

The Burdens of Inspection and Regulation

Appendix Two

2.1 Kent County Council

In 2008 across the organisation, inspections included:

Chief Executive's Directorate (CED)

- The "Harder Test" CPA Corporate Assessment in 2008 – KCC scored 4 out of 4
- Now subject to the Comprehensive Area Assessment (CAA) - includes two assessment of the organisation : Use of Resources and Managing Performance

Children, Families and Education (CFE)

- Joint Area Review (JAR) in 2008
- Preparation for annual inspection of children's services to feed into CAA

Communities

- Inspection on Youth Offending – inspection took place in January 2008 and the final report was published in May 2008 including 10 recommendations
- Inspection on Youth Services
- Contribution to preparations for the corporate inspection, the JAR and the external assessment against the equalities standard

Kent Adult Social Services (KASS)

- 3 Unannounced social care inspections: Fostering (score = good); Adoption (score = good) and Private Fostering (score = good)
- The Independence Wellbeing and Choice (Safeguards) Inspection Report - The final report and the action plan have been agreed between KCC and CQC.
- There will be an Adult Learning inspection sometime between October 2009 and July 2010.
- Preparation for annual inspection of adult social care which feeds into CAA

Environment, Highways & Waste (EHW)

- No annual inspections
- Relatively low number of PIs
- Work undertaken to support corporate assessments such as CPA and CAA

Therefore in 2008/09 there were a minimum total of 9 major inspections.

2.2 Health

Organisation: NHS Eastern & Coastal Kent

| List of inspectorial/assessment/regulatory activities | Estimated cost of inspection activity (including % of senior staff time) | Perceived benefits | Perceived burdens | Internal/localised inspectorial performance-related activity (Yes/No) |
|---|---|--|---|---|
| External Audit including Use of Resources | £310k + 5% of band 8c plus 2% of finance resource in preparing UoR | Assurance that financials and governance are right | Some work doesn't deliver vfm | No |
| Internal Audit | £100k + 5% of band 8c | As above | | No |
| Counter Fraud | £100k + 1% of vsm | Fraud is both uncovered and actively discouraged | Lots of expensive work on unpaid prescriptions, and other minor cases leading to no financial recovery. Cost of service is considerably more than the amnt recovd. | No |
| World Class Commissioning | 5% of KB's time and some of AH. Over £1m of extra commissioners on the payroll | That we meet WCC guidelines | Extremely costly for not much perceived benefit | Yes |
| Care Quality Commission | 5% of KB's time and some of AH. 2%? of AH directorate costs to prepare evidence | Good score leads to public confidence in organisation | A lot of work to prove we are delivering what we should be delivering anyway | Yes |
| Strategic Commissioning Plan | 20% of band 8d plus 10% of about 5 other key staff | Gives SHA assurance PCT is doing what it should be doing | This is best practice, which we would do, but the burden of producing it specific DH/SHA format and regular updating as assumptions change makes this a very time consuming process | Yes |

2.3 Police

EXTERNAL SCRUTINY MATRIX (2008)

| Type | Origination | Frequency | Outcome | Main Resource(s) required & cost | Staff Cost £ |
|---|-------------|-----------------|---|---|--|
| National rolling programme of themed inspections | HMIC | 2 per year | Report on level of compliance / critical threats / AFIs. (Managed by dedicated resource) | <p>80% of grade F (full time)</p> <p>5% of Chief Insp total working time</p> <p>5% of Grade I</p> <p>10% of Grade M</p> | <p>30,863</p> <p>3,848</p> <p>3,209</p> <p>9,754</p> |
| Thematic inspections – usually on risk based selection criteria | HMIC | Ad Hoc (annual) | Report on level of compliance / critical threats / AFIs. (Managed by dedicated resource) category includes inspection against | Total | 47,673 |

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|---|----------------------------------|------------------------|--|---|---------------------|
| | | | minimum threshold standards for Protective Services | | |
| Data quality audit - systems, processes and outcomes | HMIC | Ad Hoc | To audit quality of data submitted to Home Office to ensure reporting process is robust and effective. (Managed as part of normal business) | Grade H – 3 days | 746 |
| | | (TBC) | | Pat King – 3 days | 639 |
| | | | | Grade M – 1 day | 437 |
| | | | | Total | 1,822 |
| Thematic Reviews of compliance / implementation progress against specific projects / programmes | NPIA | Ad Hoc (annual) | Report on level of compliance / implementation. Examples include PREVENT in 08, violent & sexual offenders in Jan 09 and PIP in Feb 09. (Managed as part of normal business) | Grade I – 20 days | 5,781 |
| National law enforcement agency inspection against RIPA and use of communications data (different element at each inspection) | Interception Commissioner | Every 2 years | Report on findings which includes guidance and advice to Chief Constable. Also to the Home Office. | Steve Starbuck X 3 days | 867 |
| | | (2-3 days) | | 0.5 day for Chief Constable Total | 434 1,302 |

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|---|---|--------------------------------------|---|--|------------------|
| Compliance inspection against RIPA provisions | Office of the Surveillance Commissioner | Annual (1-week) | Report from Chief Commissioner to Chief Constable. (Managed as part of normal business) | Steve Starbuck X 3 days | 867 |
| External peer reviews of some major crime investigations (against MIRSAP & MIM) | Doctrine (Professional Guidance Manuals) | As required (e.g. Op Deliver) | Report on investigation and recommendations for further action. (Managed as part of normal business) | SIO (DCI) for 10 days | 3,579 |
| Audit of DSP funding use | National Coordinators Office for Counter Terrorism | Annual | Findings feed into funding settlement programme for the next reporting period. | Grade H for 2 days | 497 |
| Audit of Reflex funding use | National Centre for Immigration Crime | Annual | Findings feed into funding settlement programme for the next reporting period. | Grade H for 2 days | 497 |
| Police Use of Resources Assessment | Audit Commission | Annual | Report on compliance with set criteria published annually. Originally combined with HMIC inspection results. (Managed as part of normal business) | 50% of grade F (f/t) 30% of grade H (f/t) | 19,290 16,253 |

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|--|-------------------------|------------------------|---|--|---|
| (PURE / URE) | | | | 10% of grade H (f/t) KPA 5% Grade L (Ann) - 5% ?? DCC x 1 day CC x 0.5 day ACC x 1 day DFA x 2 days Grade K x 0.5 day Ch Supt x 0.5 day Grade M – 10 days Total | 5,418 2,709 4,406 809 434 626 1,109 179 251 4,374 55,856 |
| External Statement of Accounts | Audit Commission | Annual | Audit Opinion in Statement of accounts | Grade I – 10 days | 2,891 |
| Internal audit | Bentley Jennison | Ad Hoc | Reports to Audit & Governance. Auditors opinion on Statement of Accounts | Grade G – 50 days | 10,648 |
| National rolling programme of inspection: 2008 Inspection of offender management, in particular on MAPPA | HMI Probation | Ad Hoc (annual) | Identify action plan for delivery through Safeguarding Board. (normal business) | Insp x 1 week | 1,645 |
| National rolling programme of inspection: 2008 Joint Area Review (JAR) of Children's Social Services | Ofsted | Ad Hoc (annual) | Identify action plan for delivery through Safeguarding Board. | Insp x 1 week | 1,645 |

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|---|---|-----------------------------------|--|--|---|
| National rolling programme of inspection 2008-09 : Review of Adult Protection arrangements | Commission for Social Care Inspection (CSCI) | Ad Hoc (annual) | Identify action plan for delivery through Safeguarding Board. | Insp x 1 week | 1,645 |
| Review on Rape provisions | Home Office Working Group (Rape) | One off (poss annual) | National report and direct feedback to Forces. | Insp x 1 week | 1,645 |
| <i>Local risk based inspection under GL3 methodology – self assessment template followed by a full inspection</i> | HMIC | <i>Ad Hoc</i> <i>(TBC)</i> | <i>Report on findings with AFIs. (Managed as part of normal business)</i> | <i>Grade F - 2 weeks</i> <i>Ch Insp – 3 weeks</i> <i>2 Insp – 3 weeks</i> <i>Ch Supt – 1 week</i> <i>Supt – 1 week</i> <i>K – 2 weeks</i> Total | 1,770 5,369 9,869 2,507 882 3,574 23,970 |
| <i>Full inspection of Firearms against licensing criteria (NPFTC)</i> | NPIA | <i>Every 4 years</i> | <i>Self-assessment and evidence matrix. Report on findings and re-licence.</i> | <i>Sgt – 1 weeks</i> <i>Insp -2 days</i> Total | 1,441 658 2,099 |

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|---|---|---|---|---|--------------|
| <i>National Inspection programme of Police Service (process and compliance)</i> | <i>Health & Safety Executive</i> | <i>Ad hoc</i> <i>(to re-start in 2010)</i> | <i>Report published nationally which has influenced Force Policy, H&S strategy and internal audit process. (Managed as part of normal business)</i> | <i>H grade – 2 weeks</i> <i>(Malcolm Underdown)</i> | 2,485 |
|---|---|---|---|---|--------------|

Total Cost Kent Police staff cost 164,900

Audit Commission External Audit Charges 102,600

Bentley Jennison Internal Audit Charges 77,000

Total Cost to Kent Police 344,500

Note:- The costing is based on averages

2.4 Fire and Rescue

| List of inspectorial/assessment/regulatory activities | Estimated cost of inspection activity (including % of senior staff time) | Perceived benefits | Perceived burdens | Do you have any internal/localised inspectorial performance-related activity (Yes/No) |
|---|---|--|---|--|
| Organisational Assessment | 10 days of Middle Manager pulling together submission, 4 days of Assistant Director reviewing documentation and meetings with AC 2 days for CFO, DCO reviewing documentation and meetings with AC | Allows FRA to self-review itself and its view of strengths and weaknesses. | We find the process relatively simple to administer as the auditor only wants case studies and updates on things which have materially changed in the last year. This is better than previous regimes where each year a full submission was required against each KLOE. | Internal peer review process in place which looks at business unit performance on a three year cycle - including operational service delivery units. |
| Operational Assessment (formal national assessment of the Authority using a process led by IDeA and Chief Fire & Rescue Advisor's Unit. | Team meeting (10 people for 2 days), preparation of best practice examples (10 people 7 days). Member Scrutiny @ 2 days. 20 days of Middle Manager creating documentation, 5 days of Assistant Director reviewing. 1 day of CFO, DCO, 1 day per director (3 in total) related to reviewing documentation and meetings with AC. 5 day on site visit involving all Senior Management. | Allows FRA to self-review itself and its view of strengths and weaknesses. Helpful challenge from OpsA peer review team to focus activity on improvement areas | As above | Internal peer review process in place which looks at business unit performance on a three year cycle - including operational service delivery units. |

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|---|---|--|--|--|
| Use of Resources | 10 days of Middle Manager pulling together submission, 4 days of Assistant Director reviewing documentation and meetings with AC 2 days for CFO, DCO reviewing documentation and meetings with AC District Audit fee 10,471 | Allows FRA to self-review itself and its view of strengths and weaknesses. Useful benchmark against other authorities | Not all evidence is produced as a by-product of normal work ie need to produce case studies etc | Internal peer review process in place which looks at business unit performance on a three year cycle - including operational service delivery units. |
| Health & Safety Executive | Ad hoc inspections – last one 4 years ago. Based on a risk assessment process | Useful national framework for local activity | None | Formal performance and inspection process for H&S including regional peer assessment using RoSPA model. |
| External Audit/District Audit | District Audit Fee £70,644 (inc £2.5k for WGA) | Independent verification of the financial statements. A statutory requirement. | High cost, when many processes very streamlined | Supported by formal internal audit programme supplied by Kent Audit (KCC) |
| Ad hoc Audit Commission studies | Ad hoc, but last year we had one request for info, requiring Middle Manager (4 days) and Assistant Director (4 days) to put together, followed by 1 on-site meeting with AC, CFO, DCO and directors and service managers | Gives a level of national comparison. | It is not always clear to us how the findings from ad hoc studies will be used and why Kent has been selected. | |
| CLG Annual E & D Report | 5 days | None – completed to meet | Duplicates the activities | Extensive monitoring locally |

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|---|---|---|--|---|
| | | internal CLG reporting requirement | required to support the assessment process related to meeting the Equality Framework for Local Govt | and undertake regular assessments to meet Local Govt Equality Standard. |
| Annual (IRMP) data return to CLG | Co-ordinated and submitted by Senior Analysts. 5-10 days x 2 people | Very little benefit. Does ultimately allow some useful benchmarking but currently takes too long for results to be published. Hard to see why some of the data is collected or how it will be used. | Burden is excessive and benefits are small. KFRS proposed a reduction in data return as a CPA freedom in 2005/06, which was turned down. | Our own performance framework provides the information we need to manage effectively. |
| Data Quality Audit by Audit Commission | 1 day for Middle Manager, 2 days for 2 Senior Analysts, 1 day for Senior HR officer | Gives assurance that our data quality is robust and that of comparable organisations | Relatively low burden, hard to see how it could be made any lighter | Internal data quality checks and performance reporting |

2.5 Tunbridge Wells Borough Council

| Job Title/Description | Full Cost | CAA/Use of Resources % | CAA/Use of Resources £ | TOTAL £ |
|--|-----------|------------------------|---------------------------|----------------|
| Corporate Policy & Improvement Officer | 30,920 | 50% | 15,460 | 15,460 |
| Delivery Unit Manager | 62,290 | 20% | 12,460 | 12,460 |
| Head of Legal Services | 70,370 | 20% | 14,070 | 14,070 |
| Customer Care Manager | 42,750 | | 0 | 0 |
| Chief Executive | 135,000 | 2% | 2,700 | 2,700 |
| Directors x 2 | 224,340 | 2% | 4,490 | 4,490 |
| Heads of Service x 8 | 624,900 | 2% | 12,500 | 12,500 |
| Head of Finance & Governance | 70,370 | 5% | 3,520 | 3,520 |
| Service Accountants x 2 | 96,240 | 2% | 1,920 | 1,920 |
| Internal Audit Manager | 63,600 | 3% | 1,590 | 1,590 |
| Internal Auditor | 37,560 | 3% | 940 | 940 |
| Audit Commission Fees | 149,000 | 100% | 149,000 | 149,000 |
| Audit Committee | 6,720 | 50% | 3,360 | 3,360 |
| | | | 222,010 | 222,010 |

