



## OPERATIONAL SELECTION POLICY OSP39

### INSPECTION REPORTS

March 2006

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## 1 Authority

- 1.1 The National Archives' Acquisition and Disposition Policy statements (February 2000) announced the Archives' intention of developing, in consultation with departments, Operational Selection Policies across government. These policies would apply the collection themes described in the policy to the records of individual departments and agencies.
- 1.2 The National Archives' Appraisal Policy statement (August 2004) announced a new emphasis to Operational Selection Policies:

*The National Archives will develop generic archival appraisal guidance for categories of records such as those produced by similar types of departments (agencies, regulatory bodies) or those produced by activities common to many departments (research papers, inspection reports). (section 2.4.3.6)*

This Operational Selection Policy provides generic archival appraisal guidance for inspection reports.

- 1.3 Operational Selection Policies are intended to be working tools for those involved in the selection of public records. This policy may, therefore, be reviewed and revised in the light of comments received from the users of the records or from archive professionals, the experience of using the policy, or as a result of newly discovered information. There is no formal cycle of review but we would welcome comments at any time. The extent of any review and revision exercise will be determined according to the nature of the comments received.
- 1.4 If you have any comments upon this policy, please email

[records-management@nationalarchives.gov.uk](mailto:records-management@nationalarchives.gov.uk)

Or write to:

Acquisition and Disposition Policy Manager  
Records Management Department  
The National Archives  
Kew  
Richmond  
Surrey  
TW9 4DU

## 2 Scope

- 2.1 This policy is different from the general run of Operational Selection Policies in that it provides generic guidance about a particular type of record created by certain kinds of bodies, rather than to records deriving from functions carried out by a particular government department or non-departmental public body (NDPB).

- 2.2 Accordingly, the records addressed in this OSP may fall within the scope of any of the Acquisition Policy themes.
- 2.3 Where the function of inspection requires resources to be dispersed across a widespread area, the work is commonly delegated by central departments to local government. For example, the Food Standards Agency discharges its responsibility under the Food Safety Act 1990 by use of the local network of environmental health officers and trading standards officers. It should be noted that according to Retention Guidelines for Local Government (section 9.20) issued by the Records Management Society of Great Britain in 2003, records produced as part of the process of investigation, monitoring or inspection by the local authority should be destroyed 7 years after last action on the basis of common practice.

<http://www.rms-gb.org.uk/resources/91>

These are not public records and this type of locally enforced inspection is not covered by this Operational Selection Policy.

- 2.4 A number of government bodies have been set up as independent consumer watchdogs and regulatory bodies. They are designed to handle complaints from the public and monitor performance issues. Where appropriate they gather evidence that may lead to an investigation or enforcement action by the regulatory body. Example bodies include Energywatch and Ofgem for the gas and electricity industry, and the British Hallmarking Council for matters concerning assaying. The records of this type of organisation are not in the scope of this Operational Selection Policy.
- 2.5 The various forms of Ombudsman are sometimes considered to have an inspectorial function but they are not regulators or watchdogs, trade bodies or consumer champions. Their role is to settle disputes, as alternatives to the courts and as such do not produce inspection reports.
- 2.6 There is also need to clarify the allied role of investigation, which is often confused with the function of inspection. For the purposes of this Operational Selection Policy, investigations are inquiries carried out on an *ad hoc* basis triggered by some occurrence, such as an accident, complaint regarding service or potential criminal activity. They can vary in scale from commissions and inquiries appointed by a Secretary of State into some issue of major public concern, down to the individual investigation of a minor complaint. The records produced by these various forms of investigation are outside the scope of this Operational Selection Policy.

### **3 Definition of an inspecting body**

- 3.1 Inspections are defined as those functions that concern individual periodic assessments to measure compliance to sets of standards, be they acts of parliament, statutory regulations or licences. These can result in certain enforcement measures such as prosecution, the serving of improvement orders, the revocation of licenses and disciplinary procedures. The outcome of an inspection is encapsulated in an inspection report.

3.2 The result of inspections are accumulated for use in audit or monitoring functions often carried out by the inspectorate to reflect the effectiveness of the inspection regime. This function, however, can also be carried out by collation of returns made on a self-assessment basis, without recourse to independent inspection.

3.3 As part of their function, inspectorates are often required to issue advice and guidance on best practice, or to compile longitudinal studies into particular aspects of the inspection programme.

#### **4 Proposed changes in government inspectorates**

4.1 In the March 2005 Budget, the Government announced a major improvement strategy for public services inspection. The principal aims of the strategy are to:

- Reduce the amount of inspection activity and burden generated
- Rationalise and manage better the complex pattern of multiple scrutiny
- Refocus inspection on what is relevant to the people who use public services and the outcomes that they experience

4.2 The strategy includes significant structural changes to the current inspection landscape, rationalising the 11 existing public service inspectorates to 4 by 2008. The 4 sectors to be covered by the new inspectorates are:

- Local services
- Children and learning
- Health and social care
- Justice and community safety

#### **5 Principles of selection**

5.1 Assessment of the archival value of the various inspection reports will depend upon an assessment of the value of the function being carried out by the inspectorate. It is difficult therefore to set out generic guidance on selection without making an assessment for each inspectorate. This guidance sets out some general principles that have been agreed, which might help in considering the disposal of inspection reports for each inspectorate.

5.2 Inspection reports can be differentiated by considering the following aspects:

- Ambit – how wide-ranging is the inspection, either within the report itself or across the set of reports?
- Accountability – are inspections the means of monitoring government policy involving significant expenditure?
- Impact – taken together, do they form a narrative on the state of society?
- Accumulation – are the reports summarised in some form or brought together for analysis?

- Formula – is the information presented in a formulaic way, allowing little or no interpretative commentary?
- Accessibility – is the information routinely made available for an extended period?
- Technical detail – is the information of a specialist nature, not easily understood by the lay-person?

5.3 In assessing the cumulative impact of the inspection upon society, it is important to seek to distinguish between those areas where there is a sustained inspection programme from which the changing social and economic condition of British society can be determined, for example in the inspection of primary education provision. In other sectors, such as the inspection of slaughterhouses, although the impact of failure could be high in allowing infection of the human food chain, this is only an occasional instance and in general does not provide any light on the condition of society.

## 6 Types of inspection report

6.1 Inspections that are internal to an organisation, such as financial audit or staff inspection, have a low impact in both these areas and therefore it is recommended that **internal reports on the performance of an organisation are not selected for permanent preservation**. This would include inspections within an organisation that is distributed nationally or internationally across several locations, such as the Diplomatic Service Inspectorate of the Foreign and Commonwealth. It may be that individual reports result in significant change in the organisations under review but it can be assumed that this will be reflected adequately in the records dealing with the implementation of the change, rather than in the inspection report itself.

6.2 Where inspections of this kind are carried out across several establishments, as in the case of the inspection of magistrates' courts or the inspections carried out by Her Majesty's Inspectorate of Constabulary, there is a greater ambit and larger impact to take into account and **consideration should then be given to the permanent preservation of this type of inspection report**.

6.3 However, **when inspections of this kind are limited to the local government environment, the reports created should be considered for preservation locally**. For example, the Benefits Fraud Inspectorate is an independent unit within the Department for Work and Pensions that reports on the standard of benefit administration and counter-fraud activity administered by local government authorities. It is proposed under the changes mentioned at section 4 above, that in future it will combine with the Audit Commission to provide a single service for local government inspection. The other part of its work - auditing the benefit paying services of the Department of Work and Pensions – would be considered under paragraph 5.1 above.

6.4 Inspectorates working in an industrial or environmental context are often required to consider the functioning of equipment. Sometimes there can be a statutory requirement that they preserve the records of their inspection for as long as the equipment remains in operation, or beyond. This form of inspection is particularly prevalent where organisations are charged with monitoring equipment on health and safety grounds, for example, where the railway

inspectorate of the Health and Safety Executive carries out regular inspection of railway level crossings to enforce compliance with orders issued under the Level Crossings Act 1983. Although limited to specific instances where roads are permitted to cross railways on the same level, this type of inspection activity covers the whole of the United Kingdom. The reports are distributed as correspondence with the local authority and are not published but consist of very specific technical considerations regarding safety requirements, not affecting a large percentage of the community. When these protective provisions fail and there is an accident, the inspectorate will carry out an investigation, in conjunction with the police in the case of fatal accidents; disposal of the reports of these investigations are not considered as part of this Operational Selection Policy.

- 6.5 Inspection reports that are concerned with **the monitoring of equipment will not be selected for permanent preservation** at The National Archives, even if they are required to be preserved for period beyond 30 years. The reports will be retained in the organisations concerned for as long as they are required for administrative purposes under provisions set out in section 3(4) of the Public Records Act 1958. It may be appropriate for these reports to be presented to another, specialist archive as an alternative to destruction once administrative need for retention has expired. The proposed Operational Selection Policy on Scientific and Technical Records may provide further guidance on this type of inspection report.
- 6.6 The greatest number of inspection reports in The National Archives relates to education; in particular reports by Her Majesty's Inspectorate of Schools, which date from the beginning of the last century, as well as more recent reports on establishments in both further and higher education. This is an example of a type of report, which given their national range, together with their impact on society, is worthy of consideration for permanent preservation. They are currently the means by which government monitors the effectiveness of a primary policy area with expenditure worth billions of pounds each year. This suggests that **this type of inspection reports of educational establishments should continue to be permanently preserved.**
- 6.7 In the case of other inspection reports, assessment of their suitability should be based upon the principles of selection set out in section 5 above.

## **7 Monitoring**

- 7.1 The accumulation of inspection reports or self-assessment returns to enable analysis will usually be achieved by use of a management information system or database. Where the reports are summarised to identify national trends or distribution, such as in the published annual report of the organisation, it may be considered to be sufficient to preserve this summary as a description of the function. Where the accumulated results of inspections are not published but are maintained over a significant period in databases, **it is recommended that these databases be permanently preserved.** Guidance on the assessment of datasets of case records is set out in OSP 30, on the interaction of the state with the citizen.

- 7.2 The preservation of datasets containing the accumulated results of inspections will enable historical analysis of the development of the function in the future but consideration should also be given to the selection of the reports themselves where they add useful narrative comment on that development.
- 7.3 The solution of using sampling to reduce the number of inspection reports to an illustrative sample is not recommended. If, however, for particular reasons it is decided that sampling would be applicable, then the guidance on sampling techniques (OSP 0) should be followed.

## **8 Accessibility**

- 8.1 Where inspection reports, which are potentially of interest to The National Archives, are published, their continued availability for research should first be assessed. The aspects to be taken into account in making this assessment are set out in OSP 36 on publications and grey literature, particularly the section relating to research reports, where the same considerations apply as for inspection reports.



**Annex A**  
**Inspection reports – decision chart**

