



**Data Collections
From Local Authority
Regulatory Services:**

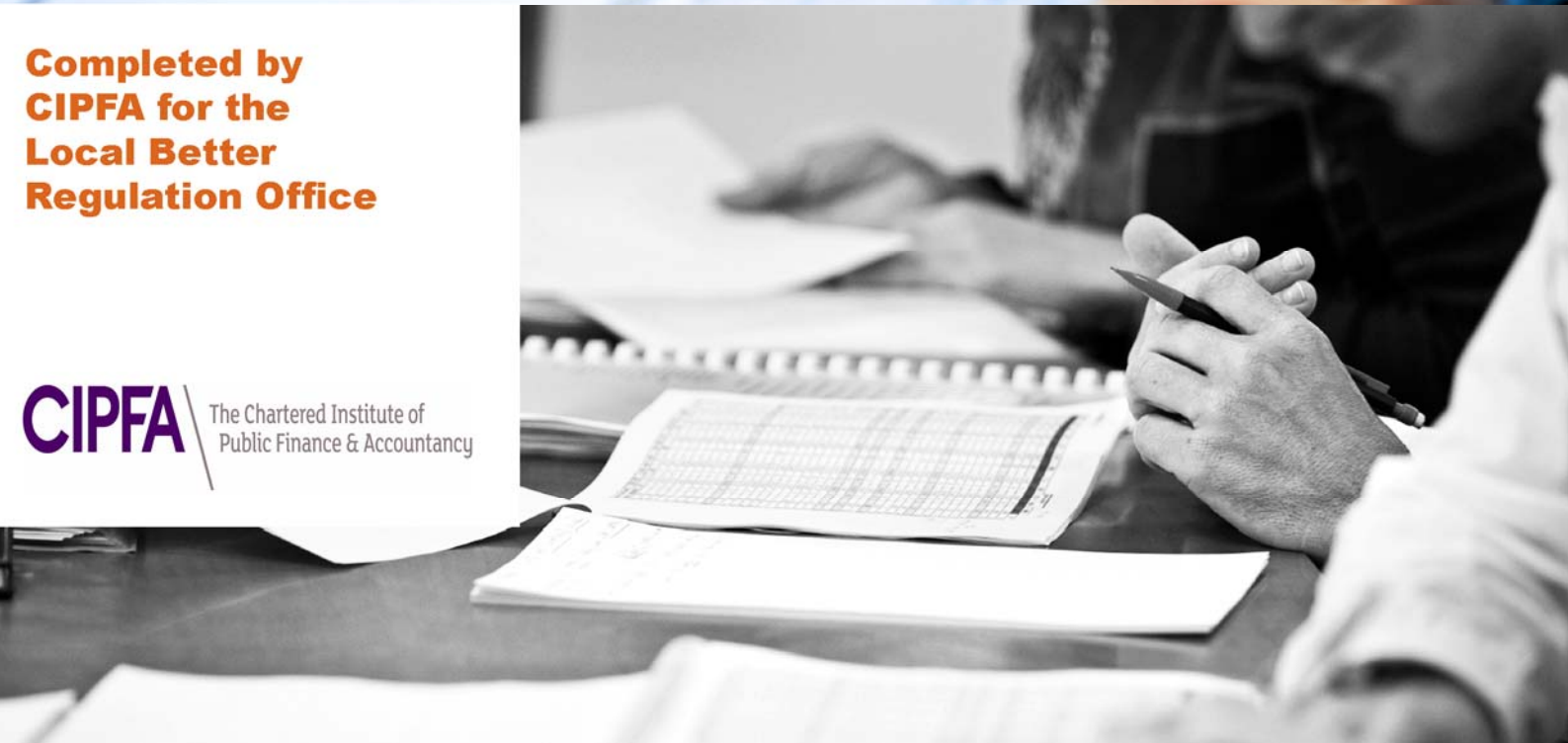
**Data Mapping
And Costing The
Administrative
Burden**

LBRO
Better Local Regulation



**Completed by
CIPFA for the
Local Better
Regulation Office**

CIPFA | The Chartered Institute of
Public Finance & Accountancy



Foreword

Good regulation means ensuring that administrative burdens on the regulators, as well as the regulated, are minimised. Efficient use of resources within the regulatory system enables enforcers to support reputable businesses and target rogue traders and to meet efficiency expectations. In the current economic climate all public sector organisations need to identify and reduce inefficiency in order to maintain high levels of service at a time when demands for services are rising whilst resources will be increasingly constrained.

Local authority regulatory services operate within a complex system, working with more than 12 government departments and national regulators to protect consumers and support businesses across a variety of legislative regimes from food safety to environmental protection. While data collection is necessary for effective performance management both locally and nationally, it is essential that information is collected, reported and used in the most efficient ways possible.

LBRO was established to promote and support improvements in local regulation. A key strand of our work is to enhance the regulatory system in which services operate. To facilitate this we have brought together a coalition of national regulators, government departments and professional and representative bodies. One of the early areas it has looked at is the effective use of data, seeking both to reduce administrative burdens and improve the use of the data collected. On behalf of the coalition LBRO commissioned the Chartered Institute of Public Finance and Accountancy (CIPFA) to identify data collections from local authority regulatory services and produce an initial estimate of the cost.

This piece of work begins to establish the scale of the issue and the task of building an evidence-base. We recognise that there is a significant challenge in identifying and costing the data returns collected by 22 organisations and that more work is needed both to validate the detailed findings and to identify solutions. The development of solutions that result in greater efficiencies and reduce the collective information burden on local authorities will be the subject of future discussions with our coalition partners and will require joint action. We hope that this report will act as a stimulus for debate now and change in the future which contributes to a more efficient regulatory system and ultimately better local regulation.



Clive Grace
Chair
LBRO



Graham Russell
Chief Executive
LBRO

December 2009

Acknowledgements

We would like to acknowledge the assistance of local authorities in providing data for this study and the support of the LBRO coalition partners, listed below.

- Animal Health Agency
- Audit Commission
- Better Regulation Executive
- Chartered Institute of Environmental Health
- Chief Fire Officers Association
- Department for Communities and Local Government
- Department for Environment, Food and Rural Affairs
- Environment Agency
- Food Standards Agency
- Gambling Commission
- Health and Safety Executive
- Institute of Licensing
- Local Authorities Coordinators of Regulatory Services
- National Measurement Office
- Office of Fair Trading
- Trading Standards Institute
- Welsh Assembly Government

Contents

	Page
Executive summary	5
Introduction	8
Aims and objectives	8
Overview of approach	8
Findings	11
How the data map has been analysed	11
Data map analysis: Headline figures	11
Data map: Detailed breakdown	11
Duplication in data requests	17
Quantifying the administrative burden	20
Conclusions	26
Understanding the nature of the burden	26
Duplication	27
Type of data requested and use by central bodies	28
Who bears the most administrative costs?	28
Appendix A: Methodology	29
Appendix B: Restrictions with data	34

Executive summary

1. CIPFA was commissioned by LBRO to review data collections in regulatory services. The work was requested as part of LBRO's World Class programme data sharing module. Regulatory services in this context are those within the scope of the Regulatory Enforcement and Sanctions Act 2008, and in particular the functions provided by environmental health and trading standards services in local councils. These services enforce a wide range of legislation from across Government and the EU and act as delivery partners for a number of national regulators.

Analysis of the returns

2. A total of 40 returns are requested by central bodies across the regulatory services of environmental health and trading standards in England and Wales. A further 8 returns are requested of these services in England only and a further 11 returns apply in Wales. This gives a total of 59 forms comprising a total of 15,088 data items collected by 22 central bodies.
3. When the frequency of the returns is taken into account the number of actual returns increases from 59 a year to 139 a year. This takes into account those that are required on a bi-annual, quarterly, monthly or weekly basis, together with ad hoc returns, which are counted as being once per year. 139 is a more accurate reflection of the actual number of returns to fill in.
4. 63% of the data items within these returns are requested of environmental health services.
5. 49% of the returns are mandatory. The mandatory returns are in general the longer and more complex returns.
6. When the returns are looked at by service function, the largest number of returns relates to the function of environmental protection with 12 returns requested. Animal health has 7 returns, as does fair trading.
7. Returns vary in length from 1 question to 1523 questions. The number of data items requested by service function is a more realistic picture of the data burden. Animal health has the most data items to be filled in, followed by environmental protection.
8. When split by central body, the FSA requests by far the most data items to be filled in, with 9185 over 9 returns, followed by the Chartered Institute for Environmental Health with 1523 data items on 1 return. However, when numbers of returns are assessed the FSA is still highest with 9 returns, followed by DEFRA, Data Unit Wales and OFT with 6 requests each.
9. 92% of the data items in the returns focus on 'activity'. This reflects the importance of monitoring processes for local authorities by the central bodies. The smallest number of data items relate to 'staffing'.

Duplication

10. The main areas of duplication are across returns requested by the same central collecting bodies, although duplication of questions is also seen between central bodies. The three service function areas where the majority of duplication is present are environmental protection, animal health and fair trading. This is not surprising given that these service functions cover the majority of returns. Duplication is found across all 'subjects' – activity, contextual, financial, performance and staffing.
11. In most cases, the duplication identified so far is between mandatory and voluntary forms making it easy to recommend removing the duplicate questions from the voluntary forms. Table 6 on page 17 details all areas of duplication found along with potential recommendations for the future.

Quantifying the burden

12. The total administrative cost for local authorities is estimated to be £6 million across all 59 returns. The split is £5.6 million for England and £0.4 million for Wales. For English authorities the cost of completing all the returns requested of them is approximately £15,825 per authority and for Welsh authorities the cost is approximately £18,673 per authority. This costing is an initial estimate as there are limitations with the data that must be borne in mind when interpreting the findings. Full details are given in Appendices A and B.
13. In terms of service function, the administrative costs are summarised in Table 7 on page 21. This shows that the administrative costs are over six times higher for environmental health than trading standards, although this is commensurate with the larger size and workforce of environmental health services. For environmental health services, the estimated administrative cost of £4.8 million equates to 145 FTE officers. For trading standards, the estimated cost of £740,000 equates to 26 FTE officers. In two-tier areas in England, this means a district council has a higher reporting burden than, for example, a county council.
14. When the cost data are looked at in more detail, across service functions, environmental protection accounts for largest administrative burden for local authorities, costing a total of £2.8 million per year. Taxi licensing is the least burdensome environmental services function, totalling £13,800. Returns relating to trading standards cost between £16,000 in total for weights and measures to £270,000 in total for food standards.
15. In terms of individual returns and the costs per local authority, the most expensive return is the Local Air Quality Management (LAQM) System which has a single cost per local authority of approximately £4000. This is followed by the Notification of Infectious Diseases (NOIDS) with a single cost of £1700.
16. There does not appear to be a correlation between number of data items and cost. For example, the Local Air Quality Management (LAQM) System is the most expensive return in terms of single cost and cost per local authority but only has four questions. Out of the top five most expensive returns (in terms of cost to local authorities) four of these are returns requesting less than 50 data items.
17. The cost estimate is underpinned by data supplied by 52 local authorities of all types. The largest response came from London boroughs with 13 responses.

Conclusions

18. This exercise has demonstrated that the data burden placed on local authorities is difficult to accurately dissect. Analysing the data from the data map in different ways produces different pictures. For example, looking at the data by service function and return provides a different view of the burden than if the data are looked at by service function and number of data items requested.
19. This exercise demonstrates that, now we have a good picture of requests and the detail within the requests, it is essential to look at what the central bodies actually do with the information they are requesting from local authorities. In the initial phases of the project central bodies were asked to explain why they request the returns from local authorities, and what they use the data collected for. There was a mixed response to this question but responses that were obtained demonstrated that the main reasons for collection of returns were to help monitor and coordinate resources, to update regulations and legislation, and to feed into national statistics. These responses are in line with a heavy lean towards activity-related questions. This needs to be clarified further.
20. As the cost of data returns for environmental health services is six times that for trading standards, district councils – which deliver environmental health functions but tend to be smaller than unitary or upper tier councils – will seek particular benefits from any work to streamline data requests and reduce the cost burden on local authorities.

Chartered Institute for Public Finance and Accountancy
December 2009

Introduction

Aims and objectives:

1. CIPFA was commissioned by LBRO to review data collections in regulatory services. The work was requested as part of LBRO's World Class programme data sharing module. Regulatory services in this context are those within the scope of the Regulatory Enforcement and Sanctions Act 2008, and in particular the functions provided by environmental health and trading standards services in local councils. These services enforce a wide range of legislation from across Government and act as delivery partners for a number of national regulators.
2. One purpose of the data sharing module is to explore ways in which to reduce the burdens of data collection on local authorities, make a positive impact on the quality of services, and increase efficiencies for both local authorities and national regulators that require the data. A second purpose is to promote better cooperation across the system. The module sits within the wider policy context of reducing administrative burdens, on both business and within the public sector. Currently central government is working towards a 30 per cent reduction in public sector administrative burdens by 2010 through simplification plans.
3. This work was carried out as part of a systematic exercise to identify the flows of data across the system. CIPFA was asked to review the full extent of data requests that are made of local authorities in the area of regulatory services and to produce a data map of all returns requested. We were also asked to establish the cost of the data burden using the Standard Cost Model approach.
4. This report documents the core findings from the data mapping exercise, highlighting areas of duplication. It also makes an initial quantification of the administrative burden for each local authority.
5. An overview of the data map, a link to the returns repository on the CIPFA website and the full detailed methodology used in the mapping process including the sample and validation / quality assurance processes are given in Appendix A.

Overview of the approach

6. A full summary of the approach to both the data mapping and costing exercises is given at Appendix A. However, this section of the report provides an overview of how the map database was put together. The map breaks down each centrally collected form into the following categories, outlined in Tables 1 and 2.

Table 1: Data map categories

Category name	Explanation
Regulatory function	Trading standards or environmental health
Service function	Taken from Rogers review with exception of public health and animal health which has been divided from a combined animal and public health service. Full details are given at Appendix A
Subject	Breakdown of coverage of questions. These have been split into contextual, activity, financial, staffing and performance. Detail around how each question was coded is given in Table 2, along with example data items
Theme	Used if there may more than one category assessed using the same questions
Question	This covers the actual questions asked with options if multiple choice questions
Unit	This is the unit used in response to the question. For example, text, number, £, %
Central body	Which central body requests the information
Name of return	Name of return
Coverage	England, Wales or both
Status	Mandatory, voluntary or required but not mandatory

Table 2: Breakdown of 'subject' areas including example data items

Subject	Definition	Example data items
Activity	Any question relating to processes, outcomes or daily activity captured by the return	<p>Number of new premises licenses refused</p> <p>Prize gaming permits cancelled in the quarter</p> <p>Planned FIT 3 visits</p> <p>Number of complaints about noise</p>
Contextual	Any question that provides supporting information, socio-economic contextual information, commentary and general information which is definitely not performance or activity related	<p>LA name and address</p> <p>Ethnicity of site residents</p> <p>What LA areas does your local/regional Animal Welfare Forum cover?</p> <p>What is the approximate area of site: 0-5 ha 5-10ha 10-15ha 15-20ha >20ha?</p>
Financial	Any question relating to funding, income or expenditure	<p>Did your LA receive funding from DH for tobacco control activities?</p> <p>Running expenses – Premises related expenses</p>
Performance	Any question that falls under the National Indicators or relates to meeting standards, risk assessment, satisfaction levels	<p>The percentage of major planning applications determined during the year within 13 weeks</p> <p>The number of high risk businesses subject to a programmed inspection for animal health</p> <p>Amount of direct and indirect Nox emitted from LA estates (NI so included in performance rather than Activity)</p>
Staffing	Any question that relates to staffing or training	<p>Number of FTE posts at the start of the financial year</p> <p>Qualifications</p>

Findings

How the data map was analysed

7. The data map can be analysed in a variety of ways. However, due to its size the easiest way to interrogate the map in terms of searching for overlap and duplication is to split the returns by regulatory function and then search for areas of duplication by subject. So, for example, all those returns that fall under trading standards and have data items covering 'activity' have been compared line by line (each data item entered) for duplication.
8. It is acknowledged that other, more thorough approaches could be taken, for example splitting the returns by regulatory function and then comparing all data items line by line without splitting the map down into the subject components first. However, this method of searching for duplication is beyond the scope of this exercise.
9. We are confident that the majority of areas of duplication have been found using the regulatory function – subject method described above. In addition, the returns have been sourced, the map populated and then searched by the same person, which increases the familiarity with the return forms and data items, thus decreasing the possibility that duplication has been missed.
10. In terms of analysis of map findings, all the major headline categories have been looked at in detail. The areas that have not been presented in this report are breakdown of 'unit' type. For example, does the return only request numeric responses or does it also request text commentary, dates etc? This information is of limited use but if a central body wished to reduce the time taken to fill in a return or alter the way data were collected it would be straightforward to extract this data using the map filters available. It may be for example, that one return only asks for quantitative data and that upon updating the form qualitative data may also be requested. Central bodies can use the filters to see how the information is currently collected and see if changes are necessary without altering the relative burden on local authorities.

Data map analysis: headline figures

11. A total of 59 returns were clarified by central bodies and local authorities as being requested across England and Wales consisting of 15,088 data items. Table 3 demonstrates the breakdown by regulatory service, coverage, status and frequency.
12. As demonstrated in Table 3, the majority of returns are requested of environmental health services. This is a function carried out by districts and single tier authorities in England and Wales. The split between voluntary and mandatory returns is fairly even with the exception of Wales. 10 out of the 11 Welsh returns are voluntary, although local authorities in Wales have more returns to complete than England.

Data map: Detailed breakdown

13. Table 4 gives detail on the frequency with which returns are requested. The majority of returns are requested on an annual basis; a small number are requested more frequently.

Table 3: Summary of data collections from local authority regulatory services

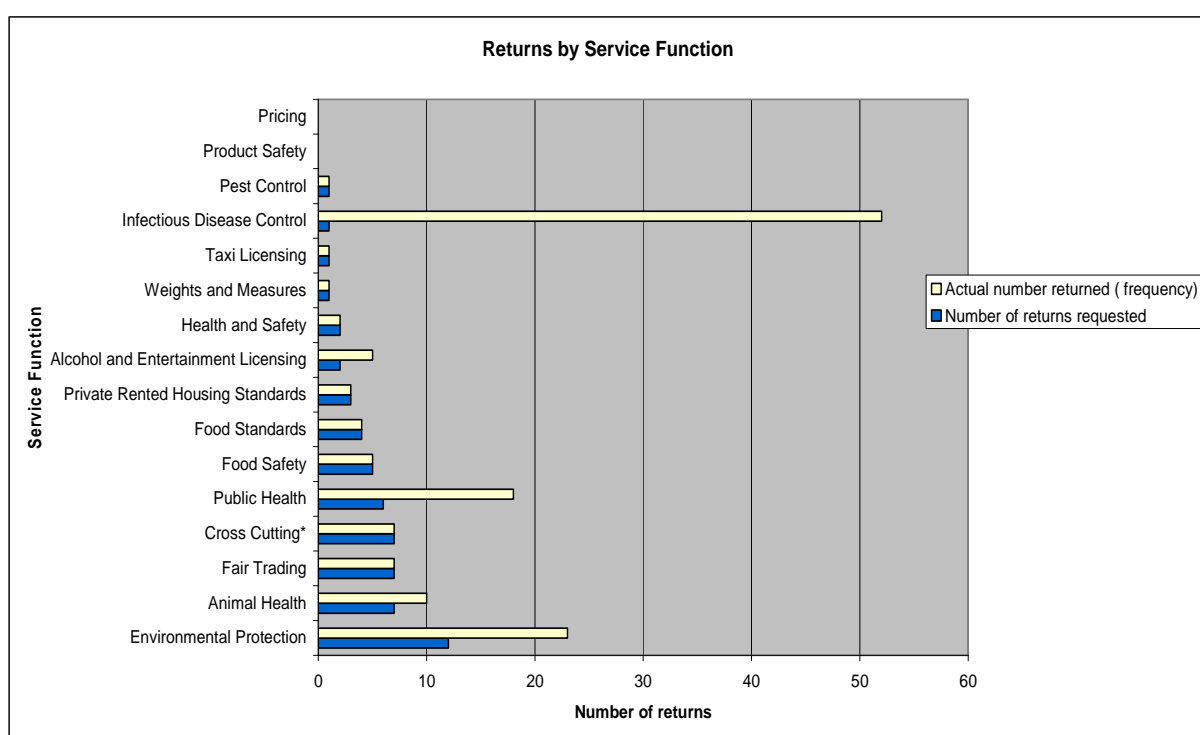
UK Coverage	Number of returns	Of which mandatory	Of which voluntary	Of which "required but not statutory"
England only	8	3	3	2
Environmental Health	6	1	3	2
Trading Standards	1	1	0	0
General Reg Services	1	1	0	0
Wales Only	11	1	10	0
Environmental Health	7	0	7	0
Trading Standards	2	0	2	0
General Reg Services	2	1	1	0
England and Wales	40	25	15	0
Environmental Health	19	13	6	0
Trading Standards	21	12	9	0
General Reg Services	0	0	0	0
Grand Total	59	29	28	2
Environmental Health	32	14	16	2
Trading Standards	24	13	11	0
General Reg Services	3	2	1	0

Table 4: Frequency of returns

Frequency	Number of returns	Total returns per year
Annual	43	43
Bi-Annual	1	2
Quarterly	2	8
Monthly	2	24
Weekly	1	52
As required	10	10
Total	59	139

14. Chart 1 demonstrates the number of returns requested in a year alongside the frequency of returns requested. For example a return requested on a quarterly basis equals a frequency of 4. The frequency of the return is a more realistic reflection of the administrative burden.
15. As Chart 1 demonstrates, when the numbers of returns requested are analysed, the service function completing the most returns is environmental protection with 12 returns. However, once frequency of submission is taken into account infectious disease control completes the most. This is due to a weekly submission of the NOIDS request. No returns are requested in the service function areas of pricing and product safety.

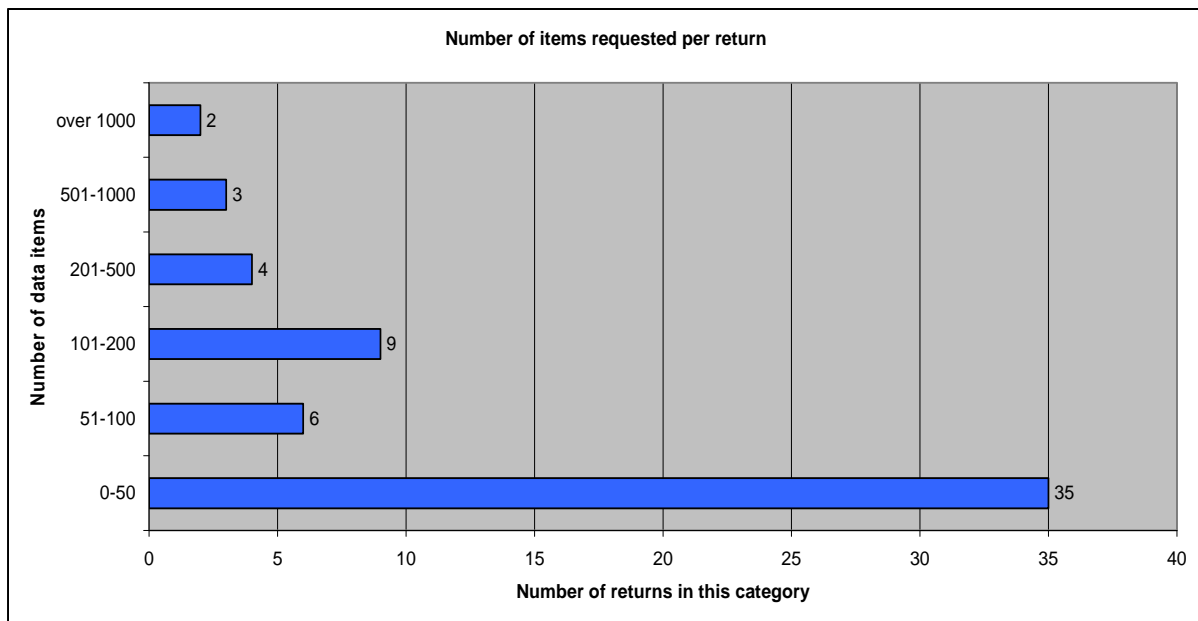
Chart 1: Total number of returns per year by service function



* Cross cutting refers to General Trading Standards, General Environmental Health and General regulatory services and includes the CIPFA returns, NI 182, the WHO'S Performance Indicators and the Planning and Regulatory Services – Public Protection returns for Wales.

16. To begin assessing the burden of data collections, it is necessary to look at the number of data items (questions) collected in order to explore the actual complexity of each return. The number of data items ranges from 1 to 1523.
17. Chart 2 shows the frequency of items requested per return. As can be seen, the majority of returns request up to 50 data items. There are only two returns that request over 1000 data items. It is important to note here that the reporting burden will be relative. For example, those returns that are over 1000 data items in length do not necessarily require local authorities to answer all questions. It may be that local authorities only need to answer a few of the questions. One example is the case is the CIEH noise return survey, which has 1523 questions. However, in reality no authority is ever going to record noise incidents against every possible source.

Chart 2: Frequency of items per return



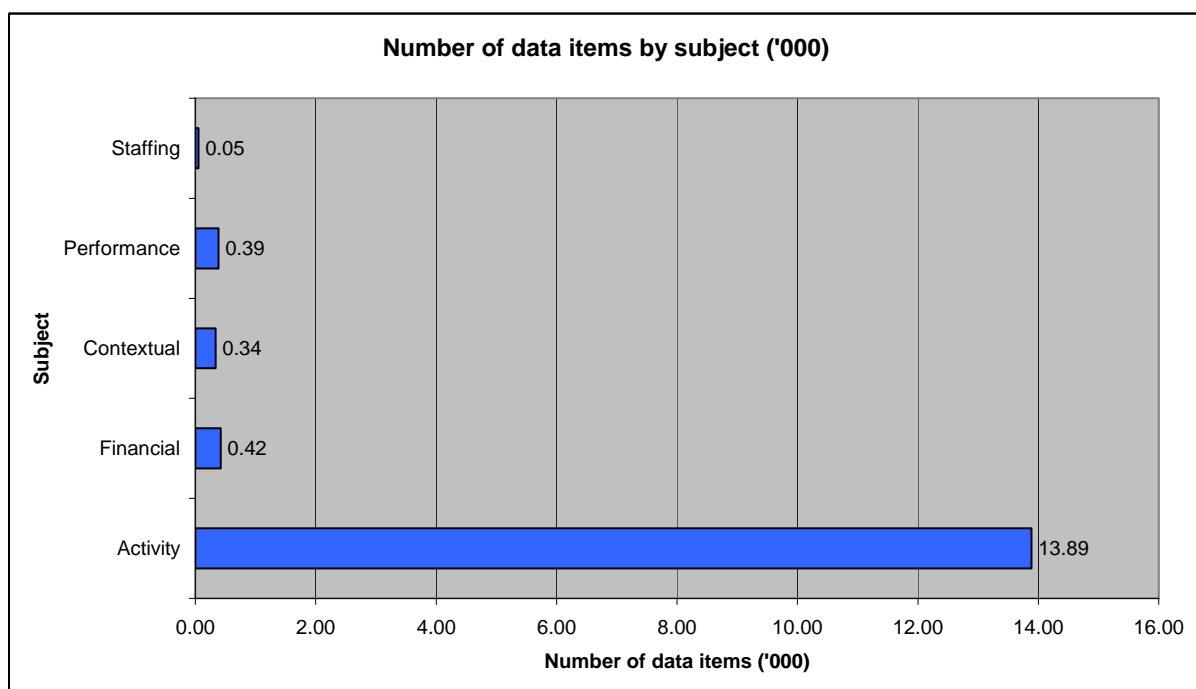
18. When data items are broken down by regulatory function the majority are requested from environmental health: 63% of data items are requested from environmental health as compared to 37% of data items for trading standards.
19. Table 5 shows the overall breakdown of returns by central body in terms of number of returns requested, number of questions/data items required, the overall average number of questions per survey and whether the returns are voluntary, mandatory or 'required but not statutory'. There are 22 central bodies in total (the WAG being split into WAG and WAG-Animal Health, and Data Unit Wales being counted as part of the WAG).
20. The FSA requests the most data items and the most returns, all of which are mandatory, presenting an average number of questions of 1090 per return. The CIEH has only one return but this is a long survey covering 1523 items, making it the largest of all returns. However, as aforementioned the burden of these types of return is relative because it is unlikely that all local authorities would need to answer all data items. The smallest number of data items is requested by the Department for Business, Innovation and Skills (BIS) with only two questions.

Table 5: Breakdown of returns by central body

Central body	Number of data items/ questions requested	Number of returns requested	Average number of questions per return	Status
Food Standards Agency	9810	9	1090	Mandatory
Chartered Institute of Environmental Health	1523	1	1523	Voluntary
Department for Environment, Food and Rural Affairs	801	6	134	Mandatory
Animal Welfare – WAG	471	2	236	Voluntary
Department for Environment, Food and Rural Affairs (E), Welsh Assembly Government (W)	362	5	72	Mandatory and Voluntary
Communities and Local Government	321	2	161	Mandatory, voluntary and requested but not statutory
Chartered Institute of Public Finance and Accountancy	213	2	107	Voluntary
Data Unit Wales (collected on behalf of WAG)	180	6	30	Voluntary
Health and Safety Executive	178	2	89	Mandatory and Voluntary
Department for Culture Media and Sports	144	1	144	Voluntary
Gambling Commission	138	1	138	Mandatory
Office of Fair Trading	87	6	15	Mandatory and Voluntary
Environment Agency	86	5	17	Mandatory
Department of Health	78	2	39	Voluntary
National Measurement Office	57	1	57	Mandatory
Department for Transport	52	1	52	Requested but not statutory
Health Protection Agency	45	1	45	Mandatory
Trading Standards Institute	42	1	42	Voluntary
Welsh Assembly Government	40	1	40	Voluntary
Wales Head of Trading Standards	34	1	34	Voluntary
National Pest Technicians Association	14	1	14	Voluntary
Dogs Trust	4	1	4	Voluntary
Department for Business, Innovation and Skills (BIS)	2	1	2	Mandatory

21. A further way to analyse the map is to look at the subject of the questions asked in the returns by service function.
22. The vast majority of questions relate to activity, which covers any question relating to processes, outcomes or daily activity captured by the return. The second largest subject is financial and this includes income as well as expenditure type questions. This is summarised in Chart 3 and a fuller breakdown of what is included under each subject can be found in Table 2 on page 10.
23. The focus on activity data demonstrates that central bodies are interested in what local authorities are currently doing. The vast majority of activity data items relate to 'number of' type questions such as 'number of complaints about noise, number of club premises allowed to sell alcohol, number of stray dogs put to sleep in current year, number of complaints about labelling'.
24. When subject is looked at across service functions the majority of service functions cover questions on all 5 subject areas. The functional area of private rented housing standards has the most diversity in questions asked. Food safety and food standards have a higher proportion of performance related questions in comparison to other types of questions.

Chart 3: Breakdown of 'subject' areas



25. At this point it is worth highlighting that in the initial phases of the project (see Appendix A) central bodies were asked to explain the reasons why they request each return from local authorities, and what they use the data for. However, there was a mixed response to this question. All the responses that were obtained are listed below.

- To fulfil FSA's statutory duty to monitor food law enforcement by Local Authorities and to report national details and totals against the National Control Plan, as required by EU law; to coordinate the delivery of import controls on milk and products and soya and soya products from China (with reference to Melamine testing); to allow coordination of resources in supporting official controls on imported food; and to update the list of approved premises in accordance with EU official controls regulations.
- Feeds into national statistics for Health and Safety – LAE 1 and Prosecutions data – HSE.
- Gambling Act 2005 requirement – Gambling Commission return.
- To provide information on the levels of compliant instruments and transactions to inform future legislative activity and to provide data for targeting activities – Weights and measures return, NMO.
- To provide local authorities with financial and activity based data relating to Environmental Health and Trading Standards – CIPFA

Interestingly no returns are requested in the service function areas of pricing and product safety.

Duplication in data requests

26. One of the major reasons for undergoing the mapping exercise was to look for duplication in the questions that are asked – with the intention of reducing the data burden placed on local authorities in the future.
27. From listing the data items from all the returns there are some examples where one central body requests the same information as another. Table 6 lists the detail for all areas of duplication found in the map by service function. Each area of duplication is listed by return and central body. Potential recommendations to rectify the duplication are also suggested. Some of the duplication areas are current and some will become duplicates when new indicators come into action. These are clearly listed in Table 6.

Table 6: Areas of duplication

Animal Health	
Return and central body	Area of direct duplication
LAEMS: Animal Feed (FSA)	Both ask for the number of FTE administration staff.
Profile – Animal Health Framework (DEFRA, WAG)	LAEMS: Animal Feed is not in operation officially until 2009/10 so it may be sensible to remove the duplicate question from Profile – Animal Health Framework as this is a voluntary return and just have it in the mandatory return.

Animal Health	
Return and central body	Area of direct duplication
NI 190 (DEFRA)	Both ask questions on enforcement and legislation compliance.
Service Delivery Plan – Animal Health Framework (DEFRA, WAG)	Once mandatory NI190 comes into action (2009/10) it may be sensible to remove the questions from the Service Delivery Plan – Animal Health Framework.

Animal Health	
Return and central body	Area of direct duplication
Animal Welfare Assessment Form (WAG)	Both ask questions on infringements
WATO (DEFRA,WAG)	Any removal of questions would need to come from the Animal Welfare Assessment Form which is voluntary and Wales only. However, the Animal Welfare Assessment Form is filled in by those given grants. As part of the grant, visits need to be made to premises that are otherwise not covered by statutory processes as well as those visited for licensing.

Animal Health	
Return and central body	Area of direct duplication
LAEMS: Animal Feed (FSA)	Both ask questions about inspections and enforcements.
WATO (DEFRA,WAG)	

Animal Health	
Return and central body	Area of direct duplication
Animal Health 134 (DEFRA, WAG)	Animal Health 134 and WATO both ask questions on offences and resulting actions.
WATO (DEFRA, WAG)	
Service Delivery Plan - Animal Health Framework (DEFRA,WAG)	All ask questions on infringements and enforcement actions.

Animal Health	
Return and central body	Area of direct duplication
Performance Indicator Form (WHoTS)	Both look at number of inspections. Please note WHoTS is a Wales-only return so this duplication only applies to Wales.
Service Delivery Plan – Animal Health Framework (DEFRA, WAG)	

Animal Health	
Return and central body	Area of direct duplication
Animal Health 134 (DEFRA,WAG)	Both ask questions on gross cost of service relating to animal health. The question needs to remain in Animal Health 134 as this is mandatory and is also required in England.
Performance Indicator Form (WHoTS)	

Environmental Protection	
Return and central body	Area of direct duplication
NI 196 (DEFRA)	All ask questions on the number of fly tipping incidents.
STS/007 Environment and Transport Street Scene (Data Unit Wales-WAG)	
FLYcapture (EA)	

Fair Trading	
Return and central body	Area of direct duplication
CRW Investigation (OFT)	Small amount of duplication around enforcement – enforcement body, legislation, offence type between these two returns.
Central Register of Convictions (OFT)	

Public Health	
Return and central body	Area of direct duplication
Smoke free Legislation compliance return England and Wales (DH and WAG)	All returns ask for information on enforcement – individuals smoking in smoke free area. Potential to remove enforcement questions from either the smoke free legislation surveys or the Tobacco Control Survey.
Tobacco Control Survey (DH)	

<p>CIPFA Trading Standards</p>	<p>General note around CIPFA Trading Standards Publication: Due to nature of how CIPFAstats are put together there will be duplication in these publications. These are not mandatory returns and CIPFA is not a regulatory body so this is for information only.</p> <p>Duplicated questions found in Profile – Animal Health Framework on High, medium, low risk businesses though the CIPFA TS publication covers more than just animal health in terms of business risk.</p> <p>Duplication of staffing questions also found in Profile – Animal Health Framework and Service delivery plan – Animal Health.</p> <p>Duplication of information on enforcement actions also found in LAEMS: Primary Production.</p>
<p>CIPFA Environmental Health</p>	<p>CIPFA Environmental Health has several duplicated questions also found in National Annual Rodent Survey, Taxi Licensing Survey, Noise returns, HSSA, Local Pollution Control Statistical Survey, LAEMS: Food Standards, Alcohol entertainment and late night refreshments, Stray Dog return, LAE1.</p>

Quantifying the administrative burden

28. To accompany the identification of the central data collections and production of the data map, a number of local authorities were asked to provide estimates of the time taken to fulfil each return. This provided data to feed into a Standard Cost Model (SCM) calculation to quantify the administrative burden of the data collections identified in the map. Data were provided by 52 local authorities of all types in both England and Wales. Further details of the method used to gather and analyse the data are given at Appendix A.
29. The resulting cost estimates are fit for purpose; however some caution should be exercised. For example, there was a degree of variation in the estimates provided by local authorities and comments received indicate that this may be for a number of reasons including IT compatibility and local variation in workload. Further details of the limitations of the data are given in Appendix B.
30. The total administrative cost for all returns was estimated at £5.6 million for England and £0.4 million for Wales. The total burden for England and Wales combined is £6 million a year. For English authorities this is approximately £15,825 per authority and for Welsh authorities this is £18,673 per authority.
31. The administrative costs in terms of service function are summarised in Table 7. This shows that the administrative costs are over six times higher for environmental health than trading standards. For environmental health services, the estimated administrative cost of £4.8 million equates to 145 FTE officers. For trading standards, the estimated cost of £740,000 equates to 26 FTE officers.¹ In two-tier areas in England, this means district councils have a relatively higher reporting burden than upper tier councils that are generally larger.

¹ The total numbers of FTE officers were calculated using the average salary for environmental health and trading standards officers respectively, without the 30% uplift used in the SCM. See Appendix A for further details.

32. Within environmental health services, the service function having the greatest administrative cost is environmental protection. Within trading standards, the service function having the greatest cost is food standards. Approximately £771,000 can be allocated across trading standards and environmental health regulatory functions and includes returns such as the CIPFA returns, NI 182, WHoTS Performance indicators and the Planning and Regulatory Services – Public Protection returns for Wales. These are listed as ‘general environmental health’, ‘general trading standards’ and ‘general regulatory services’ in Table 7.

Table 7: Estimated cost by service function

Breakdown by service function	
	Estimated administrative cost for LAs £
Alcohol and Entertainment Licensing	£258,145
Environmental Protection	£2,795,448
Food Safety	£264,992
Health and Safety	£132,311
Infectious Disease Control	£598,548
Pest Control	£16,543
Private Rented Housing Standards	£375,454
Taxi Licensing	£13,794
Public Health	£141,512
General Environmental Health	£202,775
Total Environmental Health	£4,799,522
Animal Health	£228,218
Fair Trading	£160,408
Food Standards	£269,925
Pricing	£0
Product Safety	£0
Weights and Measures	£16,091
General Trading Standards	£63,089
Total Trading Standards	£737,731
General Regulatory Services	£505,076
Total	£6,042,329

33. Another way to look at the administrative costs of central data collections placed on local authorities is to break down the costs by central body. This is summarised in Table 8.

Table 8: Total estimated administrative cost per central collecting body

Breakdown by central body	
	Estimated administrative cost for LAs £
Department for Environment, Food and Rural Affairs (DEFRA)	£2,157,715
Food Standards Agency (FSA)	£572,482
Environment Agency (EA)	£656,072
Health Protection Agency (HPA)	£598,548
Department for Business, Innovation and Skills (BIS)	£496,568
Chartered Institute for Public Finance and Accountancy (CIPFA)	£259,982
Department for Communities and Local Government (CLG)	£371,284
Gambling Commission (GC)	£163,347
Office of Fair Trading (OFT)	£153,792
Health and Safety Executive (HSE)	£132,311
Department for Culture, Media and Sport (DCMS)	£94,798
Chartered Institute of Environmental Health (CIPFA)	£77,665
DEFRA (E) Welsh Assembly Government (W) - Animal Health	£84,074
Department of Health (DH)	£96,384
Dogs Trust	£26,858
Data Unit Wales	£25,998
Department for Transport (DfT)	£13,794
National Measurement Office (NMO)	£16,091
National Pest Control Technicians Association	£16,543
Welsh Assembly Government (WAG)	£14,894
Trading Standards Institute	£6,615
Wales Head of Trading Standards	£3,138
Welsh Assembly Government (WAG) - Animal Welfare	£3,376
Total	£6,042,329

34. Table 9 sets out the administrative cost per return and per local authority. This has been calculated using the overall administrative cost divided by the number of local authorities which fill in that particular return. Table 9 also sets out number of data items per return to address any correlation between cost and length.

35. There does not appear to be a correlation between number of data items and cost. For example, the Local Air Quality Management (LAQM) System is the most expensive return in terms of single cost and cost per local authority but only has four questions. The responses required are detailed and the return takes on average 148 hours to fill in. Table 9 shows that out of the top five most expensive returns (in terms of cost to local authorities) four request less than 50 data items.

Table 9: Estimated administrative cost per return and per local authority

Return	Central body ²	Total cost (£)	Single cost per local authority (£)	Number of data items	Average time to complete (hours)
Local Air Quality Management (LAQM) System	DEFRA	1,397,870	4,017	4	148.3
NOIDS	HPA	598,548	1,720	45	1.2
FLY capture	EA	549,360	1,579	4	4.9
NI 182	BIS	496,568	1,407	2	56.4
NI 194	DEFRA	456,853	1,401	9	51.8
HSSA	CLG	301,920	926	279	34.2
Environmental Health	CIPFA	202,775	583	121	21.5
LAEMS: Food Standards	FSA	202,130	1,168	656	51.2
Gambling Act	GC	163,347	469	138	4.3
LAEMS: Food Hygiene	FSA	148,640	427	793	15.8
LAE1	HSE	113,542	326	155	12.0
Alcohol entertainment and late night refreshments	DCMS	94,798	272	144	10.1
Local Pollution Control Statistical Survey	DEFRA	85,824	247	648	9.1
AQ Grant Expenditure	DEFRA	85,369	245	1	9.1
Noise returns	CIEH	77,665	223	1523	8.2
Gypsy and Traveler caravan count	CLG	69,363	213	42	3.9
Approved food premises	FSA	64,479	185	5	6.8
Trading Standards	CIPFA	57,207	331	92	14.5
Return of legal proceedings/ CRW update	OFT	56,971	329	47	14.4
NI 183	OFT	55,778	322	33	14.1
WATO	DEFRA (E) WAG (W)	52,238	302	133	3.3
Smoke free legislation compliance return	DH	50,282	154	15	2.8
NI 190	DEFRA	48,931	324	3	14.2
Tobacco Control Survey	DH	46,102	141	63	5.2
Central Register of Convictions	OFT	41,044	237	11	10.4

² The full name of each central body is given in Table 8.

Return	Central body ²	Total cost (£)	Single cost per local authority (£)	Number of data items	Average time to complete (hours)
LAEMS: Sampling	FSA	40,395	233	8242	10.2
Non EC directive bathing waters**	EA	35,746	1,625	2	60.0**
LAEMS: Primary Production	FSA	34,873	202	120	8.8
LAEMS: Imported Food	FSA	32,944	95	64	3.5
Service Delivery Plan - Animal Health Framework	DEFRA	32,260	186	54	8.2
Fixed Penalties	DEFRA	28,050	81	136	3.0
SOCL/LA/FORM 3	EA	27,078	78	29	2.9
Stray Dog return	Dogs Trust	26,858	77	4	2.9
LAEMS: Animal Feed	FSA	25,442	147	326	6.4
Estimated Expenditure Invoicing-Animal Health Framework	DEFRA (E) WAG (W)	25,108	145	144	6.4
Profile - Animal Health Framework	DEFRA	22,559	130	19	5.7
SOCL/LA/FORM 1	EA	21,944	63	35	2.3
SOCL/LA/FORM 2	EA	21,944	63	20	2.3
Prosecution return	HSE	18,769	54	23	2.0
National Annual Rodent Survey	National Pest Technicians Association	16,543	96	14	3.5
Melamine testing	FSA	16,099	46	1	1.7
Section 70 Annual report Weights and Measures	NMO	16,091	93	57	4.1
Taxi Licensing Survey	DFT	13,794	42	52	1.6
Smoke free legislation compliance return Wales	WAG	13,107	596	40	1.8
STS/007 Environment and Transport - Street Scene*	Data unit wales	7,745	352	1	13.0*
Approved feed premises	FSA	7,480	43	5	1.9
Animal Health 134	DEFRA (E) WAG (W)	6,727	39	12	1.7
Hallmarking Act	TSI	6,615	38	42	1.7
PPN/001 Planning and Regulatory Services - Public Protection	Data unit wales	5,489	250	1	5.5
Demolitions and Hazards Return*	Data unit wales	4,170	190	175	7.0*
Companion Animal Welfare Enhancement Scheme Baseline Service*	WAG (ANIMAL WELFARE)	3,376	153	432	5.7*

Return	Central body ²	Total cost (£)	Single cost per local authority (£)	Number of data items	Average time to complete (hours)
WHoTs Performance Indicator Form	WHOTS	3,138	143	34	6.3
PPN/008 Planning and Regulatory Services - Public Protection	Data unit wales	3,019	137	1	5.5
PPN/004 Planning and Regulatory Services - Public Protection	Data unit wales	2,830	129	1	4.8
PPN/007 Planning and Regulatory Services - Public Protection	Data unit wales	2,745	125	1	5.0
Animal Welfare Assessment Form**	WAG	1,787	81	39	3.0**

* The administrative costs for highlighted returns are based on returns of between 2-4 responses.

** The administrative cost for highlighted returns is based on only one response.

Please refer to Appendices A and B for further details of the methodology used and the limitations with the data.

Conclusions

1. The data map and associated outputs have been completed as part of a systematic exercise to identify the flows of data across the local authority regulatory services system. One purpose of the data sharing module is to explore ways in which to reduce the burdens of data collection on local authorities, make a positive impact on the quality of services, and increase efficiencies for both local authorities and national regulators that require the data. A second purpose is to promote better cooperation across the system.
2. The detailed analysis undertaken has shown that 22 central bodies (WAG being split into WAG and WAG – Animal Health) request a total of 59 returns covering the regulatory services of environmental health and trading standards. The 59 forms comprise a total of 15,088 data items. In terms of frequency of the returns the number of actual returns increases from 59 a year to 139 a year. This takes into account those that are required on a bi-annual, quarterly, monthly or weekly basis, together with ad hoc returns, which are counted as being once per year.
3. The total administrative cost for local authorities is estimated to be £6 million for England and Wales. The split is £5.6 million for England and £0.4 million for Wales. As an estimated administrative cost for all the returns identified in the data map for English authorities this equates to £15,825 per authority and for Welsh authorities this is £18,673 per authority. This costing is an initial estimate as there are limitations with the data that must be borne in mind when interpreting the findings. Full details are given in Appendices A and B.
4. In terms of service function, the administrative costs are over six times higher for environmental health than trading standards, although this is commensurate with the larger size and workforce of environmental health services. For environmental health services, the estimated administrative cost of £4.8 million equates to 145 FTE officers. For trading standards, the estimated cost of £740,000 equates to 26 FTE officers.

Understanding the nature of the burden

5. This exercise has demonstrated that the 'data burden' placed on local authorities is difficult to accurately dissect. Analysing the data from the data map in different ways produces different pictures. For example, looking at the data by service function and return provides a different view of the burden than if the data are looked at by service function and number of data items requested.
6. It is important to note that when the data are initially looked at the numbers do not demonstrate the true administrative burden or the real story. It is important to assess each return by the number of data items requested and the complexity of the answers required. For example, on first glance local authorities in Wales appear to have a large data burden placed on them but on closer inspection the majority of the additional returns are voluntary and require only short answers.

7. Counting the number of returns either from each central body or from each service function provides only very superficial results. Assessing the data in the map this way provides an overview of the burden, but to really understand the burdens placed on local authorities in terms of time and cost it is necessary to look at the complexity and detail within each form. Only when actual number of data items is looked at in this way do we start to see the real picture in terms of burdens. Even then, there does not appear to be a correlation between number of data items and cost. For example, the Local Air Quality Management (LAQM) System is the most expensive return in terms of single cost and cost per local authority but only has four questions. Out of the top five most expensive returns (in terms of cost to local authorities) four of these are returns requesting less than 50 data items.
8. The number of returns at 59 does not necessarily account for all the data burdens placed on local authorities. When frequency of returns is taken into account the burden increases to at least 139 actual returns sent in to central bodies per year. The Standard Cost Model includes factors such as frequency which makes the costing more realistic. However, it is worth noting those returns provided on an ad hoc basis marked 'as required' in the map have been calculated with a minimum frequency of 1, so in reality the cost burden is likely to be higher than shown for these particular returns.
9. Value for money judgments are not possible on the administrative burden. In terms of being able to make a value for money judgment of the data collection that exists for regulatory services, we could say that value for money for a local authority can be estimated as = benefit / cost. This research has presented an estimated cost but it does not provide any way of quantifying the benefit. In order to find this out we would need to quantify what is done with the data that are collected. This is an extremely difficult assessment to make, and even more to quantify. For example, we know that the CIPFA Trading Standards Statistics are collected so that information can be used by service practitioners to better manage their services. But we cannot put a quantifiable value on that benefit.
10. In addition to the burdens placed on local authorities there will be a significant data and resource burden placed on the central bodies that is not captured in this report. No research has been carried out to assess the level of validation and quality assurance that each central body completes on the returns requested from local authorities. This could include error checking and chase up calls to local authorities all adding to the overall administrative burden per return for both local authority and central body. If the data are being requested but not actually put to any use by central bodies then there is very little point in continuing to place this burden on local authorities both in terms of time and cost. However, if central bodies are actively using the information collated to suggest changes to improve processes or policy then the costs can be understood.

Duplication

11. Overall, the data mapping exercise has revealed that there is some direct duplication of data requests. If this were to be rectified some of the burden would be removed. However, this is usually a case of a few questions within forms so any real impact in terms of time and cost would be minimal. It is acknowledged that a more thorough approach to identify duplication and similarities would be to split the returns by regulatory function and then compare all data items line by line without splitting the map down into the 'subject' components first. However, this method of searching for duplication is beyond the scope of this exercise.

Type of data requested and use by central bodies

12. The focus on activity data demonstrates that central bodies are interested in what local authorities are currently doing. The vast majority of activity data items relate to 'number of' type questions such as 'number of complaints about noise, number of club premises allowed to sell alcohol, number of stray dogs put to sleep in current year, number of complaints about labelling'. The next subject is financial, although far smaller, and this includes income as well as expenditure type questions.
13. This exercise demonstrates that, now we have the full picture of requests and the detail within the requests, it is essential to look at what the central bodies actually do with the information they are requesting from local authorities. In the initial phases of the project central bodies were asked to explain why they request the returns from local authorities, and what they use the data collected for. There was a mixed response to this question but responses that were obtained demonstrated that the main reasons for collection of returns were to help monitor and coordinate resources, to update regulations and legislation, and to feed into national statistics. These responses are in line with a heavy lean towards activity related questions.
14. Although the information on activity related questions and the initial responses from central bodies provides some insight, it is essential to find out why the information is being requested, what central bodies are doing with the information and what the data are actually showing. Considering that half of the forms are mandatory and a further 2 are required but not statutory if any of the data are being requested but not actually put to any use by central bodies then there is very little point in continuing to place this burden on local authorities both in terms of time and cost. However, if central bodies are actively using the information collated to suggest changes to improve processes or policy then it the costs can be understood. Clearly, more work needs to be undertaken in this area in the future.

Who bears the most administrative costs?

15. It is difficult to answer who bears the most administrative costs. However, as the cost of data returns for environmental health services is six times that for trading standards district councils, which deliver environmental health functions but tend to be smaller than unitary or upper tier councils, will seek particular benefits from any work to streamline data requests and reduce the cost burden on local authorities.

Appendix A: Methodology

Stage 1 – Scoping

In order to generate a list of data collections two surveys were developed that allowed us to scope the data requests made of local authorities by central bodies.

The first survey was sent to a random sample of English local authorities – the aim being to ascertain what information is requested. The sample was not a statistical sample; the aim was to consult a cross-section of local authorities whilst keeping the burden of completing the exercise to a minimum. The sample included local authorities from all class types (unitary, county, district, inner and outer London boroughs and metropolitan districts) and was derived from CIPFA Environmental Health and Trading Standards working party members plus additional CIPFA survey respondents. Sixty-one local authorities were approached and 22 responded across the functions of environmental health and trading standards.

The survey covered the following questions:

- Title of return
- Collection body
- Frequency of return
- Last deadline
- Estimated time to complete the return

A second survey was sent to the 15 members of the LBRO coalition group. The group has representatives from the majority of central bodies collecting data from local authority environmental health and trading standards services. CIPFA also completed a survey to cover the returns local authorities make to CIPFA Statistics.

There was an initial lack of responses from the central bodies. It was decided that the best course of action was to cross reference the findings received from the local authorities and pre-populate the central body surveys with data. A pre-populated survey was then sent to each and they were asked to confirm if the returns were accurate. This increased the number of responses received from the central bodies.

The survey covered the following questions:

- Title of return
- Weblink
- Purpose of collection
- Frequency of return
- Number of data items requested
- Last deadline

Using a two stage approach increased the focus of the exercise and reduced the possibility of anything being missed.

Stage 2 – Data map

The data from the first stage provided the scoping work for the map.

Responses from the surveys in the scoping stage were cross referenced and a full data map of all returns was developed. In order to provide a full map each original return form was collected. Returns were sourced either directly with central bodies or through local authorities that had responded. Once all forms had been collected they were entered into the map database in accordance with the following categories outlined in Tables 10 and 11.

Table 10: Data map categories

Category Name	Explanation
Regulatory function	Trading standards or environmental health
Service function	Taken from Rogers review with exception of public health and animal health which has been divided from a combined animal and public health service shown in Table 11
Subject	Breakdown of coverage of questions. These have been split into contextual, activity, financial, staffing and performance
Theme	Used if there may more than one category assessed using the same questions
Question	This covers the actual questions asked with options if multiple choice questions
Unit	This is the unit used in response to the question. For example, text, number, £, %
Central body	Which central body requests the information
Name of return	Name of return
Coverage	England, Wales
Status	Mandatory, voluntary or required but not mandatory

Table 11: Service function breakdown

Alcohol and Entertainment Licensing	Environmental Health (District)	Regulatory Services (Single Tier)
Environmental Protection		
Food Safety		
Health and Safety		
Infectious Disease Control		
Pest Control		
Private Rented Housing Standards / Public Health		
Taxi Licensing		
Animal Health	Trading Standards (County)	
Fair Trading		
Food Standards (including composition, labeling and animal feed)		
Pricing		
Product Safety		
Weights and Measures		

The resulting Excel map database has 15,088 entries made up from 59 returns. The data map can be searched using a simple filtering system using any of the headings listed above. An online repository was also developed to complement the map. This allows users to access the original returns and download copies where they are freely available. The link to the repository is below:

Link to repository: http://www.cipfastats.net/default_view.asp?content_ref=8484

As a quality assurance exercise the data map was sent to every central body listed in the map to check that all returns had been captured and coded accurately. Responses from all central bodies were incorporated into the map and some changes were made, some returns removed and some new ones added in.

Stage 3 – Costing the burden

In addition to the data map a Standard Cost Model was also developed to allow us to estimate the cost of the data burden.

Local authority sample

The approach to sampling the local authorities was guided primarily by the need to limit the additional burden of completing this for us, whilst gaining a robust set of estimates from local authorities themselves. Our aim was to consult a cross-section of local authorities, with reasonable geographical spread including Welsh authorities in order to account for their specific context, to avoid bias in the results. However the approach did not use a statistical sampling technique. In total 92 local authorities across England and Wales were approached and 52 submitted time estimate data.

Local authorities were asked to estimate the length of time, in hours, that it takes for their authority staff to complete each of the returns listed. The guidance stated that this should include not just the time taken to physically fill in the form, but any additional time to collate all the data together. Additionally, the guidance stated that all tasks that are relevant should be included, but not those that would still be undertaken regardless of the completion exercise.

A breakdown of the responses is in Table 12 below with an indication of the overall response rate. The main limitation with the sample is that district councils are under-represented, relative to the total population. However we felt that this was reasonable given the need to limit the burden of the exercise, particularly on smaller authorities. There was also a good response from single tier authorities that deliver the full range of environmental health and trading standards service functions, so we had confidence that environmental health functions were adequately represented.

The local authorities provided data in their present configuration following the local government re-organisation that created nine new unitary authorities in England in April 2009. Two new unitaries submitted time estimates for this exercise, however it should be noted that these estimates were based on their historical experiences of the previous district authorities.

Table 12: Local authority types providing time estimate data

Class type	Total number (as of April 2009)	Number approached	Number responding
London Borough (single tier)	125	26	13
English Unitary (single tier)		21	7
Metropolitan District (single tier)		14	9
District Council	201	9	7
County Council	27	12	10
Welsh Unitary	22	10	6
Total	375	92	52
Percentage of total number of local authorities in England and Wales		25%	14%

Standard Cost Model (SCM)

The SCM is a costing methodology developed originally to cost the administrative demands placed by Government upon business in the UK. It is based on the international standard cost model and is a broad principle-based approach rather than a detailed scientific measurement. It is used to cost the time devoted to complying with regulations by business and also to cost the time given by public bodies to fulfilling data requests. It has been used across central government departments in England to tackle the 30 per cent administrative burden reduction target set in the last CSR. The Cabinet Office/Better Regulation Executive publication *Measuring administrative costs: UK Standard Cost Model Manual*, September 2005 is the key reference document we used.

Each return was then costed using the SCM formula, which is set out below:

$$\text{Unit Cost} \\ (\text{T} \times \text{W})$$

multiplied by

$$\text{Quantity} \\ (\text{P} \times \text{F})$$

Time (T) = the time taken to complete the return

Wage Rate (W) = the wages of the person completing the return including a 30 per cent mark up for back office costs as detailed in SCM – the 30 per cent uplift reflects payroll and other overheads.

Population (P) = number of authorities carrying out the return

Frequency (F) = the regularity with which the returns are requested

In this case, the following approach was used to create each of the variables above for any individual return:

T = Average number of hours submitted by surveyed authorities to complete the return.

LAs were asked “If your authority no longer had to complete the return, how much time would be saved”. This would then account for the full collection time spent, but not include time spent on tasks that would be carried out regardless of the need to complete a return.

It is worth noting that there are advantages and disadvantages of using an average value, or mean, rather than the middle value, or median. We decided to use the mean as the most representative value in this case, a judgment made after checking the outliers. Using the median will produce different results and this should be borne in mind when interpreting the results.

W = As an estimate, we have converted the average salaries for environmental health and trading standards officers as published in the Local Government Association Local Government Earnings Survey 2008, of £33,096 and £27,889 respectively, into hourly rates of £20.83 and £17.55 (based upon an average 227 working days of 7 hours). A 30 per cent mark-up was then added to the hourly rates making hourly rates of £27.08 and £22.82 respectively. For those returns that were cross-cutting (covering both TS and EH functions) the midpoint salary of £30,493 was used equating to £19.19 per hour (£24.95 with 30% mark up).

The SCM suggests that the ONS Annual Survey of Hours and Earnings is used to provide wage data, and this was used to underpin the impact assessments for LBRO’s establishment and the Primary Authority statutory instruments. However in this instance, the Local Government Earnings Survey provided more specific data and is a robust source based on pay bill and average pay data from 212 local authorities in England and Wales (51.7% response rate, based on the total of 410 local authorities up to the end of March 2009).

P = This equates to the number of authorities with responsibility for that particular service function, 348 for Environmental Health and 173 for Trading Standards, in England and Wales combined.

F = This is simply the number of times the return is requested each year i.e. annual equals 1, quarterly 4 and monthly 12.

This method allows for the ability to cost the administrative burden by service function, central body and whether the return is mandatory or voluntary.

Appendix B: Restrictions with data

1. When using the data map or the results from the SCM it is important to bear the following points in mind.

Sample size

2. Not all local authorities in England and Wales provided time estimates. The results from the SCM are based on 52 respondents. To have a more accurate costing all local authorities would be required to submit data for this exercise. However, this would have placed a heavy burden on local authorities and was not possible within project timeframes or budget so the results provide an indication of cost, not a true cost.
3. All costing data are based on estimated responses from local authorities and should therefore be treated as an estimate rather than a definite figure. Guidance on how to estimate time taken was issued with the survey, but CIPFA cannot guarantee the accuracy of the data provided or guarantee that the guidance was followed correctly by all local authorities.

Variation in time estimates

4. For some returns there was a wide variation in the time estimates submitted by local authorities. When the responses were validated (which involved checking survey responses for outliers and speaking directly with local authorities to check for errors) some of the local authorities submitted high figures where others submitted low figures. These are not incorrect but a reflection of the demographic situation for certain local authorities. For example, in a local authority where there are a lot of bars and restaurants a high figure for the alcohol entertainments and late night refreshments return is a real representation of time taken to fill in this return, whereas most authorities have low figures for this return. Where figures were unusually high local authorities were asked if the figures were correct and representative.
5. Another reason for variation appears to be the variety of IT systems in use in local authorities that may or may not interface with other systems. Some local authorities explained that they had to re-input data from one system to another, increasing the time taken to complete that return.

SCM methodology

6. The SCM methodology as outlined in Appendix A takes into account the factors of Frequency, Time, Wage and Population. A 30 per cent mark-up has been factored into the formula. This is used in regulatory impact assessments and includes payroll overheads, training and development, IT, personal and general indirect costs.
7. The SCM does not include one-off transitional costs – the costs associated with setting up a new return – which may inflate the time estimates in the first year of a return's operation. This is an issue that may affect the estimates for new returns such as NI 182 (Department for Business, Innovation and Skills) and LAEMS (Food Standards Agency) and this should be borne in mind when interpreting the cost estimates.

8. In addition to the burdens placed on local authorities there will be a significant data and resource burden placed on the central bodies that is not captured in this report. No research has been carried out to assess the level of quality assurance that each central body completes on the returns requested from local authorities. This may include error checking and chase up calls all adding to the overall administrative burden per return for both local authority and central body.

Value for money

9. Value for money judgments on the administrative burden are not possible. In terms of being able to make a value for money judgment of the data collection that exists for regulatory services, we could say that value for money for a local authority can be estimated as benefit/cost. This research has presented an estimated cost but it does not provide any way of quantifying the benefit. In order to find this out we would need to quantify what is done with the data that are collected. This is an extremely difficult assessment to make and even more to quantify. For example, we know that CIPFA Trading Standards Statistics are collected so that information can be used by service practitioners to better manage their services but we cannot put a quantifiable value on that benefit.

Identifying duplication in data requests

10. The most thorough approach to highlight duplication is to split the returns by regulatory function then compare all data items line by line without splitting the map down into the 'Subject' components first. However, this method of searching for duplication is beyond the scope of this exercise and would require a lot of time and resources considering there are over 15,000 data items to assess. Duplication was sourced by splitting the returns into regulatory function and comparing returns under the same 'subject' areas.
11. Although all central bodies have addressed their individual returns in detail there may still be subjective errors in coding the 'subject' category.

Views and comments on this report are welcome. If you wish to give feedback, please contact Ffiona Kyte at ffiona.kyte@lbro.org.uk or on 0121 226 4000.