standards (labelling) • Petroleum (storage/safety) • Price marking • Misleading prices • Product safety (subject to specific safety regulations, i.e. fireworks) • Product safety (not subject to specific safety regulations) • Vehicle safety (sale of unroadworthy vehicles) • Public protection (e.g. receiving malicious communications) • Overloaded vehicles • Control of sale of poisons • Weights and measures (short measures / fraudulent use of equipment) • Labelling of equipment
Licensing	• Street trading licensing • Liquor and entertainment licensing • Taxi licensing • Licensing for animals (welfare/breeding/safety) • Business licensing • Selective licensing (falls within private sector housing standards)

Fire safety	• Core responsibilities of local authority or fire safety authority are set out in the Fire and Rescue Services Act 2004[4] • Promoting fire safety with aim of preventing death and injuries in home and reducing impact of fire on community as a whole. Includes fire safety education (especially for vulnerable groups) and fire safety checks for householders and others. Many fire and rescue authorities also provide training programmes for young people and work with local businesses, agencies and partnerships (e.g. in crime and disorder partnerships and local strategic partnerships). • Fire and road traffic accidents: fire authorities have a duty to plan and provide arrangements for fighting and protecting life and property from fire within their area; they also have a duty to make provision for rescuing persons from road traffic accidents and dealing with the aftermath of such accidents.

Source: Rogers Review (2007a)

The scale of the regulatory problems that local authorities attempt to address varies greatly from one legislative area to another. For example, animal and public health, animal movements and identification, which fall under environmental health, may have potentially fatal and seriously economically damaging impacts, as was seen at the time of the bovine spongiform encephalopathy (BSE) crisis that caused the death of 160 people through the brain disease Creutzfeldt-Jakob disease (Sample 2007). Other significant impacts include the 2001 outbreak of foot and mouth disease, which resulted in the slaughter of 8.5 million cattle and compensation costs to the government that were greater than £3.9 billion. It is estimated that the 10-year ban on exports of UK cattle and beef resulted in a significant financial loss to UK exports as this market was worth £600 million a year in the 12 months prior to the ban (Anderson 2002). Other regulatory problems have impacts and outcomes that are potentially less damaging but nonetheless very important to the public; for example misleading prices, which falls within the trading standards regulatory area. This includes unfair selling techniques, misleading claims and misinformation, accounting for 15 per cent of an estimated 85.8 million total of consumer complaints and concerns in the UK annually (Rogers Review 2007a).

2.1.2 Distribution of responsibilities between levels of local government

In cases where there are two tiers of local government – that is, a district and a county council – the responsibilities are distributed between the levels (LBRO 2008; Rogers Review 2007a, p. 22). Unitary authorities as well as metropolitan councils and London boroughs perform all functions of LARS.

The enforcement of fire safety legislation is currently the responsibility of 58 fire and rescue authorities run by elected members. They often (though not necessarily) cover an area similar to county councils and unitary authorities. Table 2.2 below shows the distribution of LARS activities by level of local government.

[4] Fire and Rescue Services Act 2004, Explanatory Notes to Fire and Rescue Services Act 2004, Chapter 21, online, available at: http://www.opsi.gov.uk/ACTS/acts2004/en/ukpgaen_20040021_en_1

Table 2.2: Enforcement functions by type of local authority

Unitary authorities	Main enforcement functions of district councils	Alcohol and entertainment licensing Environmental protection (air pollution, noise pollution, nuisance) Food safety Health and safety Infectious disease control Pest control Private rented housing standards Taxi licensing
	Main enforcement functions of county councils	Animal and public health Fair trading Food labelling Pricing Product safety Weights and measures
Fire and safety authorities		Fire and safety

Source: Rogers Review (2007a)

2.1.3 Organisation of Local Authority Regulatory Services

The way in which LARS are organised within local authorities and the number of staff dedicated to regulatory services varies greatly, depending on a number of factors such as the role and size of the local authority and its priorities for a given area. To illustrate this point we can compare two of the local authorities we visited during our field work: Camden Borough Council and East Cambridgeshire District Council. Camden Borough Council, which is a unitary authority providing the full range of regulatory services for a population of about 227,500 residents, had in the region of 100 staff working on these services; East Cambridgeshire District Council, which as a district council provides only 'lower tier' regulatory services, had 19 staff providing these services for a population of about 76,000 local residents.

In terms of structure the functions of LARS are organised into two distinct units in East Cambridgeshire District Council: a commercial unit that deals with food, health and safety, licensing and waste; and a domestic unit that takes care of pollution and HMOs, and housing issues. Camden Borough Council, on the other hand, organised all functions in a unit called Regulatory Services that encompasses environmental health (housing and pollution), consumer protection issues (trading standards, health and safety, food and licensing) and planning enforcement.

2.1.4 Budget dedicated to regulatory services

Overall about £1.24 billion is spent on regulatory services across Great Britain. This represents slightly less than 1 per cent of total local authority expenditure, which was £130 billion in 2008. In addition the national regulators – the Food Standards Agency (FSA), the Health and Safety Executive (HSE), the Office of Fair Trading (OFT), and others – spend about £1.45 billion on their own services (LBRO 2008; financial data quoted are for 2006–2007).

2.2 Who are the other actors in the landscape, and who are the stakeholders?

The regulatory landscape in which LARS operate is diverse and comprises a wide range of other actors from the national to the local level such as (LBRO 2008b):

- government departments: Department for Business, Innovation and Skills (BIS), the Department of Communities and Local Government (DCLG), the Department for Work and Pensions (DWP) and the Department for Environment, Food and Rural Affairs (DEFRA)
- national regulators: Food Standards Agency (FSA), the Office of Fair Trading (OFT) and the Health and Safety Executive (HSE)
- sector organisations: Local Government Association (LGA) and Local Authority Coordinators of Regulatory Services (LACORS)
- non-departmental public body: Local Better Regulation Office (LBRO)
- professional bodies and national agencies: Trading Standards Institute (TSI), Chartered Institute of Environmental Health (CIEH), British Retail Consortium (BRC), Federation of Small Businesses (FSB), Confederation of British Industry (CBI), Environment Agency (EA), Gambling Commission (GC), etc.

In addition, there is a lot of partnership working taking place at the local level with such organisations as the police, the local PCT and the fire brigade.

The national regulators work closely with LARS, and the ways in which they operate differ greatly. The following is a brief example of the types of interaction that are taking place between each national regulator and LARS:

- FSA was set up in 2000 and tasked with 'protecting consumer interests in relation to food safety and standards; the FSA is also entitled to make public the advice that it gives to Government ministers which means that it can be seen to act openly and independently in looking after the interests of consumers'.[5] Local authorities are responsible for the delivery of European and national food regulations at the local level, whereas FSA is the central competent authority with a duty to make sure that local authorities are fulfilling their statutory functions. FSA has the power to audit local authorities if it feels they are underperforming, and it can also focus on particular issues faced by individual local authorities. FSA collects data from every local authority about their activities and outputs; these include the number of premises in the area, the type or category of those premises and the risk level associated with them, and the percentage of businesses that comply with legislation. FSA also gives inspection targets to each local authority regarding the number of premises they have to inspect. Nevertheless, the overall focus is still to concentrate on the regulatory compliance of high-risk businesses.[6]
- OFT is a non-ministerial government department established by statute in 1973. Its mission is 'to make markets work well for consumers'.[7] LARS and OFT essentially have

[5] Food Standards Agency (FSA) website: http://www.food.gov.uk/aboutus/how_we_work/originfsa

[6] Based on a key informant interview conducted with an FSA interviewee in December 2008.

[7] Office of Fair Trading (OFT) website: http://www.oft.gov.uk/about/

'mirroring' roles because trading standards have to ensure that markets are competitive at the local level, whilst OFT's role is to ensure that markets are competitive at a national level and an international level where applicable. Both LARS and OFT share powers, so their relationship centres on mutual collaboration; they are not answerable to each other. The actual sharing of responsibilities between them is not clear cut although they have recently established a protocol to identify who should have responsibility for certain cases, so that on the whole larger cases with national precedence are the responsibility of OFT whilst smaller regional or local cases which do not require national solutions fall under the remit of LARS.[8]

- HSE was created by the Health and Safety at Work etc. Act 1974 and is tasked with 'protecting people against risks to health or safety arising out of work activities' (HSE website).[9] The HSE and local authorities have equal power regarding health and safety; these powers were granted to them in the Health and Safety at Work Act etc. 1974. The Health and Safety (Enforcing Authority) Regulations (1998) set out the rules that determine the distribution of responsibilities for workplaces and premises between the HSE and local authorities.[10] HSE and local authorities carry out broadly similar and complementary activities and seek to achieve the same impacts. The main activities performed by LARS with regard to health and safety are inspections. HSE peer-reviews local authorities' work on health and safety matters through a committee; this committee reports on improvements, notices, activity data such as time and resources spent on the priorities set by HSE. Outcome measures are derived only from national indicators (NIs) which rest on both local and national activities.[11]

With regard to the impact of regulatory services, a wide range of stakeholders are affected including businesses, consumers, local communities, individuals and particular community groups (e.g. vulnerable groups such as the elderly, children and young people).

2.3 The current use of impacts and outcome information in Local Authority Regulatory Services practice

To understand whether and how LARS are currently using and collecting impact and outcome information, we undertook semi-structured interviews with staff from selected local authorities, national regulators and staff at LBRO and at the end of 2008 conducted an online survey of local authorities. The aim of this exercise was to gauge the views of LARS officials and stakeholders on three broad questions: What data do LARS typically collect? What are their reasons for collecting and not collecting data? What are the hurdles they face in data collection? Answers to these questions informed the development of the toolkit, especially in judging what data it would be useful for LARS to have in terms of management information, and what information LARS could be collecting without placing an undue burden on local officials. Full methodological and

[8] Based on key informant interview conducted with an OFT interviewee in December 2008.

[9] Health and Safety Executive (HSE) website: http://www.hse.gov.uk/aboutus/index.htm

[10] For full detail of the Act: http://www.opsi.gov.uk/si/si1998/19980494.htm#sch1

[11] Based on key informant interview conducted with an HSE interviewee in December 2008.

technical details about the interviews and the online survey may be found in the Appendices A to C.

2.3.1 What information is collected by local authorities?

Local authorities collect a wide range of data about their services, but concentrate on collecting output and activity data rather than outcome data

Many of our interviewees highlighted the fact that local authorities collect a wealth of data with respect to the regulatory services they deliver. They collect a significant amount of data for their local authorities and for national regulators, and as part of auditing and performance assessment purposes – meeting their statutory obligations under the LAA and other performance frameworks. Interviewees felt that, for the most part, these data were not used to their full potential, mostly because of resource constraints.

Generally, local authority staff seemed to have a mixed understanding of the meanings of outputs and outcomes, and in practice it was difficult for them to draw a clear distinction between them. This came out strongly during our key informant interviews and was also an issue we explored in most of the workshops we ran with local authorities on particular regulatory services. When asking the interviewees about what they believed were the *outcomes* of LARS services, some interviewees answered instead with the *outputs* collected by LARS. For example, many interviewees considered inspecting food premises as the ultimate result of their activities rather than thinking further down the line about the outcomes produced by their activities, such as contributing to making the local population healthier through fewer instances of food poisoning from unhygienic food places.

In addition, and apart from any conceptual uncertainties, the key informant interviews we conducted in the scoping stage of our research indicated a general move by local authorities from output-based measures towards more outcome-based measures. Many informants mentioned that a move away from 'number crunching' to more qualitative measures at the national level was having an impact on the way LARS operate at the local level. This trend is linked in particular to the move towards LAAs and the adoption of sustainable community strategies by councils that have moved their focus to a 'broader' agenda of health and well-being promotion for the local population through their services. However, despite the move from the national regulators towards more outcome-based data and information, it is still noticeable that a large proportion of local authorities do not collect outcome data, and/or do not feel that it is feasible to collect such data and/or that the means of wider impact/outcome measurements is at their disposal.

Only around half of the regulatory services collect information about the wider impact of their service

This dominance of output information was confirmed when we asked LARS whether they currently collect information on the wider impacts of regulatory services (see Figure 2.1). Overall, only around half of LARS (55%) collect this information. It is interesting to note that some types of local authority are less likely to collect information on these impacts – in particular unitary authorities (only 43%) – whereas others, such as London boroughs (76%) and metropolitan districts (79%), are much more likely to do so.

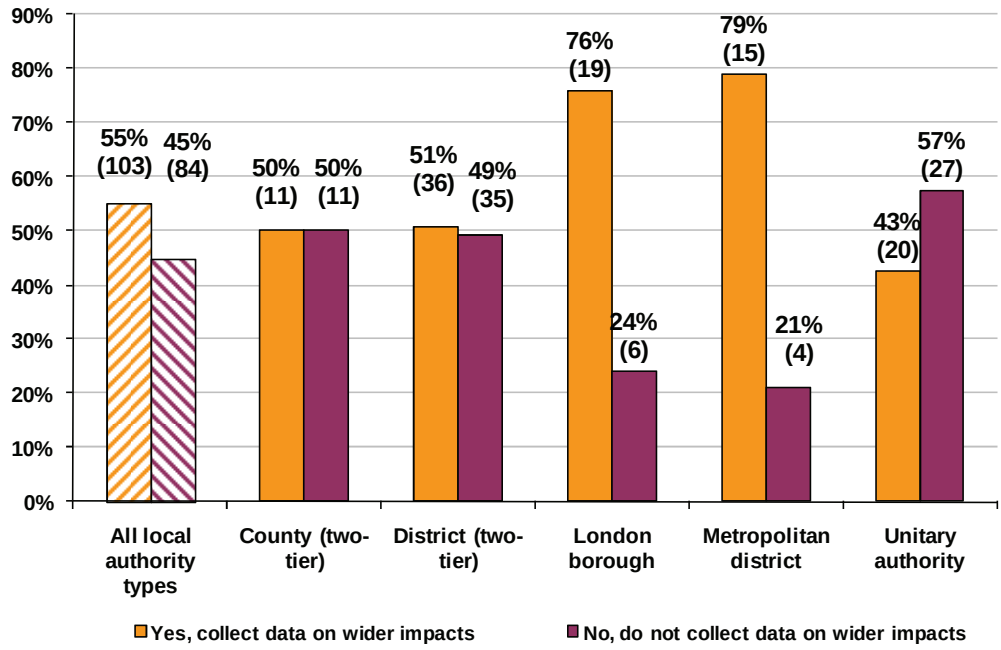


Figure 2.1: Type of local authority by whether they collect information on the wider impacts of regulatory services

(excluding 3 responses by 'Other' type of local authority)

SOURCE: RAND Europe survey of local authorities 2008. *Q4 Do you collect any information on the wider impact of local area regulatory services in your council? These include trading standards, environmental health, licensing, and fire and safety (2008).* Figure based on 188 responses to Q4.

Local authorities collect a wide range of impact information

If we now analyse the outcome and impact information that is collected by LARS, we see that data on the following three impacts are most likely to be collected (see Figure 2.2):

- impact on business in the local community: 70%
- impact on the environment in the local community: 60%
- impact on general health outcomes: 54%.

Interestingly, different types of local authority put emphasis on different types of impacts for which they collect data and information. Most notably, London boroughs and district (two-tier) authorities collect the majority of their data on the impacts on the environment in the local community (82% and 77% respectively, compared to an average of 60% across all types), whereas county (two-tier) authorities are less likely to collect such data, with only 14 per cent of respondents in that category stating that they did. This might be a reflection of the division of tasks between trading standards and environment health services in two-tier local authorities.

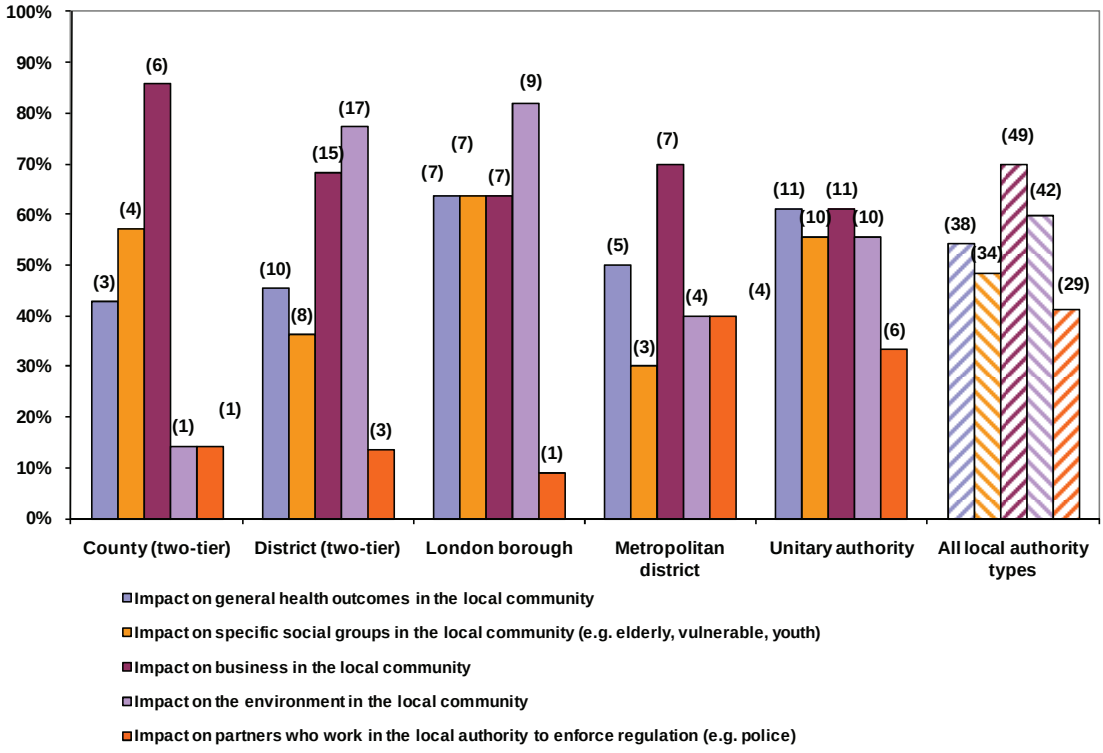


Figure 2.2: Impact information collected by type of impact and type of local authority

SOURCE: RAND Europe survey of local authorities 2008. *Q5 Does the information you collect on impacts relate to? (please tick all that apply).*[12] Figure based on 62 responses to Q5.

Data on impacts are collected both in a qualitative and a quantitative way

If local authorities collect information on impacts, it is also valuable to have a closer look at what information is collected. The major distinction here is between qualitative and quantitative information and between local and regional/national data sources. Figure 2.3 shows the type of information collected across regulatory services. Across all local authorities there are three main types:

- qualitative data based on the documentation of enforcement activities (e.g. description of health or environmental improvements): 59%
- quantitative data that are specific to impact in the local community (e.g. costs to business, specific health benefits to population): 55%
- qualitative data on the basis of engagement with stakeholders (business and citizens) (e.g. description of health or environmental improvements): 41%.

Different types of local authority appear to collect different types of data. For example, there is not as much emphasis on collecting quantitative data that is specific to impact in the local community in metropolitan district authorities (25%) as there is in county (two-tier) authorities

[12] Please note that respondents could choose to answer 'Other' to Q5. This option has been omitted from this figure. Respondents who did not answer Q2 about the structure of their local authority were also excluded from this figure.

(100%).[13] The proportion of each type of local authority that collects data on stakeholder engagement also differs greatly, with much more emphasis put on this type of data by metropolitan district authorities (38%) than by county (two-tier) authorities (0%).

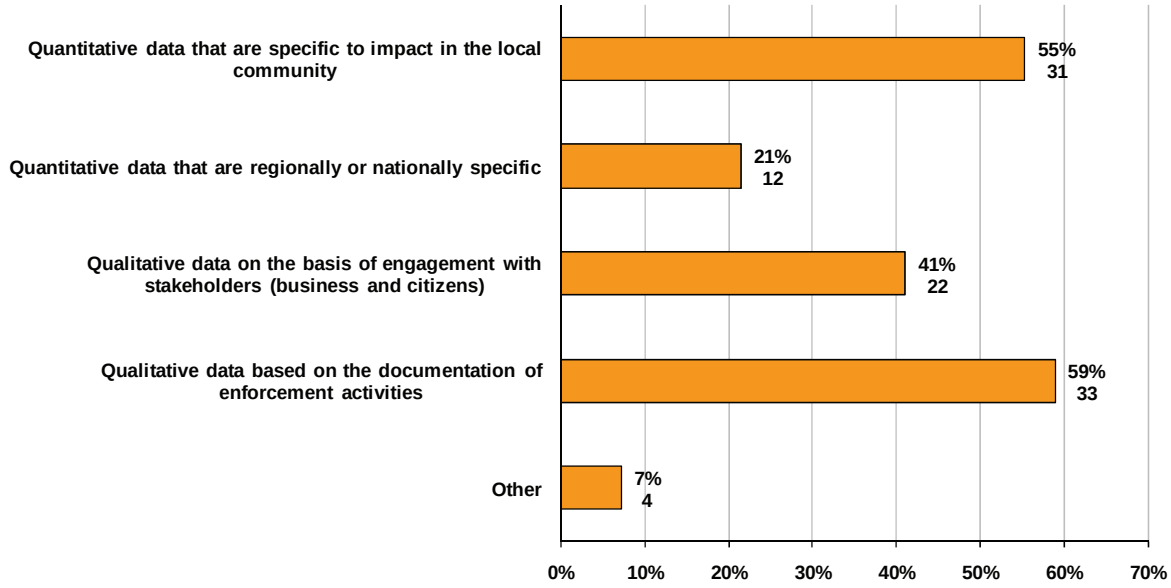


Figure 2.3: Type of information collected by different local authorities

SOURCE: RAND Europe survey of local authorities 2008. *Q7 Is the information on impacts that you collect across regulatory services mainly? (please choose answer that most closely corresponds to the situation in your council).* Figure based on 56 responses to Q7.

2.3.2 Local Authority Regulatory Services would like to strengthen data collection across all types of impact

If we now move away from the status quo of data collection and have a look at the impact and outcome related 'wish list' for data collection, we find there is a general desire to collect more data across all the different kinds of impact. Figure 2.4 below shows that local authorities would like to collect more information on the impacts of regulatory services, regardless of which type of impacts it relates to. However, as may also be seen from the figure, there are stark differences between what data they would find it most useful to collect and the data they currently collect.

[13] Note that this represents only seven county authorities who answered Q7, of which seven answered that they collect this type of data.

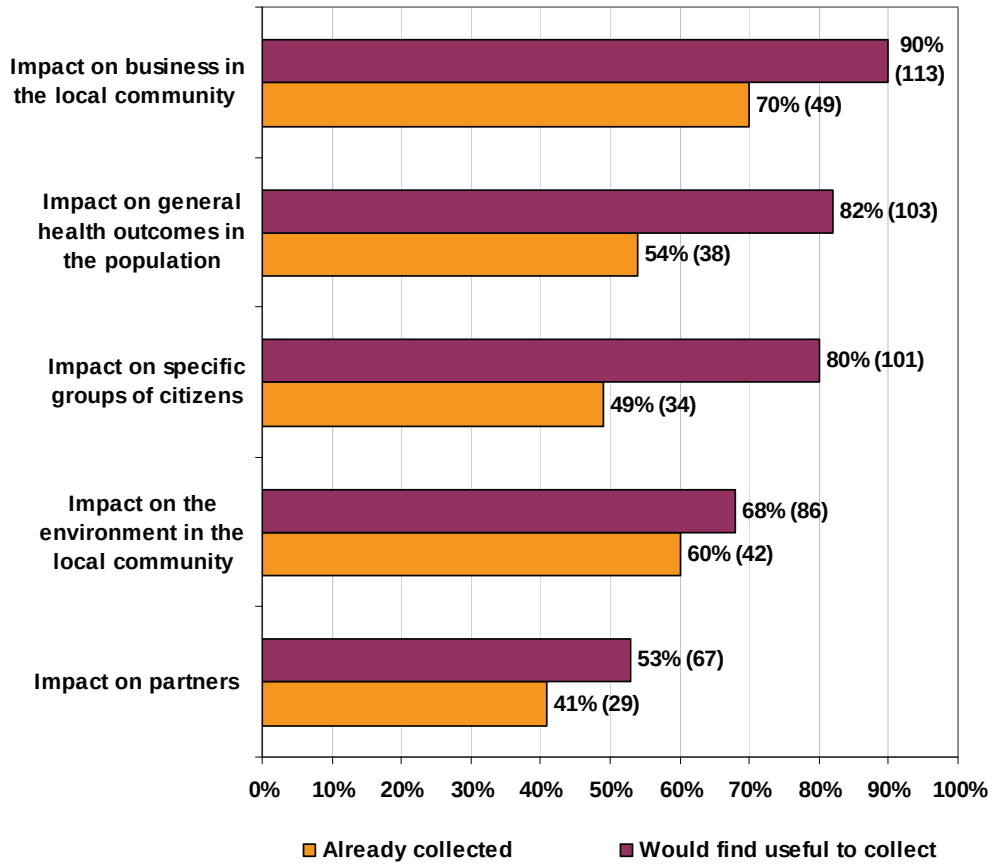


Figure 2.4: Type of impact data LARS would find useful to collect

Source: RAND Europe survey of local authorities 2008. *Q5 Does the information you collect on impacts relate to? (please tick all that apply); Q11 Given the data that you hold in the council, what type of information on impacts of regulatory services would you find most useful to collect to measure impacts and outcome? (please tick all that apply).*[14]

Most notably, the biggest differences are between the following types of data:

- data collected on impact on specific groups of citizens: 31 percentage-point difference between the number of respondents who would like to collect such data and those that currently do
- data collected on impact of general health outcomes: 28 percentage-point difference between the number of respondents who would like to collect such data and those that currently do.

In addition, data collected on the impact on partners and the environment are overall the type of data that local authorities would find it least useful to collect: 53 per cent and 68 per cent of respondents respectively would find it useful to collect this information compared with 90 per cent, 82 per cent and 80 per cent of respondents for the respective impacts on business in the

[14] Please note that respondents could choose to answer 'Other' to Q5 and Q11. This option has been omitted from this figure. Respondents who did not answer Q2, about the structure of their local authority, were also excluded from this figure.

local community, impact on general health outcomes in the population, and impact on specific groups of citizens.

Overall, the most important type of data for the majority of local authorities' respondents to collect is data on the impact on business in the local community, with 90 per cent of respondents stating that they would find it most useful to collect this data and 70 per cent stating they currently collect such data.

2.3.3 What are the reasons for collecting or not collecting impact data?

To explain some of these observations, we looked at the reasons for LARS to collect their current set of outcome information (see Table 2.3). The most common reasons cited are 'to allow management to assess the performance of the services' and 'to assess the benefits of local authority regulatory services activity', with 73 per cent and 67 per cent of respondents to Q10 respectively. The category least often cited (apart from 'Other') is 'to answer specific management targets set by the council' (44%). Interestingly, these two reasons most cited are the ones that focus most explicitly on the performance and benefits of LARS in particular rather than on the basic functioning, partnership working or wider contributions of such services to broader outcome-/impact-based measurement frameworks such as National Priorities and LAAs.

Table 2.3: Reasons why local authorities collect information on impacts of regulatory services

Reasons for collecting information on impacts	Proportion of respondents to Q10 (%)	Number of respondents to Q10
To allow management to assess the performance of the services	73	40
To assess the benefits of LARS activity	67	37
To satisfy other National Priorities (e.g. improve local economy, tackling crime, etc.)	58	32
To inform partnership working	56	31
To collect some basic information on the functioning of services	49	27
To feed into the indicator set in the LAAs	49	27
To answer specific management targets set by the council	44	24
Other	13	7

SOURCE: RAND Europe survey of local authorities 2008. *Q8 Why do you collect this information on impacts of regulatory services? (please choose answer that most closely corresponds to the situation in your council)?* Table based on 55 responses to Q8.

2.3.4 What hurdles do local authorities face in assessing the impacts of Local Authority Regulatory Services?

As discussed in the earlier sections, slightly fewer than half of LARS do not collect outcome information, and those that do would like to extend the information collected, for example regarding health impacts. Therefore we analysed the evidence available in order to find out what the main hurdles to assessing impacts are.

The main hurdle mentioned by the respondents is 'Availability of wider data on impacts' (36% of respondents). 'Evaluation capacity in the council' was (omitting the 'other' category) the second most important issue (17% of respondents) (see Figure 2.5).

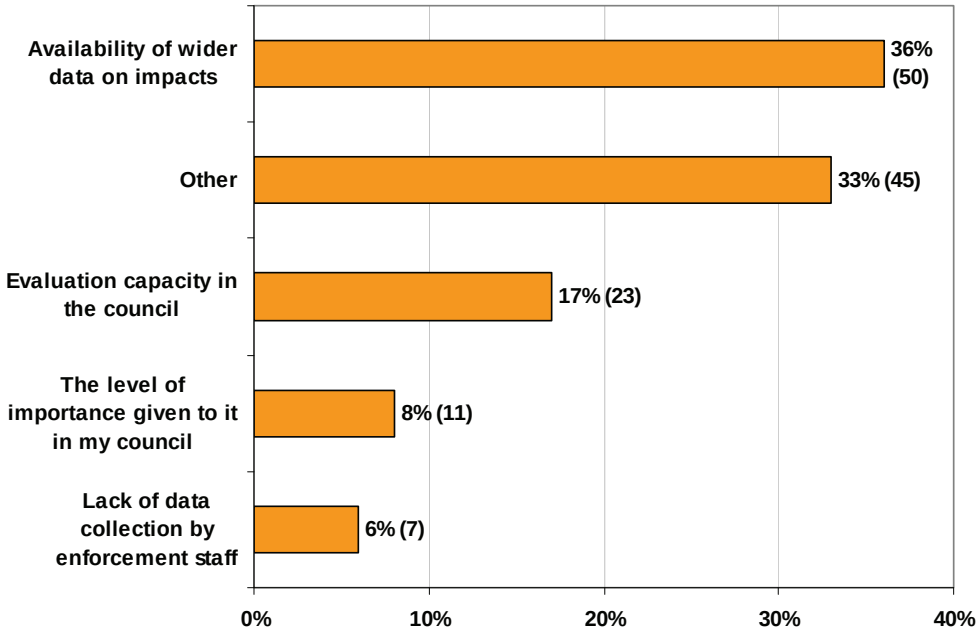


Figure 2.5: Main hurdles faced by local authorities in assessing the impacts of the regulatory services they deliver

Source: RAND Europe survey of local authorities 2008. *Q10 What is the main hurdle in assessing the impact of regulatory services?* Figure based on 137 responses to Q10.

A third of the respondents mentioned 'Other' as the most important hurdle for assessing impact. We therefore analysed the responses to the open-ended question in which we asked respondents to specify their other response. We reviewed the open-text answers given by the respondents and clustered them by theme, subsequently counting each instance of this theme being mentioned by a respondent. The results may be found in Table 2.4 below.

In this exercise the issue of attribution – linking a specific impact to the activities of LARS – was most prominent (8 respondents – 28%). This is to a certain extent unsurprising given that this issue was significantly flagged up by interviewees at the scoping stage and subsequently by workshop participants. In fact, most interviewees believed the impact of LARS could not be regarded in isolation because regulatory services are part of a wider set of forces, all acting in concert. In other words, the impact of LARS is determined by a combination of actors and actions, often making it difficult to isolate the impact of LARS. These issues of attribution, the interviews revealed, make it practically and politically difficult to demonstrate the value of LARS. In addition, interviewees frequently highlighted the difficulty of collecting information purely on a local basis, without looking at the impact in the context of a wider regional and national agenda.

Table 2.4: Clustering of respondents' open-text answers on the main hurdles their council faces in assessing the impacts and outcomes of Local Authority Regulatory Services

Main hurdles faced by respondent's council in assessing the impacts and outcomes of LARS	Count of respondents	Proportion of respondents (%)
Attribution of outcomes to LARS' activity against a background of partnership work and confounding and intervening contextual factors	8	28
LARS' evaluation and data collection capacity	6	21
Time lag between LARS' activities and the realisation of impacts	5	17
Establishing the causal link between outputs and outcomes and impacts	5	17
Difficulty in defining and measuring specific outcomes measures	2	7
Often difficulties in assessing preventative work	2	7
Wide area of LARS' activities makes it difficult to come up with comprehensive measures	1	3
Lack of good baseline data against which to compare LARS' intervention	1	3

SOURCE: RAND Europe survey of local authorities 2008. *Q10 What is the main hurdle in assessing the impact of regulatory services? (please choose one).* Based on 29 respondents to Q12 who chose 'Other' and specified their response in the open-text box provided.

The second most cited hurdle that respondents mentioned was 'Evaluation and data collection capacity of local authorities' (6 respondents – 21%), and the third most cited hurdles were the 'Time lag between LARS activities and the realisation of impacts' and 'Establishing the causal link between outputs and outcomes and impacts', with 5 respondents each.

Some of the survey findings detailed above were upheld during our key informant interviews; many interviewees mentioned that assessing the impacts of regulatory services delivered by local authorities was a real challenge. They acknowledged the difficulty of establishing a baseline to measure these impacts and the challenge in making clear causal links between the outputs of their regulatory services and the outcomes. For example, it is not clear whether a large number of inspections carried out on food premises will result in a reduction of food poisoning cases. In fact, a smaller number of inspections might result in a greater reduction in food poisoning cases if these inspections are more targeted and more thorough. One workshop participant flagged up that a high number of counterfeit goods seizures in one area might either mean that the local trading standards team is working really hard and being very effective at identifying instances of counterfeit goods, making a real difference to the local area, or that the overall number of counterfeit goods in that area is extremely large and the reaching only the tip of the iceberg. This participant strongly questioned whether it would make any sense at all to try to infer a judgement on the performance of a local trading standards team from this output measure alone.

2.3.5 Key characteristics of current practice

To summarise this quick overview of the current practice, the following picture emerges:

- A wealth of data and information is collected by local authorities for a wide range of purposes (e.g. statutory obligations, performance and auditing purposes). However, a large proportion of these data remain focused on output measures rather than on wider impacts, despite a gradual move towards more outcome-based data gathering since the introduction of LAAs, National Priorities, and so on. A large proportion of local authorities do not seem to collect information currently on the wider impacts of their regulatory services (45% of respondents to our online survey).

- The information that local authorities currently collect on impacts is most likely to be concerned with the impact of their regulatory services on businesses in the local community, on the environment of the local community and on the general health outcomes of the local population. More particularly, such data are most likely to be documentation and information on their enforcement activities, information on the impacts their services have on the local community, and information on the engagement of their services with stakeholders.
- The information that local authorities feel it would be most useful for them to collect[15] as far as the wider impacts of their services are concerned is information and data on the impact of their services on local businesses.
- Local authorities collect data on the wider impacts of their regulatory services to allow management to assess the performance of their services and to consider the benefits of these services, and also to be better informed about the basic functioning of their services, partnership working and wider contribution to broader outcome/impact-based measurement frameworks such as LAAs and National Priorities.
- Local authorities face hurdles in collecting impact information. The most significant hurdles are the availability of data, the evaluation and analysis capacity available at the local level, and the issue of attribution of impacts. Data are often not collected, not available at the right level of aggregation for the local authority, or held only by partners. At the same time, the size of many LARS does not allow them to build up sufficient capacity to collect and analyse data themselves. The challenge of attribution is of a conceptual nature; it is often difficult or even impossible for services to dissociate partners' and wider actors' and factors' impact on a given outcome from the impacts of LARS.

[15] Or indeed, information that they currently collect and which they feel is most useful to demonstrate the wider impacts of their regulatory services.

CHAPTER 3

Assessing the known impacts and outcomes of Local Authority Regulatory Services

The earlier chapters presented an overview of the organisational and political background of LARS and current practice in impact and outcome measurement. This chapter now presents the findings of the first substantial research stage. The key objective of this stage was to map out, on a high level of aggregations, what is known already about the impacts and outcomes achieved by LARS at the local level.

3.1 Approach

To map the outcomes and impacts of LARS, RAND Europe used an impact evaluation matrix to identify possible impacts and outcomes, to structure the literature and document review, and to present the results of the review. For this purpose, an initial evaluation matrix was drafted, constructed along two key dimensions: (1) the type of impact and (2) the type of stakeholder (see Table 3.1).

Table 3.1: Initial impact evaluation matrix

Stakeholder	Type of impact		
	Economic	Environmental	Social
1. Consumers			
2. Local businesses			
3. Small and medium enterprises (SMEs)			
4. Police			
5. Others			

To populate the initial impact evaluation matrix, RAND Europe first conducted a literature and document review of the impact and outcomes of LARS activities. Details of the research strategy may be found in Appendix A. We searched for studies and reports that analyse the impacts of LARS activities, or the activities of trading standards, environmental health, licensing and the fire and safety authorities, on outcomes and impacts in local communities. Although the academic literature and the 'grey literature' on regulation issues are both vast, our research did not identify any literature addressing our research question directly.

3.1.1 Key findings of the initial literature review

Most of the information contained in the review of the official documents is of the following kinds:

- background to how regulatory services operate
- what the better regulation agenda should look like in practice (reduction in the burden on businesses, accountability of regulators regarding the effectiveness of their activities, etc.)
- perception of local regulatory services by businesses
- performance of certain regulatory services (e.g. one report was a performance assessment of the fire and rescue service in England, giving details about the performance levels of different local authorities, etc.).

Whilst this information was useful in terms of our gaining a greater understanding of local regulatory services, it was not sufficient to populate our table of impacts and outcomes.

When relating the literature review to the aim of the study, the following themes could be observed:

- The literature around regulatory impact assessment (RIA) is large.
- When trying to identify *general* impacts and outcomes, the literature covers only regulation theory, which provides a useful perspective from which to interpret current changes and outline a research framework.

During our literature review we did not come across any article analysing or studying the broadly encompassing impacts and outcomes of the main areas of local regulation. We found no evidence of differentiation between the various types of stakeholders, including businesses, consumers and citizens. Although stakeholders of local regulation can be easily identified, it is very difficult to measure the degree to which each stakeholder group is affected by specific regulation. In relation to the latter point, most literature focuses on the impact of national or global regulation, and rarely on local regulation, which often cannot be measured outside the context of wider regulation. A good example is air pollution.

Finally, we reviewed RIAs issued by the national regulators. The key observation for those documents was the specificity of the policy questions addressed. Statements about impacts and outcomes were made, but they hold true only in very limited circumstances.

Across the different kind of documents reviewed, two key observations could be made that led to an adjustment of our research approach:

1. **LARS are not subjects of study.** Particularly in the academic literature, it appears that LARS are not studied as a group, and even their constituent parts – trading standards, environmental health and fire safety – are not the subject of studies. The overarching classification of the different enforcement activities at the local authority level into LARS is only used in official documents by government organisations and other sector organisations. Most of these focus on one element of LARS rather than analysing the whole suite of activities.

2. **Enforcement is not covered as a specific stage of the regulatory chain.** The focus of many studies that are explicitly concerned with impacts of regulation is not on local enforcement but on regulation as a whole, not differentiating between different elements of the regulatory chain. FSA studied, for example, the administrative burden that food regulation has on business, but did not assess whether local enforcement increases or decreases that burden.

3.1.2 Identifying impacts with an adjusted approach

The level of detail of information available made it necessary to adjust our research approach from a bottom-up approach to a more top-down approach in order to ensure that the most important areas of LARS activities and outcomes were covered. 'Top-down' means in this instance to define a framework of potential impacts and outcomes (i.e. to populate the impact evaluation matrix with the outcomes and impacts of LARS that may be expected) and then to substantiate those with further analysis and evidence.

To define the framework, we decided to use the substantial evidence that is contained in the annexes to the Rogers Review (2007a) as a starting point, applying our own conceptual lens and supplementing that with information from other sources. The annexes cover the 24 most important areas of LARS activities, identified in a consultative process by Rogers. For each of these, the Rogers Review provides an overview of the policy problem, policy measures and policy objectives. The content of the annexes has been submitted by the national regulators (departmental and non-departmental bodies), and differs in terms of comprehensiveness and details. To use this information as a framework for defining impacts and outcomes, RAND adjusted the impact evaluation matrix and extracted the following information:

1. policy area
2. policy problem
3. scale of regulatory area/problem
4. output and indicator of output
5. outcomes (i.e. include outcomes potentially achieved)
6. indicator of outcome
7. type of outcome:
    - economic
    - social
    - environmental
8. stakeholder:
    - business
    - consumer
    - local community
    - national
9. service affected:
    - environmental health
    - trading standards
    - fire and safety authority
10. regulator, e.g:
    - FSA
    - DEFRA

- OFT
- HSE.

The information was extracted by the project team and inputted in an Excel sheet which allows search by type of impacts, stakeholders, services affected, and so on. After the coding had been finalised more targeted searches for evidence on impacts and outcomes were conducted for the cases for which little evidence had been provided up to then. That search focused in particular on national regulators that either collect information on the very specific activities of LARS or conduct ad hoc studies into specific areas of LARS.

3.2 The impacts and outcomes of Local Authority Regulatory Services

Through the impact evaluation matrix, more than 75 economic, social and environmental outcomes were identified. After grouping very similar outcomes, a total of 48 of outcomes are presented in this section, by type of outcome and then subdivided into major stakeholder groups. Each table has columns for the following categories:

1. Stakeholder: the stakeholder affected by the outcome described.
2. Outcome: a description of the outcome. Outcomes are first grouped by type (economic, social and environmental) and then by stakeholder affected.
3. Indicator: information about existing or potential indicators to measure the outcome. Sometimes indicators are proxy indicators, and some information is available only ad hoc – i.e. contained in single studies and not gathered on a regular basis.
4. Scale of the problem / potential size of outcome: the scale of the potential outcome is described, or (if information had been scarce) the scale of the problem.
5. Contribution: aims to give at least a qualitative assessment of how and to what degree LARS contribute to achieving the described outcomes or addressing the policy problem mentioned by distinguishing between indirect and direct contribution. This is based on an assessment by researchers founded on the closeness between outputs and outcomes, and thus should be understood as indicative rather than definitive. Information about LARS outputs may also be found in this section.
6. Source of evidence: a snapshot of where the information on the outcome has been retrieved from, listing the major sources.
7. Service: which service would be typically responsible for the associated outcome.

Taking, for example, outcome no. 7, the tables may be read as follows:

> *Through licensing the sale of alcoholic beverages environmental health services could have a positive economic impact on businesses by helping to contribute to more responsible consumption patterns and consequently fewer work days lost due to alcohol consumption. This impact is however only indirect.*

The table first provides an extensive list of outcomes and an assessment of its potential scope. In addition, indicators that might allow an observation of changes in outcomes are provided. Secondly, those outcomes are linked to activities of LARS. Finally, it attempts to assess the

contribution of LARS to the outcome listed. The tables for the three major types of impact follow. The key findings from the tables are analysed in section 3.3.

3.2.1 Economic impacts

Table 3.2: Economic outcomes

Additional abbreviations: EH – environmental health; H&S – health and safety; LA – local authority; PSA – public service agreement; TS – trading standards

	Outcome	Indicator	Scale of the problem / potential size of outcome	Contribution	Source of evidence	Service
Business						
1.	Administrative costs for businesses complying with air quality regulations	Standard cost modelling measurement conducted by DEFRA	In 2006 the total administrative costs emanating from the pollution prevention and control regime were estimated to be £45.9 million	Indirect contribution through enforcement styles, no influence on actual information obligations	DEFRA 2006a)	EH
2.	Administrative costs through complying with consumer credit regulation	No indicator available	Cost estimate not available	Indirect contribution through enforcement styles, no influence on actual information obligations	Rogers (2007b	TS
3.	Delays to planning applications due to clarification of status of land (contaminated land)	No indicator available	No evidence available	Direct contribution through the identification of local land	Rogers (2007b)	EH
4.	Administrative cost through enforcing hygiene regulations	Standard cost modelling conducted by FSA	In 2006 the total administrative costs of European food hygiene regulation (without dairy and meat) were estimated at around £30.2 million	Indirect contribution through enforcement styles, no influence on actual information obligations.	FSA (2006)	TS
5.	Administrative cost for food businesses through enforcing labelling legislation	Standard cost modelling measurement conducted by FSA	In 2006 the total administrative costs of food labelling regulation were estimated to be £7.2 million	Indirect contribution through enforcement styles, no influence on actual information obligations.	FSA (2006)	EH
6.	Administrative costs for business through complying with H&S regulation	Standard cost modelling measurement conducted by HSE	In 2006 the total administrative costs of all H&S regulation were estimated to be £2.9 billion Annual costs per employee have been estimated for 2007 for different company sizes: • small £87.01 • medium £34.03 • large £14.07 • very large £15.00.	Indirect contribution through enforcement styles, no influence on actual information obligations	HSE (2006)	EH
7.	Reduction in alcohol-related absenteeism	No. of working days lost due to alcohol-related absence	Government office estimated that in 2001 17 million days were lost in England due to alcohol misuse. The estimate of the total cost of absenteeism (including employer costs) due to alcohol misuse in England is £1.8 billion	Indirect contribution through licensing and partnership work	Cabinet Office and Strategy Unit (2003)	EH/TS
8.	Reduction of negative economic impact of animal disease on local food businesses	No systematic assessment, depending on type of outbreak	In the 2001 outbreak of foot and mouth disease 8.5 million cattle were slaughtered, compensation costs for the government were greater than £3.9 billion and it is estimated that the 10-year ban on	Direct contribution through enforcement of feed legislation	Rogers Review (2007b)	EH

Table 3.2: Economic outcomes

Additional abbreviations: EH – environmental health; H&S – health and safety; LA – local authority; PSA – public service agreement; TS – trading standards

	Outcome	Indicator	Scale of the problem / potential size of outcome	Contribution	Source of evidence	Service
			exports of UK cattle and beef resulted in a loss in UK exports worth £600 million a year (value in the 12 months prior to the ban).			
9.	Reduction of costs to employers due to work-related ill health at the workplace	Occupational health and safety; PSA targets (HSE)	In 2007 34 million days were lost overall (1.4 days per worker), 28 million due to work-related ill health and 6 million to workplace injury Costs to employer of injury and ill health in LA enforced sectors (HSE estimate: GBP 370 to 385 million in 2001–2)	Direct contribution through enforcement of H&S regulation in 1.12 million premises	HSE (2008), H&S statistics 2007/8	EH
Consumers						
10.	Protection against unfair credit products	No indicator available	Based on an RIA from 2004, consumers could save up to £41m a year (OFT)	Direct contribution through enforcement of credit legislation	Rogers Review (2007b)	TS
11.	Reduction in damage to private/public property due to the use of unsafe products	No indicator available	General Product Safety Regulations 2005 and a variety of product-specific legislation introduced under the Consumer Protection Act were introduced to protect consumers from unsafe products	Direct contribution through enforcement and proactive as well as reactive action	Rogers Review (2007b)	TS
12.	Fewer cases of rogue door-step selling	Consumer complaints about selling Only ad hoc assessments of impact	The total value of doorstep sales is around £2.4 billion annually There are estimated to be around 15,000 cases of door step selling each year, at an average value of £2,000	Direct contribution through enforcement national regulation	OFT (2004)	TS
13.	Fewer cases of scams and less damage to consumers	Consumer complaints about selling Only ad hoc assessments of impact	OFT estimates that UK consumers lose about £3.5 billion to scams each year. The mean average amount per scam is £850, the median amount £47	Direct contribution through enforcement national regulation,	Rogers Review (2007b)	TS
14.	Less economic cost through unfair selling, misleading claims and misinformation, etc.)	Consumer complaints about selling Only ad hoc assessments of impact	Estimated level of consumer detriment £8.3 billion for currently 15% of the overall 85.8 million complaints	Direct contribution through enforcement national regulation	Rogers Review (2007b)	TS

Table 3.2: Economic outcomes

Additional abbreviations: EH – environmental health; H&S – health and safety; LA – local authority; PSA – public service agreement; TS – trading standards

	Outcome	Indicator	Scale of the problem / potential size of outcome	Contribution	Source of evidence	Service
Local authorities						
15.	Reduction of cost of fly-tipping removal	Fly-capture database (DEFRA): – fly-tipping incidents – cost estimates for removal NI 196, Improved street and environmental cleanliness – fly-tipping	There are around 1.28 million cases of fly-tipping a year, resulting in removal costs of £73.8 million for the UK (average case of fly-tipping costs £58 to remove)	Direct contribution through enforcement, deterrence and potential recovery of costs from offenders	DEFRA website	EH
16.	Reduction of costs of graffiti and fly-posting removal	NI195, Improved street and environmental cleanliness (levels of graffiti, litter, detritus and fly posting)	Encams Ltd estimates the costs of graffiti at £1 billion a year	Direct contribution through enforcement, deterrence and potential recovery of costs from offenders	Rogers Review (2007b)	EH
17.	Reduction of costs of removing abandoned vehicles and prevention of vehicle arson	WasteDataFlow: Number of abandoned vehicles reported	In 2007 more than 80,000 abandoned vehicles were reported to LAs Each case of vehicle arson costs fire and rescue services around £4,000	Direct contribution through enforcement, deterrence and potential recovery of costs from offenders	Rogers Review (2007b)	EH
NHS						
18.	Reduction of economic burden of food-borne diseases	FSA strategic plan target 9	Estimation (2005) of 765,000 cases of food poisoning resulting in 17,300 hospitalisations and 479 deaths. In 2005, the latest year for which incidence data are available, food-borne diseases are estimated to have cost the economy in England and Wales slightly less than £1.4 billion: • £25m cost to NHS • £107m lost earnings and other expenses • £1,248m lost through pain and suffering	Direct contribution through enforcement of food hygiene at local food businesses, but some food poisoning originates in private homes	Rogers Review (2007b)	EH
19.	Reduction of spending on alcohol-related treatment	Expenditure on specialist alcohol treatment (ad hoc only) NI 39	PCTs spent an average of £600,000 on commissioning alcohol services in 2006–7 The wider general cost to the NHS of dealing with the consequences of alcohol misuse, ranging from the cost of ambulance services to acute	Indirect contribution in partnership through enforcing alcohol-related licensing regulations	National Audit Office (2008)	EH/TS

Table 3.2: Economic outcomes

Additional abbreviations: EH – environmental health; H&S – health and safety; LA – local authority; PSA – public service agreement; TS – trading standards

	Outcome	Indicator	Scale of the problem / potential size of outcome	Contribution	Source of evidence	Service
		Alcohol-harm-related hospital admission rates	surgical procedures such as liver transplants, is estimated by the department at in the order of £2.7 billion annually			
20.	Reduction of costs for treating infectious diseases	Number of cases of Infectious diseases reported Ad hoc cost estimates	In 2005 there were 152,955 statutory notifications of infectious diseases under the Act in England and Wales. These included 70,407 cases of food poisoning, 7,628 of tuberculosis, 4,109 of viral hepatitis and 2,120 of hepatitis C. The cost of treating infectious diseases is estimated to be around £6 billion to the NHS	Direct contribution through enforcement and proactive as well as reactive action	Rogers Review (2007b)	EH
21.	Reduction in local health costs (hospitals or other health services) due to incidents with unsafe products	No indicator available	General Product Safety Regulations 2005 and a variety of product-specific legislation under the Consumer Protection Act were introduced to protect consumers from unsafe products	Direct contribution through enforcement and proactive as well as reactive action	Rogers Review (2007b)	EH
22.	Reduction of costs to the healthcare systems as a whole emanating from work-related ill health and injury	Only ad hoc assessment	Total costs to the healthcare system were last assessed by HSE to be £300m to £1,280m for 2001 (all areas, not only LA enforced)	Direct contribution through enforcement of H&S regulation in 1.12 million premises	HSE (2004)	EH
Society as a whole						
23.	Reduction of costs to society as a whole emanating from work-related ill health and injury	Only ad hoc assessment	HSE estimated the total cost to society at £20b to £32b in 2001 (all areas, not only LA enforced)	Direct contribution through enforcement of H&S regulation in 1.12 million premises	HSE (2004)	EH

3.2.2 Social impacts

Table 3.3: Social and health outcomes

Additional abbreviations: EH – environmental health; H&S – health and safety; LA – local authority; TS – trading standards

	Outcome	Indicator	Scale of the problem/potential size of outcome	Contribution	Source of evidence	Service
Business						
24.	Reduction of animal health problems linked to poor standards of animal welfare	NI 190, Achievement in meeting standards for the control system for animal health	No quantitative data on impact of problem	Indirect contribution in partnership with DEFRA and other actors	Rogers Review (2007b)	EH
Children						
25.	Reduction in number of children affected by parental alcohol problems	NI 50, Emotional health of children	Up to 1.3 million children affected by parental alcohol problems	Indirect contribution in partnership through the enforcement of alcohol-related licensing regulations	Cabinet Office (2004) esd Solutions4Inclusion website	EH/TS
Consumers						
26.	Avoid cases where food is falsely described, claims are misleading or substances which may be harmful to some consumers are not identified on the label	FSA: number of informal samples and inspections with unsatisfactory labelling and presentation	Mislabelling of products may lead to customers being defrauded; impacts may be ethical, actual harm or economic loss – e.g. a product being described as containing fillet steak when it contains stewing meat. The product could be harmful to some consumers – e.g. if a product is described as nut-free when it isn't. On the basis of sampling data, labelling problems are the most common defects detected.	Direct contribution through risk-based inspections, enforcement regime and guidance	Rogers Review (2007b)	TS
27.	Food business sells food that is fit for consumption	NI 184, Food establishments in the area which are broadly compliant with food hygiene laws	The study estimated that 9.4 million people in England suffered symptoms of infectious intestinal disease in a year, of which 1.6 million consulted a GP. There were an estimated 765,000 cases of food-borne disease in the UK in 2005, of which 470 resulted in death and 17,300 in hospitalisation.	Direct contribution through their licensing and inspecting powers	FSA (2001)	EH
28.	Consumer confidence in businesses' product descriptions	No specific indicator found	No specific information on scale of problem	Indirect contribution in partnership; LARS will be able to raise consumer confidence through inspections	Rogers Review (2007b)	TS

Table 3.3: Social and health outcomes

Additional abbreviations: EH – environmental health; H&S – health and safety; LA – local authority; TS – trading standards

	Outcome	Indicator	Scale of the problem/potential size of outcome	Contribution	Source of evidence	Service
Employees						
29.	Reduce risks to employees of contracting or aggravating an illness or health condition due to their work	No specific indicator found NI 119, Self-reported measure of people's overall health and well-being	Estimated 478,000 new cases in 2005–6 of illness caused or made worse by work, where the industry is recorded. Of these 147,000 (31%) are in LA-inspected industries. Around 560,000 people were suffering from such an illness started in that or a previous year in 2005/6.	Indirect contribution in partnership	Rogers Review (2007b)	EH
30.	Reduction in deaths and fatal injuries at work	Occupational H&S PSA targets (HSE)	Health and Safety Commission has revealed that 241 people were involved in fatal work accidents in 2006/7, an increase of 24 on 2005/6. Construction accidents and agricultural accidents account for 46% of fatal workplace injuries, with falls from heights the most common type.	Direct contribution through inspection of work premises	Total Access website (2007)	EH
Individual						
31.	Reduction in hospital admissions due to alcohol consumption	NI 39, Alcohol-harm-related hospital admission rates	Alcohol was the main or secondary cause of 207,800 NHS admissions in 2006/7, compared to 93,500 in 1995/6	Indirect contribution in partnership through the enforcement of alcohol-related licensing regulations	NHS Information Centre (2008) Alcohol Policy UK website (April 2008)	EH/TS
32.	Reduction in incidence of domestic violence linked to alcohol misuse	NI 32, Repeat incidents of domestic violence (PSA 23) NI 34, Domestic violence – murder (PSA 23)	32% of incidents of intimate partner violence were committed when the perpetrator was under the influence of alcohol	Indirect contribution in partnership through the enforcement of alcohol-related licensing regulations	Improvement and Development Agency (IDeA) website, Domestic Violence. http://www.idea.gov.uk/idk/core/page.do?pageId=8798971 Home Office (2004b)	EH/TS
33.	Reduction in premature deaths due to alcohol consumption	No specific indicator found	In 2003 there were an estimated 22,000 premature deaths related to alcohol misuse	Indirect contribution in partnership through the enforcement of alcohol-related licensing regulations	Alcohol Concern (2003)	EH/TS
34.	Prevention of negative health outcomes from contaminated land	BV 216b, Sites with sufficient detailed information available to decide whether remediation of the land is necessary as percentage of all sites of concern	EA estimates that there are 5,000–20,000 contaminated land sites in England and Wales. Contaminated land may cause death, injury, serious illness including cancer and reproductive disorder, in both the short and long term.	Direct contribution through risk-based inspections, enforcement regime and statutory guidance	National Public Health Service for Wales website (2008)	EH

Table 3.3: Social and health outcomes

Additional abbreviations: EH – environmental health; H&S – health and safety; LA – local authority; TS – trading standards

	Outcome	Indicator	Scale of the problem/potential size of outcome	Contribution	Source of evidence	Service
35.	Reduction in noise-related health problems	Number of complaints about noise Collected by CIEH	18% of UK respondents place noise in the top five environmental problems that affect them personally; 21% reported that noise spoilt their home life to some extent (including 8% that said it spoilt it either quite a lot or totally) (data from National Noise Attitude Survey 1999/2000)	Direct contribution through enforcement	Rogers Review (2007b)	EH
Local community						
36.	Reduction in anti-social behaviour and fear of such behaviour resulting from the consumption of alcohol	NI 41, Perceptions of drunk or rowdy behaviour as a problem NI 115, Substance misuse by young people NI 20, Assault with injury crime rate	Crime in England and Wales 2006/7, reports on whether offenders in violent crimes were believed to be under the influence of alcohol at the time of the offence. The report shows that 46% of victims believed the offender was under the influence of alcohol; 59% of victims who were wounded believed the offender was under the influence, and 47% of victims who were assaulted with minor injuries thought the offender was under the influence of alcohol.	Indirect contribution in partnership through the enforcement of alcohol-related licensing regulations	NHS Information Centre (2008) Alcohol Policy UK website (April 2008), NI set definitions released. http://www.alcoholpolicy.net/2008/04/national-indica.html	EH/TS
37.	Reduction in large-scale outbreaks of food-borne disease	NI 184, Food establishments in the area which are broadly compliant with food hygiene laws	The study estimated that 9.4 million people in England suffered symptoms of infectious intestinal disease in the course of a year, of which 1.6 million consulted a GP There were an estimated 765,000 cases of food-borne disease in the UK in 2005, of which 470 resulted in death and 17,300 in hospitalisation	Indirect contribution in partnership with Customs, port authorities, etc. through their licensing and inspection powers	FSA (2001)	EH
38.	Reduction in anti-social behaviour linked to HMOs	No specific indicator found	No specific data on scale of anti-social behaviour linked to HMOs	Indirect contribution through licensing of HMOs and inspections	Rogers Review (2007b)	EH
39.	Prevention of the spread of infectious diseases	No specific indicator found	In 2005 there were 152,955 statutory notifications of infectious diseases under the Act in England and Wales. This included 70,407 cases of food poisoning, 7,628 cases of tuberculosis, 4,109 cases of viral hepatitis and 2,120 cases of hepatitis C.	Indirect contribution in partnership with airport and port authorities, NHS, etc.	Rogers Review (2007b)	EH

Table 3.3: Social and health outcomes

Additional abbreviations: EH – environmental health; H&S – health and safety; LA – local authority; TS – trading standards

	Outcome	Indicator	Scale of the problem/potential size of outcome	Contribution	Source of evidence	Service
40.	Reduction in criminal damage and theft due to underage sales and associated anti-social behaviour	NI 17, Perceptions of anti-social behaviour NI 19, Rate of proven reoffending by young offenders NI 41, Perceptions of drunk or rowdy behaviour as a problem	Those 10- to 17-year-olds who drank alcohol once a week or more committed a disproportionate volume of crime, accounting for 37% of all offences reported by 10- to 17-year-olds but only 14% of respondents. Those who had never drunk alcohol or had not drunk alcohol in the past year committed 16% of all offences but comprised 45% of respondents. A higher proportion of those who drank alcohol once a week or more reported committing criminal damage (12%) and theft (4%) offences during or after drinking than those who drank less frequently.	Indirect contribution in partnership with PCT, social services, etc.	Home Office (2004b)	TS
Tenants						
41.	Improved standards and management of HMO stock	NI 160, LA tenants' satisfaction with landlord services	Research carried out by BRE in 2006 found that 39% of LAs experienced significant problems with property conditions in HMOs and 32% with their management, which licensing will address	Direct contribution through licensing of HMOs and inspections	Rogers Review (2007b)	EH
42.	Reduction in health risks for occupants of HMOs	No specific indicator found NI 160, LA tenants' satisfaction with landlord services	No specific data on scale of health risks for occupants of HMOs	Indirect contribution through licensing of HMOs and inspections	Rogers Review (2007b)	EH
43.	Improvement in housing conditions and design contributes to fewer accidents and better health (including mental health)	No specific indicator found	Research carried out by BRE in 2006 found that 39% of local authorities experienced significant problems with property conditions in HMOs and 32% with their management, which licensing will address	Indirect contribution in partnership, LARS will be able to identify poor housing conditions but not necessarily design issues, so other actors will also be involved (surveyors, building companies, etc.)	Rogers Review (2007b)	EH

3.2.3 Environmental impacts

Table 3.4: Environmental outcomes

Additional abbreviations: EH – environmental health; H&S – health and safety; LA – local authority; TS – trading standards

	Outcome	Indicator	Scale of the problem/potential size of outcome	Contribution	Source of evidence	Service
Local community						
44.	Improved air quality through emission control under the LA air quality management scheme	Air quality objectives as described by the Air Quality Regulation 2000 target measures BV 217, Pollution control improvements	Assessment carried out for draft revised UK air quality strategy (published April 2006) estimates that the level of man-made particulate air pollution experienced in the UK in 2005 would be expected to reduce average life expectancy by up to about 8 months, with an estimated health impact cost in 2005 of £9.1–21.4bn a year	Direct contribution through the regulation of emissions from some 16,000 industrial processes under the pollution prevention and control regime	DEFRA 2006b) DEFRA (2007)	EH
45.	Reduction of environmental pollution by ensuring contaminated land is dealt with	BVP 216, Identifying contaminated land BV 216b, Information on contaminated land	There are an estimated 400,000+ sites which by virtue of past or current use might be affected by contamination to some degree. BV 216 data for 2005/6 suggest a higher figure. The EA estimates that 5–20% may require some form of action to ensure risks are minimised	Indirect contribution, LARS have to identify potential contaminated land in their areas, and to ensure that remediation takes place. However, clean-up has to be done by a third party.	Rogers Review (2007b)	EH
46.	Improved cleanliness of local streets, including dog fouling, abandoned vehicles, litter, graffiti. etc.	NI195, Improved street and environmental cleanliness (levels of graffiti, litter, detritus and fly-posting)	In 2007 80,000 abandoned vehicles were reported to LAs (WasteDataFlow/DEFRA). Where dog fouling comes into contact with humans, particularly children, it can cause the disease toxicariasis, which is estimated to affect 16,000 UK residents a year.	Direct impact, however mostly through largely reactive action. Through enforcement, deterrence and potential recovery of costs from offenders.	Rogers Review (2007b)	EH
47.	Reduction in incidents of fly-tipping	Fly capture database (DEFRA): – fly-tipping incidents – cost estimates for removal NI 196, Improved street and environmental cleanliness – fly-tipping	In 2007 and 2008 1.28 million incidents of fly-tipping were reported and removed at a total cost of around £74 million	Direct contribution, however mostly through largely reactive action. Through enforcement, deterrence and potential recovery of costs from offenders.	DEFRA website	EH
48.	Noise levels reduced in the local area	Number of complaints about noise Collected by CIEH	Around half of all LAs reported more than 200,000 noise complaints in 2007	Direct contribution, however largely reactive enforcement	CIEH (2008)	EH

3.3 Summary of key impact tables

The previous section provided an overview of the impacts that can be directly or indirectly attributed to regulatory services at the local level. In this section we shall summarise the tables and identify some key themes by analysing who the main stakeholders affected are and what the types of impacts on those stakeholders are.

Both negative impacts (costs) and positive **economic impacts** can be observed for a wide range of stakeholders. Directly or indirectly, LARS activity contributes to:

- the administrative burden placed on business
- compliance costs of business
- productivity increases in the local economy
- reduction in unfair competition
- reduction in healthcare cost
- reduction in environmental cleaning costs.

These economic impacts are, however, not distributed evenly across the different categories of stakeholder. Businesses appear to carry most of the direct and short-term economic burden of LARS' activity through administrative and compliance costs, while the longer-term benefits appear to accrue to the wider society and public. Nevertheless, local businesses also stand to benefit economically, through for instance increased productivity related to reduced work-related ill health or less unfair competition. A closer look at the economic beneficiaries shows that local authority and government services in particular benefit from the activities of LARS, through:

- reduced waste removal and cleaning costs for the local authority
- reduced healthcare costs for the NHS
- reduced costs of anti-social behaviour for the police authorities.

Finally, the general public also stands to benefit from LARS activity in economic turns, mainly as consumers who would be less exposed to scams and frauds.

Some examples of economic impacts include these. In 2006 the administrative burden for food labelling regulation was estimated to be £7.2 million across the EU, albeit enforcement only partially contributed to these costs. In the area of fair trading, and in particular scams, LARS contribute to tackling a problem that currently costs consumers around £3.5 billion a year.

The **social impacts** of LARS are focused on the likely positive health effects of their activities, but also include less tangible aspects of social impacts. Through the impact matrix the following social impacts were identified:

- safer food
- increased consumer confidence
- less anti-social behaviour, crime and violence
- reduction in infectious diseases

- healthier workforce
- reduced alcohol-related harm
- better standards of living and health in HMOs.

These benefits mostly accrue to the general public as a whole and may sometimes be attributed to specific subgroups. Our review in particular identified children, consumers and employees as being impacted on by LARS activities.

An example of a social and health impact is enforcing hygiene standards in food businesses. The size of the problem was estimated in 2005 to be 765,000 cases of food-borne disease, resulting in 470 deaths and 17,300 hospitalisations.

Finally, **environmental impacts** were identified through the use of the impact evaluation matrix. Specifically these were:

- improved air quality
- reduced contamination of land
- increased cleanliness of public streets and spaces
- decreased noise pollution.

The whole local community benefits from cleaner air, land and water. Enforcing fly-tipping regulation is a typical example of how LARS are having an environmental impact on the local level. In 2007–2008 a total of 1.28 million cases of fly-tipping were dealt with by local authorities at a cost of around £73.8 million.

CHAPTER 4

Looking at the intervention logic of Local Authority Regulatory Services – developing pathways

The review of the literature and the compilation of information about impacts and outcomes in our evaluation framework proved to be difficult. Key problems were both the attribution of outcomes to LARS and finding the right meaningful level of aggregation to discuss the impacts and outcomes. One way of addressing these issues is to explore in more detail the pathways along which LARS affect the local community. That means establishing the causal or logical chains which lead from LARS actions to changes in the (local) community. In this chapter five such pathways will be presented, after quickly introducing the approach chosen for this research stage.

4.1 Approach

To develop pathways, the systematic, high-level approach of logic modelling was combined with some of the more fine-grained rigour of process mapping, the key aim being to uncover the intervention logic of LARS activities. This approach sits within the 'theory of change' family of evaluations. Such an approach takes into account the difficulties of measuring the attribution of a single policy, actor or intervention on a complex, multifaceted and multicausal problem. It replaces the need for making a clear statement of attribution with an approach that demonstrates the contribution to the solution of a problem made by establishing a causal chain (or a theory of change) for how a specific intervention will result in (desired) changes. By providing information along each step of the causal chain, this approach develops a plausible argument that a specific intervention had, or had not, contributed to a specific problem.

Replacing a statement of *attribution* with a statement of *contribution* has, however, consequences for the inferences that can and should be made from this research. Cost-benefit analysis typically requires a clear attribution of actions to a specific outcome or impact. This applies to determining the costs and benefits that result from LARS action, and statements of cost benefit should therefore be made with caution in relation to these pathways. Nevertheless, the pathways are an important step towards such an analysis. Only by identifying impacts and outcomes in the first place can they form the basis for further analysis.

4.1.1 Logic models and process mapping

Logic models (Kellogg Foundation, Logic Model Development Guide)[16] enable us to produce a graphic representation of how a policy is intended to work – that is, how resources are converted into programme activities, and how those activities in turn produce the results intended. Therefore, logic models generally allow a researcher to analyse the relationship between inputs and outputs, and between inputs and outcomes. Logic models provide an opportunity within the 'accountability area' (Osborne and Gaebler 1992) to measure results, correct problems and identify successes. It also ensures a shared understanding of the intervention and helps uncover any implicit disagreements and confusions. An abstract version of a logic model is shown in Figure 4.1 below.

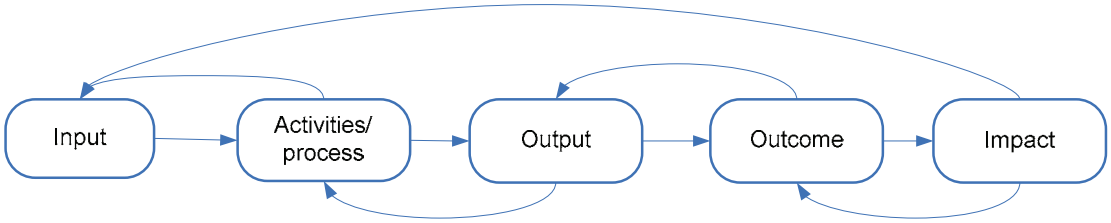


Figure 4.1: Outline of a basic logic model

SOURCE: RAND Europe

Logic models usually stop short of formulating specific links between the elements within each category. A logic model would, for example, list a number of activities as well a number of outputs, without linking the specific activity to a specific output and then a specific outcome. For the purpose of developing the pathways, we therefore supplemented the logic models with elements known from process mapping, by indicating links between the elements of the logic model and highlighting interactions with key partners.

4.1.2 Conceptual issues around using a theory of change approach in the study of Local Authority Regulatory Services

In this section we briefly outline the conceptual understanding underpinning the theory of change approach.[17] This approach should also support learning and accountability within the LARS community more widely. The approach aims not only to understand the contribution made by a programme or activity to achieving outcomes, but also to interrogate evidence and communicate findings in a way that is informative for decision-makers and supports effective understanding and better judgements.

Our approach takes as its starting point the argument of Weiss (1995) that:

> The concept of grounding evaluation in theories of change takes for granted that social programs [in this case local regulation activities] are based on explicit or implicit theories about how and why the program [regulation activities] will work … The evaluation should surface those theories and lay them out in as fine detail as possible, identifying all

[16] Kellogg Foundation, Logic Model Development Guide, online, available at: http://www.wkkf.org/Pubs/Tools/Evaluation/Pub3669.pdf (last accessed July 2009)

[17] We do not always find it helpful to use the language of theory of change', but the approach has underpinned our work for clients including the National Audit Office, the Department of Health, DG SANCO, the Health Foundation, Tommy's the Baby Charity, the Papworth Trust and others.

> the assumptions and sub-assumptions built into the program. The evaluators then construct methods for data collection and analysis to track the unfolding assumptions. The aim is to examine the extent to which program theories hold … the evaluation should show which of the assumptions underlying the program are best supported by the evidence.

This is an approach rather than a methodology (its successful delivery requires the harnessing of a range of methodologies such as those outlined elsewhere in this document). The approach we propose could be said, conceptually, to have five elements:

1. It requires us not only to look at the outcomes of the regulation activities, but also to pay close attention to the processes leading to these outcomes. This contrasts with more classical evaluation approaches, which tend to look at outcomes first and then to address attribution (perhaps using a case-control or time-series approach).
2. It requires a more 'embedded' evaluator working closely with policymakers, practitioners and end users to understand and elaborate a sometimes changing theory of change. This should be easier for evaluators using the toolkit in a LARS setting than for external evaluators. Without losing independence, the successful user of the toolkit will understand the world of the policymakers, practitioners and service users, including what motivates their behaviour.
3. It requires an ability to reconstruct and represent the sequence of events connecting actions to each other and how these contributed to the outcomes identified.
4. It is sensitive to the possibility that during the lifetime of a regulation, activities may change in response to learning or to exogenous events. In building a long-term understanding of the impacts of LARS this is likely to be relevant and important.
5. It will also be sensitive to the fact that different and potentially conflicting theories of change might be simultaneously pursued within different local services.

Collectively, these five elements describe an interest in not only *causal effects* (what happens when an independent variable changes) but also *causal mechanisms* (what connects causes to their effects).

Our approach has been to encourage LARS to focus on understanding what Mayne (2008) calls the 'contribution story'; that is, to understand why practitioners believe that their use of resources (money, authority, expertise, time, etc.) will contribute to public benefits and what side-effects and unintended outcomes they envisage. Data collection is then driven by the need to support or challenge these narratives. This allows us to narrow down the potential range of questions posed by a more general (and sometimes abstract) theory of change approach and to focus on the things service users, practitioners and policymakers most need to know. In practice, we therefore need a tool for developing and understanding the 'contribution story' which we can use to make sense of the (sometimes varying) claims made.

We therefore suggest using logic models to achieve some initial clarity about the contribution story. Two things should be made clear about our use of these: first, they are a starting point for data collecting rather than representing the programme/project itself (they generate mini-hypotheses to be assessed); and, secondly, they have their own limitations, which we identify below. The toolkit allows these to be tested against independent evidence that supports or

weakens the contribution stories. This interest in what really brings about change in behaviour and outcomes is not unlike the 'process-tracing' approach of George and Bennett (2005), but we advocate that their approach of drilling down into individual behaviour should be supported with strong statistical evidence of costs and consequences where data can feasibly be collected.

We also suggest using logic modelling in a pragmatic way as part of a wider theory-guided approach. That focuses attention on the key intended steps in the causal chain and directs the evaluator's attention towards the key mechanisms intended. Data can then be collected to assess whether these mechanisms really do work in the intended way in the particular context. However, logic models carry dangers that should be guarded against. First, they can be excessively linear and homogenising, and distract attention from feedback loops and the uneven pattern and pace of implementation. Secondly, they can focus too strongly on intended outcomes and fail to identify unintended outcomes and side-effects. Thirdly, in our experience they can be alienating for those being evaluated, who find their complex world being recategorised and redefined as inputs, processes, outcomes or whatever. If researchers are unaware of this effect, this may be an unhelpful way to understand the causal chain and become a barrier to understanding the motivations and behaviour that drive it.

Assessing contribution remains a challenge

Even within the approach outlined here, there are still substantial problems in brigading evidence to support or weaken the contribution stories. There are two main difficulties. First, regulatory services are the last element in a long causal chain often stretching from the European level through national departments and regulators on to the local level. If a regulation enforced at the local level, such as food hygiene legislation, is very effective in reducing food-borne diseases, to which level should the impact be attributed? Are the positive outcomes the result of a well-designed regulation and reasonable national transposition, or of excellent enforcement on the ground? At the same time, it is clear that for a regulation to succeed, all the elements of the chain need to be working together to achieve the desired outcomes.

The second set of problems arises from the multitude of factors influencing a specific outcome; in other words, even if a straightforward causal link exists between outputs and outcomes, there may be interfering or competing influences that change the effect LARS can achieve. Taking, for example, the case of alcohol-related harm, LARS have a clear potential to impact through enforcing alcohol licensing regulation and preventing underage sales. However, there are a multitude of other factors influencing the outcomes, such as alcohol pricing in pubs and police presence in night-time hot-spots. In such circumstances LARS activities may be necessary but not sufficient, or their beneficial effects may be masked by powerful countervailing tendencies. The evidence may consequently be obscured. In either case there may be an absence of evidence (but this is not evidence of absence of effect). The problem of finding evidence of contribution is analytical but it has pragmatic consequences. This challenge also helps to limit the visibility of LARS.

Counterfactual and comparator data

Very closely related to the attribution of impacts is the question of the counterfactual. What would happen if LARS did not exist or were completely inactive? This is a question about the added value of LARS. There are at least two imaginable counterfactuals:

1. What would happen in the absence of any enforcement activities for LARS? This is the more extreme case. Some level of compliance with the law could be expected. Food businesses would, for example, still aim at a reasonable degree of hygiene as doing otherwise would endanger their business.
2. How would LARS compare with other possible forms of enforcement? In this case, researchers would need to assess the different impacts of the current enforcement against an alternative enforcement regime. What would be, for example, the impact of FSA or HSE conducting all enforcement activities through their own inspectors?

In classical evaluations involving randomised controlled trials or related approaches, the absence of a counterfactual means that relatively little can be said about the impact of a specific intervention as the measure against which to compare performance is missing. In developing a persuasive contribution story the challenge is different. Marshalling evidence to help assess the contribution story requires us to use a set of comparator data (trends before and after a change in regulatory practice, different outcomes associated with different regulatory practices, and so forth) but does not require a single counterfactual control site. However, without a convincing comparator the contribution story becomes less pervasive.

4.1.3 Dashboard

In addition to the pathways, RAND Europe developed a way of summarising the findings of the case studies in a more quantitative way, making use of indicators and measurements uncovered during the pathway exercise. To do so, we chose to adapt the idea of a management dashboard, which has become increasingly popular in recent years. Dashboards are executive information systems that present a small set of performance measures on a regular and structured basis to strategic decision-makers in order to provide an overview of an organisation's performance and thereby identify areas of particular success or concern for more detailed examination. In a situation that is awash with different performance measurement, indicators and targets, we decided to use the dashboard approach to make more sense of already existing data and indicators, and propose only to develop new indicators in exceptional cases. The dashboards developed for this project will have a less operational perspective and more strategic perspective than management dashboards.

The key challenge for a dashboard lies in the selection of data sources and indicators. Criteria for the prioritisation of indicators and measurements are both systematic and pragmatic. They include the following:

- Do they cover a key causal chain identified by the pathways?
- Do they cover an input, output, outcome or impact?
- Are they being collected already?
- Are data held by the local authority or external partners?
- Will new data need to be collected?

Finally, the dashboard represents the findings in a one-page overview that is easy to read and allows monitoring of changes in impacts and outcomes.

4.1.4 Selection of case studies

The selection of the case studies followed the selection of the interviews described in Appendix A of this report in terms of local authorities. However, not all local authorities were able to accommodate our request to host a workshop, so two additional local authorities – the London Borough of Islington and Northamptonshire County Council – were included. The selection of case studies took into account three dimensions:

1. **The service involved.** The five pathways to be conducted were intended to cover all three service areas: trading standards, environmental health and fire and safety. It proved, however, difficult to engage with the fire and safety authorities, so RAND Europe selected three trading standard services and two environmental health services.
2. **The policy/activity area.** Ideally, our pathways would have covered a wide range of activities and constituted a representative sample of policy areas which are included under the label of LARS. With a selection of five pathways, the research project had to limit itself, however, to a selection of activities that are illustrative of the diversity of services rather than representative. To do this, we selected case studies that were likely at least to cover the three main areas of impact: social and health, economic, and environmental.
3. **The type of pathway.** There are in principle two ways of developing a pathway towards impacts and outcomes. A pathway could be designed by defining a specific activity or set of activities as the starting point and then exploring to what intended and unintended outcomes these lead. Alternatively, a pathway could be developed by working backwards from a specific outcome or impact towards the activities that contribute to it.

The final selection of case studies may be seen in Table 4.1 below.

Table 4.1: Final selection of case studies

Additional abbreviations: EH – environmental health; TS – trading standards

Policy area	Service	Local Authority	Type of pathway	Outcome
Tackling fly-tipping	EH	East Cambridgeshire District Council	Activity	Environment, social
Reducing harms from smoking	TS	Leicester City Council	Outcome	Health
Interventions to reduce alcohol-related harm	TS	Cambridgeshire County Council	Outcome	Health
Ensuring health and safety in the workplace	EH	London Borough of Islington	Activity	Health, economic
Fair trading	TS	Northamptonshire County Council	Activity	Economic

The following sections present the findings from the specific case studies. It is important to note that these rely to a large extent on the information gathered during the workshops, and that only some of the causal claims made in the case studies were substantiated by additional literature or document review after the workshops.

4.2 Implementing fly-tipping regulation in a rural district council

Fly-tipping is the illegal deposit of household or business waste on public land or private property. It ranges from a single black bin bag deposited along an urban road to a large pile of rubbish deposited on agricultural land, in a lay-by or a country lane.

Fly-tipping is mainly regulated by the Environmental Protection Act 1990 and the Clean Neighbourhoods and Environment Act 2005, as well as the Anti-Social Behaviour Act 2003. It is jointly enforced by the EA and local authorities, based on a protocol agreed between the EA and the Local Government Association:

1. The EA is responsible for investigating large-scale incidents of fly-tipping involving hazardous waste and incidents involving organised gangs of fly-tippers.
2. Local authorities' responsibility is to deal with small-scale fly-tipping and to tackle clear-up of fly-tipping on publicly owned land, including roads and lay-bys.

For rural areas, with large areas of agricultural land, fly-tipping is a particularly serious problem. RAND Europe therefore decided to conduct a workshop with East Cambridgeshire District Council to explore the impacts and outcomes of their activities in tackling fly-tipping. East Cambridgeshire District Council is a local authority in a rural part of Cambridgeshire with a population of around 77,000. The local authority employs about 200 staff, with around 19 staff working in regulatory services.

4.2.1 Key activities and their inputs

To address fly-tipping, East Cambridgeshire District Council conducts two sets of activities: first, reactive work once a fly-tipping incident has been reported; and, secondly, preventative education work within the community to dissuade future fly-tipping.

The reactive work is the core of the enforcement activities. The process usually starts with the reporting of a fly-tipping incident by local residents, the general public, parish councils or neighbourhood policing teams. It is registered at the council service centre and passed on to the environmental services department. A fly-tipping enforcement officer investigates the incident, usually by making a site visit first, to determine the type of fly-tipping. If there are large quantities of deposited rubbish, hazardous materials or an indication of criminal involvement ('Big, bad and nasty'), the case will be transferred to the EA. Normal cases of fly-tipping will be dealt with by the local authority. If the investigating officer can collect enough evidence on the scene or from witnesses, a prosecution is initiated. In every case the next step for the enforcement officer will be to notify the waste management contractor, who will remove the waste.

The proactive work is less prominent in the council's work, owing to resource constraints. It consists of education activities. A recent example is participation in an environmental action day organised in partnership with Cambridgeshire Fire and Rescue Service, Cambridgeshire Police, the Ely Neighbourhood Panel and the Ely Society.

To conduct these activities, the district council requires a number of inputs. These are first of all staff. With a newly recruited enforcement officer, the environmental services team will have around 2.5 full-time equivalents (FTE) devoted to fly-tipping activities. These staff will need to be adequately trained and skilled to do the job – skills constitute another vital input. In conducting their activities, enforcement officers need to be equipped with adequate powers to enforce and investigate cases. Those are derived from the three Acts mentioned above. Finally, the

council needs intelligence about the location of fly-tips, which is currently coming from several sources including members of the public, parish councils and council officials.

4.2.2 Outputs

These activities lead to a series of outputs produced by regulatory services. The reactive activities lead basically to two sets of output. First, there are outputs that result from the prosecution of fly-tipping cases. These are court rulings, cautions or fixed penalties issued by regulatory services. This element of enforcing fly-tipping in East Cambridgeshire is not fully developed yet; so far prosecutions have not been conducted. The other main output is the removal of waste deposited illegally. This is currently done by a contractor appointed by Recycling in Cambridgeshire and Peterborough (RECAP).

In terms of education activities, the major output described during the last year has been an environment action day organised by Cambridgeshire Fire and Rescue Service, in which regulatory services participated alongside Cambridgeshire Police, the neighbourhood panel and other East Cambridgeshire District Council services.

4.2.3 The outcomes of enforcing fly-tipping regulation

East Cambridgeshire District Council's efforts to tackle fly-tipping may lead to a number of outcomes and impacts, along **three main causal chains**:

1. The current main activity of the regulatory service is to initiate the **removal of fly-tipped waste**, which has indirect and direct consequences for the local community. There are clear direct benefits in removing the waste, including a generally cleaner environment, less pollution, fewer obstructions to rights of way and less damage to agricultural land. Indirectly, the timely removal of waste also contributes to preventing the future illegal deposit of waste.
2. **Education activities** are the second set of activities conducted by the regulatory services. Those are ad hoc in nature, including, for example, environment action days. The thrust of the education activities is to prevent fly-tipping by informing the public about its illegal nature and the potential hazards for residents and the environment. This should reduce the number of fly-tipping incidents.
3. The third causal chain evolves from the **prosecution of fly-tippers**. If there is sufficient evidence on site, the regulatory service can initiate a prosecution which could result in a number of outcomes such as cautions, fixed penalties and court-sanctioned sentences. Two outcomes are central. Prosecution allows the local authority to recover the removal costs from the offenders. If pursued actively, cases in which offenders have been punished or have had to pay substantial amounts could be communicated to the wider public to create publicity and act as a deterrent. Prosecuting offenders would thus result in a reduction in costs for local authorities through the recovery of some of the clean-up costs. In addition the prosecution should lead to a reduction of fly-tipping over time.

All three causal chains contribute to wider impacts on the community. These mainly result from a cleaner environment. An environment free of rubbish and litter is often one of the most visible signs of local authority activity. Conversely, an environment full of litter is often perceived as a sign of a badly performing local authority, as well as of social deprivation. Thus a cleaner environment is likely to affect a number of aspects of the quality of a local community, including:

- pride in the local area

- community cohesion
- attractiveness for consumers and tourists
- house prices.

These will be reflected, for example, in place surveys and business satisfaction surveys. In addition to these community impacts, activities to enforce fly-tipping regulation may have a positive impact on the budget of local authorities and thereby reduce costs to taxpayers.

4.2.4 The pathway

Based on the workshop and additional review of documents, the pathway represented in Figure 4.2 could be developed.

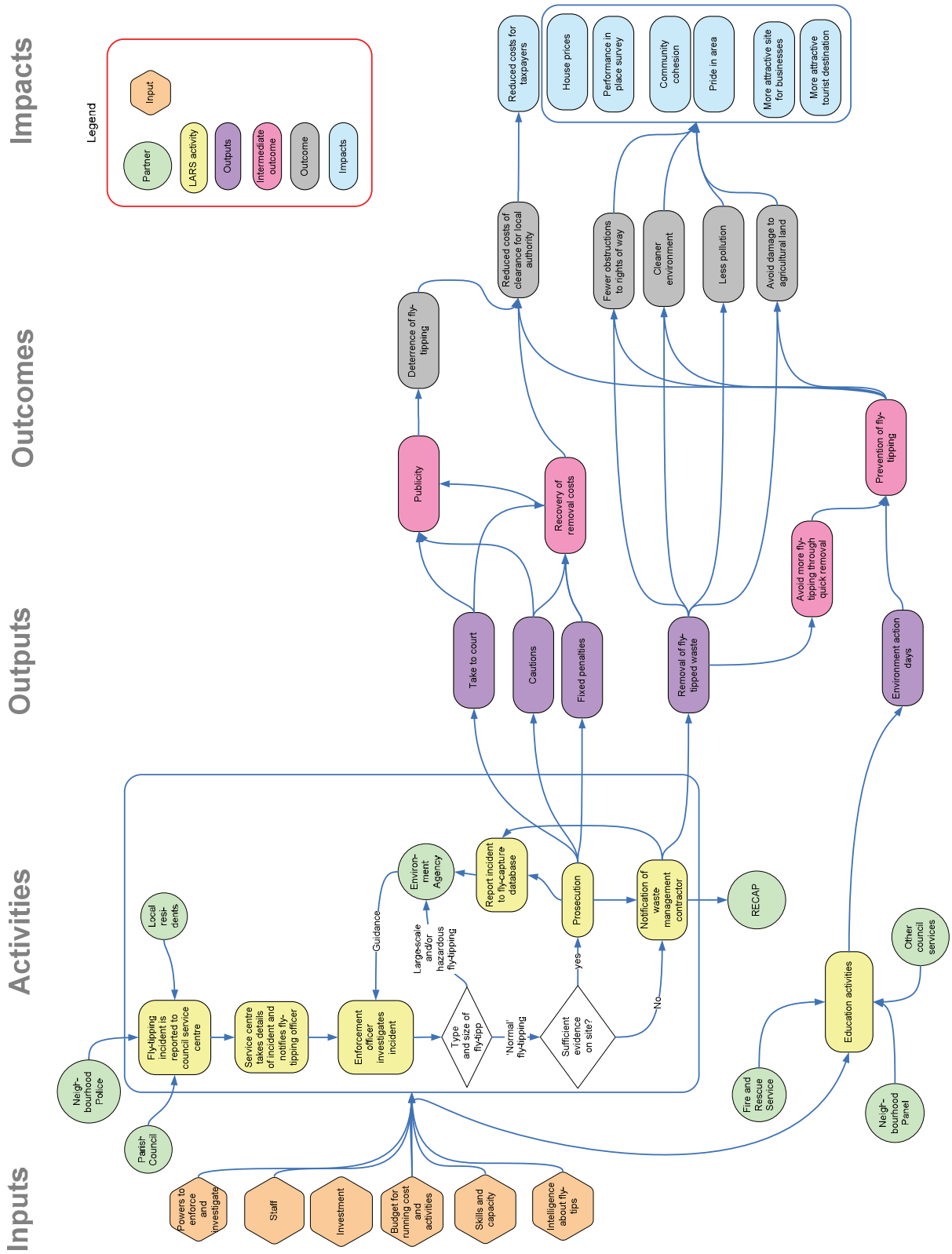


Figure 4.2: Fly-tipping pathway

4.2.5 Identifying indicators and developing a dashboard

After establishing the pathway and intervention logic for dealing with fly-tipping, the next step is to identify indicators that can be used to measure the key elements of the pathway in an impact and outcome dashboard.

In terms of **inputs**, East Cambridgeshire currently has information available on staffing levels as well as on running costs and investments, such as for a CCTV camera to monitor fly-tipping hot-spots, and the budget for education activities. The costs are currently not broken down for fly-tipping activities specifically, but cover all waste collection, recycling and street-cleansing activities. Intelligence about fly-tips is mainly provided through reports to council services by local residents, parish councils and council employees. The number of cases reported is available, and is currently being measured. Other inputs – in particular skills and capacity, and the powers to investigate – are not easily quantifiable, but qualitative information about them is available at the local level. These inputs are relatively generic and feed into all causal chains identified earlier. The selection of indicators for the dashboard is thus relatively straightforward, even though there may be difficulties in attributing these costs precisely to fly-tipping related activities:

1. staff (FTE or in £)
2. running costs (in £)
3. capital costs (in £).

There is a range of information on **outputs** currently available to the service, including the number of fly-tips removed, the number of prosecutions undertaken and the type of sanction applied. This is part of the data reported to the fly-capture database and forms part of the data collected for NI 196 on fly-tipping. There is currently, however, no quantitative measurement of educational activities. If we consider the three causal chains again, data cover only the first and the third chain:

> **Chain 1.** Number of fly-tips reported and removed (fly-capture database).
>
> **Chain 2.** There is no quantitative indicator of the key outputs. For this purpose, the service could develop a new measure such as an assessment of people reached through educational activities (e.g. participants in an environment action day) to enable them to compare the level of outreach activities across different years.
>
> **Chain 3.** Number of prosecutions and type of enforcement action taken (fly-capture database).

The immediate **outcomes** resulting from LARS activities are measured to a differing degree. The fly-capture database contains data on recovered funds, the costs of removing fly-tips and the time taken to remove a fly-tip. There are, however, no specific measurements for direct environmental impacts, or for the deterrence and prevention of fly-tipping. There is thus a lack of some key data along the causal chains:

> **Chain 1.** There are no systematic data available on the direct environmental impacts of fly-tipping. This is unproblematic in this case as the causal relationship is very clear. If no rubbish is dumped it cannot pollute the environment, block rights of way or damage agricultural land. The second claim made in this causal chain is that a quick removal has a preventative effect. Thus monitoring the time between reporting

of a fly-tip and its removal is essential. Fortunately, this information is already collected by the service.

Chain 2. To substantiate the claim that education activities lead to prevention of fly-tipping, an understanding of whether the education activities reach the targeted groups is needed. As there are currently no measures for this, the service could consider surveying the target population of their education activities and, for example, testing whether there are changes in the perception of fly-tipping. A question that could be asked in a resident survey could be whether fly-tipping is considered 'not a big deal'; 'bad for the environment', and so on.

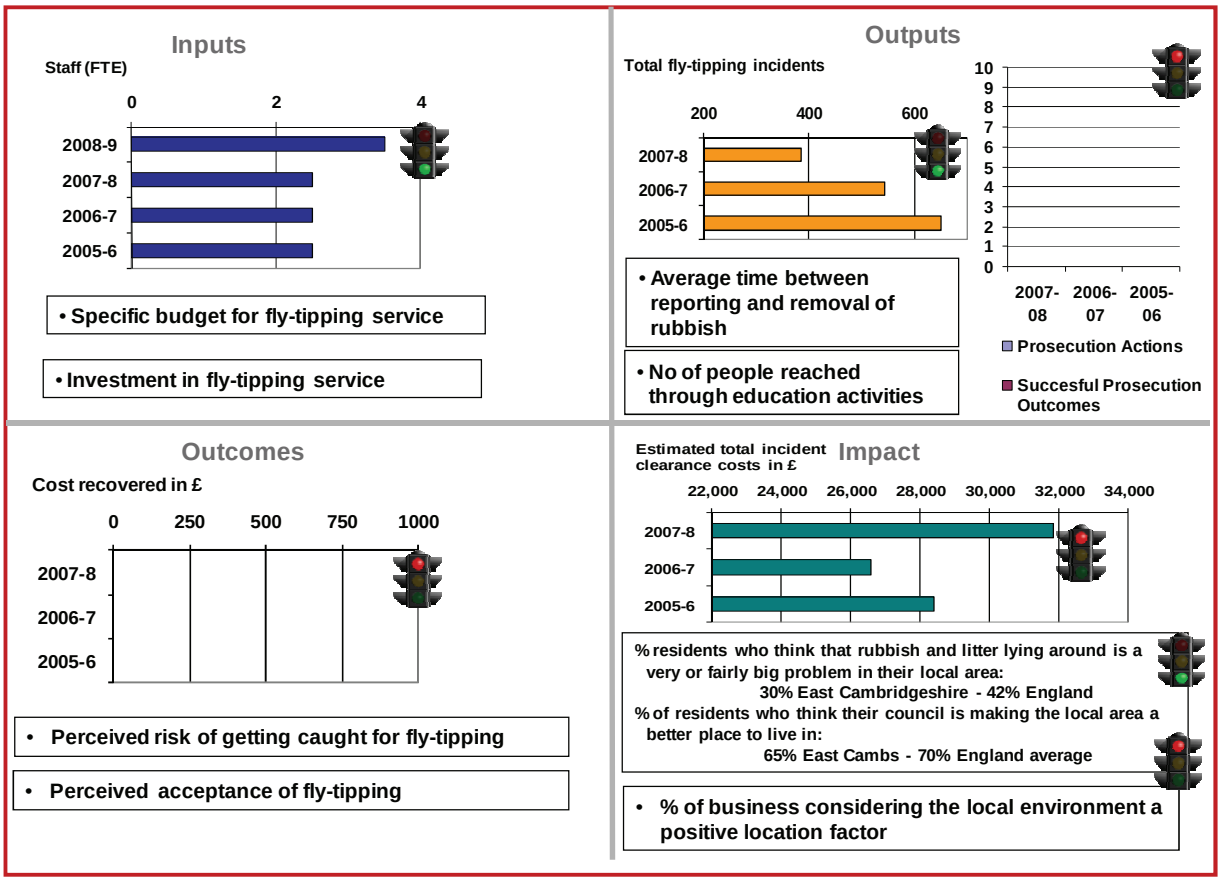
Chain 3. Finally, it is claimed that prosecution activities will deter future fly-tipping as well as recover costs. Recovered costs are included in the fly-capture database and are easily accessible to the service. There is, however, no measure of deterrence. As this is an essential element of the causal chain, the service should consider measuring this effect. A necessary precursor to that would be publicity about legal sanctions. Survey questions such as 'Do you consider the risk of getting caught for fly tipping as high?' could be put.

These (additional) indicators should allow the causal chains from outputs to outcomes to be followed. In terms of the wider, long-term impacts, the causal chains merge as they achieve final impacts either through the reduction of illegal waste disposal or through saving money.

In **terms of impacts**, there are currently not many specific measurements. Several questions in the place survey attempt to measure the perception of environmental cleanliness (e.g. level of satisfaction with cleanliness, views on fly-tipping), and community cohesion. Savings to the taxpayer may be presented through reduced clearance costs as well as the amount of money recovered following prosecutions. In terms of the business and tourism impacts claimed, a survey tool could help to assess whether, for example, environmental quality influenced the destination decision of tourists, or the location decision of businesses. For this dashboard we decided to include the following indicators:

1. Total incident clearance costs (fly-capture database).
2. Percentage of residents who think that rubbish and litter lying around is a very or fairly big problem in their local area (resident survey).
3. Percentage of residents who think their council is making the local area a better place to live in (resident survey).
4. Percentage of business who consider the local environment a positive location factor.

A summary of these indicators, together with time-series data over the last available three-year period, may be found in a dashboard form in Figure 4.3 below. The traffic lights indicate whether the evidence available supports that impacts are made though the claimed causal chains or not. It can be safely assumed, for example, that the deterrence effect is currently very limited because no prosecutions are conducted.



SOURCES: Place survey 2008, documentation from East Cambridgeshire District Council

Figure 4.3: Dashboard for fly-tipping activities in East Cambridgeshire District Council

4.3 Reducing harm from smoking in Leicester

The 'Choosing Health: Making Healthy Choices Easier' report (Department of Health 2004) highlights the importance of reducing smoking prevalence and exposure to cigarette smoke because of their negative health consequences. Smoking causes a wide range of illnesses, including cancer and cardiovascular and respiratory diseases. Additionally, research shows that the incidence of miscarriages, reduced birth weight and perinatal death increases significantly when mothers smoke during pregnancy.

Overall smoking is the greatest single preventable cause of illness and death. In England alone, deaths estimated to be caused by smoking were around 83,700 in 2007 (18% of all deaths of adults aged 35 and over (Office for National Statistics, 2009)[18]. In 2007, 21% of the population of Great Britain aged 16 and over smoke, 22% of men and 20% of women. Furthermore,

[18] Office of National Statistics (2009). Statistics on Smoking England, 2009. Available at: http://www.ic.nhs.uk/webfiles/publications/smoking09/Statistics_on_smoking_England_2009.pdf (accessed October 2009).

important socio-economic differences exist in the prevalence of cigarette smoking, with higher rates among people in manual work than among those in non-manual professions: 25% compared to 16%. Furthermore, around a third of pupils have tried to smoke at least once, and 6% of pupils do smoke regularly (Office for National Statistics, 2009). Costs to the NHS of treating illness and disease associated with smoking were estimated at £5.2 billion a year in 2005/06, approximately 5.5% of the total health care costs[19].

Smoking in public places is regulated by the Health Act 2006. The Act bans smoking in all working premises and public premises that are enclosed or 'substantially' enclosed. This definition includes vehicles used for work purposes such as taxis and vans used in the construction industry. In all cases, the person in charge of the management of smoke-free premises or vehicles needs to make sure that no-smoking signs are displayed in accordance with the established legislation.[20]

In Leicester smoking prevalence is slightly lower than the average rate in England. In fact, 23 per cent of the respondents to the Leicester Lifestyle Survey (2002) said they smoked, compared to a national average of 26 per cent. People aged between 35 and 44 years old as well as people in younger age groups showed the highest smoking prevalence, above the Leicester average. Overall, the highest prevalence of smoking was found amongst the following groups: white men, people with lower levels of education, and those who described themselves as having bad health. This shows that there are socio-economic characteristics that seem to influence smoking prevalence. People above 55 years old were less likely to smoke than the average and smoking seemed to decline increasingly with age. The same survey also found that more than half of smokers wanted to quit. This was the case amongst those smokers aged less than 45 years old in particular.

4.3.1 Key activities and their inputs

The mission of LARS with regard to smoking is to protect the public by regulating and advising premises, allocating licences and enforcing laws. To do that, working processes in LARS may be split in various stages: data collection and analysis followed by enforcement and education. Although these activities often follow a sequential order, this may not always be the case. In fact, the sources of data very often include information about previous education and enforcement actions. For reasons of simplicity we distinguish between the stages described in the following sections.

Data collection and analysis activities

Local authorities spend a significant amount of time collecting, collating and sharing **intelligence data**. These data are often collected and collated by the local authority itself. They typically include information on inspections, visits or audits; and information originating from initiatives, projects or special investigations. At the same time, related intelligence data on smoking prevalence, smoking behaviour and other related smoking statistics are also available through partnerships with other services of the locality such as the fire brigade, the police, the health sector, social care professionals and local community actors. On other occasions, data are shared between local authorities and national regulators or other national bodies such as HM Revenue and Customs. Collection of data is an activity, whereas the **data** themselves are an important

[19] http://www.tobacco.org/news/290442.html

[20] http://www.opsi.gov.uk/acts/acts2006/ukpga_20060028_en_2#pt1-ch1-pb2-l1g2

input to the activities of regulatory authorities in tackling smoking. They may include research laboratory results and also statistics on complaints from the public. Public bodies offer information desks and channels of communication such as the web, the phone and physical facilities to respond to residents' enquiries and offer various forms of support. These communication channels are not only important support services, but also important sources of information. Following the path of data collection, data are monitored and analysed. For this activity local authorities require the appropriate **infrastructure** – buildings, equipment and people. Infrastructure includes office equipment, computer and communications equipment, and other types of technology. **Staff** need to be trained and to have the skills, competencies and analytical capacities their work requires. Altogether staff, skills and infrastructure form the basis of the data collected, stored and analysed by local authorities, who carry out their statutory activities.

Risk assessment has a key role to play at all stages of the regulatory process. Typically, the local authority will use risk assessments or risk ratings to prioritise its work, in particular in relation to inspections. This element also contributes to the general move towards a better regulation agenda in which local authorities and national regulators seek to minimise the burden they place on compliant businesses and direct their resources to best effect towards businesses they suspect may be in breach of legislation (or know to be non-compliant from previous inspections). In the case of smoking, local authorities may prioritise those businesses that have previously been caught selling tobacco products to young people under the age of 16, for example.

Following guidance from the BIS, regulators aim to adopt a precautionary principle to minimise the regulatory burden they place on third parties. This includes keeping three criteria in mind: 'that there must be a credible threat (which needs to be described and clarified); that scientific certainty is not required (but the appropriate level of scientific proof needs to be determined); and that measures taken must be cost-effective (which requires the validity of any cost-benefit analysis to be tested critically)' (BIS 2009a).

Education and awareness activities

With appropriate intelligence data and analytical support, regulatory services can carry out **education and awareness activities**, which are different depending on whether the target is the demand or the supply side of the smoking market. On the demand side, local authorities work together with other organisations using a variety of different marketing and communication strategies to inform the population about the adverse effects of smoking, including those on health and those on the environment caused by fire and littering. For example, local authorities often create media opportunities to promote smoke-free environments, collaborating and supporting national media campaigns and so on. In addition to general public campaigns, strategies addressing the demand for cigarettes target particularly people at high risk such as those under the age of 16, pregnant women, and people on low earnings and in low-skilled employment.

On the supply side, local authorities in conjunction with partner organisations such as Business Link and the local Chamber of Commerce work to increase general awareness and provide advice about existing (and often new) regulation of smoking.

Enforcement activities

To reduce smoking, regulatory authorities act on several enforcement fronts:

- **Enforcing marketing and sales legislation.** Tobacco lobbyists claim that advertising only increases the market share of a particular brand, without recruiting new smokers. However, tobacco control activists assert that tobacco advertising stimulates tobacco sales (and thus encourages smoking behaviour). Several evaluation studies confirm this position, reporting decreases of up to 9 per cent in smoking prevalence as a consequence of banning tobacco advertising (Willemsen and de Blij 2009). Because of the negative consequences of tobacco advertising, local regulatory authorities have the duty to ensure that current restrictions (e.g. regarding advertising, labelling, free gifts) and new regulations on tobacco (e.g. internet advertising, brand-sharing) are enforced.
- **Enforcing underage legislation.** Under British law, it is prohibited to sell certain products, such as tobacco, to persons under a certain age. Furthermore, retail premises are under the obligation to put a warning notice in a prominent position to make that message visible to anyone purchasing cigarettes. Appropriate warnings also need to be displayed on vending machines.
- **Enforcing smoke-free legislation.** LARS also ensure workplaces and enclosed public places in England comply with smoke-free legislation.
- **Dealing with counterfeit tobacco.** This is a task typically performed by trading standards within local authorities. Counterfeit tobacco is a widely available substitute for genuine tobacco products. It tends to be found in shops located in more disadvantaged areas and in car-boot sales, amongst other places. Control of it not only contributes to better health outcomes,[21] but also to a fairer and more competitive market.
- **Tackling smoking-related litter.** Smoking-related litter is detrimental to local areas as it degrades the amenities and general environment. In addition, smoking litter can be dangerous: burning cigarettes can cause bin fires (and potentially more extended fires and human deaths).

4.3.2 Outputs

Regulatory authorities aim to carry out their activities in a practical, equitable, consistent and constructive way whilst having a positive impact. Enforcement authorities, including Leicester City Council, recognise that as a principle businesses want to comply with the law. They therefore follow 'soft' approaches that minimise the regulatory burden on businesses. These approaches may produce different outputs. Education and awareness activities include outputs such as routine and targeted visits by LARS to business premises in order to raise awareness and provide advice, and campaigns and leaflets aimed at the target population. Outputs derived from enforcement activities include inspections, reports of investigations, test purchasing, informal warnings, formal statutory letters, formal legal cautions, and so on.

For critical breaches of legislation, LARS follow the prosecution pathway, with outputs ranging from fixed administrative penalties to court rulings, revocation of licence, prison sentences, and so on.

[21] If cheap cigarettes were not available to under-18s, for instance, we can envisage that the price of genuine tobacco products would be an incentive for young people not to smoke. In addition, counterfeit tobacco products may contain additional hazardous substances and have greater health consequences than tobacco itself.

4.3.3 The outcomes of enforcing smoking regulation (causal chain)

Outcomes are medium- to long-term effects derived from the activities carried out by local authorities alone, or in collaboration with other public and private organisations. In the case of smoking, we identified a number of outcomes and impacts to which Leicester City Council contributes. We have described these along a set of two key causal chains as described below: Education, awareness and enforcement activities include 'soft' measures of enforcement such as advice and caution letters.

Chain 1: education and awareness activities are conducted by local authorities, mostly in coordination with other public and private organisations. The thrust of these activities is to increase awareness of the negative consequences of smoking by informing the public about the health and environmental consequences and dangers. Higher rates of awareness may lead to changes in behaviour with lower prevalence of smoking and fewer younger people starting to smoke. If the causal chain follows, a lower prevalence of smoking will improve health outcomes and consequently will reduce healthcare costs and social inequalities, and contribute to increased life expectancy for those who quit smoking.

Chain 2: enforcement activities are conducted by local authorities when businesses are found not to be compliant with legislation. These measures may include 'soft' instruments like business advice or caution letters, or sanctions such as administrative penalties, licence revocation or prison sentences. Depending on the area of activity performed by the regulatory authority, the following subcausal chain components have been identified within the wider enforcement causal chain:

- With **marketing and sales enforcement**, local authorities aim to prevent the illegal advertising and promotion of tobacco products, which if enforced reduces smoking prevalence rates and dissuades people from starting to smoke. The impacts are straightforward: improvement in health outcomes and consequently a reduction in health costs and social inequalities, and an increase in life expectancy for those smokers who quit.
- **Enforcing underage legislation** aims to reduce the availability of tobacco products to young people, helping them to avoid an early start in smoking and thereby contributing to better health outcomes.
- **Ensuring compliance with smoke-free legislation** intends to change the behaviour of smokers, and also to improve the environment of businesses, thereby reducing exposure to harmful smoke. Again, the direct impact of these activities is lower prevalence rates and improved outcomes.
- By **dealing with counterfeit tobacco** authorities expect to reduce the supply of cheap cigarettes, with the purpose of reducing smoking prevalence, dissuading potential new smokers from starting, and so contributing to better health outcomes. However, the main purpose of dealing with counterfeit tobacco is to contribute to a fairer and more competitive market, in which businesses compete in the same conditions.
- By **tackling smoking-related litter**, regulatory authorities intend to reduce the illegal disposal of cigarette butts and consequently prevent bin fires and reduce smoking-related litter. At the same time, the prevention of bin fires implies

generally a reduced number of fires, preventing negative health outcomes and potentially saving lives, and also protecting valuable material property (including land). Reducing the illegal disposal of cigarette butts also supposes a decrease in cleaning costs and hence a more efficient use of council resources that can be redirected elsewhere.

4.3.4 **The pathway**

Based on the workshop and additional review of documents, the pathway represented in Figure 4.4 could be developed.

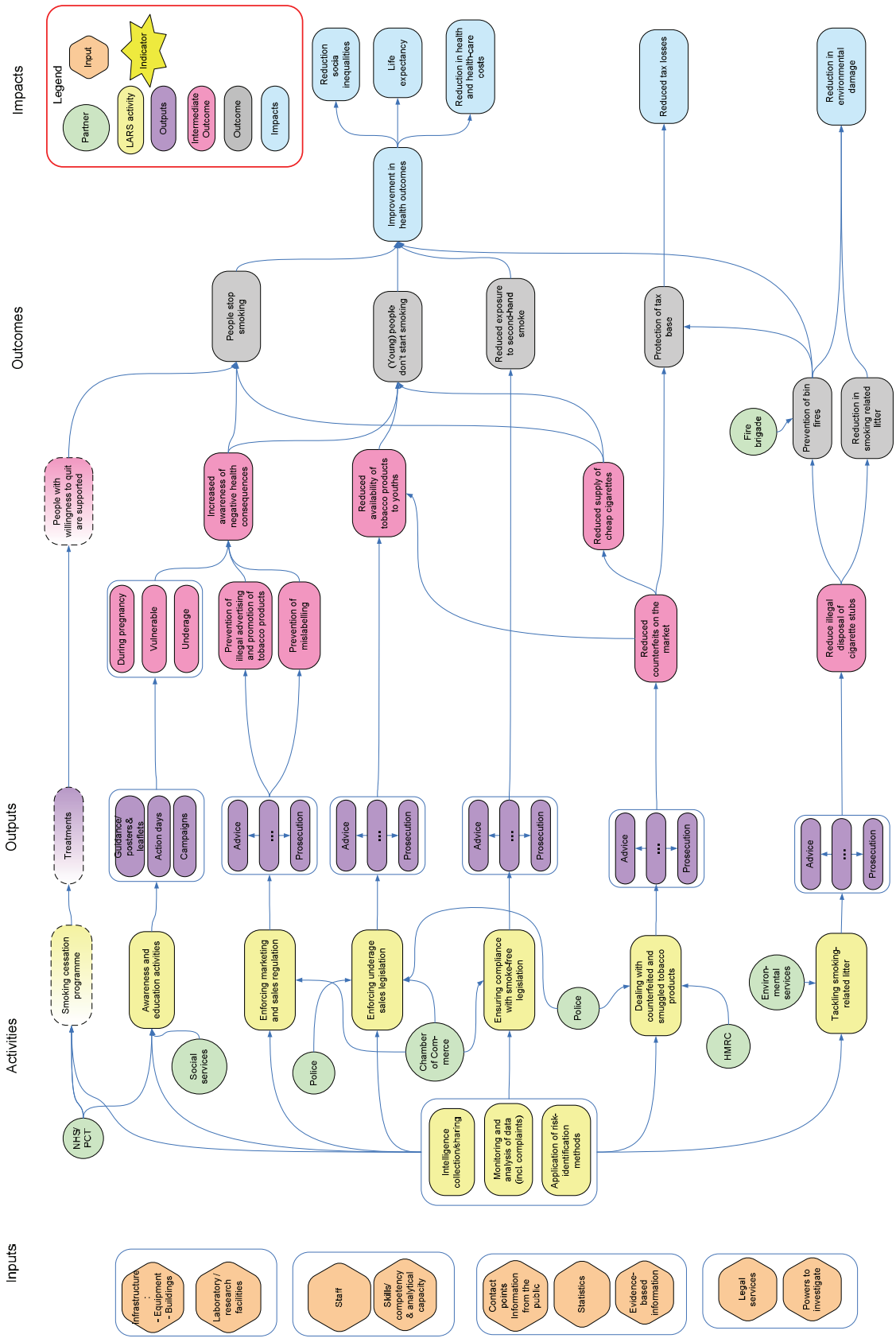


Figure 4.4: Smoking pathway

4.3.5 Identifying indicators and developing a dashboard

After establishing the pathway and intervention logic for smoking, the next step is to identify indicators that can be used to measure the key elements of the pathway in an impact and outcome dashboard.

In terms of **inputs**, we would envisage that Leicester City Council has information available on staffing levels, training and level of experience of staff, as well as on budget allocation for the environmental health team overall (if no specific information is available for the activities the team carried out with regard to smoking in particular). This budget information is likely to include salary costs, running expenses and other departmental overheads.

The council's work in relation to smoking is very varied and, as previously identified, may be clustered into two main groups of activity or causal chains:

Chain 1: education and awareness activities

Chain 2: enforcement activities.

The main inputs for chain 1 have been mentioned (staff, staff experience, budget, etc.) and will also include information obtained from partner agencies in order to target education and awareness activities at certain at-risk groups, for instance (e.g. the team might rely on information from the PCT to gain intelligence about which groups within the population are most likely to start smoking). The inputs for chain 2 are largely centred on intelligence gathered by the council. As previously mentioned, this intelligence will be made up of various sources and types of information including complaints from the general public about non-compliant premises (e.g. someone reports a business they have witnessed selling tobacco products to under-18s), risk rating of premises (based on complaints from the public, intelligence from partner agencies and experience of dealings with a business, as well as other criteria such as type of business), and information and statistics from partner agencies about premises and the population in a given area.

Thus the selection of indicators for the dashboard at this point is relatively straightforward and could be as follows:

1. staff (FTE or in £)
2. running expenses (in £)
3. departmental overheads
4. staff training and years of experience
5. number of complaints from the general public and partner organisations about non-compliant premises.

There is a range of **output** information that is currently available to the local authority to assess its activities in relation to smoking. These could include the number of inspections or visits to businesses for potential breaches of smoke-free legislation or for selling tobacco products to under-18s, the number of education and awareness activities and the number of people attending these activities, and the proportion of successful test purchases in relation to the overall number of test purchases and the number of prosecutions for breaches in smoke-free regulation and

underage selling of tobacco products. These outputs would be split between the two causal chains as follows:

> **Chain 1:** number of education and awareness activities and the number of people attending these activities, and so on.
>
> **Chain 2:** number of inspections or visits to businesses for potential breaches of the smoke-free legislation or for selling tobacco products to under-18s; proportion of successful test purchases in relation to the overall number of test purchases, the number of prosecutions for breaches of smoke-free regulation and underage selling of tobacco products, and so on.

The immediate **outcomes** resulting from these inputs and outputs are measured to different degrees. These are classified below into health outcomes and other outcomes, and are accompanied by suggested relevant indicators:

Health outcomes:

1. Reduction in the number of people smoking / increase in the number of people accessing smoking-cessation services; NI 123, 16+ current smoking rate prevalence / PSA 18.
2. Reduction in levels of second-hand smoke exposure – measures of cotinine concentrations[22] in non-smokers; number of businesses non-compliant with the smoke-free ban.[23]

Other outcomes:

3. Reduction in illegal advertising and promotion of tobacco products – number of businesses non-compliant with legislation regarding the promotion and advertising of tobacco products.
4. Decrease in the availability of tobacco products to under-18s – number of successful test purchases in relation to the overall number of test purchases carried out.
5. Reduction in the supply of counterfeit tobacco products – number of counterfeit tobacco products offences.
6. Reduction in the number of bin fires caused by tobacco products such as cigarette butts – number of bin fires.
7. Reduction in smoking-related litter – number of tobacco-related littering offences.

In terms of **impacts**, we have identified the following as resulting from the two causal chains previously described and have indicated potential indicators for each:

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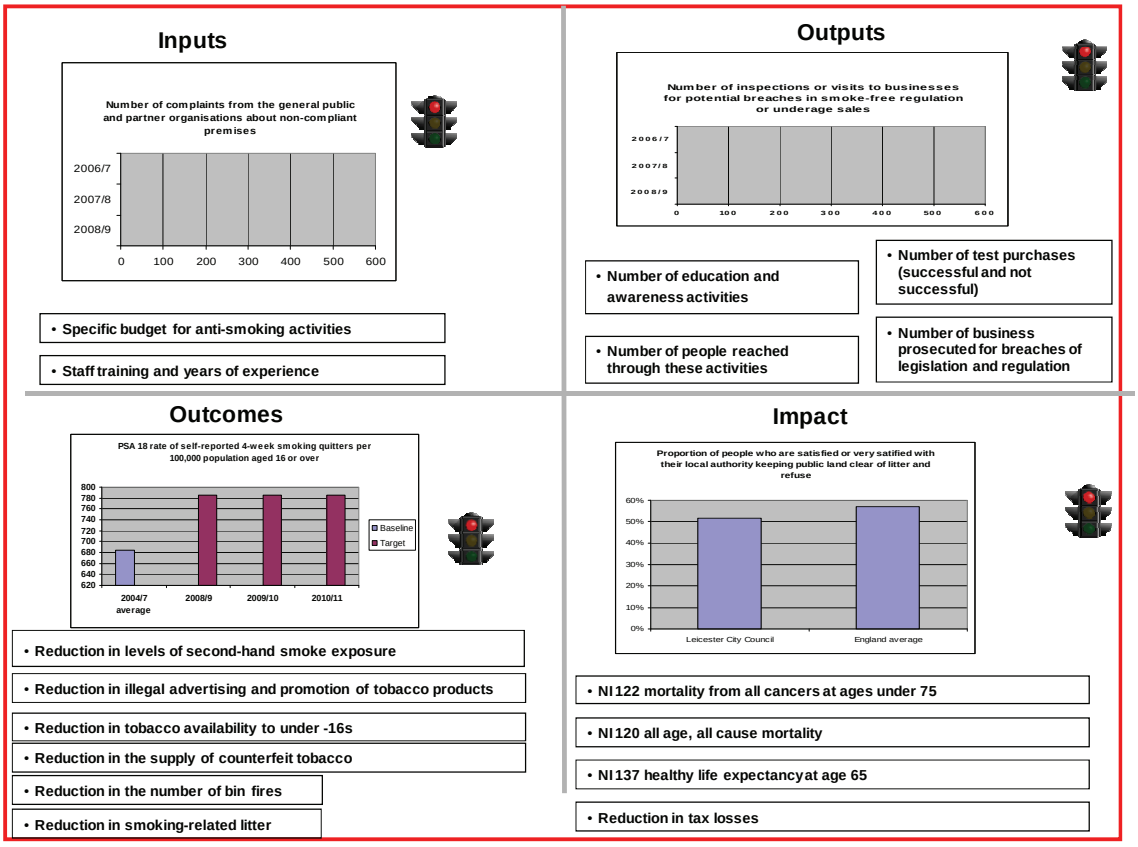
[22] Cotinine has an *in vivo* half-life of approximately 20 hours, and is typically detectable for up to one week after the use of tobacco. The level of cotinine in the blood is proportionate to the amount of exposure to tobacco smoke, so it is a valuable indicator of tobacco smoke exposure, including secondary (passive) smoke (Source: Wikipedia 2009: http://en.wikipedia.org/wiki/Cotinine; last accessed July 2009).

[23] This measure is suggested rather than the number of businesses compliant with the smoke-free ban because it is possible that the local authority will not have the exact number of businesses to which the smoke-free legislation applies within the area it covers.

1. **Improved health outcomes** including a reduction in social inequalities, an improvement in life expectancy and a reduction in health and healthcare costs that result from tobacco smoking – NI 123, 16+ current smoking rate prevalence / PSA 18; NI 122, Mortality from all cancers at ages under 75; NI 120, All age, all cause mortality rate; NI 137, Healthy life expectancy at age 65.
2. **Improved environment** – residents' satisfaction with the local authority keeping public land clear of litter and refuse (place survey).
3. **Reduction in tax losses** through preventing counterfeit products and litter – number of penalties issued for tobacco-related litter (money recouped by the council), value of counterfeit products seized.

A summary of these indicators may be found in a dashboard in Figure 4.5 below. The traffic lights indicate whether the available evidence supports that impacts are made through the claimed causal chains or not. However, as may be seen, there was limited data publicly available about the different parts of the causal chain, with a notable exception for outcome and impact measures. Therefore, the traffic lights are only illustrative and do not indicate a judgement on Leicester City Council's current performance in this regulatory area. We would envisage that local authorities would hold most of the data mentioned for the input and output component of the chain and that they therefore would be able to populate it themselves without much need for added data collection.



SOURCES: Leicester Local Area Agreement Framework 2008–11. and Place survey 2008

Figure 4.5: Dashboard for anti-smoking activities undertaken by Leicester City Council

4.4 Interventions to reduce alcohol-related harm in Cambridgeshire

According to a NHS Information Centre report published in May 2008, alcohol-related NHS hospital admissions more than doubled from 93,500 in 1995/6 to approximately 207,800 admissions in 2006/7. Of the total admissions, 57,100 were specifically related to alcohol, such as liver disease. Alcohol was also the cause of 6,500 deaths in 2006. Equally alarming has been the increase in the number of pupils who admit having started consuming alcohol and the increase in the units of alcohol consumed (NHS Information Centre 2008).

Drinking alcohol above reasonable consumption patterns has consequences for health outcomes and also affects the burden on the NHS. The estimated cost of dealing with alcohol-related sicknesses and admissions is from £1.7 billion to £3 billion each year.[24, 25]

Furthermore, consumption of alcohol often results in higher rates of violence and crime. For example, reports show that 46 per cent of victims of violence and crime believed the offender was under the influence of alcohol at the time of the offence. Fifty-nine per cent of victims who were wounded believed the offender was under its influence, and 47 per cent of victims who were assaulted with minor injuries thought the offender was under its influence (NHS Information Centre 2008). Thirty-two per cent of incidents of intimate partner violence were committed when the perpetrator was under the influence of alcohol (Home Office, 2004a). The annual cost of alcohol-related crime and public disorder has been estimated at £7.3 billion.[26]

Furthermore, alcohol has significant negative consequences for the overall economy: the total cost of absenteeism (including employer costs) due to alcohol misuse in England was estimated at £1.8 billion in 2001 (Cabinet Office and Strategy Unit 2003). The cost to employers has been put at £6.4 billion.

The figures moved the government to publish the Alcohol Reduction Strategy for England in 2004 and a renewed strategy in 2007 entitled 'Safe, Sensible, Social: Next Steps in the National Alcohol Strategy'. These publications included the following aim:

> to best minimise the health harms, violence and anti-social behaviour associated with alcohol, while ensuring that people are able to enjoy alcohol safely and responsibly[27]

Cambridgeshire County Council has been significantly successful in reducing alcohol-related negative consequences. It won Beacon status for 'Cutting Red Tape: Delivering Real Economic and Social Benefit through Better Regulation'.[28]

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[24] BBC (March 2004), Alcohol puts Huge Pressure on NHS, online, available at: http://news.bbc.co.uk/2/hi/health/3537257.stm (accessed June 2009)

[25] Telegraph (June 2009), £3 Billion Cost of Alcohol to NHS every Year, online, available at: http://www.telegraph.co.uk/health/healthnews/5561217/3bn-cost-of-alcohol-to-NHS-every-year.html (accessed July 2009)

[26] BBC (March 2004), 'Alcohol puts Huge Pressure on NHS'. online, available at: http://news.bbc.co.uk/2/hi/health/3537257.stm (accessed June 2009)

[27] Cambridgeshire Alcohol Strategy 2008–2011, online, available at: http://www.huntsdc.gov.uk/NR/rdonlyres/B79922AB-E732-4F15-AC16-8A313D30CF4A/0/cambridgeshire_alcohol_strategy_2008__2011_final1.pdf (accessed June 2009)

[28] IDeA/LBRO, Cutting red tape: delivering real economic and social benefit through better regulation. Beacon Scheme, online, available at: http://www.beacons.idea.gov.uk/idk/aio/10847491 (accessed July 2009).

4.4.1 Key activities and their inputs

To address alcohol-related harm, Cambridgeshire County Council conducts five main types of activity. The first is common to the others and consists of procedures related to collecting, collating and sharing information with partner organisations, especially the local community, the NHS and the police. These partnerships have been set up to share tasks (and therefore resources), including tasks related to data collection and analysis. The remaining four broad areas of activity are the following:

- **Awareness and education activities.** To change alcohol consumption patterns, it is first crucial to understand what sectors of the population are most at risk. Statistics reveal that young people are the most vulnerable to unsafe and anti-social drinking patterns, whether as victims of violence and crime from others such as relatives and friends or as consumers of alcohol themselves. One important element of an alcohol-reduction strategy is to set up campaigns in collaboration with schools to educate and inform children about how risk-taking alcohol consumption can be avoided.
- **Referral to and coordination with health and social services.** Cambridgeshire employs significant resources on preventative measures, such as educating young people and parents about abusing alcohol. An equally important approach to reducing negative alcohol-related consequences is actively providing help and advice to those in need of assistance owing to an existing alcohol-related problem. These types of intervention include referring people who need treatments or social support to the relevant health and social care services. Identification of people at risk can be achieved through collaboration with NHS services, by identifying hot-spots together with the police and community services, and so on.
- **Provide business advice.** LARS inform businesses not only about potential new pieces of legislation, but also about how to implement and better comply with alcohol regulation. They also inform businesses about the risks of alcohol consumption. Advice includes how best businesses, regulatory services and other partnerships can work together to tackle the adverse impacts of a night-time economy.
- **Enforce underage legislation.** It is illegal for age-restricted goods to be sold to those who are below the specified age limit. A trader can be prosecuted for making an illegal sale. Ignoring the risks of underage alcohol sales does not only affect the health of the community but also the quality of life of those affected. For Cambridgeshire and the majority of councils in England, reducing alcohol-related anti-social behaviour among youths is a priority. To stamp out illegal sales and reduce youth disorder, Cambridgeshire provides advice to businesses. The authority also coordinates and balances the prevention of disturbance (including underage alcohol sales) in neighbourhoods where temporary sports or cultural events are taking place.

To conduct these activities, the council requires a number of inputs. These include first of all staff, who need to be adequately trained and skilled, and appropriate infrastructure – including buildings, laboratory and research facilities and equipment. The council also needs intelligence data on unsafe and anti-social alcohol consumption. These stems from many different sources (depending on the partnership agreement) and includes the police, schools, PCTs and retailers, and members of the public and council officials. Enforcement officers need to be equipped with

adequate powers to enforce and investigate cases. Together the inputs mentioned form the basis of local authorities' statutory activities.

4.4.2 Outputs

These activities lead to a series of intermediate and final outputs. First, there are outputs from data collection such as reports. Secondly, in terms of education and awareness, local authorities produce a variety of outputs. For example, the trading standards services (TSS), in collaboration with the police, arrange school visits to inform students about the consequences of buying and consuming alcohol. Often staff from licensed premises are also present during school visits. Other outputs include awareness workshops, posters, leaflets and information campaigns. Business advice can take many forms, including visits to premises and distribution of information packs about the dangers of underage selling and tips about what to do to reduce it. Thirdly, inspections and test purchasing are conducted. The latter consist of sending minors into shops to see whether they are sold alcohol. Finally, outputs in cases of underage sales of alcohol may be court rulings, formal caution letters, fixed penalties issued by regulatory services, fines or revocation of licences.

4.4.3 The outcomes of enforcing alcohol regulation

Cambridgeshire County Council's efforts to tackle unsafe consumption and illegal sales of alcohol may lead to a number of outcomes and impacts, along four main causal chains:

> **Chain 1.** The current main activity of the regulatory service is to carry out and coordinate **awareness and education activities** targeted at young people, parents and the general population. Clear benefits are gained from alerting the population about the consequences of alcohol and educating them on how to drink safely and responsibly. By doing so, it is hoped that alcohol consumption can be reduced and dangerous drinking patterns changed – especially among underage people and young people between 18 and 24, who are legally allowed to drink but statistically the most significant group of binge drinkers – thereby reducing adolescent pregnancies, accidents caused by drunk driving and hospital admissions due to alcohol consumption,. A publication by the Home Office reports that the number of people in the UK that binge-drink at the ages of 18–24 is around 50 per cent among males and a third among females.[29] Changes in behaviour, whether reduced average consumption, less dangerous drinking patterns or both, have very significant consequences for health outcomes. For example, by decreasing the number of people starting to drink at a young age, the number of deaths from liver cirrhosis should decrease. Improvements in health outcomes have an impact on the costs of health and the healthcare system. In addition to achieving positive health outcomes, education and awareness activities are crucial for reducing anti-social behaviour, which includes crime, reckless disregard for safety of self and other forms of consistent irresponsibility. Reducing anti-social behaviour contributes to a healthier and safer community and reduces alcohol-related litter, thereby contributing to a cleaner environment.
>
> **Chain 2.** A very similar causal chain applies to those activities concerned with the **coordination and referral of cases to health and social care services** providing help,

[29] Home Office, Binge Drinking Campaign Resource Guide, online, available at: http://www.alcoholstakeholders.nhs.uk/pdf/Binge%20Toolkit.pdf (accessed August 2009)

advice and treatment to people with high alcohol dependency. As with education and awareness, the provision of services to reduce alcohol dependency may change alcohol consumption patterns and behaviour, leading to improvements in health outcomes and a reduction in violent crime. Alcohol is the principal factor in cases of violent crime, destroying families and contributing to a cycle of deprivation and lost opportunities.

Chain 3. Advice consists mainly of explaining to businesses what their legal duties are, informing them about good management practices and suggesting ways to promote responsible drinking. Furthermore, enforcement officers provide businesses with advice about what licences are required to sell alcohol, what forms and procedures are needed to get a licence, when and to whom alcohol is allowed to be sold, and so on. The outcome of such activities is increased compliance by the licensed trade and off-premise retail outlets, with the objective of reducing alcohol availability among underage youths as well as reducing alcohol consumption and dangerous drinking patterns among the general population. As with the previous causal chains, business advice may contribute to improved health outcomes, less anti-social behaviour and promoting safer and healthier communities more widely. Furthermore, the provision of information and advice may also contribute to reducing social inequalities, taking into account the fact that small and medium-sized businesses may not always have the resources to be up to date in relation to changes in legislation or ways to approach alcohol-related crime. By providing national coverage, regulatory bodies ensure that all businesses get information and advice, regardless of their size.

Chain 4. Enforcement outputs, including inspections and test purchasing, converge to the same common outcome as previous activities: reduced alcohol consumption accompanied by responsible and safe drinking patterns. By prompting such behaviour, society will benefit by savings in health and healthcare costs, fewer social inequalities and less anti-social behaviour. The last of these not only leads to a safer community, but also to a cleaner environment – drinking alcohol in public places such as streets and parks is often correlated with higher volumes of litter.

In conclusion, in the long term the impact of enforcement activities combined with the other activities carried out by LARS contribute to a better quality of life.

4.4.4 The pathway

Based on the workshop and additional review of documents, the pathway represented in Figure 4.6 could be developed.

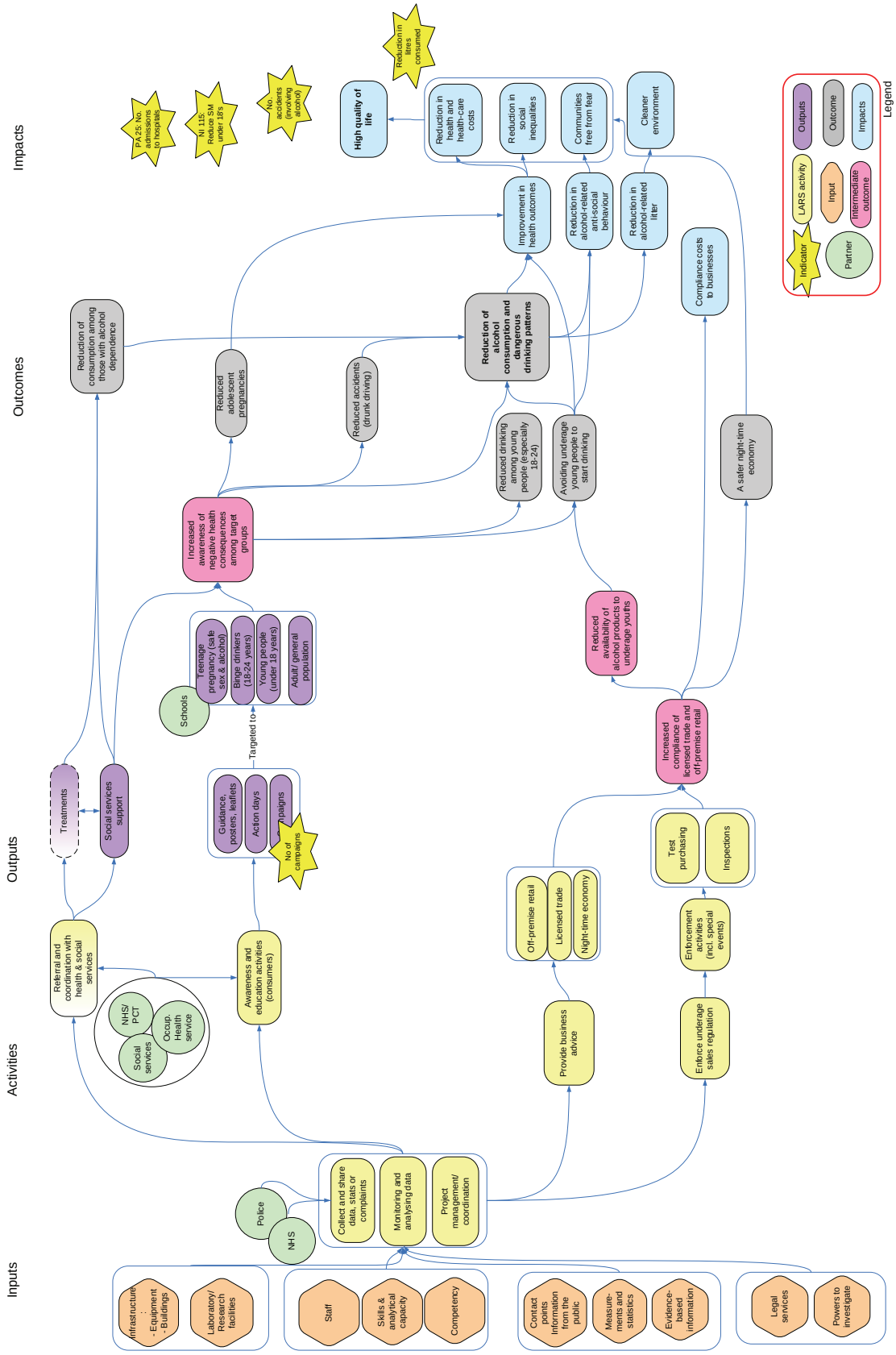

Figure 4.6: Pathway of interventions to tackle alcohol-related harm

4.4.5 Identifying indicators and developing a dashboard

After establishing the pathway and intervention logic for alcohol reduction, the next step is to identify indicators that can be used to measure the key elements of the pathway in an impact and outcome dashboard.

In terms of **inputs**, Cambridgeshire could use information available on staffing levels as well as on yearly net budget. Staff and budget should be broken down by type of activity. The selection of indicators for the dashboard is relatively straightforward here, even though there may sometimes be difficulties in breaking down staff and budget by the different related activities:

1. staff (FTEs or in £)
2. net budget (in £).

If we consider the four causal chains again, the following **output** measures could be collected:

Chain 1. To support the Cambridgeshire alcohol strategy, the council provides a wide range of **education and awareness activities** producing a series of outputs. For example, education and awareness activities targeted at children and young people include the number of schools receiving personal, social and health education (PSHE) sessions. Another example of the type of outputs produced by local authorities is the number of pupil referral units[30] receiving PSHE and the number of sessions delivered. There is a question about whether this type of information is collected regularly by LARS or partner organisations, although similar data should be collected to be able to achieve one of the LAA targets, which is to reduce teenage conception by 45 per cent.[31] PSHE is delivered to promote the health and well-being of young people as they grow up by giving them knowledge and skills.

Chain 2. Treatment of alcohol in the UK is divided into four tiers of service delivery, with two variables, 'amount of treatment' and 'amount of observation', determining the appropriate level of intervention. Tier 1 and tier 2 consist of supportive counselling and opportunistic detoxification regimes respectively. Tier 3 is for complex cases and Tier 4 for the most urgent and severe cases of alcohol misuse (Raistrick 2000). In order to assess the extent of the problem of alcohol misuse and outputs delivered by local authorities, Cambridgeshire could count the number of cases by tier. For example, in the case of tiers 3 and 4, Cambridgeshire is counting the number of cases of alcohol detoxifications as well as the related percentage of rehabilitation placements. While this information was not at our disposal, it is probably collected for the NI 39, Alcohol-related hospital rates.

Chain 3. Following the experience of a pilot community alcohol partnership (CAP) in St Neots (Cambridgeshire), trading standards provides **information and education** to off-licence premises to help avoid incidents of underage sales. Enforcement officers also visit licensed premises and attend special events, distributing information to provide advice to businesses, especially on how to deal with factors that affect safety, such as fire safety,

[30] Pupil referral units (PRUs) are a type of school established and maintained by the local authority that provides education for children who require alternative educational provision.

[31] Template for local public service agreement (LPSA) performance reward grant proposal of Cambridgeshire County Council, online, available at www.cambridge.gov.uk

first-aid provisions and structural integrity.[32] The number of visits is probably a measure available to LARS, but was not publicly available.

Chain 4. Some measures which give a feel for the scale of activities engaged by **enforcement** officers may be measured in term of inspections, the total number of attempted test purchases using children, and the number of complaints from the public about underage sales of alcohol.

All activities carried out by LARS lead to one common outcome: reducing alcohol consumption and at the same time changing behavioural patterns with regard to drinking alcohol. In fact, reducing average levels of alcohol consumption is not enough. By increasing knowledge and providing advice to both businesses and consumers, local authorities aim to trigger more responsible, safe and reasonable alcohol behaviour. How regulatory activities impact on alcohol consumption is easy to measure. Statistics are regularly available from bodies such as HM Revenues and Customs, which collects excise data on duty-paid clearances for the UK domestic market, and by the Office of National Statistics, which publishes the alcohol consumption pattern. The intermediate outcomes for the causal chains are slightly more difficult to measure, and not necessarily always available:

Chain 1. Substantiation of the claim that education and awareness activities lead to less alcohol consumption and less dangerous drinking patterns requires them to be linked together by understanding, first, whether those activities change people's awareness of the dangers and consequences of irresponsible alcohol drinking. This can be measured by means of public opinion perception surveys with either the overall population or specific target groups. For example, Cambridgeshire found that alcohol as a whole is a concern in the wider community. Findings included results where 78 per cent of people feel informed about the risks of alcohol, but 40 per cent wanted more information.

Chain 2. A typical output of the referral and coordination of alcohol cases consists of counting the number of cases of alcohol detoxification over a period by tier level – in other words, by the extent and gravity of the alcohol case. However, to connect and understand the relationship between availability and access to treatments and its effect on consumption patterns, it is necessary first to understand whether the number of cases treated actually contributes to less consumption among those with alcohol dependence. Ideally, the length and frequency of structured alcohol interventions should be recorded as well as the outcomes of those, which can be measured by, for example, the levels of alcohol in blood and cases of relapse. Unfortunately, Cambridgeshire does not record any of that information systematically.[33]

Chain 3 and Chain 4. The supply of alcohol is also an important factor affecting alcohol consumption – alcohol consumption is affected by the legal and illegal availability of alcohol. To reduce the availability of illegal alcohol, and therefore illegal

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[32] http://www2.cambridgeshire.gov.uk/commins/minutes.nsf/web/sub-commins-env_transport-env_trans_ctte-reports-etc0699-5.doc/$FILE/etc0699-5.doc

[33] Cambridgeshire Alcohol Strategy 2008–2011, online, available at: http://www.huntsdc.gov.uk/NR/rdonlyres/B79922AB-E732-4F15-AC16-8A313D30CF4A/0/cambridgeshire_alcohol_strategy_2008__2011_final1.pdf (accessed June 2009)

consumption, LARS need to make sure they are increasing business compliance. Business compliance is typically assessed in terms of number of complaints.

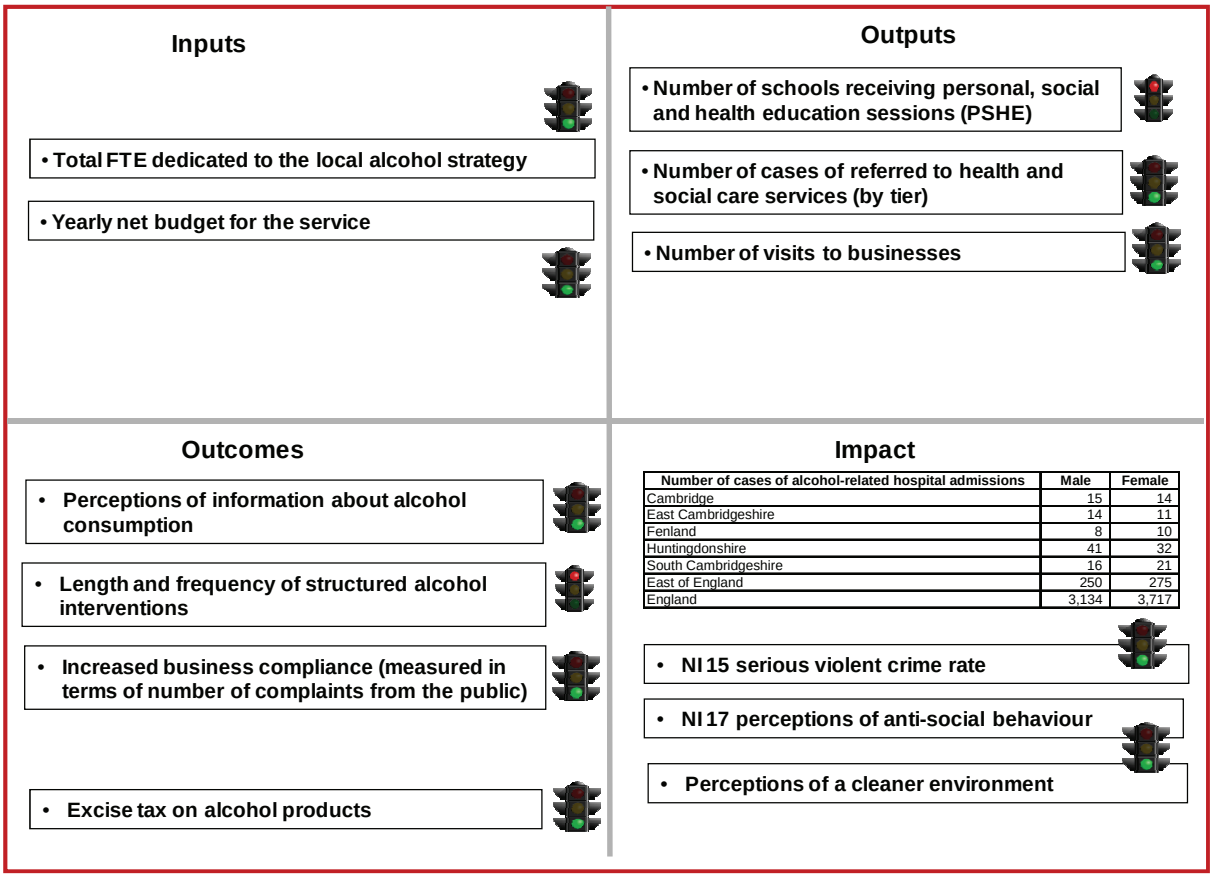
So, following the causal chain, activities have been linked to a common outcome: reduction in alcohol consumption and reduction in dangerous drinking patterns. However, in terms of the wider, long-term impacts, the causal chain splits into three main types of impact:

- **Impact on health outcome indicators.** Lower alcohol consumption has proved to decrease alcohol-related disease such as liver cirrhosis. Other possible indicators include hospital admissions for alcohol-specific conditions.[34] Evidently, through their activities and their impact on health outcomes, LARS are also contributing to reduce health and social care costs.
- **Impact on anti-social behaviour and violent crime.** Statistics show that on average 38 per cent of offenders supervised by the Cambridge probation area identified alcohol as the principal cause for offending. By reducing alcohol consumption – whether through increased compliance by retails, pubs and other premises or because of increased knowledge and awareness by consumers – violent crime and anti-social behaviour can be reduced. NI 15, Serious violent crime rate, and NI 17, Perceptions of anti-social behaviour are reported on an annual basis.
- **Impact on alcohol-related litter.** The evidence from the CAP pilot scheme in St Neots showed that (joint) interventions to reduce underage public drinking reduced alcohol-related litter in spot areas by 92 per cent.

In the long term, safer, healthier and cleaner environments will have multiple effects in yielding better quality of life. Despite limitations derived from attribution, levels of satisfaction are often measures in surveys.

A summary of these indicators may be found in a dashboard form in Figure 4.7. The traffic lights indicate whether the evidence available supports that impacts are made through the claimed causal chains or not.

[34] Cambridgeshire Alcohol Strategy 2008–2011, online, available at: http://www.huntsdc.gov.uk/NR/rdonlyres/B79922AB-E732-4F15-AC16-8A313D30CF4A/0/cambridgeshire_alcohol_strategy_2008__2011_final1.pdf (accessed June 2009)



SOURCE: RAND Europe

Figure 4.7: Dashboard for alcohol activities in Cambridgeshire County Council

4.5 Implementing health and safety regulation in workplaces in Islington

Over 200 people a year lose their lives at work in Britain, around 150,000 non-fatal injuries are reported each year and an estimated 2 million suffer from ill health caused or made worse by work (HSE 2008). These injuries are very costly to employers. As an example, slips and trips alone have been estimated to cost employers over £500 million a year (*ibid.*).

Health and safety regulation in the workplace is aimed at helping businesses comply with legislation in order to minimise the risks of accidents, ill health and sickness absence resulting from work activities.

It is mainly regulated through the Health and Safety at Work Act etc. 1974 and the Health and Safety (Enforcing Authority) Regulations 1998. The latter statutory document allocates the enforcement of health and safety legislation of different premises to HSE and local authorities. In a nutshell, the regulations set out the following division between the two:

1. HSE is responsible for workplaces where the main activity is manufacturing, transport services, healthcare, education, public sector services and construction.

2. Local authorities are responsible for enforcement in the services sector, such as offices, retail premises, warehouses, catering establishments, consumer services premises, places of entertainment, hotels and residential accommodation.

For an urban area such as Islington which has over 5,000 workplaces[35] that fall within the remit of the local authority and a large number of commuters, health and safety in the workplace is an important service.

The borough of Islington is an inner London authority with a population of 175,797 and 80,289 households. It covers an area of just 6 square miles and is London's smallest borough. It borders four local authorities – Hackney, City of London, Haringey and Camden – in an area of immense diversity in both use and population. Islington is rated as the eighth most deprived area in England, but house prices are well above the London average, showing that disparities are high. The ethnic minority population is estimated at 26.75 per cent and there are many community languages.

4.5.1 Key activities and their inputs

To address health and safety in the workplace, Islington Borough Council conducts two key sets of activities: inspections (both programmed and reactive) and the provision of guidance, training and information to businesses, employees and members of the public regarding health and safety in the workplace.

Programmed inspections represent the bulk of the work carried out by the commercial environmental health team, and a majority of the team's resources are dedicated to these. Each year, officers in the team are set inspection targets as part of their performance appraisal process. They are monitored on progress against these targets on a monthly and quarterly basis. As an example, in 2006/7 the inspection target for the team was 380.

Reactive inspections, on the other hand, are ad hoc inspections triggered by intelligence gathered from the public, employees, businesses and partners such as the police and the fire brigade as well as HSE. This information is logged by the team along with details of any subsequent inspections or actions from the team with regard to this intelligence. In the event that the intelligence gathered about a potential health and safety risk in a workplace falls under HSE's jurisdiction, the team passes on the relevant information to HSE for them to act upon. If the intelligence gathered falls under the remit of the council and the information given is deemed to be serious enough to present a potential risk to health and safety, an officer from the team will make an initial visit to the site. When the investigating officer finds significant evidence of a potential health and safety breach on the premises, they will provide the business with guidance and advice on how to comply with health and safety regulation effectively or, if the breach is serious enough, initiate a process of formal action.

[35] Of these 5,000 workplaces, over 1,000 are classified as retail shops, 2,000 as offices and 1,000 as catering premises. Source: Islington Council, Public Protection Division, Workplace Health and Safety Enforcement Service Plan 2006/7, online, available at: http://www.islington.gov.uk/DownloadableDocuments/Environment/Pdf/healthandsafetyserviceplan.pdf (Accessed, July 1st, 2009).

In addition to inspections, the council organises awareness-raising events and training events to inform and guide businesses and the general public on how to comply with health and safety legislation.

In order to conduct these activities, the council requires a number of inputs. These are first of all staff. In 2006/7, the commercial environmental health team has 23 members of staff for a range of activities including health and safety. The team comprises 4 principal environmental health officers, 14 senior environmental health officers, 4 principal technical officers and 1 trainee food safety officer. These staff need to be adequately trained and skilled to carry out their job within the team; skills are an important input to the council's work on health and safety in the workplace. Skills are not only necessary to carry out investigations on the ground, but also for applying risk ratings to premises in order to prioritise programmed inspections. In conducting their enforcement and guidance/awareness-raising activities, officers need to be equipped with adequate powers and knowledge to enforce health and safety legislation in the workplace and carry out investigations, as well as to provide guidance. The employment and training of staff require financial resources which are detailed in Table 4.2 below for the year 2006/7.

Table 4.2: Budget dedicated to workplace health and safety

Activity	Workplace health and safety budget (£)
Employee salaries	380,261
Running expenses	10,990
Total budget under budget manager's control	391,251
Department overheads	154,654
Gross expenditure	545,905

SOURCE: Islington Borough Council (2006), Public Protection Division, Workplace Health and Safety Enforcement Service Plan 2006/7, online, available at: http://www.islington.gov.uk/DownloadableDocuments/Environment/Pdf/healthandsafetyserviceplan.pdf (accessed 1 July 2009)

The team's authority is derived from the two statutory documents: the Health and Safety at Work Act etc. 1974 and the Health and Safety (Enforcing Authority) Regulations 1998. Finally, the team needs intelligence about potential breaches of health and safety legislation in order to carry out their reactive work. This type of information/intelligence is passed on to the team by a wide range of stakeholders and partners, including the general public, employees, businesses, the police, the fire brigade and HSE. Another important input into the process of health and safety regulation enforcement in the workplace is the service planning and objective setting activities that the team carries on a yearly basis to drive their activities.

4.5.2 **Outputs**

The activities described above lead to a series of outputs. Inspection activities (both programmed and reactive) lead to two sets of possible outputs: formal action and informal action. Formal action is undertaken by the team when there has been a serious breach of health and safety regulation or when businesses that were previously advised about an existing health and safety hazard on their premises fail to remove it. The outputs of formal action available to enforcement officers may be categorised as follows:

- serving statutory notices or prohibiting activities
- seizing equipments, documents and goods

- issuing licences with conditions
- removing licences or changing conditions
- issuing formal cautions
- prosecution
- seeking injunctions.

On the other hand, informal action may be taken when no formal breach of health and safety legislation has been found or when there is a breach of legislation but it is not deemed to warrant immediate formal action. The outputs of informal action include giving advice and guidance as well as sending warning letters setting out changes that need to be made to work premises to make them compliant with health and safety regulation.

In terms of education, outreach and awareness activities for the general public and businesses, the main outputs are events and activities to raise awareness. For instance, the team has recently run a dermatitis awareness event for hairdressers to raise awareness and dispense advice about how to deal with this issue in that particular sector. The team also runs regular training events for businesses. The team uses examples of prosecutions of businesses as a means to raise the public's awareness of particular health and safety issues in local businesses; for instance, they recently publicised the prosecution of a tattooist in the local press. This publicity acts as a deterrent to other businesses as it shows them that the council is taking action and that there is a risk of their getting caught if they don't comply with current regulation.

4.5.3 The outcome of health and safety regulation in the workplace

The work of the commercial environmental health team in the area of health and safety in the workplace can lead to a number of outcomes and impacts at the local level. We have clustered these impacts and outcomes along two main **causal chains**:

1. The first causal chain is the **removal of potential health and safety hazards in the workplace** through both programmed and reactive inspections. Inspections are the main activity carried out by the team and they have both direct and indirect consequences for the local community. Directly, there are clear benefits from removing potential health and safety hazards, the main one being a reduction in the risk of accidents, ill health and death in the workplace. Indirectly, prosecutions that result from the investigation of potential hazards in workplaces may also act as a deterrent and increase compliance with health and safety legislation from other businesses if the prosecutions are effectively publicised. In addition, publicising prosecutions may increase the general public's awareness of health and safety regulation, which may in turn result in more intelligence/complaints being transmitted to the team for investigation.
2. The second causal chain is the **provision of guidance and advice to both members of the public and businesses** through educational and training activities. This tends to be a more ad hoc set of activities which may, for example, include individual training or awareness-raising events. The aim of this set of activities is to inform and raise the awareness of the general public and businesses about health and safety legislation and compliance. Logically, this provision of information about legislation and how to comply

with it should reduce the number of accidents, and the incidence of ill health and deaths caused by breaches in health and safety legislation.

Both of these causal chains contribute to wider impacts on the local community. There are three main impacts to which these chains contribute. They are as follows:

1. **An improved local economy.** As more businesses comply with health and safety legislation, we envisage that they will save financial resources through having fewer staff members off work due to ill health or injuries, which will contribute overall to an improved local economy. In addition, it is possible that compliant businesses will be more sustainable financially because their risk of litigation from employees is lessened and because they are more likely to be compliant in other areas.
2. **A more vibrant and attractive community.** As more businesses comply with health and safety legislation, we envisage that local businesses will become more attractive places to work in, contributing to ensuring that a flow of people come into the borough to work and also spend some leisure time in pubs, restaurants, bars, shops and other outlets located there.
3. **A healthier Islington.** As accidents, ill health and deaths are reduced, we envisage that employees' health will improve to some extent and that this could have wider implications for the local community's health status.

Some of these impacts will be reflected in the place survey or business satisfaction survey, for example.

4.5.4 The pathway

Based on the workshop carried out at Islington Borough Council in June 2009 and additional documents, we were able to develop the following pathway.

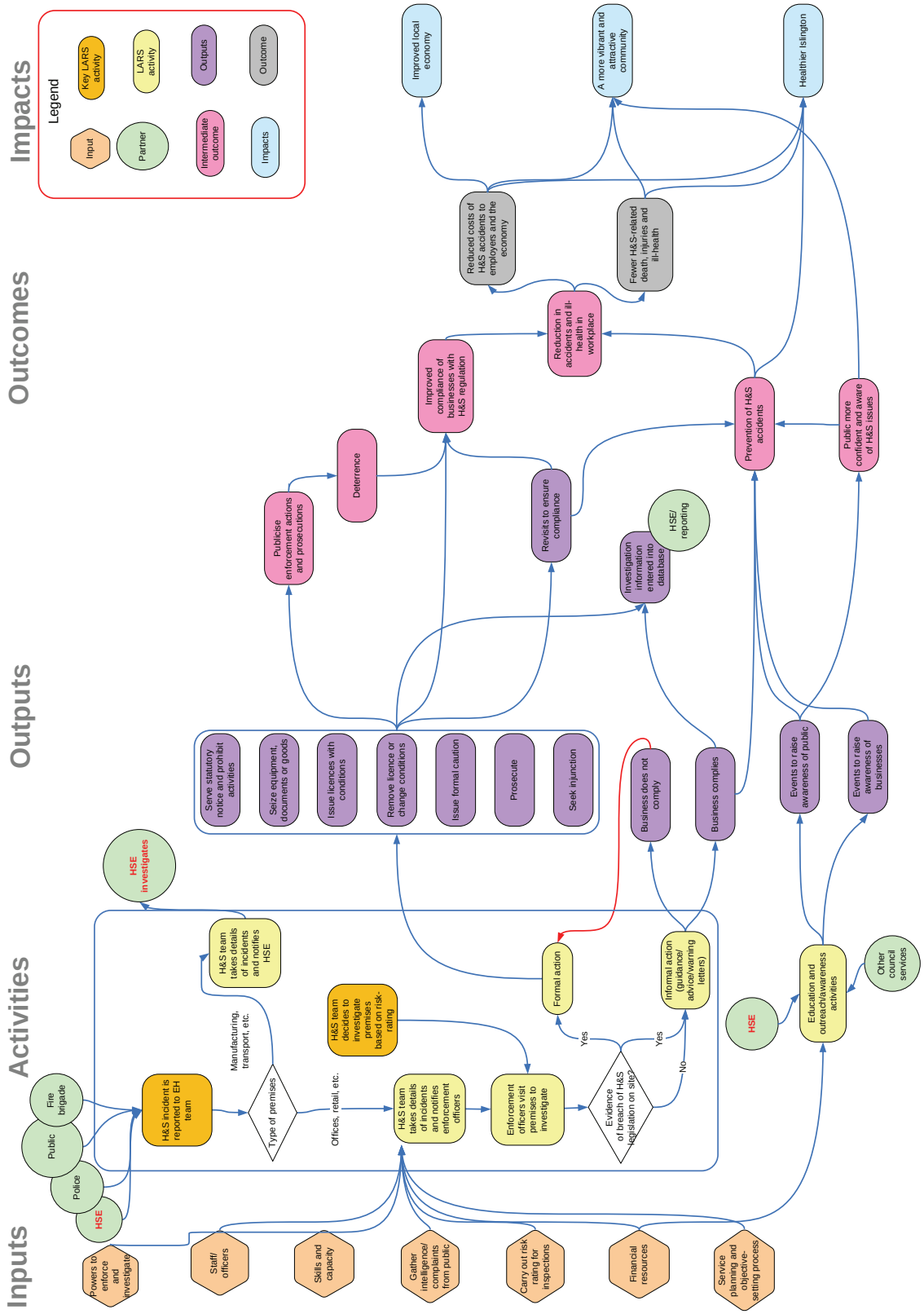


Figure 4.8: Health and Safety Pathway

4.5.5 Identifying indicators and developing a dashboard

After establishing the pathway and intervention logic for health and safety in the workplace, the next step is to identify indicators that can be used to measure the key elements of the pathway in an impact and outcome dashboard.

In terms of **inputs**, Islington Borough Council currently has information available on staffing levels as well as the budget allocation for the team's health and safety enforcement work in the workplace, broken down into employee salaries, running expenses and department overheads.

As previously mentioned, a majority of the team's inspection work is undertaken through programmed inspections based on risk ratings of premises. Another significant part of the team's work is made up of reactive inspections triggered by intelligence from a number of stakeholders and partner agencies (i.e. the general public, businesses, the police, the fire brigade, etc.). It is expected that a majority of this intelligence is either provided by phone or in writing and that the team then enters the information gathered into a database to inform its enforcement work. Therefore, one of the input measures could be the number of complaints or reports of health-and-safety-related incidents made to the team. Other inputs such as skills and the powers to investigate are not easily quantifiable, but the team would hold qualitative information about these. For instance, the team would know the qualifications of their staff and their years of experience, and so on. These inputs are fairly generic and feed into the two main causal chains previously identified. Thus the selection of indicators for the dashboard at this point is relatively straightforward and could be as follows:

1. staff (FTEs or in £)
2. running expenses (in £)
3. department overheads (in £)
4. number of complains/reports made to the team.

There is a range of **output** information that is currently available for the enforcement of health and safety in the workplace, including the number of inspections (both programmed and reactive) carried out, the number of enforcement notices served and the number of prosecutions, as well as qualitative information about these (e.g. type of premises, type of legislative breach, number of visits to the premises, action taken by the officer). Some of these data are part of the data reported to HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences at Work Regulations (RIDDOR), which is compiled into annual statistics. The team also sets itself target in terms of the number of businesses it needs to engage with each year and records the number that have been engaged with against this target. However, from the documents we reviewed there does not seem to be quantitative measurement of public information and awareness activities. If we now map the two main causal chains previously identified with the output data described, we obtain the following:

Chain 1. Number of enforcement notices served.

Chain 2. Number of businesses engaged with. In addition to this measure, the team could develop a new measure or use current data gathered about the interaction it has with the general public to raise awareness and provide information on health and safety in the workplace. This measure could include elements such as the number of events organised that are aimed at the general public, with such detail as the number of

participants, of leaflets sent out, and so on. Collecting this type of data (if not currently collected) would enable the team to get a feel for the amount of outreach activity conducted year on year in this field of regulation.

The immediate **outcomes** resulting from health and safety regulation in the workplace are measured to different degrees. For example, as identified in the pathway, this regulatory service produces the following two main outcomes:

> **Chain 1.** Compliance of businesses with health and safety regulation as a result of inspection activities undertaken by the team to remove potential health and safety hazards in workplaces.
>
> **Chain 2.** Prevention of health-and-safety-related accidents, ill health and deaths, and reduction in accidents related to health and safety in the workplace, as a result of providing guidance and information to both businesses and the general public.

The first outcome, compliance, is not straightforward to measure as such. One way to get a sense of business compliance over time would be to look at the number of accidents and regulatory breaches reported to the team and HSE regarding health and safety in workplaces in the borough. Presumably a reduction in the number of accidents and regulatory breaches reported might indicate an increase in compliance. The number of accidents that occur year on year could also be used as a proxy for compliance.

The second outcome, prevention of health-and-safety-related accidents, ill health and deaths, and reduction in accidents related to health and safety in the workplace, is more straightforward to measure as the team reports and monitors the number of accidents and fatal injuries that take place in the borough.

These outcome indicators should enable us to follow the causal chain from outputs to outcomes. In terms of the wider, long-term impacts, the causal chains merge again to some extent, as they achieve these final impacts either through the removal of potential health and safety hazards in the workplace through inspections or through its awareness-raising activities and guidance to the general public and businesses.

In terms of **impacts**, there are currently no straightforward measurements to gauge progress made against these. As previously mentioned, there are three main impacts at the end of the two causal chains:

1. improved local economy
2. more vibrant and attractive community
3. healthier Islington.

The first two impacts are very closely interrelated as an improvement in the local economy often goes hand in hand with the creation of a more vibrant and attractive community for people to move into – more businesses move into the area and with them come new opportunities for leisure and employment. The third impact is slightly different as it relates to the health of the local community. It can also be said that the link between health and safety in the workplace and this impact is somewhat more removed, in particular since the borough has a large number of commuters who are by definition not residents of the local community.

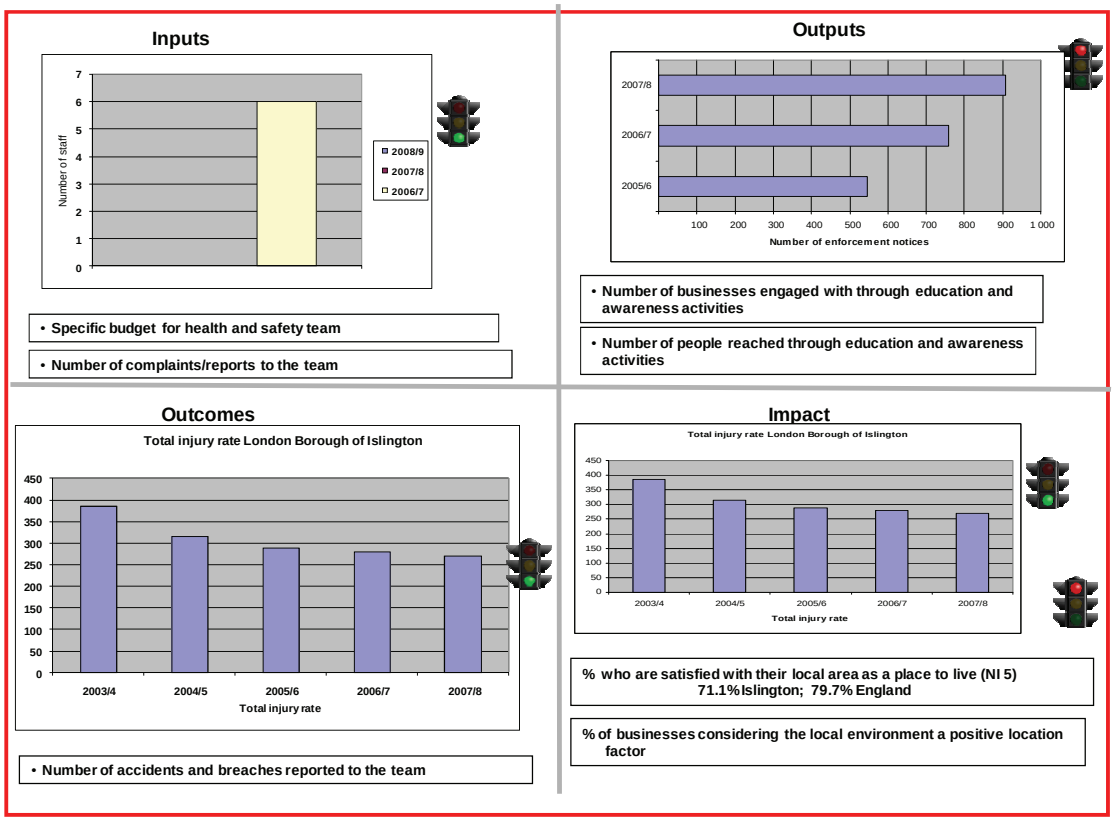
In terms of measuring these impacts, the following indicators, some of which have already been used in previous stages of the causal chain, may be used as proxy:

1. Total number of ill health, accidents and fatal injuries due to health and safety breaches in the workplace.
2. Percentage of residents who are satisfied with their local area as a place to live (data from the place survey).
3. Percentage of businesses that consider the local environment a positive location factor (to be collected through the business satisfaction survey if not readily available).

A summary of these indicators, together with time-series data over the last available three-year period, may be found where available in a dashboard form in Figure 4.9 below. The traffic lights indicate whether the available evidence supports that impacts are made through the claimed causal chains or not. As such, they should give an indication of which areas the local authority should focus its attention on to achieve its set outcomes. However, in this case, given that the data we obtained from publicly available sources were patchy, these are only illustrative and should not be read as a judgement on the performance or ability of Islington Borough Council to meet its aims with regard to health and safety in the workplace.

In addition, data on the number of enforcement notices are from the regional statistics reported to HSE under the RIDDOR regulations and are for all London local authorities who submitted the data, rather than just for Islington Borough Council (as those data were not available at local authority level).

In most cases where data for the different components of the causal chain (i.e. input, output, etc.) are not available, we envisage that these data would be currently held by local authorities so that they would be able to complete the dashboard almost entirely without the need for additional data collection.



SOURCES: Place survey 2008, HSE and RIDDOR data

Figure 4.9: Dashboard for health and safety in the workplace activities at Islington Borough Council

4.6 Trading standards services in Northamptonshire

TSS enforce a broad range of legislation on fair trading and often on other aspects of legislation for animal health, food safety and underage sales of tobacco, alcohol, knives and fireworks. TSS are responsible for enforcing over 80 Acts of Parliament including:[36]

- Weights and Measures Act 1985
- Trade Descriptions Act 1968
- Consumer Protection Act 1986
- Consumer Credit Act 1974
- Enforcement provisions under Part 8 of the Enterprise Act 2002.

In the face of increased budgetary pressures as well as increased demand for public services, local regulatory services work with a clear focus on priorities, which are generally set by councillors,

[36] http://www.berr.gov.uk/whatwedo/consumers/fact-sheets/page38607.html

who at the same time focus on the needs of the local community and the National Priorities set by the government.

The service responds to many government priorities, including from BIS, the Department of Health, the Home Office, the Serious and Organised Crime Agency, FSA and OFT, which has responsibility for Consumer Direct. Trading services also collaborate with scambusters, illegal money lending and intelligence teams, which have been implemented regionally to take action jointly with TSS against rogue trading activities. Other partners include the police, the Chamber of Commerce, schools, LACORS, and so on.

In Northamptonshire the is primarily a consumer protection and fair and safe trading enforcement service. In addition to enforcement and regulatory activities, the service provides advice and information to consumers (in association with Consumer Direct) and businesses, with the aim of increasing their knowledge and raising awareness about their rights and obligations.

Trading standard services in Northamptonshire carry out these enforcement and education activities in different areas including age-restricted sales, counterfeit goods, and buying goods and services (including product safety):

- **Age-restricted sales**, which primarily includes alcohol and tobacco products, have been an important priority for the Northamptonshire County Council, which managed to reduce illegal sales in 2007/8 against the previous year.[37] The impacts of the causal chain for age-restricted sales of tobacco and alcohol may be followed under sections 4.3 and 4.4 of the current report respectively.
- **Counterfeiting** of goods occurs most commonly in designer-labelled clothes, cosmetics, alcohol, music and computer software. By collaborating with different organisations, Northamptonshire has seized thousands of items, including DVDs, trainers, sunglasses and jewellery.
- **Buying goods and services.** As with the above two other categories, trading standards aims to ensure a fair and safe trading environment. With regard to the safety aspect of trading standards, LARS aim to reduce avoidable injuries by ensuring compliance with safety regulation through enforcement activities or through education and advice. For example, Northamptonshire County Council removed various products from the market (e.g. electric blankets) after testing established that they were unsafe for use. On the fair trading aspect, TSS deal with consumer complaints and thereby reduce or eliminate the 'provision by traders of goods or services without reasonable skill, misleading or false acts or omissions, aggressive or coercive selling, use of unfair contract terms and failure to provide consumers with statutory rights, such as cancellation rights' (OFT 2009). In other words, trading standards protect the statutory rights acquired by consumers the moment they buy goods from a trader, and they also protect consumers from other unfair or rogue trading activities such as doorstep crime. Examples derived from these types of activities include the prosecution by Northamptonshire trading standards of individuals and businesses supplying falsely described motor vehicles.

[37] Northamptonshire County Council Trading Standards Service Plan 2008/9, online, available at: http://www.tradingstandards.gov.uk/northants/SERVICE%20PLAN%20%202008-2009.pdf (accessed June 2009)

The next sections focus on the latter of the above mentioned activities – that is, on the fair trading aspect of buying and selling goods. The purpose of focusing on one of the activities is to build a simple pathway that graphically represents the potential social, economic and environmental impacts of TSS.

4.6.1 Key activities and their inputs

To ensure fair trading in buying and selling goods, Northamptonshire conducts an important number of activities, starting with back-office activities such as data collection, monitoring and analysis. A lot of the analysis is shared between partners such as the police and the NHS. This intelligence is the basis for the core activities of trading standards. These are split between education and awareness activities for consumers and for businesses, and enforcement activities.

- **Education and awareness activities** may follow two different approaches: a more proactive approach, targeted towards consumers or businesses, with the objective of increasing general knowledge and awareness; and a more reactive approach, targeted towards people who have been victims of rogue trading, for example victims of doorstep crime.
    - Proactive education and advice is probably the most common activity, directed at both businesses and consumers. Education and advice to consumers is directed at the general population and the vulnerable population, including the elderly, young children and individuals with low incomes. One typical area of advice concerns doorstep crime, which may cover many areas of concern including distraction burglary, bogus callers and unscrupulous doorstep selling. Advice may consist of action days, campaigns, posters, leaflets and booklets providing practical guidance on how to choose a reliable trader, as well as a range of other useful general information on a variety of topics. Most of these activities are carried out in collaboration with a variety of stakeholders. Proactive work also applies to businesses. In fact, regulatory services also help businesses more generally to comply with regulation. Typically, LARS help businesses by visiting their premises to inform them about new pieces of legislation.
    - Reactive work especially applies to cases of doorstep crime. Trading standards in collaboration with different organisation offer emotional support and practical help as well as information for victims of a range of crimes.
- **Enforcement and regulatory activities by trading standards** (buying goods and services) most commonly consist of inspections. Inspections may be carried out as part of a service routine inspection programme, because a complaint has been received, or because an officer suspects that legislation has been breached. The last-named often results from earlier inspections or from intelligence data gathered by an officer making the case for an investigation into a possible breach of legislation. If the inspection or investigation reveals a breach of the law, trading standards have to decide on the path they want to follow. Depending on the severity of the breach, trading standards may choose 'soft' instruments such as visiting business premises to provide advice on trading standards, issuing informal warnings or sending out formal letters. If the breach is more severe, trading standards may decide to take the case along the path of prosecution. Prosecutions are instigated only after careful consideration of all the circumstances.

To conduct these activities, trading standards require a number of inputs. First, they need staff who have the experience, skills and knowledge to carry out the activities. In conducting their activities, enforcement officers also need to be equipped with the adequate infrastructure and materials such as buildings, research facilities, databases and software and hardware facilities. Together these produce the data and statistics that enforcement officers need to prioritise their work and to target the highest risk businesses. In this respect, the Consumer Direct helpline and database are a key input to the activities of trading standards officers.

4.6.2 Outputs

The activities outlined earlier lead to a series of outputs produced by regulatory services. Enforcement activities lead basically to two sets of output. First, outputs may result from the prosecution of unfair trading cases, which depend on the seriousness of the breach of the law. Compliance with regulation is enforced either through 'soft' instruments such as business advice, formal cautions or informal warnings; or through prosecution, which may result in different legal outputs such as administrative penalties, revocation of licences or prison sentences.

Secondly, education and awareness activities produce different kinds of output. For the general population, TSS of Northamptonshire together with Consumer Direct target consumers and businesses by providing general advice and information on their rights and obligations. For the vulnerable groups, Northamptonshire organised in 2008 the consumer challenge quiz competition in which local schools participated. Outputs vary greatly and can be measured in terms of the type and frequency of activities, scale of target population, and so on.

4.6.3 The outcomes of enforcing trading standards regulation

Northamptonshire County Council's efforts in trading standards may lead to a number of outcomes and impacts, along the following causal chains:

Chain 1. The first causal chain arises from the **enforcing fair trading regulation** activity. Depending on the severity of the breach, enforcement officers will follow different legislative pathways. Whenever appropriate, enforcement officers are advised to use **soft instruments**. Small and medium-sized enterprises especially may not always be aware of certain regulations. It is therefore the role of the TSS to support, advise and raise awareness among businesses regarding the existing legislation. The direct intermediate outcome of using soft instruments is better informed and more compliant businesses. At the same time such an outcome has positive effects, including direct financial savings to consumers and reduced income losses to legitimate businesses, positively affecting the competitiveness of the local trading economy.

Although soft instruments are more often used, certain businesses might commit more **serious offences**. In such cases, regulatory authorities will refer the cases to court, which may decide on a variety of different outputs, such as administrative penalties, revocation of licences, seizure of products and proceeds of crime or even prison sentences. These decisions are taken at court, graphically represented in the pathway in Figure 4.10 by the dashed boxes as opposed to the boxes with solid lines. Independent of the type of output, prosecution results in two important intermediate outcomes: a financial outcome (through fines and money collected from the proceeds of crime) and a behavioural outcome, by stopping or deterring traders from carrying out unfair practices. The **financial outcome**, derived from the collection of fines and from proceeds of crime, can

positively affect public finances and give greater value for public money. The **behavioural outcome** of deterring businesses and individuals from unfair trading practices can have two important outcomes:

- Prosecution deters unfair trading such as doorstep crime, often resulting in *less violence and crime*, although deterrence will depend on the perception of the risk of being prosecuted. Reduction in violence and crime has important social impacts by creating independent, safer and healthier communities as well as communities free from fear.
- Prosecution and its associated perception of risk changes behaviour by making *businesses more compliant* with legislation. Variations in business compliance obviously have significant non-financial and financial impacts. For example, common sense dictates that a more compliant business community, everything else equal, results in fewer costs to consumers given that the probability of being involved in unfair trading practices (e.g. purchasing falsely described products and services) decreases, hence saving costs to consumers. At the same time, both legitimate businesses and also the public sector are more satisfied with a more compliant business community. For the former, incomes might increase compared to a situation where competition includes unfair trading businesses. For the latter, a wider compliant business community entails potentially higher tax revenues but also less enforcements costs.

Chain 2. The second causal chain evolves from **education and awareness**. The outcomes differ slightly depending on the target group to which education and awareness is directed. In the case of activities targeted to consumers, the degree of impact is very different if the intervention is directed at the general population or at specific groups. Targeted interventions to vulnerable groups such as the elderly, young children or low socio-economic groups tend to be more effective. For example, campaigns to prosecute doorstep crime may not be effective if targeted to the general population, but will be more effective for specific groups such as the elderly and homemakers, who are the most vulnerable groups. Therefore where possible education and advice are tailored to cover the specific needs of consumers with the objective of increasing consumers' awareness and knowledge of their rights and obligations. On the other hand, LARS also provide specific support to victims of crime, which has a direct impact on consumer confidence. Hence, TSS play an important role in creating better informed and more confident consumers. At the same time this causes the following:

- A financial impact, measured by the savings made by consumers. Consumers with a better understanding and knowledge of their rights and obligations when purchasing goods will become wiser purchasers, thereby saving themselves the costs of unfair purchases.
- A social impact, with consumers feeling better informed and more confident, and consequently less fearful, safer and more independent.
- In the case of education and advice to businesses, the expected outcomes are similar to the 'soft' enforcement activities, meaning better informed and

compliant businesses, thereby positively impacting on consumer savings, legitimate business income and public finances.

The causal chains just described (and represented in the pathway represented in Figure 4.10) are mainly a lineal representation. Causal relations are often more complicated, and important feedback loops exist between the different elements of the causal chain. Nevertheless, the essence is to identify what local regulatory authorities do to understand the outcomes and impacts to which they contribute as well as to identify some of the external factors that may affect those outcomes and impacts.

4.6.4 **The pathway**

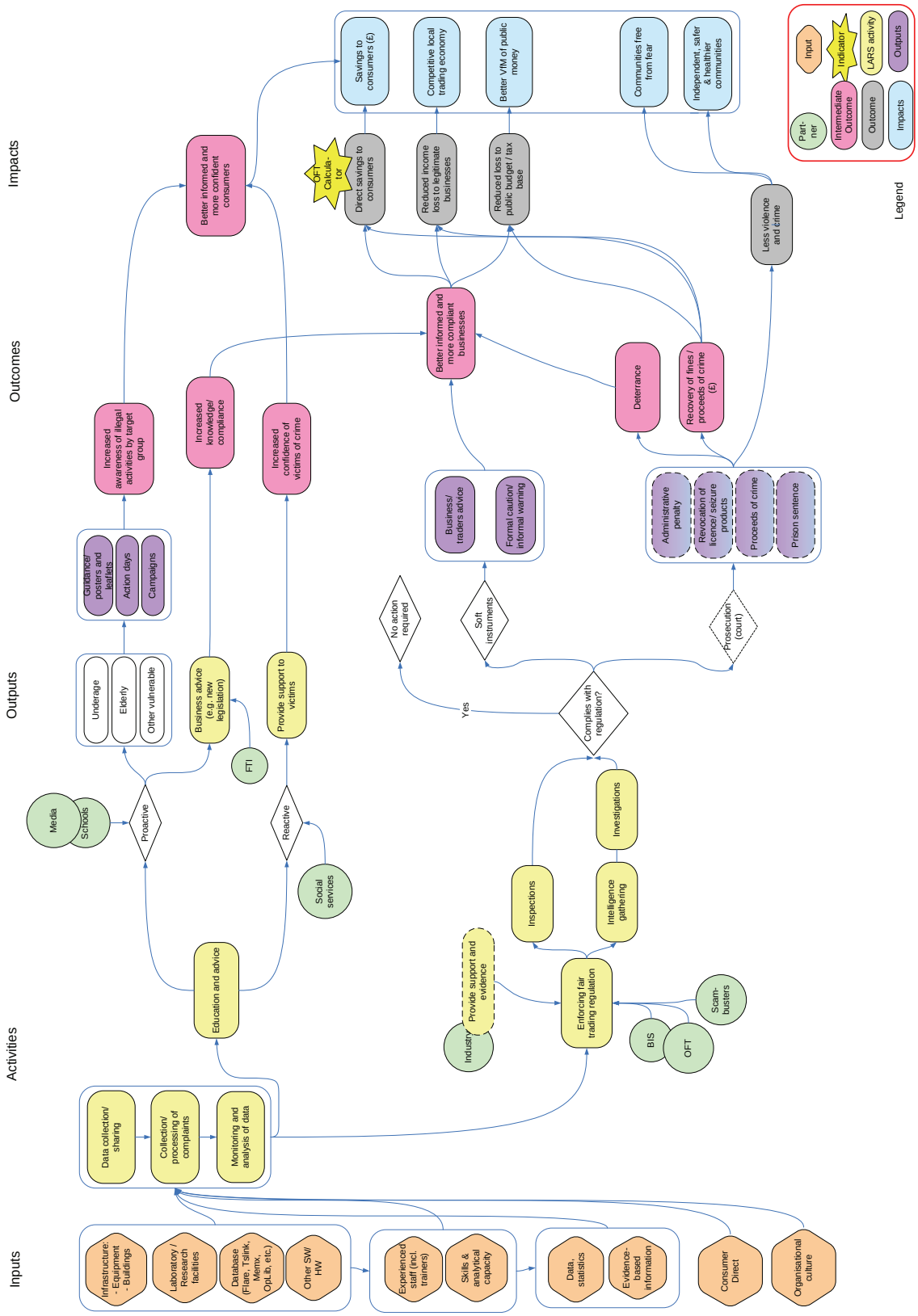


Figure 4.10: Trading standards pathway

4.6.5 Identifying indicators and developing a dashboard

After establishing the pathway and intervention logic for fair trading, the next step is to identify indicators that can be used to measure the key elements of the pathway in an impact and outcome dashboard.

In terms of **inputs**, Northamptonshire could use information available on staffing levels, on the number of people receiving training and also on running costs. Northamptonshire trading standards had a total of 39.5 staff on 1 April 2008 and a total net budget of slightly over £1.9 million.[38] However, the service benefits from a more detailed reporting of inputs. For example, LARS could report by the nine areas of responsibility: fraud (including rogue trading), fair trading, age-restricted sales, animal health and welfare, consumer and business advice, environmental controls, consumer safety, food and agricultural standards, and licensing and registration.

Achievements towards the staff personal appraisal and development programme could provide an indication of how many skills and how much knowledge and expertise go into trading standards work. Performance is reviewed on a regular basis and assessment on how to improve it is provided. The number of actions derived from the assessments for the programme could be an indicator of how the service is being monitored and how it managed to ensure delivery of services.

The selection of indicators for the dashboard is thus relatively straightforward here, even though there might be difficulties in attributing costs to the different areas of responsibility within trading standards:

1. staff (FTEs or in £)
2. achievements derived from assessments of the personal appraisal and development programme
3. running costs (in £).

There are a range of **outputs** currently available to the service. Let us consider the two causal chains again:

> **Chain 1.** Many types of outputs are produced as a result of **education and awareness activities** to consumers. For example, Northamptonshire County Council counts the total number of press releases, which for the year 2007/8 totalled 20.[39] These press releases were targeted at the whole population and covered a wide variety of topics. Titles included 'Trading Standards Warning about Counterfeit Vodka', 'Electric Blankets Tests Reveal Faults', and so on. Press releases may not only raise the exposure (and profile) of trading standards; they may also raise awareness of the type of crime and how to deal with it. To target more specific consumers' groups, Northamptonshire could count the number of people over 50 attending awareness campaigns. Their campaigns set up to raise awareness about distraction burglary and at the same time provide community safety and security advice.

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[38] Northamptonshire County Council Trading Standards Service Plan 2008/9. Available at: http://www.tradingstandards.gov.uk/northants/SERVICE%20PLAN%20%202008-2009.pdf (accessed June 2009).

[39] See: http://www.tradingstandards.gov.uk/cgi-bin/northants/newslist.cgi?news=prss

Chain 2. Enforcement actions produce a variety of outputs, which may be classified depending on the level of risk to health, danger or nuisance from a particular situation. The actions are proportionate to the risk and generally allow informal warning before formal action, unless there is a high risk. Some of these actions produce more informal outputs, such as visits to businesses, general visits or visits resulting from an inspection or investigation. Other outputs produced are formal cautions issued by trading standards. For example, Northamptonshire has regularly reported on the number of formal cautions issued by the service. No information was available for the year 2006/7, but the number of cautions issued went down from 21 in 2005/6 to 14 in 2007/8. This number in isolation is not necessarily an indicator of increased compliance. However, by following the causal chain it would be possible to find out whether the decrease in the number of cautions is a measure of better compliance or just a consequence of an increase in the number of inspections. For more severe cases, Northamptonshire also records and publishes information on the number of defendants prosecuted in court, which increased from 29 in 2005/6 to 59 in 2007/8. Again, these statistics can only be analysed as part of the different indicators of the causal chain. For example, measures along the causal chain could indicate that the number of prosecutions increased as a direct result of an increase in the number of inspections, of better trained and thus more efficient inspectors, and of better collaboration between trading standards, the police and other local partners.

Depending on what path is followed along the causal chain, a variety of outcomes result from LARS activities. Following the causal chains that have been described, LARS can claim to produce three principal outcomes: better informed and more confident consumers, better informed and more compliant businesses, and improved recovery from fines and proceeds of crime.

Chain 1 showed that education and awareness activities are carried out by trading standards with the aim of achieving certain impacts. For example, awareness days about bogus callers and doorstep crime should decrease the chances of residents being defrauded, and in the long term entail significant cost savings to consumers and reduced crime. However, before understanding the long-term impact, trading standards need to measure the short- to medium-term impact. In this particular case, Northamptonshire could measure whether education and awareness activities targeted at consumers result in better informed and more confident consumers. This outcome can be measured by means of the **number of complaints/enquiries**. Alternatively, Northamptonshire could measure the outcome on the basis of the results from the customer satisfaction survey. The survey includes information about percentages of 'consumers who found the advice given was useful and easy to understand', 'consumers who felt better equipped to deal with future problems', and so on.

Chain 2 (enforcement activities) produces two main types of immediate outcome. On one hand, enforcement activities, whether through soft instruments or prosecution, are intended to produce more informed and more compliant businesses. Business compliance may increase simply because businesses have more information about their rights and obligations and because they get advice on how to deal with some of their problems. However, business compliance is also highly correlated with the deterrent effect caused by the risk of being caught – in other words, by the probability of being caught in an illegal activity plus the severity of the punishment. Better informed and

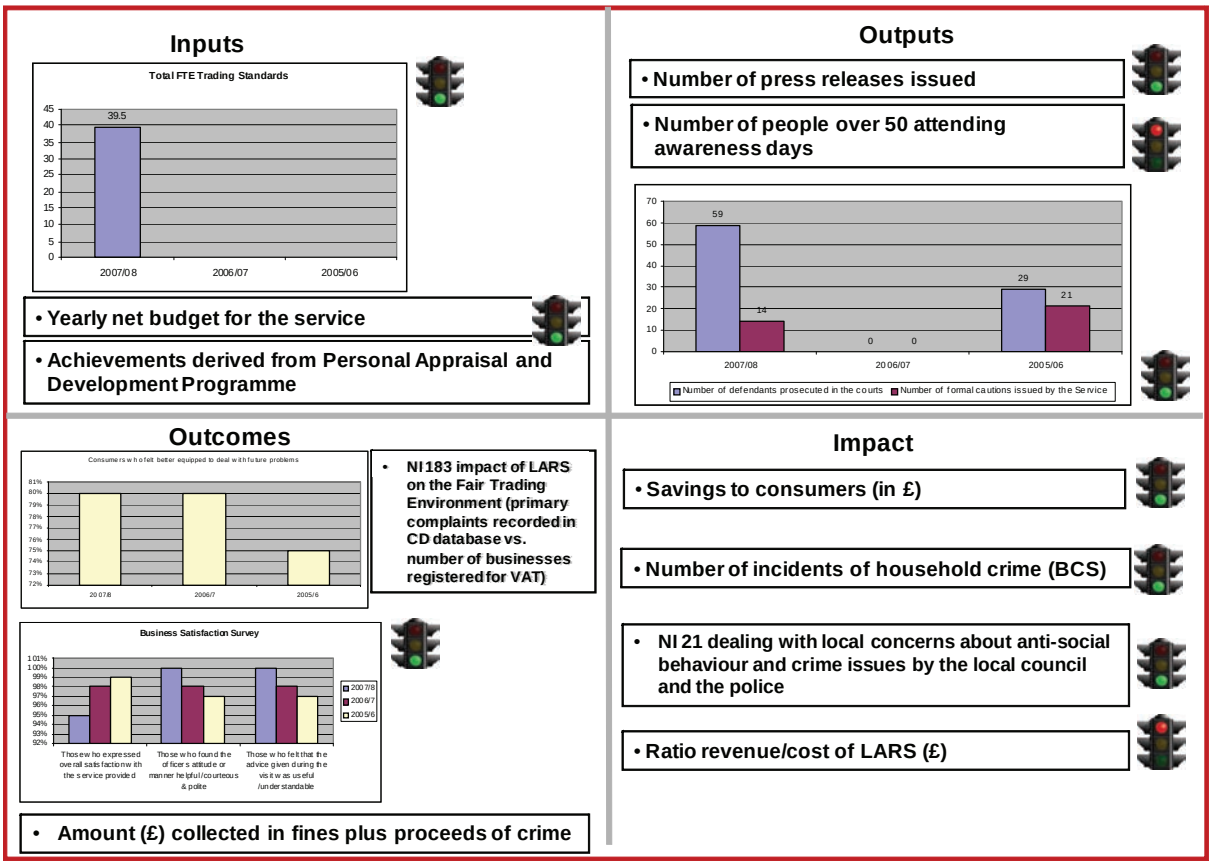
compliant businesses can be measured through business satisfaction surveys. Northamptonshire reported that 100 per cent of businesses in 2007/8 felt the advice given during a visit was useful/understandable. On the other hand, the outcomes of enforcement activities can also be measured in terms of the amount of money collected from fines and from proceeds of crime.

Impact follows outcomes. Better informed and more confident consumers and better informed and compliant businesses lead to the following:

- **Direct savings to consumers.** OFT's trading standards impact study (OFT 2009) reports that trading standards work can deliver at least £347 million of consumer savings a year in the UK, which equals a benefit–cost ratio of 6:1. To estimate the individual contribution of each trading standards service, OFT in partnership with TSS has developed the Impact Assessment Calculator. The calculator enables TSS to estimate individually the consumer savings they deliver, and hence provide evidence of their contribution to the economic well-being of local communities.
- **Less violence, crime and disorder.** With informed and confident consumers and more compliant businesses, the levels of crime, violence and disorder may decrease. For example, if consumers have been informed that doorstep crime offenders tend to distract a person in order to burgle their house by using tricks such as saying they are from a gas or electricity company, consumers will be more aware of taking such preventative action as asking visitors for official documentation. TSS in partnership with organisations such as the police collect important statistics that can inform about how violence, crime and disorder are affecting the local community. A key source for this type of information is the British Crime Survey, which contains different indicators by county council. Alternatively, NI 21, Dealing with local concerns about anti-social behaviour and crime issues by the local council and police, may be used as an indicator to measure the impact of trading standards on perceived confidence in community safety. This indicator is built on data from the place survey and the British crime survey.
- **Reduced income loss to legal businesses** is difficult to measure. Nevertheless, surveys reporting satisfaction of businesses with trading standards could be used as an indicator.

Money collected from fines and proceeds of crime improves public finances. The type and degree of penalty for breaking the law tends to have a deterrent effect on offenders, as suggested by the general deterrent theories which assume that potential offenders will measure the risk of being similarly caught or prosecuted for committing a crime. However, deterrence theory has proved difficult to validate, also because of the multiple intervening factors (Encyclopædia Britannica 2009). Prosecution can also be an important source of public income. OFT estimated that the financial impact of TSS in terms of fines and proceeds of crime was in excess of £3 million in 2007. Hence, by pursuing crime more effectively, the revenues generated by LARS can be higher, potentially increasing the return on investment of every pound invested. It is important to bear in mind, however, that the higher the perception is regarding the efficiency of LARS, the higher the

deterrence effect, which at the same time can cause a reduction in prosecution cases coming to court and therefore a reduction in revenue.



SOURCE: RAND Europe

Figure 4.11: Dashboard trading standards for Northamptonshire County Council

CHAPTER 5 Developing a toolkit to assess impacts and outcomes

The final objective of this research project was to develop a toolkit for LARS to identify and assess the impacts and outcomes of their activities. This chapter provides the rationale behind the development of the toolkit. It first reflects on the views of LARS on a toolkit, captured through key informant interviews and the survey of local authorities. The discussion then moves on to providing the rationale for selecting specific elements to be included in the toolkit. The toolkit itself, in the form of a step-by-step guide, may be found in section 5.3. Although it consists of several tools, the term 'toolkit' (or 'toolbox') may be slightly misleading. The tools suggested here are closely linked and part of a step-by-step approach to understand impacts and outcomes better. While LARS would be able to use them separately, the full value will lie in using them as the elements of a comprehensive evaluation framework.

5.1 Making a toolkit relevant for stakeholders

To ensure that the toolkit will be both useful and meaningful for local authorities, RAND Europe consulted LARS through interviews, an online survey and five workshops with specific regulatory services. These enabled us to build on current practice of using impact and outcome information as well as scoping out the demand for a toolkit.

5.1.1 Building on current practice

The current practice of how LARS use and consider impact and outcome information has been discussed in detail in section 2.3 of this report. The observations that are highly relevant for the design of the toolkit may be summarised as follows:

- A wealth of data and information is collected by local authorities for a wide range of purposes (e.g. statutory obligations, performance and auditing purposes). However, a large proportion of these data remain focused on output measures rather than on wider impacts, despite a gradual move towards more outcome-based data gathering since the introduction of LAAs, National Priorities, and so on. In fact, a large proportion of local authorities do not seem to collect information on the wider impacts of their regulatory services currently (45% of respondents to our online survey).
- The information that local authorities currently collect on impacts is most likely to concern the impact of their regulatory services on businesses in the local community, on the environment of the local community and on the general health outcomes for the

local population. More particularly, such data are most likely to be documentation and information on their enforcement activities, data on the impacts their services have on the local community and data on the engagement of their services with stakeholders.

- The information that local authorities feel would be most useful for them to collect (or, indeed, information which they currently collect that they feel is most useful to demonstrate the wider impacts of their regulatory services) as far as the wider impacts of their services are concerned, is information and data on the impact of their services on local businesses.
- Local authorities collect data on the wider impacts of their regulatory services to allow management to assess the performance of their services and to consider the benefits of these services, and also to be better informed about the basic functioning of their services, their partnership working or their wider contribution to broader outcome / impact-based measurement frameworks such as LAAs and National Priorities.
- Local authorities face hurdles in collecting impact information. Amongst these, the most prevalent are the availability of data, the evaluation and analysis capacity available at the local level and the issue of attribution of impacts. Data are often not collected, not available at the right level of aggregation for the local authority or held only by partners. At the same time, the size of many LARS does not allow them to build up sufficient capacity to collect and analyse data themselves. The challenge of attribution is of a conceptual nature, it is often difficult or even impossible for services to dissociate partners' and wider actors' and factors' impact on a given outcome from the impacts of LARS.

5.1.2 Establishing the demand for a toolkit

Against this background RAND Europe also collected views on the 'demand' for a toolkit; we asked both survey and interview participants whether a toolkit would be useful for them, and if so which features it should have. We received a total of 94 responses to the open-ended question in the survey about what features a toolkit should have and what kind of indicators it should collect. The majority of the answers were provided by services that currently do not collect outcome or impact information (see Table 5.1 below).

Table 5.1: The demand for a toolkit

	Q4: Do you collect any information on the wider impact of local area regulatory services in your council?		
		Yes (n=104)	**No (n= 84)**
Respondents formulating ideas on features of a future toolkit	Yes	40% (42)	61% (51)
	No	60% (62)	39% (33)

SOURCE: RAND Europe survey of local authorities 2008

Table 5.2 below provides an overview of the key themes mentioned in the open survey questions, the right-hand side giving an impression of how often the themes that were mentioned more than twice occurred.

Table 5.2: Key themes in the design of the toolkit (Q18)

Themes: the toolkit should …	Count
– be simple and easy to use	13
– help establish the causal link between LARS activities and outcomes	12
– include local/regional data and allow for comparisons	8
– include health outcome data	8
– provide examples of good or best practice	7
– provide a cost-benefit analysis of LARS activities	5
– use existing data sources	5
– provide (reliable and repeatable) data	5
– link to LAA and local strategic frameworks	5
– include data on business impact	5
– include data on crime and community safety	5
– provide methodologies to assess benefits	3

SOURCE: RAND Europe survey of local authorities 2008

Combining the survey responses with the richer, contextualised information obtained through the key informant interviews allows us to identify the following key themes concerning the scope and focus as well as the content and the design of the toolkit.

General comments related predominantly to the usability of the toolkit:

- **LARS would like an easy-to-use tool.** Practicability or ease of use of the tool was the prime concern of the regulatory services consulted and featured prominently during the interviews. This relates both to the resources and skills required ('not requiring a degree in mathematics'). Respondents suggested a web-based tool that could be used easily by different services.
- **A toolkit should be based on existing measures and indicators.** Closely related to the desire for an easy-to-use tool, a recurring theme was that any toolkit should avoid requiring substantial new data gathering and or the definition of new measures and indicators. It could also include data held by national regulators and other partners in the field. Exchanging data with PCTs or local police forces was mentioned in particular by the interviewees (compare with Q16/17) and the survey respondents.

In terms of **features or functionalities** a toolkit should have, the respondents developed different ideas in terms of focus and scope:

- **Establish causal links.** To support LARS in uncovering the link between what they are doing on a day-to-day basis and outcomes and impacts on the local community is the feature of a potential toolkit most often mentioned by the respondents. LARS currently perceive it as difficult to link the activities of the services to changes in the local community.
- **Provide a cost-benefit analysis of LARS activities.** Another group of respondents would like the tool to allow them to conduct a cost-benefit assessment of LARS activities. This would help LARS to 'make a business case' for investment in their services.
- **Include local/regional data in benchmark performance.** To benchmark their performance and to make data more meaningful at the local level, respondents suggested

focusing the toolkit on regional and local data in order to compare the own authority's performance with those of similar ones.

- **Providing best-practice examples.** To help services understand the toolkit, some would want best-practice examples of how it could be applied. Such examples should cover different type of activities as well as different services (trading standards, environmental health).
- **Provide reliable and repeatable data.** In slight contrast to the desire to use existing data sets only, some respondents envisaged the toolkit as a kind of database from which they could choose good-quality outcome indicators.
- **A toolkit should collect a wide range of outcome information.** The type of information contained in a toolkit should cover a wide range of potential impacts and outcomes. Health impacts and impacts on local businesses were put forward as the most important ones to collect for LARS.
- **Link to local strategic frameworks.** An important final element suggested was to ensure the link between the toolkit and local strategic / performance management frameworks.

Finally, the interviews were particularly insightful in generating an understanding of what an impact and outcome toolkit might be used for and what the purpose of the toolkit might be:

- **Communicate to local stakeholders.** The toolkit will be useful to local authorities to demonstrate their impact to local stakeholders, and would thereby improve the accountability of the services.
- **Demonstrate value for money.** If the toolkit enables local authorities to demonstrate that their actions on the ground are having a positive economic impact on business and consumers, it will enable them to build cases for given areas and to show the value for money of their services.
- **Help to make the case for funding.** By demonstrating that regulatory services at the local level contribute to achieving local priorities and generate benefits, they could achieve more awareness among the political leadership of the councils.

However, two respondents were critical of developing a new toolkit focusing on impacts and outcomes:

- **Provide methodologies, rather than another toolkit.** This view focused on providing more specific methodologies to assess specific kinds of impacts rather than having a toolkit at a relatively high level of abstraction.

5.2 The design of the toolkit

5.2.1 Approach: balancing objectives, expectation and capacity

Taking into account these views of the potential users of a toolkit and the research objective of developing 'a toolkit for use by LARS, that demonstrates the impacts and outputs of LARS activity and clearly demonstrates the costs and benefits of LARS activity across a series of

identified pathways',[40] RAND Europe designed a toolkit that sits within the 'theory of change' tradition of evaluation.

Such an approach takes into account the difficulties in measuring the attribution of a single policy, actor or intervention on a complex, multifaceted and multicausal problem. It replaces the need to make a clear statement of attribution with an approach that demonstrates a contribution to the solution of a problem by establishing a causal chain (or a 'theory of change') for how a specific intervention will result in (desired) changes. By providing information along each step of the causal chain, this approach then develops a plausible argument that a specific intervention had, or had not, contributed to a specific problem.

As such the toolkit approach addresses one of the key concerns of LARS: to develop a better understanding of the causal link between the activities of regulatory services and larger societal impacts. It stops, however, short of being a tool to conduct a full cost-benefit calculator. In mapping out the key relationships between LARS activities and potential impacts and outcomes, this toolkit will, however, be a stepping stone for further analysis in terms of a cost-benefit analysis. Given the breadth of LARS activities, the experience of this research project shows that such analysis would need to be conducted at a higher level of granularity, looking at very specific activities of LARS.

A very good example is the work conducted by OFT on the impacts of the fair trading work of local trading standard services, which looks at one specific outcome (consumer savings) of specific activities (advice and interventions) (OFT 2009). The underlying causal chain explored by OFT would be part of a wider pathway of this service and could as such be identified for further analysis.

Finally, to make the toolkit easy to use it will be primarily built on existing tools, measures and indicators, and it is designed to use the knowledge of local services to develop a meaningful and realistic assessment of local impacts and outcomes of regulatory services.

5.2.2 The key elements of the toolkit

The RAND Europe toolkit consists of three steps, each with a specific tool to be used by LARS:

1. mapping the intervention logic using logic models
2. identifying and defining indicators
3. presenting the findings in a dashboard.

Intervention logics

At the core of the RAND Europe toolkit stands the development of pathways which will help the services to establish the intervention logic of their activities – how activities conducted by LARS such as inspections, licensing or education efforts could lead to the desired outcomes and impacts at the local level. The tool proposed combines the systematic, high-level approach of logic modelling with some of the more fine-grained rigour of process mapping, and follows the approach outlined for the five pilot pathways conducted as part of this research project (see the previous chapter). The aim of this step is to identify the key causal chains that lead from an activity to desired outcomes. By identifying and 'isolating' these causal chains, they can be used

[40] LBRO invitation to tender.

later to structure and focus the measurement activities. One such causal chain would be, for example, to conduct education activities, with a television campaign as the most important output, which should lead to an increased awareness among women of the dangers of drinking during pregnancy. That in turn should lead to improved health outcomes.

To ensure the usefulness and acceptability of the toolkit to LARS, establishing the intervention logic is best done in a collaborative way. Using workshops with LARS to establish the pathways is therefore proposed. Experience from the workshops conducted for this research project shows that such workshops are a very good opportunity to step back from day-to-day work and to reflect on what the service is trying to achieve and how.[41]

Indicators and measurement

Once the pathway has been developed and the key causal chains have been mapped out, the next stage of the toolkit is the identification of potential indicators that would provide a fair description of changes along the causal chain. In the original design of the toolkit, this stage would have been primarily informed by the impact evaluation matrix (see Chapter 3), and LARS could have used the matrix to 'pick and choose' indicators out of a database. The literature and documentation reviewed did not, however, allow the compilation of such information within the scope of this project.

The identification of indicators will therefore have to rely to a large extent on the knowledge and expertise of LARS themselves, and RAND Europe provides techniques in the toolkit on how to identify potential indicators. A systematic consideration of partners that at some stage interact with LARS is, for example, a starting point in identifying indicators.

The outcome of this stage of the toolkit will be a long list of indicators to be potentially used to measure the elements of the causal chain, and an assessment of whether these indicators are available already or not.

Building a dashboard

The final stage of the toolkit aims to prioritise and present indicators in a way that allows a quick but meaningful overview of which impacts and outcomes are achieved and contributed to by LARS. To do so RAND Europe chose to adapt the idea of a management 'dashboard', which has become increasingly popular in recent years. Dashboards are executive information systems that present a small set of performance measures on a regular and structured basis to strategic decision-makers in order to provide an overview of the organisation's performance, and thereby to identify areas of particular success or concern for more detailed examination.

In a situation which is awash with different performance measurement, indicators and targets, we decided to use the dashboard approach to make more sense of already existing data and indicators and to provide guidance on how to link this information in a meaningful way. However, this dashboard will have a less operational perspective than management dashboards and will not need to be updated as often as a management tool (which often can be 'real time' as well). Instead we see the dashboard as a more strategic tool that should be updated once or twice a year.

The key challenge of a dashboard lies in the selection of data sources and indicators. To support this selection the guidance contains a rationale for selecting specific indicators (along the

[41] A similar view has been formulated by one respondent to the survey.

pathways) and tools that will help to prioritise data sources with the aim of reducing the number of indicators used for the dashboard to between 16 and 20. Criteria for the prioritisation of indicators and measurements are both systematic and pragmatic. They include the following:

- Does it cover a key causal chain?
- Does it cover an input, output, outcome or impact?
- Is it being collected already?
- Are data held by the local authority or external partners?
- Will new data be collected?

The final step of the dashboard is to represent the indicators in a graphical interface.

5.3 A step-by-step guide to assessing impacts

Based on these conceptual considerations, this section now presents the step-by-step guidance (or the 'toolkit') for LARS, which will be also used as a stand-alone document for further dissemination purposes.

Introduction

This toolkit has been developed as part of a research project on the impacts and outcomes of LARS activities commissioned by the LBRO. This toolkit has been designed to help LARS overcome three interrelated challenges:

1. LARS often attract little attention and have a low profile in local government priority setting. This may be due to the fact that little systematic knowledge about the impacts and outcomes of LARS activities exists and that it is often difficult to measure, prove and illustrate the positive contributions they make at the local level. Against a background of increasing responsibility for local authorities and tightening local budgets, it may become even more difficult for LARS to make a case for their service and defend their budgets in the future.
2. With the emergence of the better regulation agenda and its extension to the local government level, LARS will need to be increasingly prepared to measure their impact on stakeholders and demonstrate that their activities create benefits and outcomes for local businesses and the communities.
3. Finally, the move towards fewer, outcome-oriented and joined-up performance measures requires LARS to have a better knowledge about the outcomes they are contributing to and how they can help achieve the targets of the LAAs.

This toolkit should help LARS across England and Wales to engage in a more evidence-based discussion about the important impacts and outcomes they may have on a local level and will be a stepping stone towards a cost-consequence analysis at the local level.

EXAMPLE

Throughout this toolkit, you will find examples of how to apply it to assess LARS activities. The examples will focus on the work we conducted with East Cambridgeshire District Council on their fly-tipping activities, but will also include evidence from the other case studies.

Despite consisting of several tools, the term 'toolkit' (or toolbox) may be slightly misleading. The key tools suggested here are closely linked and part of a step-by-step approach to understanding the impacts and outcomes better. While you would be able to use them separately, their full value will lie in using them as the elements of a comprehensive evaluation framework.

This toolkit is structured into three stages, which loosely follow the research stages of the wider research project undertaken by RAND Europe. These stages are:

1 to establish the intervention logic of LARS

2 to find indicators to measure LARS outcomes and impacts

3 to summarise the findings in a dashboard.

There is an overview of the stages and steps in Table 5.3 below.

Table 5.3: Overview of the key stages and steps of the toolkit

Establish the intervention logic of LARS	
1.	Define the scope of your pathway
2.	Choose your approach
3.	Identify your activities
4.	Analyse the inputs
5.	Identify partners
6.	Identify outputs
7.	Identify outcomes and impacts
8.	Link the elements of the pathway
Find indicators to measure the elements of the pathway	
9.	Create a long list of indicators
10.	Mapping potential indicators against known indicators
Synthesise, analyse and communicate the findings in a dashboard	
11.	Prioritise indicators
12.	Choose indicators for dashboard
13.	Arrange indicators into a dashboard

Stage 1: Identify the impacts and outcomes of your service

The objective of the first stage of the toolkit is to identify the intervention logic of your regulatory service. By 'intervention logic' we mean the way in which your activities are contributing to your service's and your local authority's final objectives. The main tools we suggest for use here are logic models and some elements of process mapping. The final product of this stage will be a pathway – a visual representation of how you perceive impacts to relate to your activities.

STEP 1: Define the scope of your pathway

The first step towards developing this pathway will be for you to define the scope or boundaries of what activities you want to include in your pathway. As both trading standards and environmental health work across a wide range of areas, it will be necessary to focus on a specific area of activity. In choosing such an area you will have to be aware of the trade-off between focusing on a narrow area, which will allow you to draft a more detailed and specific pathway but with only limited outcomes and impacts, and a more high-level pathway with a lower level of detail and accuracy, but a wider picture of outcomes and impact. Furthermore, there are in principle at least two ways of defining the scope and the boundaries of the pathway:

1. By **activitiy:** Prior to developing the pathway, you define a cluster of activities in a specific policy area. A good starting point for this would be, for example, the policy areas defined by the Rogers Review (2007). From this list of activities you then work your way 'forward' to uncover what final outcomes these activities have.
2. By **outcome:** You are interested in a specific outcome, and want to know which activities contribute to LARS, for example which activities contribute to the reduction of alcohol related harms.

Both approaches can be chosen within this toolkit, but the second one is more challenging and will be practically more difficult to execute and requires further steps in defining the scope of your work and ensuring a robust analysis:

1. After choosing your outcome, you need to define an **initial list of activities** you expect to contribute to this outcome. This list will then need to be verified, refined and amended as your analysis continues.
2. It is highly likely that **other services' activities** will also contribute to your outcome, so you should consider which external partners to include, in developing your pathway.
3. By defining outcomes, there is a danger that you will miss out on the **unintended impacts** of LARS. To avoid this, go through all the causal chains in both directions to identify where you might have overlooked essential unintended outcomes.

EXAMPLE

RAND Europe decided to select three case studies which looked at specific activities:

– Activities to tackle fly-tipping

– Measures to tackle alcohol-related harm

– Reducing harm from smoking

RAND Europe then selected two case studies which focused on outcomes:

– Enforcement of health and safety in non-industrial workplaces

– Ensuring a fair trading environment

STEP 2: Choose your approach

After deciding on the scope of your pathway, you will need to make a decision about the approach you want to use to draft the pathway. The choice is between an interactive approach and a desk-based approach:

1. The **interactive approach** uses a workshop with LARS staff and potential external partners to gather the evidence and produce the first draft of the pathway.
2. In the **desk-based** approach a project manager or a small project team will draft a pathway based on available documentation such as service plans and strategy documents as well as their own experience.

The interactive approach has several advantages over a purely desk-based approach. By holding an interactive workshop with key staff involved in the activities and potentially also external partners and stakeholders, a wider set of views can be harvested and the story is going to be generally richer in context. Secondly, through jointly developing a pathway ownership of the pathway among staff is increased and discussions about the outcome and impact focus of a service can be triggered. Thirdly, a meeting like this may help to identify options for future collaboration and allow further developing networks on the local level. An interactive approach is, however, more resource intensive and will still need desk-based preparation and follow-up. Nevertheless we clearly see the advantages outweighing the disadvantages and would recommend this approach.

EXAMPLE

RAND Europe used an interactive approach for all case studies conducted. In each local authority we facilitated an interactive workshop. The main technique used was so called 'hexi-mapping'. Participants were asked to write down key elements on individual hexies/Post-it notes to identify the key elements of the causal chain. In a second stage those were put on a large whiteboard and arranged to reach a shared understanding of the key causal chains.

A wide range of stakeholders participated in these workshops, representing:

– LARS staff

– other council services

– PCT

– police

– parish councils

– neighbourhood panels

– industry and business.

The next steps formulated here will be the key analytical steps to cover both an interactive and a desk-based approach.

STEP 3: Identify your activities

The starting point for you to draft a pathway will be to identify the activities you and your team are currently conducting. The best start may be to identify activities individually. These are questions you could ask:

- What are the main activities you are conducting?
- On a day-to-day basis, what are you doing in your job?
- Can these activities be clustered in a group of related activities?

Then you will need to group these activities into clusters of similar activities to reduce the complexity of your pathway. Typically you might find groups of activities such as support,

analysis and intelligence, enforcement or education. These groups will be the cornerstone of your pathway. From them you will both work 'backwards' to identify inputs and 'forwards' to identify the outputs and later the outcomes of your activity.

EXAMPLE

In the fly-tipping workshop, the following activities were identified by workshop participants:

– participating in environmental action days

– enforcement

– prosecution

– investigation

– site visits

– rubbish removal.

These varied activities essentially comprise two clusters, one centred on enforcement actions, and another on education.

The workshop conducted on smoking in Leicester identified a wider range of activities, e.g.:

– running smoking cessation programmes

– awareness and education activities

– enforcing marketing and sales regulation

– enforcing underage sales regulation

– ensuring compliance with smoke-free regulation

– dealing with counterfeited and smuggled tobacco products

– tackling smoking-related litter.

In this case we decided to not group them any further to reflect the breadth of activities. However, two of the activities, smoking cessation and smoking-related litter, were not part of the service under review (environmental health rather than trading standards).

STEP 4: Analyse the inputs

Once you are confident that you have identified the relevant activities, you can turn your attention to the inputs of your activities. The key questions to address are these:

- What inputs do you need to conduct these activities?
- How many staff are required for these activities?
- What resources are needed to conduct the activities?
- What information is needed?

If you decide to focus your pathway on a part of your services activities, you may find it difficult to attribute the share of staff or specific resources to specific activities. At this stage a simple mentioning of the type of inputs would be sufficient, but for the later step you may need, for example, to estimate how much time your staff spend on a particular activity.

EXAMPLE

The inputs required for conducting the fly-tipping work were:

– staff
– skills and capacity
– resources for rubbish removal
– investment budget
– intelligence about fly-tips
– powers to enforce and investigate.

STEP 5: Identify partners

Before moving on to the core of the pathway, the output – outcome – impact relationship, now would be a good time to reflect on the partners you are working with. The idea behind this is twofold:

1. A better understanding of whom you are working with will allow you to assess who else influences the outcomes and impacts of activities.
2. Your partners may hold valuable information and data sources that can be useful for you to assess the outcomes and impacts of your work.

Another set of questions may be useful in identifying partners:

- With whom are you working with on a regular basis?
- With whom do you share information?
- On whom do you have to rely to perform your services?
- What is the character of your collaboration?

EXAMPLE

Key partners identified for the work on fly-tipping were:

– parish council
– neighbourhood policing team
– RECAP (Recycling in Cambridgeshire and Peterborough)
– other council officers
– neighbourhood panels
– fire brigade
– police
– EA.

STEP 6: Identify outputs

With the identification of outputs, you start to develop your pathway forward. Outputs are the direct product of your activities and are typically tangible and countable. Outputs generally refer to what is being done or what is being produced. In principle you should have full control over the outputs you produce. The type of output will depend on the activity under consideration. For example, the outputs of an advertising campaign typically include the number of local press and television adverts, website activity, and so on. The output of food standards work would be, for example, an inspection or a particular type of enforcement action. Compliance of food business is

already an outcome as it is beyond your immediate control and might (or might not) be the result of your inspection activity.

To identify your outputs you will therefore have to ask yourself what the direct outputs of your activity are. A lot of (performance) management frameworks use output indicators, so this may be a good starting point for you to identify outputs.

EXAMPLE

The outputs that could easily be identified for the fly-tipping example were:

– removal of waste

– fixed-penalty notices

– cautions

– court cases

– education activities

– environment action days.

STEP 7: Identify outcomes and impacts

From the identification of outputs you can move on to the identification of outcomes and impact.

Outcomes are the intended and unintended results and consequences of your activities. Typically, outcomes tend to be categorised into short-, medium- and longer-term results. The differentiation between outcomes and impacts is not very clear, and we propose here to use a pragmatic definition of impacts. For this research we consider impacts to be outcomes that are more long term and have a wider impact on the community or environment. They are the fundamental direct and indirect effects of your activities over a long-term period on the wider community or environment. These include changes in economic and financial conditions, in social conditions (e.g. reduced violence or increased cooperation) or in environmental and political conditions (e.g. participation and equal opportunities).

To identify the outcomes and impacts, consider the list of questions below:

- What is the ultimate objective of your activities?
- What are the final outcomes you want to achieve?
- Which intermediate outcomes are a precondition for achieving the final outcomes?
- How does your service affect the local community?
- Which groups in the community might benefit, or be burdened by, your service?

In addition, a list of potential outcomes and impacts is included in RAND Europe's impact evaluation matrix, which may be found in the accompanying research report. This initial brainstorming should provide you with a long list of potential outcomes and impacts, of which you will start to make sense in the next step.

EXAMPLE

A wide range of outcomes was identified by the workshop participants in the Ely fly-tipping workshop:

– recovery of removal costs
– avoided fly-tipping through quick removal of rubbish
– publicity
– deterrence of fly-tipping
– preventing further fly-tipping
– reduced cost of clearance for local authority
– fewer obstructions to rights of way
– cleaner environment
– less pollution
– avoided damage to agricultural land
– reduced cost to taxpayers
– improvement in house prices
– performance in place survey
– community cohesion
– pride in area
– more attractive site for businesses
– more attractive tourist destination.

STEP 8: Linking the elements of the pathway

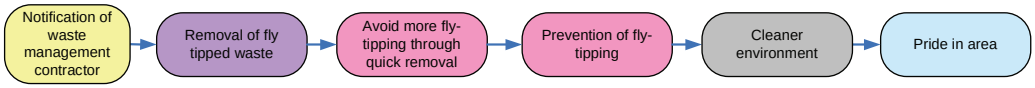
You have collected all the key elements of a logic model. Now it is time to make sense of these elements and start linking those elements systematically:

1. Arrange the elements in a basic Input – Activity – Output – Outcome – Impacts order. This will give you the basic structure of your logic model.
2. Choose one activity and start linking it with the matching output. Then think about which outcome follows relatively directly from this output. These are often intermediate outcomes that are not the final objective of your activity, but a necessary requirement for meeting them. A food safety inspection (output) might lead, for example, to a better understanding and awareness of the regulation by the business owner (intermediate outcome), which in turn leads to more compliant food businesses (outcome). More compliant food businesses in turn will reduce the number of cases of food poisoning (outcome), which will increase the overall health of the local community (impact).
3. Test the chains you identified by talking them through in both directions. Are there logical breaks between elements? Are intermediate steps missing? If so, you will need to add elements.
4. Identify the key causal chains. What are the main mechanisms through which your service attempts to impact on the local community?

On a practical level, this mapping exercise can be done in different ways. If you have a large whiteboard available, you could use Post-it notes to denote the key elements and start drawing lines between them, or you could do it in a similar way on a (large) piece of paper. If you go down the desk-based approach, it may be easier to draft the pathway on a piece of paper before using software packages such as Microsoft Visio® straight away.

EXAMPLE

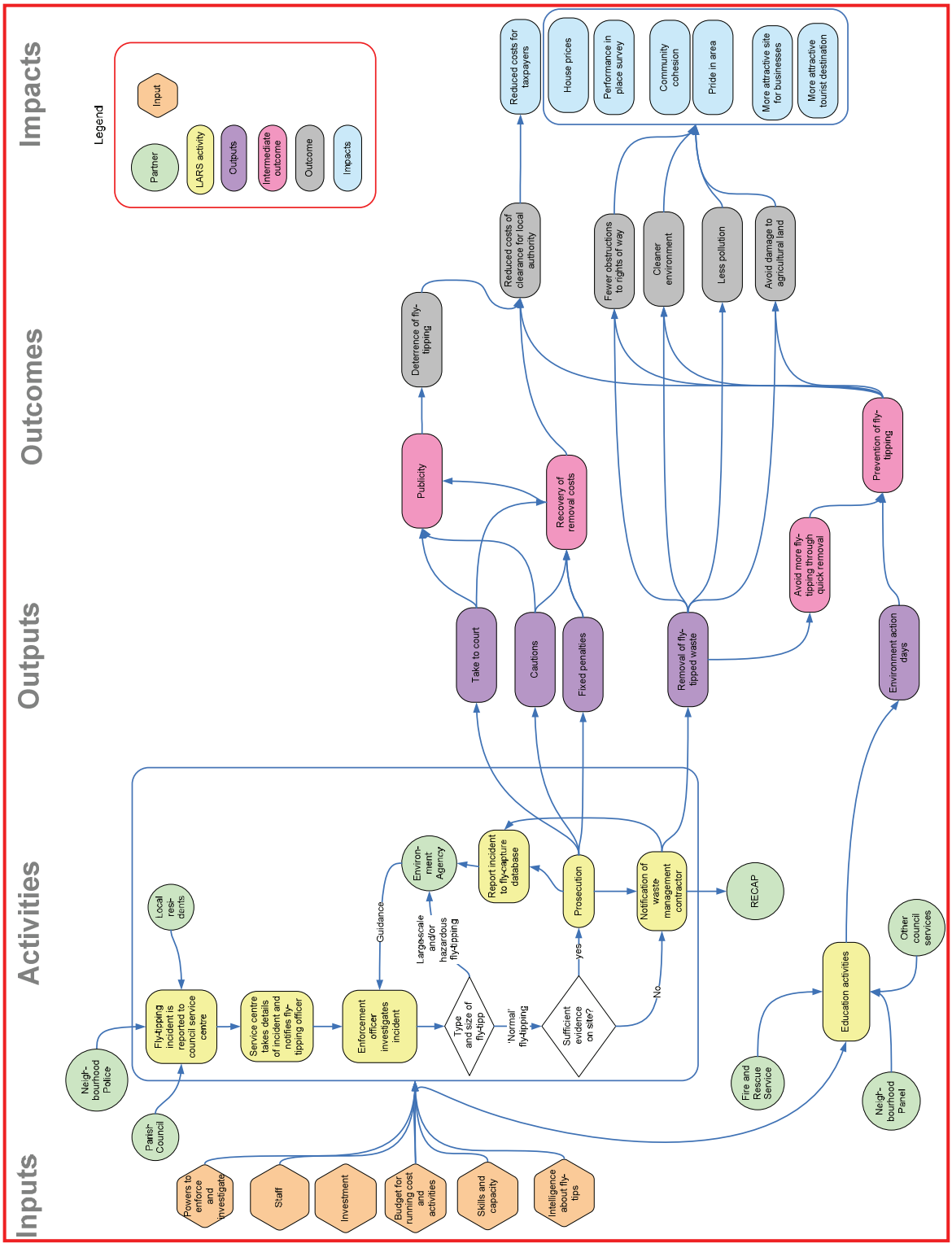
Sticking to our example of fly-tipping, we can now identify different causal links between the elements. The example below focuses on the preventative effect of quick removal of fly-tipped rubbish in the community. If the rubbish is removed quickly (output), this will prevent future fly-tips (intermediate outcome), which in turn results in a cleaner environment (outcome). A visually cleaner environment might lead to an increased identification with and pride in the local area. This chain would look something like this:



This chain does not include inputs as part of the causal chain. In developing your pathway you may realise that inputs can be rather generic for all activities in your service, so you would not need to link them systematically to every activity, doing so when they are very specific. The complete pathway for fly-tipping, combining several of these causal chains, is shown on the next page. Further examples are available in chapter 4 of this report.

Analysing this pathway, three key causal chains may be identified:

1. The current main activity of the regulatory service is to initiate the removal of fly-tipped waste, which has indirect and direct consequences for the local community. Directly, there are clear benefits from removing the waste, including a generally cleaner environment, less pollution, fewer obstructions to rights of way and less damage to agricultural land. Indirectly, the timely removal of waste contributes to preventing future illegal deposit of waste as already existing dumps tend to reduce the threshold for illegally dumping waste.
2. Education activities are the second set of activities conducted by the regulatory services, although those are more ad hoc in nature, including, for example, environment action days. The thrust of the education activities is to prevent fly-tipping by informing the public about the illegal nature and the potential hazards for residents and the environment. This should in turn reduce the number of fly-tipping incidents.
3. The third causal chain evolves from the prosecution of fly-tippers. If there is sufficient evidence on site, the regulatory service can initiate a prosecution which could result in a number of outcomes, such as cautions, fixed penalties or stronger sentences. Central are, however, two outcomes. The prosecution will allow the local authority to recover the removal costs from the offenders. If pursued actively, cases in which offenders have been punished or had to pay back substantial amounts might be communicated to the wider public to create publicity and act as a deterrent. Prosecuting offenders would thus result in reduced costs for local authorities by recovering some of the clean-up costs. In addition the deterrence should lead to an overall reduction in fly-tipping over time.



Stage 2: Find indicators to measure the elements of the pathway

In thinking about and focusing your activities on outcomes and impacts, the pathway you have just developed may already be a valuable tool in itself as it made implicit knowledge and a tacit

understanding of your activities visible. The next stage of the toolkit builds on the pathway you developed and aims to find ways to measure the key elements meaningfully. As a general rule, this toolkit aims to use existing indicators and measurements rather than developing new indicators. This stage consists of two essential steps, a brainstorming phase to identify potential indicators, and a mapping stage to identify which of those indicators are already being measured.

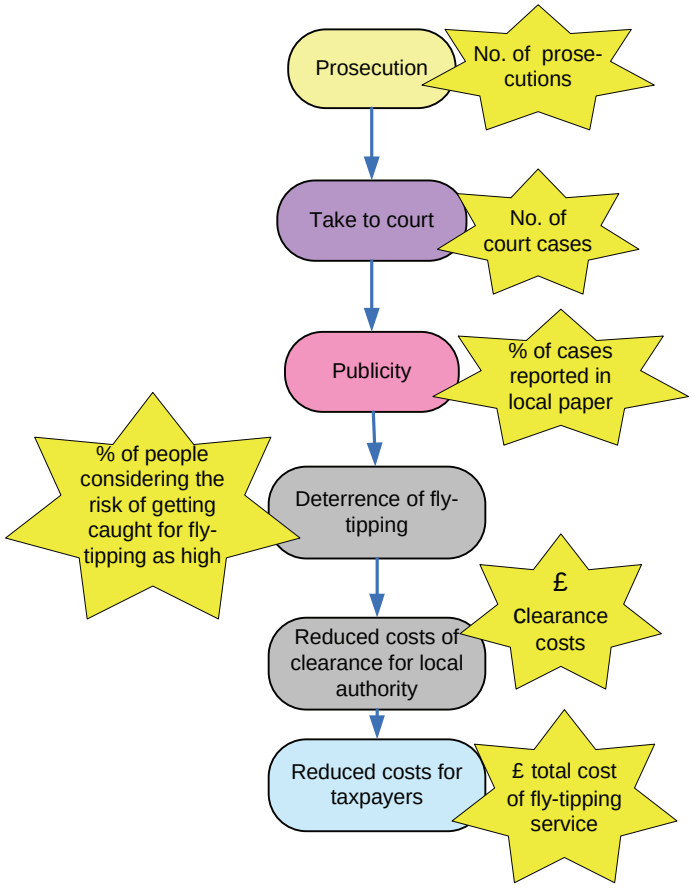
STEP 9: Create a long list of indicators

If you now have the pathway in front of you, start thinking about how you could measure its key elements. It is very likely that indicators have been mentioned during the initial discussion about the pathway, and now would be the time to focus on them again. The aim of this step is to have a long list of indicators that cover your whole pathway. Draw up this list as follows:

- Try to think about a way of measuring each element of the pathway.
- Consult the impact matrix for further indicators,
- Create a long list of indicators that would be potentially useful in measuring the elements of the pathways.

EXAMPLE

To illustrate how you could think about indicators, we again show an extract from the fly-tipping pathway, this time focusing on the effects of prosecuting for fly-tipping The yellow star shapes contain the (unreviewed) indicators



STEP 10: Mapping potential indicators against known indicators

This long list of indicators will now need to be mapped against the information already available by comparing which of the identified indicators are already being measured.

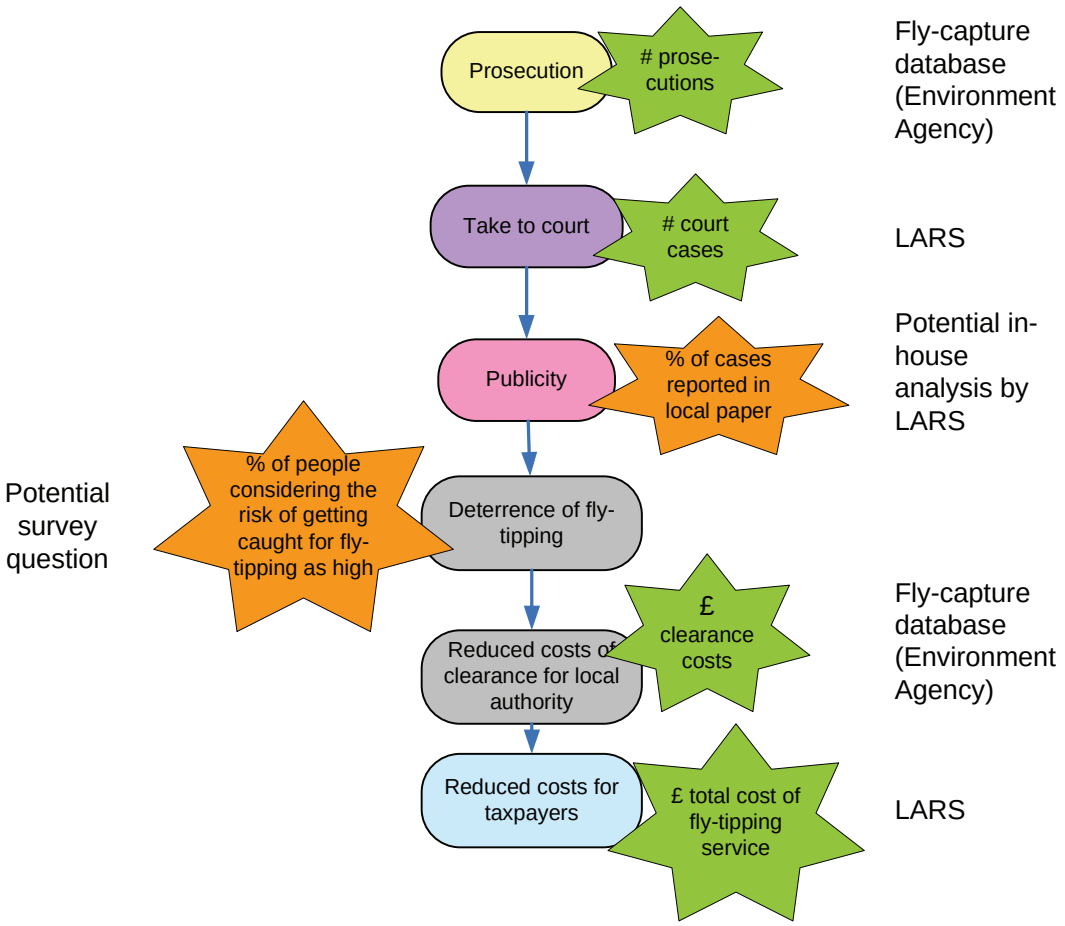
1. Start by looking for indicators already collected by your service. These can be found in service plans, strategy documents and other performance information you and your service currently use. These tend, however, to focus very much on the direct outputs and inputs of the service.
2. If you can't find the indicator identified, start widening the scope of your search:
    a. Are other services within your local authority likely to hold the information you identified? (e.g. social services, place surveys)
    b. Do other local organisations have this information? (e.g. PCT, NHS, police)
    c. Do national regulators or sector bodies provide this information?

3. If you can't find a measurement for the initial indicator you identified, make sure you also consider similar indicators that may be suitable to measure what you intend to measure.

Having done this, you now know which indicators and measurements are currently unavailable or not being measured. In the next stage you will need to decide whether it will be worth considering collecting those in the future.

EXAMPLE

If we stay with the previous example, this long list of indicators could be mapped against what is being measured already. Green indicates that an indicator is measured already, orange that it is not collected yet. In addition, the current source and the potential source are indicated on the right-hand side of the chain.



Stage 3: Synthesise, analyse and communicate the findings in a dashboard

The third and final stage of the toolkit aims at analysing, synthesising and communicating the findings of your pathway. To do so we suggest using a dashboard tool. This stage contains guidance on how to prioritise indicators to collect, and how to arrange them in a dashboard.

STEP 11: Prioritise indicators

Your long list of indicators and your knowledge about the availability of indicators will now be the starting point for thinking about prioritising indicators for the dashboard. The key underlying idea is that you want to measure all impacts along the key causal chains you identified. By having a 'data point' at each important step, you will be able to make a more convincing case for how you contribute to local outcomes and impacts.

You will first have to assess which indicator is central to the assessment:

1. Does it measure a key element of the causal chain?
2. Does it measure a key outcome or impact that is of particular importance to your service? (e.g. as part of a LAA)
3. Is it a necessary indicator to achieve a balanced assessment?

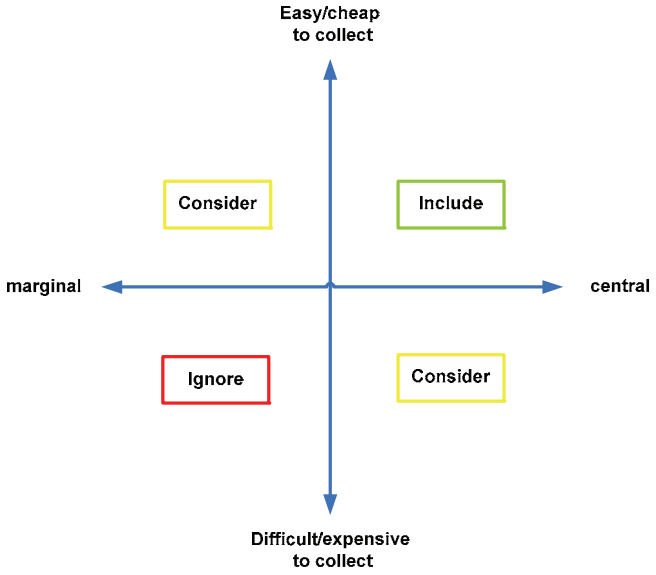
Once you have a list of (potentially) important indicators, you should also consider the ease of measurement:

4. Is the indicator already being measured by your service?
5. Is it being measured by other services or national stakeholders?
6. Will it need to be developed?

If the indicator you identified is not being measured yet, consider the following before setting out to collect data:

7. Could the indicator be replaced by an indicator that is already measured? (proxy)
8. Can it be integrated in existing data gathering? (e.g. residents' survey)
9. Could it be easily collected during performing the activities? (e.g. another tick box on an inspection protocol)
10. Would it require substantial your own primary data collection? (e.g. a complete new survey)

The following matrix may be helpful to conceptualise the decision about which additional indicators to collect. If you find yourself with data gaps, make sure you focus on the right-hand side of the diagram, collecting indicators that are central to the assessment – that is, primarily set on the key causal chains of the activity. You could, however, also collect some indicators from the upper left-hand side. These easy-to-collect indicators may help to develop a richer story, but are not central to your assessment.



EXAMPLE

Earlier in this example we identified three key causal chains. Along some of those data were not available; however, we considered it to be essential to measure some of them as they were key elements of the causal chain. These were:

– outputs from educational activities

– assessment of the preventative effect

– assessment of the deterrent effect.

Some indicators that are not currently measured were dropped, such as the publicity indicator, as the deterrence indicator would suffice to demonstrate the effect.

STEP 12: Choose indicators for dashboard

Out of the prioritised indicators you can now choose the final indicators to include in your dashboard.

For this toolkit, we chose to adapt the idea of a management dashboard, which has become increasingly popular in recent years. Dashboards are executive information systems that present a small set of performance measures on a regular and structured basis to strategic decision-makers in order to provide an overview of the organisation's performance and thereby identify areas of particular success or concern for more detailed examination. However, the dashboards you will populate here will have a less operational perspective and be more strategic in focus than management dashboards.

There are three criteria to include in the final selection of indicators to go into the dashboard:

1. Indicators should cover all stages of the logic model. Indicators should thus give a fair representation of inputs, outputs, outcomes and impacts.
2. The indicators selected should cover all important causal chains.

3. Finally, there should be a limited number of indicators in the dashboard. We propose having between 12 and 20 indicators overall.

EXAMPLE

The final selection of indicators followed the considerations to cover the three most important causal links as well as the four elements of the logic model. The table below shows the indicators included in the toolkit.

Causal chain	Input	Output	Outcome	Impact
Removal		• No. of incidents	• Average time between report and removal of waste •	• Total incident clearance costs • % of residents who think their council is making the local area a better place to live in • % residents who think that rubbish and litter lying around is a very or fairly big problem in their local area • % of businesses considering the local environment a positive location factor
Education	• Staff in FTE or £ • Investment in £ • Budget in £	• No. people reached by education programmes	• % of people considering the illegal deposit of rubbish as 'not a big deal' • % of citizens considering the risk of getting caught for fly-tipping as high • Costs recovered	
Prosecution		• No. of successful prosecutions		

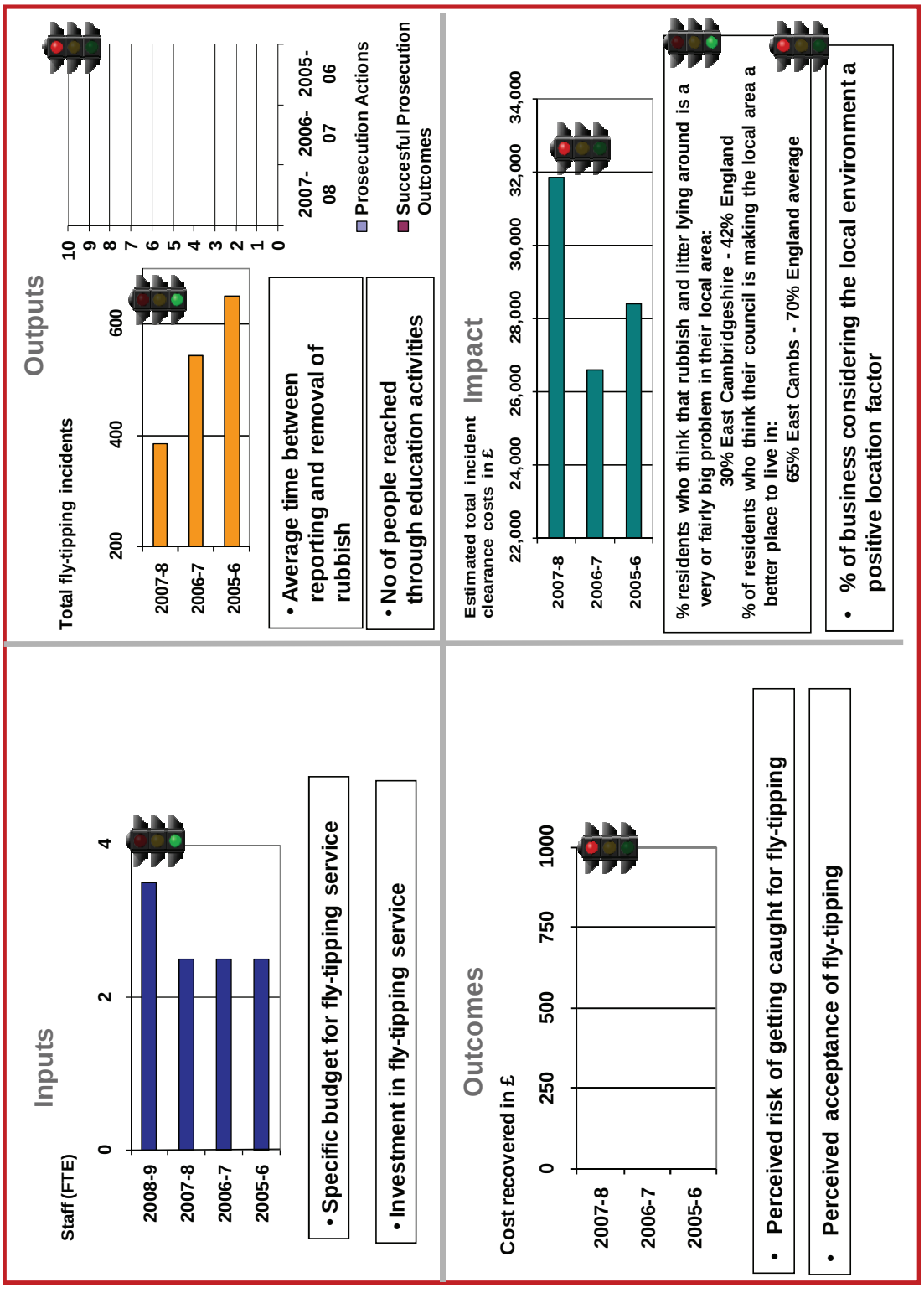
STEP 13: Arrange indicators into a dashboard

In the final stage you can arrange the indicators into the graphical representation of the dashboard. The aim is to provide a one-page overview of how your local service contributes to local outcomes and impacts. For our examples (see box) we developed a page divided into four quadrants (inputs, outputs, outcome and impacts). Each quadrant contains the key indicators and presents time-series data for the last three years where possible. Such an overview page can be easily implemented and updated in a Microsoft Excel spreadsheet or using similar software.

The final task will be to define for each indicator what constitutes a positive development and which developments need attention or closer monitoring. To indicate this, you can use traffic light symbols and colours (red, amber, green).

EXAMPLE

The final dashboard developed for the fly-tipping case study is shown in the figure below. The traffic lights indicate which elements of the causal chains require attention. If, as in this case, no prosecution has been happening, potential offenders are unlikely to be deterred.


Inputs
Staff (FTE)
0
2
4
2008-9
2007-8
2006-7
2005-6
• Specific budget for fly-tipping service
• Investment in fly-tipping service
Outputs
Total fly-tipping incidents
200
400
600
2007-8
2006-7
2005-6
• Average time between reporting and removal of rubbish
• No of people reached through education activities
0
1
2
3
4
5
6
7
8
9
10
2007-08
2006-07
2005-06
Prosecution Actions
Succesful Prosecution Outcomes
Outcomes
Cost recovered in £
0
250
500
750
1000
2007-8
2006-7
2005-6
• Perceived risk of getting caught for fly-tipping
• Perceived acceptance of fly-tipping
Impact
Estimated total incident clearance costs in £
22,000
24,000
26,000
28,000
30,000
32,000
34,000
2007-8
2006-7
2005-6
% residents who think that rubbish and litter lying around is a very or fairly big problem in their local area:
30% East Cambridgeshire - 42% England
% of residents who think their council is making the local area a better place to live in:
65% East Cambs - 70% England average
• % of business considering the local environment a positive location factor

CHAPTER 6 Conclusions

In this chapter we offer some final reflections on the work undertaken for this study.

6.1 Making the toolkit useful

The ultimate purpose of this research project was to develop a toolkit to support LARS in understanding and assessing the impacts and outcomes to which they are contributing. The toolkit suggested consists of step-by-step guidance for developing a pathway and selecting indicators to include in a dashboard. Reflecting on the future application of such a toolkit, we see a number of potentially useful applications:

1. The toolkit should allow LARS to engage in better informed discussions about their impacts and outcomes at the local level. This will allow them to contribute better to and participate better in local partnerships set up as part of the performance management frameworks. The benefits that can be delivered by LARS may be overlooked at the local level.
2. In a world with a plethora of performance information, an evaluation and prioritisation framework such as the toolkit presented here will enable LARS to choose indicators in addition to the NIs and local priorities that are most meaningful to assess the impacts they have.
3. This toolkit may serve as a focal point for exchanging ideas and learning between regulatory services. By applying a common but highly flexible framework, similar services could, for instance, compare the results of their mapping activity and jointly define the most useful indicators to assess local impacts and outcomes. This would also be the first step towards an exchange of best-practice and better benchmarking of LARS in the future.
4. Finally, the toolkit may be seen as a high-level evaluation framework to structure research and analysis of LARS impacts. Such a framework will allow the design of a more detailed analysis of the causal chains identified. These may range from more detailed qualitative case studies to full cost-benefit analysis, depending on the ultimate objective and the availability of data. A very good recent example of how such fine-grained analysis could be accommodated into our research framework is the evaluation of trading standards impact recently conducted by OFT, which effectively maps out one of the specific causal chains.

6.2 Attribution vs. contribution: applying a theory of change approach

In this report we have suggested using a theory of change approach that aims to demonstrate the contribution to rather than the attribution of impacts and outcomes. We used process mapping and logic modelling as stepping stones to design dashboards. This approach helped to overcome some of the conceptual difficulties related to assessing the impacts of LARS, for instance how to 'prove' that a specific impact was due to the activities of LARS.

In a sense, we tried to overcome the 'nil finding', the fact that the impact of LARS is difficult to determine and therefore this impact should not be established or described. For reasons stated earlier, understanding the impact of LARS is important on many levels. Using the theory of change approach in this and future studies will further this understanding in the following ways:

- Linking LARS action to a specific policy problem in a systematic way.
- Understanding the detailed causal linkages between LARS action and intended and unintended impacts and outcomes.
- Making sense of collected data and identifying gaps for future monitoring.
- Conducting further analysis by narrowing down and framing research questions.

Still, we do not want to claim more for this approach than is justified by the wider evidence and the experience of delivering this project. We have identified a promising way forward, but achieving this will depend upon the following:

- continued capacity building
- professional commitment
- willingness on the part of policy-makers and wider stakeholders to be influenced by evidence supported by persuasive contribution stories
- practitioners using the insights to improve their practice
- decision-makers demonstrating a continuing interest in dashboards and the thinking behind designing them.

6.3 There is scope for further research

In studying a complex and diverse field such as regulation in general and local government regulation specifically, a study like this one necessarily has to be limited in scope and focus, and therefore leaves out interesting areas that would justify further research and analysis. Four questions emerged during the research which would be worth exploring in future research in the field.

First, the notion of different 'enforcement styles' emerged on several occasions during the interviews and the workshops. Practice between LARS seems to differ on how much they rely on 'soft' enforcement instruments such as giving advice and explaining regulation to business and citizens, and to what extent they make use of their array of 'hard' enforcement mechanisms such as penalties, revoking licences and prosecutions. These different enforcement styles may generate very different impacts at the local level. Soft instruments relying more heavily on cooperation and

learning may create different long-term impacts (such as community cohesion) than harder enforcement activities. These might promote trust and flexibility amongst regulators, those regulated and the wider community. On the other hand, clear rules and hard regulation can promote predictability and the expectation that processes will be applied equally to all. Finding the right balance, or mix, for different situations is an essential challenge to ensure compliance with local regulation.

Secondly, the different styles of interaction between LARS and the national regulators would probably justify further research. Some national regulators take a very hierarchical and prescriptive approach towards LARS that define in detail the type of activities to be conducted and the measurement of those. In contrast, others follow a more cooperative strategy towards LARS. These differences may be reflected in the type of performance information collected (output, outcome or impact) as well as in the freedom services have to target their activities to local needs. For example, we know that when professionals are given more autonomy over how best to deliver their services, they are often able to craft their behaviour according to local circumstances, and outcomes may be better than when professionals simply apply formal rules to their activities. However, how this applies in the context of local regulation is less well known.

Thirdly, it may be worth exploring in detail how the shift towards risk-based regulation as initiated by the Hampton review (Hampton 2005) will affect the impacts and outcomes of local regulation, and whether focusing activities on a smaller sample of high-risk businesses is likely to impact negatively or positively on society and local communities. The success of this approach depends upon, first, being able to assess risk accurately and, secondly, an agreement among stakeholders about how to weigh these risks (high risks for some might be lower risk for others). It would be important to bring these challenges to the surface, but also to clarify how they set limits to risk-based regulation.

Fourthly, it would be interesting to establish whether the use of bottom-up or top-down performance management frameworks affects outcomes. This study found examples of small benchmark clubs existing between LARS of different authorities, and indeed the proposed toolkit serves as an instrument for local administrators to assess their impacts and monitor them over time. At the other end, the Audit Commission's use of performance indicators and benchmarking is influential. Research could establish how top-down and bottom-up mechanisms affect good practice and improved performance on the ground.

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APPENDICES

Appendix A: Method of literature review

This appendix describes the methods we used to search for literature in stage 1 of the original research design.

Academic literature review

For the academic literature review, the following key words were used: 'local regulation AND UK', 'local regulatory enforcement', 'local enforcement UK', 'regulatory impact assessment', 'local government AND enforcement', 'enforcement AND regulation', 'enforcement AND public policy', 'food safety and standards', 'impacts and enforcement', 'environmental health AND local enforcement', 'food safety AND local AND impact', 'regulatory impact assessment theory', 'impact air quality regulation UK', 'impact entertainment alcohol licensing regulation UK', 'impact assessment food labelling UK'. These keywords were either web searched through Google or through our RAND Library. Within the RAND Library, we searched for key words directly in identified relevant journals such as *Public Performance and Management Review* or through subscription databases such as ABI Inform Request and PAIS Archive.

Following the described search strategy, we identified and read over forty relevant abstracts in relation to impacts and outcomes of local regulation. The articles identified were published by different publication providers, including Social Sciences Abstract, Routledge, Science Direct, Elsevier Science, SAGE, Wiley Interscience, JSTOR, ProQuest, CSA Illumina, Ingenta Connect and Emeraldinsight. The publication dates extended from 1996 to 2008. On the other hand, only just over half of the abstract articles were available in full-text format.

Official document review

Part of our strategy to identify relevant reports and publications on impacts and outcomes of regulatory services was to search official websites of regulators and other national agencies that are involved or are likely to be involved in local regulatory services in some form. The following websites were searched for relevant publications and reports: the Local Better Regulation Office (LBRO), Local Authorities Coordinators of Regulatory Services (LACORS), the Local Government Association (LGA), the Audit Commission, the Office of Fair Trading (OFT), the Food Standards Agency (FSA), the Health and Safety Executive (HSE), Trading Standards (TS), the Chartered Institute of Public Finance and Accountancy (CIPFA), Communities and Local Government (CLG), the Environment Agency (EA), Department for Business, Innovation and Skills (BIS), the Better Regulation Executive (BRE), the Fire and Rescue Authority (FRA), Drug and Alcohol Action Team (DAAT), the Chartered Institute for Environmental Health (CIEH), the Chief Fire Officers Association (CFOA), HM Treasury and the Better Regulation Commission (BRC).

For those websites that contained a 'limited' number of reports (i.e. fewer than 250), each report title and abstract was scanned individually to see if it was likely to contain any information on impacts, outcomes or costs (to stakeholders or regulators at the national and local level) of regulatory services. For those websites that contained more that 250 reports or publications, the following key words were used to search for relevant material: 'outcomes', 'impacts', 'costs', 'local government', 'local authorities', 'regulatory services', 'environmental health', 'trading standards', 'licensing', 'fire and safety' and a combination of those.

A total of 16 reports were identified as potentially relevant, some of which were included to gain a better understanding of regulatory services as a whole. These reports were then scanned for relevant information and only very limited information and evidence on impacts and outcomes of regulatory services was found. Most of what was found was either background information on how regulatory services operate and on what the better regulation agenda should look like in practice (i.e. reduce burden on businesses, accountability of regulators to the effectiveness of their activities, etc.), information on the perception of local regulatory services by businesses or information on the performance of certain regulatory services (e.g. one report was a performance assessment of the Fire and Rescue Service in England and gave details about the differences in performance levels across different local authorities). Whilst this was useful in terms of our gaining a greater understanding of local regulatory services, it was not sufficient to populate our table of impacts and outcomes.

Appendix B: Selection of case studies

Criteria for selecting local authorities

The selection of local authorities was carried out taking into consideration the institutional variety that is found in English local government. The first selection criterion was to include both a single-tier and a two-tier local authority in our sample. Secondly, we used performance information published by the Audit Commission to narrow down the number of local authorities. More specifically, we looked at best value indicators (BV166a and BV166b) and the result of the CPA conducted by the Audit Commission. The purpose of this exercise was to include only local authorities that are performing well as we assume that better performing local authorities have a better understanding of their processes as well as a greater awareness of outcomes achieved. Secondly, by comparing only performing local authorities that are performing well, we aim to control for differences in performance and instead focus on more structural variables to explain differences in perceptions of outcomes and impacts.

Thirdly, we aimed to select, as far as possible, a geographically related sample of local authorities, in order to observe expected interactions between, for example, county councils and district councils or unitary authorities within a county council.

Fourthly, we aimed to select both urban and rural local authorities.

And, finally, given the scope of the project, the selection of local authorities also reflects pragmatic research considerations, with the aim of reducing travel times and expenses and ensuring quick access. We expected that access for the interviews and workshops would be easier in local authorities that are performing well. The table below shows the chosen initial selection of local authorities:

Two tier		**Unitary authorities**			**Fire and rescue authority**
County councils	District councils	Metropolitan districts	English unitary	London boroughs	
Cambridgeshire	East Cambridge-shire	None proposed	Peterborough	Camden	Cambridgeshire and Peterborough Fire Authority Norfolk Fire Authority

During the research we encountered difficulties in conducting interviews with all the local authorities selected initially and had to select alternative ones. The table below shows the final selection of local authorities.[42]

Two tier		**Unitary Authorities**			**Fire and Rescue Authority**
County councils	District councils	Metropolitan districts	English unitary	London boroughs	
Cambridgeshire County Council Northamptonshire County Council	East Cambridge-shire District Council	None proposed	Leicester City Council	Camden (interviewed only in the first stage of the project) Islington Borough Council	West Sussex Fire and Rescue Authority (interviewed only in the first stage of the project)

[42] Where local authorities were interviewed in the first stage of the research but did not participate in a workshop on a regulatory service, this is indicated in the table.

Appendix C: Interview template

Introduction

To start our interview, RAND Europe will provide you with a brief summary of the background and key objectives of this study.

Understanding regulatory services in your local authority

To understand more about the regulatory services in your local authority, we want to learn more about your county administration and how Local Authority Regulatory Services (LARS) are organised.

1. Please describe your local authority:
    - How large is the county (i.e. size of population and size of area)?
    - How many staff does your local authority employ?
2. How are LARS organised in your local authority?
    - How many units/departments are involved in LARS?
    - How many staff are working in LARS?
        - In Environmental Health?
        - In Trading Standards?
        - In Licensing?
    - What is your local authority's annual budget for LARS?
3. Do you hold information about the key process used for enforcement (e.g. process maps, detailed descriptions)?

LARS activities

The questions in this section are aimed at helping us understand the kind of activities performed by your LARS and the kind of information collected by your local authority about these activities.

4. What are the key tasks performed by LARS in the areas of:
    - Environmental Health?
    - Trading Standards?
    - Licensing?
5. What activities do these tasks include? What kind of enforcement activities are conducted?
    - Licensing
    - Approval
    - Inspections
    - Giving advice
6. What kind of information about those tasks and activities is collected in your local authority on a regular basis?
    - Input information
    - Output information
    - Outcome information
7. Who is this information reported to?
8. Who uses this information and for what purpose?

Impacts and outcomes of LARS

In this section we want to learn more about your views on the outcomes and impacts LARS achieve through their activities. We are interested in both positive and negative outcomes/impacts, and intended and unintended outcomes/impacts.

9. What do you think are the five most important *positive* outcomes/impacts LARS achieves in your local authority?
    - Which stakeholders benefit from these outcomes?
    - Do you have any indicators that measure these outcomes of LARS?
    - Are you aware of other indicators to measure these outcomes?
10. What do you consider as *negative* outcomes/impacts that are a result of LARS activities?
    - Which stakeholders are affected by these outcomes/impacts?
    - Do you have any indicators that measure these outcomes of LARS?
    - Are you aware of other indicators to measure these outcomes?
11. From your experience, are there notable differences between local authorities?
    - What are the drivers/barriers for achieving outcomes/impacts? Do they differ between local authorities?

- How do you explain such differences? (e.g. are they related to enforcement styles, types of LAs, size of LA, etc.)

12. Has your local authority conducted studies on the outcomes and impacts of LARS work and/or are you aware of such ad hoc studies?
    - eg. on the administrative burden created by LARS?
    - eg. on specific health or environmental outcomes of LARS?

Developing a tool for local authorities

The ultimate objective of our research project is to develop a toolkit that helps local authorities to asses the impacts and outcomes of their activities. To develop such a tool it is however essential to understand both the needs of LARS and the available resources to use such a tool.

13. From your experience, what would you see as the essential elements of an instrument to assess the impacts and outcomes of LARS?
14. How would you assess the impact and outcomes of LARS in different areas?
15. What information is already available?
16. Do you feel there is information that is currently not available or not collected by your local authority which would be useful to assess these impacts and outcomes? If so, what type of information would be useful?
17. How many resources would your local authority have to assess the outcomes and impacts of your activities?
18. Do you see major obstacles to assessing impacts and outcomes on a regular basis?

Next steps

This interview is part of our first research stage. In the next research stage we want to conduct case studies into five areas of LARS and conduct logic modelling workshops with local authorities.

Appendix D: Survey

Survey details

The target population for the online survey was heads of services in local authorities in England and Wales. Given that the link to the online survey was sent directly by LBRO to local authorities' staff, it is not possible to know if all local authorities received the email, but it is possible to calculate an approximate response rate by assuming that all local authorities in England and Wales received the email with the link to the online survey.[43]

There is a total of 358 local authorities in England and 22 local authorities in Wales, which makes a total population of 380 local authorities for the survey.[44] The survey received a total of 189 responses, so the estimated response rate is about 50 per cent, bearing in mind that this scenario assumes that all local authorities in England and Wales were given the opportunity to respond to the survey. This response rate may be further broken down by country: the response rate was 68 per cent for Wales (15 responses out of 22 local authorities) and 49 per cent for England (174 responses out of 358 local authorities).

Before launching the survey, we piloted it with three local authorities who had taken part in the scoping interviews. 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, we amended the survey to take into account the comments made at the piloting stage. Following the amendments and further comments from LBRO, the survey was launched in December 2008.

Survey questions

1) In what region of England is your local authority?
    a. North East England
    b. North West England

[43] Please note that this will be the 'worst case scenario' response rate. given that it is possible that not all local authorities received the email containing the link to the online survey.

[44] http://en.wikipedia.org/wiki/Local_government_in_England and http://en.wikipedia.org/wiki/Local_government_in_Wales (last accessed August 2009)

c. Yorkshire and the Humber
d. East Midlands
e. West Midlands
f. East England
g. London
h. South East England
i. South West England

2) What is the structure of your local authority?
   a. County (two-tier)
   b. District (two-tier)
   c. Unitary authority
   d. London borough
   e. Metropolitan district
   f. Other

3) What is the population size covered by your local authority?
   a. 0–50,000
   b. 50,000–150,000
   c. 150,000–300,000
   d. 300,000–500,000
   e. 500,000–1 million
   f. More than 1 million
   g. Do not know

4) Do you collect any information on the wider impact of local area regulatory services in your council? These include trading standards, environmental health, licensing, and fire and safety. yes/no

   if no go the question…..(7)

5) Does the information you collect on impacts relate to? (please tick all that apply)
   a. Impact on general health outcomes in the local community
   b. Impact on specific social groups in the local community (e.g. elderly/vulnerable/youth)
   c. Impact on business in the local community
   d. Impact on the environment in the local community
   e. Impact on partners who work with the local authority to enforce regulation (e.g. police)
   f. Other … (please specify) [text field]

6) Could you briefly provide additional detail on the type of information you collect on impacts and for what services it is collected (i.e. licensing, trading standards, environmental health and fire safety)? *By type of information we mean more detailed data on impacts such as number of*

food-borne illnesses or improvement in air quality [text field]

7) Is the information on impacts that you collect across regulatory services mainly? (please choose answer that most closely corresponds to the situation in your council)
    a. Quantitative data that is specific to impact in the local community (e.g. costs to business; specific health benefits to population)
    b. Quantitative data that is regionally or nationally specific (e.g. costs to business; specific health benefits to population) (data taken from national and regional sources)
    c. Qualitative data based on the documentation of enforcement activities (e.g. description of health or environmental improvements)
    d. Qualitative data on the basis of engagement with stakeholders (business and citizens) (e.g. description of health or environmental improvements)
    e. Other … (Please specify) [text field]

8) Why do you collect this information on impacts of regulatory services? (please choose answer that most closely correspond to the situation in your council)
    a. To collect some basic information on the functioning of services
    b. To allow management to assess the performance of the services
    c. To answer specific management targets set by the council
    d. To feed into the indicator set in the Local Area Agreements
    e. To satisfy other National Priorities (e.g. improve local economy, tackle crime, etc.)
    f. To assess the benefits of local authority regulatory services activity
    g. To inform partnership working
    h. Other … (Please specify) [text field]

9) For any of the above, please expand or provide further detailed information. [text field]

10) What is the main hurdle in assessing the impact of regulatory services? (please choose one)
    a. The level of importance given to it in my council
    b. Evaluation capacity in the council
    c. Lack of data collection by enforcement staff
    d. Availability of wider data on impacts
    e. Other … (please specify) [text field]

11) Given the data that you hold in the council, what type of impacts of regulatory services would you find most useful to collect to measure impacts and outcomes? (please tick all that apply)
    a. Impact on general health outcomes in the local community
    b. Impact on specific social groups in the local community (e.g. elderly/vulnerable/youth)
    c. Impact on business in the local community
    d. Impact on the environment in the local community
    e. Impact on partners who work with the local authority to enforce regulation (e.g. police)

f. Other … (please specify) [text field]

12) Is there information held by other agencies, bodies and partners that would make it easier for you to assess the impact of regulatory services?
    a. Yes
    b. No
    c. Do not know

13) If yes, could you describe the agency/body/partner and the type of information they hold? [text field]

14) This research projects aims to develop a toolkit for local authorities to assess the impacts and outcomes of LARS. Such a toolkit could for example consist of a list of outcome measures, methodologies that help establish causal links between your actions and outcomes, and examples of good practice in measuring impacts. If you were to use such a tool, what features do you feel would be most useful to you and which indicators would you like it to include? [open text field]

15) Would you be happy to be contacted by the research team to discuss your responses in more detail? If yes, please provide your contact information. (open question) [text field]

16) If you would be happy to be contacted by the research team to discuss your response in more detail, please provide your contact details below.

    a. Name
    b. Local authority
    c. Email address
    d. Telephone number

Appendix E: Workshops

Workshop guidance

Below is an example of the guidance we gave to local authorities for the workshops. It include a brief description of the project as well as an outline of the workshop sequences.

To : Northamptonshire County Council

From : RAND Europe

Subject : Workshop Guidance

Date : 22 May 2009

Date	3 June 2009
Location	Northamptonshire County Council
Local authority regulatory area	Fair trading
Number of participants, position and organisation	To be confirmed
RAND Europe facilitators	Jan Tiessen (Project Manager of the study at RAND Europe) supported by Lidia Villalba-van-Dijk and Claire Celia

Summary of research

The LBRO has commissioned RAND Europe to undertake a study into the impacts and outcomes of LARS. As part of this study, RAND Europe is also helping to equip LARS with a tool to assess the impact they have on local communities. This tool should both explain to interested external stakeholders the impact of LARS and help to improve the delivery of LARS.

This study is being conducted in three stages:

1. **Stage 1** – Mapping impacts and outcomes of LARS. This stage was informed by key interviews with selected local authorities, national regulators and other national agencies and by a literature review. The interviews and literature review helped to create an impact evaluation matrix with details of the inputs, impacts and outcomes of LARS by type of

regulatory services (e.g. trading standards, environmental health) and by stakeholders (e.g. local community, NHS, children).

2. **Stage 2 –** Identifying and simply describing the main links connecting what LARS do to the wider costs and benefits and organising these within a 'logic model'. This stage will include the analysis of pathways, using both logic modelling and process mapping. These pathways will be tested at a series of workshops at the local level.
3. **Stage 3 / Final stage** – Development of a toolkit to assess the impacts and outcomes of LARS. This stage will build on the research and outputs from stages 1 and 2.

Objectives of the research

The objectives of the research are to understand further the impacts and outcomes of LARS and to produce a toolkit that will enable local authorities to assess, communicate and improve these impacts and outcomes for local communities.

Description of the workshop and details of participants to be involved

RAND Europe is carrying out a series of workshops (stage 2 of the research, as described above) with selected local authorities to explore different areas of regulatory services in more depth (e.g. we are looking at smoking, alcohol and fly-tipping) and gain insights and views into the development of the toolkit so that the final product of the research is as useful to local authorities as possible. In selecting local authorities, we have taken care to engage with the full range of local authorities (i.e. one-tier, two-tier, rural, metropolitan, etc.) to make sure our research takes into account differences between local authorities.

Participants in the workshops

We would like to involve at least 6 and up to 12 participants in each workshop. Although the majority of the participants would come from local authorities, we would suggest inviting participants from other organisations. The number of participants from other organisations would depend on the type of regulatory service explored in the workshop. In the case of fair trading, we would expect the involvement of the police and other partner organisations to be beneficial in order to gain as wide a view and understanding as possible of the issues at stake in the regulation and enforcement of fair trading.

Participants will not need to carry out any preliminary work or research before the workshop. In addition, there will no follow-up work required after the workshop.

Description of the workshop

Following the usual introductions and explanations, the workshop will focus on identifying the different impacts and outcomes of a particular area of LARS (e.g. health and safety in the workplace; fly-tipping) as well as any other actors and issues relevant to assessing impacts and outcomes.

The workshop will last from two to three hours, depending on your availability and that of your colleagues. Comments will not be attributed to individual participants in our reporting to the Local Better Regulation Office (LBRO).

Outline of the workshop

Introduction (5–10 minutes)

The purpose of this workshop is to collect your views on the impacts and outcomes of a particular area of LARS. We will also seek to identify any issues and problems that need to be taken into account when trying to measure these impacts and outcomes (e.g. issues of attribution, partnership working, indicators). This workshop will inform the creation of a toolkit to help local authorities assess the impacts of their regulatory services.

The following table presents an *indicative* structure for the workshop.

Sequences and timing[45]	**Activity**
9.30–9.45 15 mins.	Welcome and outline of the day ♦ Presentation of the outline of the logic model we want to populate at today's workshop. ♦ Introduction of workshop participants ♦ Participants' role/involvement with fair trading regulation and enforcement
Inputs, activities, outputs	
9.45–10.05 20 mins.	Plenary: a. Each participant to write the main activities on hexies b. Put hexies on board and discuss how LARS involved c. Identify clusters or groups of activities
10.05–10.20 15 mins.	Break-out session: Form 2–3 groups, each group covering a number of activities: a. For each activity, participants will identify inputs, outputs and interactions with other bodies b. Each group will think about who takes the lead in the respective activities and what role LARS play c. Each group designates a rapporteur to feed back to plenary
10.20–10.40 20 mins.	Plenary: ♦ Rapporteurs to feed back to plenary ♦ Facilitators to populate the logic model on the board/wall ♦ Identify indicators and measurements for inputs and outputs, what kind of data and information are available, what are missing.
10.40–10.50 10 mins.	**Tea/coffee break**

[45] The timing of sequences is indicative and subject to changes according to the dynamics of the workshop on the day.

10.50–11.50 60 mins.	1. Plenary: exploring the causal chain ♦ Short introduction ♦ What outcomes (both intermediate and long term) are you trying to achieve through your activities? → note down outcomes on hexies and put them into the logic model ♦ How do these outcomes relate to the outputs of your activities? ♦ How are these outcomes measured? 2. Plenary: identifying additional outcomes ♦ Which other outcomes are generated through your work? Any unintended outcomes? ♦ How could you measure these outcomes? Are you currently using indicators to measure them? If so, which ones?
11.50–12.10 20 mins.	**Developing a toolkit and conclusions** Tour de table: ♦ What kind of toolkit would be most helpful (if at all)? ♦ Which piece of information would be most valuable? Conclusions, next steps and thanks

After the workshop

The RAND Europe research team will send you a copy of their write-up of the workshop for you to read to make sure that the views of the participants have been adequately represented and that the processes have been adequately described. This will be a very short document that it should take you no longer than 10 to 15 minutes to read.

Workshop locations and participation

Table E.1 below shows the detail of the policy areas covered by the five workshops as well as the LARS these belong to, the local authority who hosted the workshop, the type of pathway produced and the type of outcome these services work towards.

Table E.1: Workshops

Policy area	Service	Local authority	Type of pathway	Outcome
Tackling fly-tipping	EH	East Cambridgeshire District Council	Activity	Environment, social
Reducing harms from smoking	TS	Leicester City Council	Outcome	Health
Interventions to reduce alcohol-related harm	TS	Cambridgeshire County Council	Outcome	Health
Ensuring health and safety in the workplace	EH	London Borough of Islington	Activity	Health, economic
Fair trading	TS	Northamptonshire County Council	Activity	Economic

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