



Chartered Institute of
Environmental
Health

Sefydliad Siartredig
Iechyd yr
Amgylchedd

Re-thinking audit and inspection

The impact of audits, inspections and studies on
environmental health service delivery

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Introduction

This is a time of great change in public service provision in Wales, in particular in public service delivery, as evidenced by Sir Jeremy Beecham's review of local service delivery *Beyond Boundaries*. The Welsh Assembly Government has recognised that citizen centred services are crucial, and that there is an ever growing expectation from service users and receivers – the citizens. In order to develop the highest quality services there is an expectation of both the citizen and the service provider to co-operate and collaborate to increase public value in a time of ever diminishing resources. How these resources will be used to produce the greatest benefit in terms of public health outputs and outcomes will test the minds of many.

Audits, inspections and studies of services are an increasing feature of local government. The purpose of such exercises is to analyse the service being delivered and to identify changes in the way in which it is being delivered to benefit the service target group, whether local businesses, citizens or other service areas within the local authority, to identify areas of practise which are exemplary and which can be disseminated to other local authorities as ways in which they can improve the service they deliver, to identify new ways of delivering existing service and to identify more efficient ways of delivering services.

For environmental health professionals the purpose of audits and inspections goes beyond issues relating to efficiency of service delivery. Improvements to services are also measured by the improvements that accrue to public health through improved public health outputs or outcomes. A change to service delivery will not be beneficial if it results in detriment to public health in either the short or long term.

In order to ascertain how many audits, inspections and studies of environmental health services are carried out on an annual basis the CIEH undertook a research project. The CIEH asked each local authority how many audits, inspection and studies of their service are carried out, how they impact on service delivery and the benefits that flow from them for the local authority and for the public health of the citizens of the area. The survey form sent out appears as Appendix 1 to this report.

Responses were received from 12 of the 22 local authorities in Wales, a response of 54.54 percent. Responses have been aggregated and the identity of local authorities providing responses has been kept confidential, to ensure complete freedom of response.

1.0 Number of audits

Local authorities were asked how many inspections, audits and studies of their service were made in the year 2005. Responses ranged from one to 11, the average was 3.08.

Commenting on the regularity of external audits local authorities reported that the FSA audit their service every two to three years.

Annual returns are provided, *inter alia* to the FSA, HSE, Welsh Assembly Government regarding IPPC, DEFRA/SVS regarding the Animal Health Framework, the WAO on National Strategic Performance Indicators and Core Performance Indicators and WEFO regarding Bathing Water Quality.

All local authorities reported internal audits of discrete parts of their services taking place each year. Only one reported an internal audit of their whole service in 2005.

1.1 Auditing bodies

Inter-authority Health and Safety Audits were the most common audit reported by local authorities, 36.36 percent of the services reporting having been subject to one. 27.2 percent had been subject to audits by the WAO, 18.18 percent had been subject to audit by the FSA.

Other auditing and inspecting bodies identified were the Audit Commission and the Criminal Records Bureau. Local authorities also reported inspections relating to Investors in People, Charter Mark award scheme, QMS auditor (British Standards Institute) the Information Commissioner in respect of information storage under the Data Protection Act 1998, and all reported internal inspections and audits of parts of the service.

Reference was also made to time spent by services collating information required by other bodies including: CIPFA, National Dog Warden Association, CIEH Noise Survey, National Pest Technicians Association, Welsh Assembly Government, Private Water Supplies Survey, Welsh European Funding Office, Bathing Water Quality, DEFRA and internal studies relating to the Performance Management Framework.

2.0 Resources required to support audits and inspections

Responding local authorities were asked to quantify what resource, in terms of officer hours was required to prepare for audits, to support the audit team during the audit or inspection and what time was required to consider and, where appropriate, to implement the findings of the audit or inspection after it had reported.

Preparation times reported varied widely from over 100 hours (reported by four local authorities) to three hours (reported by two local authorities). The average time resource required to prepare for inspections and audits was 46.3 hours.

Time spent supporting auditors carrying out audits varied, some local authorities choosing to have staff shadowing auditors to be on hand to answer questions as they arose, others allowing auditors to carry out the audit and only providing support when requested. Resource ranged for 40 hours (one local authority) to one and a half hours (one local authority), the average was 14.75 hours.

Resource spent considering and implementing the findings of the audit ranged from 70 hours (one local authority) to no time (three local authorities), the average time spent was 8.83 hours.

Local authorities report an average of 3.08 audits or inspections per year. Taking the average figures for time spent preparing for, supporting and considering, and implementing, the findings of the audits or inspections shows the average amount of resource expended by each of the responding authorities per year in this process.

Function	Time (hours)	No.	Total resource per year
Preparation	46.08	3.08	141.92
Support	14.75	3.08	45.43
Implementation	8.83	3.08	27.20
Total	69.66	3.08	214.55

The average time spent by each responding local authority on each audit or inspection is 69.66 hours. Each authority engaged in 3.08 audits or inspections in 2005, spending therefore 214.55 hours engaged in inspections and audits.

3.0 Effect of audits and inspections on service delivery

The survey asked local authorities whether the audit or inspection of their service caused any disruption to service delivery. They were asked to respond either yes or no, and if they responded yes to provide details as to how service delivery was disrupted.

Three quarters of responding authorities (nine local authorities) indicated that the audit or inspection had caused disruption to service delivery. The remaining 25 percent (three local authorities) indicated that there had been no disruption to their service delivery. However, one indicated that this was due to the fact that the inspection was internal and had been required to be carried on without detriment to service delivery.

Local authorities where disruption to service delivery had occurred indicated that in the majority of cases the disruption was to the work of senior staff within the department, who were required to provide assistance to auditors, although there was also disruption to the work of front line staff.

"Few audits cover all aspects of environmental health, let alone public protection, so when an audit is selective in a particular field it can disrupt service delivery in that field, and impinge on other areas, particularly when capacity is limited and resources are shared across disciplines"

"Officers, especially the principal officer, were engaged for long periods."

"Diverted managers away from day to day operations."

"Resources were taken away from the Enforcement Team."

"Removed a senior officer for two months – our senior officer audited another authority and wrote up the report."

4.0 Perceived benefits of audits and inspections

Audits and inspections of service departments are carried out for a number of reasons including: the identification of best practice for dissemination to others; incorporation of best practise identified elsewhere; identification of ways in which efficiency savings can be made; ensuring consistency of approach across Wales in respect of enforcement; ensuring compliance with legal requirements and ensuring financial propriety. This list is neither exclusive nor exhaustive. Local authorities were asked to consider what benefits or dis-benefits had derived from the audit or inspections of their services and whether the benefits, if any, had been proportionate to the disruption to service delivery that had been caused by the originating audit or inspection.

4.1 Benefits to the environmental health department

Six (50 percent) of the responding local authorities indicated that they considered there was no identifiable benefit to the service department in consequence of the audit or inspection. Where benefit was identified it was qualified, either being in the form of improvement to procedures or the highlighting of training needs or lack of resources generally. No local authority reported that there were major benefits to the service or to the local authority in consequence of the audit or inspection.

"It highlighted a lack of resources, but we knew that anyway."

"The most helpful and least time consuming are usually the Internal Audits reports. The FSA audit and the Audit Commission audits weren't particularly helpful although the former did lead us to re-examine our authorisation procedures and was used as a lever to press a couple of staff into completing log books and obtaining EHRB registration. Those things would have happened anyway but were given greater priority."

"Some benefits accrue from comparative data with other local authorities but much of the requested data is presented simplistically and is thus easily misinterpreted or misconstrued by the media."

"It allowed us to positively report to members that we were professional in our activities."

4.2 Benefits to external parties

Three quarters (nine) of local authorities reported that there were no identifiable benefits to consumers, businesses or other service areas from the audit or inspection of their service. Two (16 percent) stated that they considered that there may be small benefits (cited as negligible and very minor) but no local authority could point to clear and identifiable benefits to any of the external groups or service users.

"Some minor benefits accrue regarding a general comparison of the activities of various local authorities but considerably less than the benefits accrued through joint working directly with other agencies and local authorities through the Technical Panels and Task Groups."

"It's always hoped that such audits help us provide better customer service although there is usually no measurable benefit."

Where benefit, internal or external, had been identified local authorities were asked to consider whether the benefits that accrued were proportionate or disproportionate to the distortion or disruption to service delivery that occurred during the audit or inspection.

Of the local authorities that identified benefits only one felt that the benefits had been proportionate to the disruption to services.

"Proportionate - licensing where we changed our procedures concerning the handling and retention of sensitive data."

Generally, where the response was that the audits and inspections are disproportionate, local authorities did not expand on their view. Although, one local authority commented:

"No. The benefits were quite disproportionate to the time and pressures involved."

5.0 Changes implemented in consequence of audits and inspections

As noted in 4.0 above, there are a number of reasons for undertaking audits and inspections. The main purpose of audits is that service improvements should be identified and implemented. Local authorities were asked whether any changes had been made to the way in which their service is delivered, and to identify the change/s.

Four (33 percent) local authorities indicated that changes had been made to service delivery. One indicated that a number of changes had been identified and implemented while the other two authorities indicated only minor changes having been made.

"Changes had been made to officer training including induction, review of management skills and capabilities, attempts to be more flexible in ways in which we make services available to the public.....rewording of documents for the public, assisting in prioritising services with members, more face to face discussions."

"Procedures were tightened in a couple of places."

"Additional training undertaken (E.g. Notices) and certain issues raised at team meetings."

See also 4.2 above.

One local authority indicated that if an audit finding was that change should be made the identified change would be implemented, but that no such changes had been identified in consequence of the audits that had been undertaken.

The remaining seven local authorities (58 percent) indicated that no changes had been made to service delivery in consequence of any of the audits they had been engaged with.

"Not really – lack of resources not addressed by the local authority."

"No, it didn't tell us anything that we didn't already know."

6.0 Benefits to public health from audits and inspections of environmental health services

The role and function of an environmental health department is to improve the health of the people that they serve by raising and maintaining standards of public health. To have any value therefore, the changes identified and implemented in consequence of service audits and inspections should deliver improvements through better outputs and outcomes to public health in the administrative area of the local authority concerned. Local authorities were therefore asked whether the changes identified during audits and/or inspections would deliver improvements through better outputs and outcomes to public health in their area.

One (8.4 percent) indicated positive public health outcomes, indicating that a number of empty properties had been brought back into active use.

One pointed to a positive change - the way in which the HSE/HSC have addressed the issue of enforcement visits and that local authorities and HSE officers are moving towards more focused inspection activity based around public health outcomes. It was further noted that food safety enforcement recognises the need for a broader based policy to address specific problems, although it is not clear whether this has evolved as a result of audits or through discussions in other fora.

One local authority indicated that it hoped that the implemented changes that arose from the audit findings would improve public health, but that if it did improvements were unlikely to be measurable. The remaining nine (75 percent) considered that there would be no benefits to public health that could be demonstrated either by positive outcomes or outputs.

7.0 Co-ordination of audits and inspections

As noted in 1.0, local authority environmental health departments are engaged in a number of audits and inspections each year, as well as being required to collect, collate and submit data to government and to other agencies about their service. Some of the audits and inspections are service area discrete, some however impinge on a broad part of the service, and in some cases separate audits repeat work carried out by previously studies. There is also potential for the same areas of work to be covered by both external and internal auditors for different purposes.

Where data is collected there may be similarities in the information required but information may be collected by different agencies in different formats, imposing burdens on the service.

Local authorities were therefore asked whether in their view audits were co-ordinated and if they felt that this was not the case whether there was merit in agencies working together to co-ordinate their audits and inspections to cause minimum disruption to services.

Two (16.6 percent) local authorities expressed the view that audits and inspections are co-ordinated, two expressed the view that internal audits are co-ordinated but the external ones are not, the remainder (eight, 66 percent) were of the view that there was no element of co-ordination in the way in which audits and inspections are planned and delivered.

"There appears to be no co-ordination of audits/inspections and studies, and each agency/government department appears to pursue a seemingly different and often conflicting or competing agenda."

"Many external audit bodies have vested interest in the outcome of the audit process and in promoting their own area of responsibility, rather than being completely impartial."

Where local authorities had expressed the view that audits, inspections and studies should be co-ordinated they were asked to give the reasons for their view. All of the responding authorities considered that there should be co-ordination of audits, inspections and studies. Reasons for co-ordinating responses cited included: production of all Wales co-ordinated reports highlighting best practise and strengths and weaknesses; the need to have consistency of auditing practice; information gathering and information reporting; the fact that inconsistencies in auditing between agencies causes misinformation to be put into the public domain, causing confusion and to avoid duplication and make for more effective use of resources.

8.0 Conclusions and discussion

8.1 Discussion

Environmental health departments in Wales are engaged in a number of audits, inspections and studies every year. The year chosen for study was 2005, when the number of audits, inspections and studies ranged from one to 11. They were external to the local authority concerned - carried out by government, government agencies and others, including other local authorities as part of an inter-authority audit process - and internal, conducted by the local authority itself as part of its Performance Management function.

Time spent supporting audits was considerable, in some cases exceeding 100 hours of officer time and in most cases local authorities identified that senior officers (at senior and principal officer level) were engaged with the audits.

In 2005 each of the responding authorities was subject to an average of three audits and expended 214.5 hours of officer time on them. Salary levels of senior and principal environmental health officers in Wales are diverse. However, if a salary of £30,000 and a 1,776 working hour year (48 weeks at 37 hours) is assumed, audits, inspections and studies cost each local authority £3,625 in officer time in 2005. In addition each local authority pays a considerable annual fee to the Wales Audit Office.

The results of the survey show that respondees consider that the audits and inspections carried out were disruptive, distorting service delivery in most cases. This is to be expected since the auditing bodies interface with the service will reflect their area of interest rather than span the whole of the service equally and disruption is inevitable when officers of senior level are taken away from service deliver to assist the audit process.

What is clear is the environmental health departments that responded to the survey do not consider that the audit process delivers benefits that are proportionate to the disruption to service delivery. Few internal benefits, i.e. benefits to the local authority and to the environmental health service, are identified and only a few very minor benefits to external parties. This is evidenced by the fact that most respondees felt that the audits did not deliver proportionate benefits and, in practical terms, there were not many changes to practice and procedures as a consequence of them. Most importantly for environmental health practitioners there were no significant, measurable improvements to public health outputs or outcomes in consequence of the audit process.

Notwithstanding the responses discussed above, when asked whether audits should be co-ordinated the responding environmental health departments indicated that they should and that they felt that there could be some value in the process if the results were consistently gathered, co-ordinated and presented in an all-Wales basis. However, there was considerable concern regarding duplication of process by internal and external auditors and by the different methods used to collect data - which results in information that is erroneous and damaging to service departments being put into the public arena.

8.2 Conclusions

All environmental health departments in Wales were invited to respond to the survey that forms the basis of this study. Just over 50 percent responded. It is noteworthy that the respondees were not those that had an axe to grind in respect of audits, inspections and studies, as some reported having engaged in only one such exercise during 2005, while the authority reporting the highest engagement had participated in 11 studies of parts of its service during that year.

The impact of audits, inspections and studies of services is significant, both in engagement time and in qualified cost, and it is disappointing to note that service departments perceive that there is little value from having engaged in them. This is evidenced by the fact that very few changes are implemented in consequence of the audit work, which often highlights areas (such as lack of resource) that were known to the service department prior to the audit and that cannot be addressed due to local authority funding issues. It is therefore necessary to question whether inputting resource at the level required to support the audit and inspection process is value for money, particularly as departments are being required to make efficiency savings. *Prima facie* it is not. The programme of audits, inspections and studies of environmental health departments as currently being delivered by government, other agencies and internally by local authorities themselves delivers little of value and in some cases serves to put information into the public domain that is wrong and damaging, is being exploited by the media and diminishes public confidence in the environmental health service and the local authority.

It is interesting to note that notwithstanding the perceived weaknesses of the present system, the environmental health departments that responded to the survey were not against the concept of auditing *per se* and could see that there could be considerable benefit to Wales - if the system was to be refined, co-ordinated and used to produce meaningful data that applied on an all-Wales basis. There was also recognition that the system could be used for the identification and promulgation of best practice, which would also be of benefit and could deliver positive outcomes for public health in Wales.

There is clearly a climate of change occurring in public services and public service delivery and the views expressed by Sir Jeremy Beecham in a recent speech are pertinent:

"We are drowning in data, and some of the data is useless, and some perverse and thus worse than useless..... If one is looking for performance management and performance data, we have to start with – as for inspection and regulation in general – what is proportionate and what is meaningful and concentrate on that."¹

The present system of audits, inspections and studies is disruptive, expensive to deliver, has no discernable benefits to those being audited or studied or to those who receive services from them and is therefore not working. It is suggested that an urgent review is required.

¹ 19 February 2006

Appendix 1

Survey form

Impact of audits, inspections and studies on service delivery

Name of local authority -

Email address for contact -

Your responses to the questions below will be aggregated. The responses of individual local authorities are confidential and will not be identified.

1. How many inspections, audits or studies of your service, or part of it, were carried out last year, and by whom?

Number.....

Please tick all that apply:

Wales Audit Office

FSA

HSE

Other (please identify)

2. In respect of each of the audits/inspections/studies identified, how often are they carried out? (annually, half yearly, other - please state):

Wales Audit Office

FSA

HSE

Other (please identify)

3. In respect of each inspection/audit/study identified how much time was spend by departmental staff in:

- | | | |
|-------|--|-------|
| (i) | Preparation for the audit? | hours |
| (ii) | Supporting the auditors during the audit | hours |
| (iii) | Responding to the audits findings? | hours |

4. Did the audit/inspection/study of your service, or part of it cause any distortion or disruption of service delivery?

Yes

No

If yes, how?

5. What benefits accrued to the department in consequence of the audit / inspections/ studies?

6. Did benefit accrue to other parties, e.g. consumers, businesses, other service areas from the audit/inspection/study?

If so, how much and what form did the benefit take?

7. Was the benefit identified in (5) above proportionate or disproportionate to the distortion identified in (3) above, if any?

8. Has the audit/inspection/study caused you to make any changes to the way in which you deliver your service? If so, please identify the changes implemented.

Yes No

If yes, please identify the changes implemented:

9. Have/will the changes made deliver improvements through better outputs and outcomes to public health in your area?

Yes No

If yes, can these be quantified?

10. Do you consider that audits/ inspections/ studies are co-ordinated?

Yes No

11. If no, do you consider that they should be co-ordinated?

Yes No

12. What is/are the reason/s for your view?

[Empty rectangular box for providing reasons]

Please complete and return this form to at on or before .

Thank you for your help, which is appreciated.

Appendix 2

Glossary of Terms

CIEH	Chartered Institute of Environmental Health
CIPFA	Chartered Institute of Public Finance and Accountancy
DEFRA	Department of Environment Food and Rural Affairs
FSA	Food Standards Agency
HSC	Health and Safety Commission
HSE	Health and Safety Executive
IPPC	Integrated Pollution Prevention and Control
SVS	State Veterinary Service
WAO	Wales Audit Office
WEFO	Welsh European Funding Office