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## **Secretary of State's Zoo Inspectors' Performance**

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## **Executive Summary**

1. This project has been carried out for the Global Wildlife Division of the Department for Environment, Food and Rural Affairs (DEFRA). The stated objective of the project was “to furnish the Department with the information required to make a decision on whether an appraisal system is required to analyse the performance of Zoo Inspectors and, if so, what form it should take”.
2. A number of evaluation research methods were chosen, including a contextual review, a wide consultation exercise, examination of other inspection regimes, observation of a zoo inspection, and a review of inspection reports from defined collections.
3. The results from each research method were tabulated to provide data on how appraisal could improve the zoo licensing and inspection process.
4. The consultation exercise revealed that, although all responding groups felt that Secretary of State’s Zoo Inspectors were knowledgeable, professional and competent, 73% of responding local authorities and 69% of responding zoos felt that there is a real need to instigate some form of performance evaluation for zoo inspectors. Thirty-one per cent of zoo inspectors agreed with this view.
5. Seventy-six per cent of local authorities, 64% of zoos and 50% of zoo inspectors felt that the major benefit of any appraisal scheme would be improved consistency of inspections. Other perceived benefits included improved credibility and transparency; maintenance of an up-to-date understanding of the role and legislation from inspectors; raised standards in zoos; and the identification and removal of substandard inspectors.
6. Drawbacks of appraisal were suggested to be additional cost, time and bureaucracy; difficulties in selecting impartial assessors; and concerns that an appraisal scheme might restrict the number of inspectors willing to take on the role.
7. The results of our combined research clearly indicate a greater need, and support for, training for Secretary of State’s Zoo Inspectors, rather than for appraisal *per se*, in order to achieve the benefits perceived to be important.
8. In light of our research findings and the outcome required by the stakeholders, and taking into account the drawbacks and risks identified, we have developed an Integrated Performance Management System. The system is based on a 5-yearly re-appointment cycle for zoo inspectors, to include Criteria for Inclusion, initial and regular compulsory training (to consist of 2 compulsory annual training days per 5 year period), appraisal at inspection, and a monitoring system with centralised record-keeping by DEFRA.
9. It is recommended that the Department implement our proposed Integrated Performance Management System, to begin one year from the acceptance of this proposal.

10. In order for the Department to successfully implement the system, a number of factors must first be in place. The Department should:

- Develop a mission statement for the Secretary of State's Zoo Inspectors.
- Provide training and guidance to zoo inspectors on the historical perspective and aim of the inspection process.
- Develop a series of Core Competences required of zoo inspectors.
- Clarify the Secretary of State's Standards of Modern Zoo Practice, particularly with regard to the Conservation, Education and Research requirements of the Zoo Licensing Act (England and Wales) Amendment Regulations 2002.
- Require returns of inspection documents from local authorities, and adopt a centralised record keeping and monitoring system for this information.

11. It is recommended that the Scottish Executive and the National Assembly for Wales combine resources with the Department, and implement the Integrated Performance Management System for zoo inspectors as a joint initiative.

# **1. Introduction**

This project has been carried out for the Global Wildlife Division of the Department for Environment, Food and Rural Affairs (DEFRA). The stated objective of the project was “*to furnish the Department with the information required to make a decision on whether an appraisal system is required to analyse the performance of Zoo Inspectors and, if so, what form it should take*”. A requirement of the project was to devise an appraisal system for Secretary of State’s Zoo Inspectors that is cost effective and would lead to a more proficient inspection regime. In devising such a regime, it was requested that the benefits, costs, risks and other implications such a scheme might have on the efficiency of the inspectorate were fully considered. The Department will use this document to assist in the decision either to introduce an appraisal system or not.

The title provided by DEFRA for this project implies the performance of the inspectorate as a whole is to be appraised. In order for the performance of the inspectorate to be appraised, the purpose, intention and method of licensing and inspecting zoos must be clearly established to provide a benchmark. This necessitates a comprehensive review of various factors relating to the aims and outcomes of the inspection process, to include:

- The historical perspective of the inspection process
- The aim of the inspection
- The administration of the inspection process
- The means to monitor progress by zoos
- The clarity of the Standards
- ‘Core competences’ of individual inspectors
- The meaning of ‘inspectors’ performance’

# **2. Background**

## **Zoo Legislation**

1981 In 1981, British parliament passed the Zoo Licensing Act 1981 (ZLA). Zoo inspections under the Act began in 1984.

Standards specified by the Secretary of State were published to accompany this Act, which all zoos must meet.

1992 Convention on Biological Diversity, Rio de Janeiro. Article 9 of this Convention adopted measures for *ex-situ* conservation requiring each contracting party to “*adopt measures for the recovery and rehabilitation of threatened species and for their reintroduction into their natural habitats under appropriate conditions*”.

Picking up this initiative, the European Union, with significant contribution from the UK, began to develop an EC Directive with its objective being to “*protect wild fauna and to conserve biodiversity by providing for the adoption of measures by Member States for the licensing and inspection of zoos in the Community, thereby strengthening the role of zoos in the conservation of biodiversity*”.

- 1999 The EC Directive 1999/22/EC (the “Zoos Directive”) was adopted in 1999, requiring compliance by all Member States by April 2002.
- 2000 Following a review of the Secretary of State’s Standards in 1999, the Department published new Standards of Modern Zoo Practice (SSSMZP) on 3 April 2000. These remain in force to date.
- 2002 In order to bring legislation in line with the published Zoos Directive, the ZLA was amended, with the Zoo Licensing Act 1981 (Amendment) (England and Wales) Regulations 2002 coming into force in England on 8 January 2003. The main amendment to the original Act concerns the mandatory implementation of conservation, education and research measures in zoos.

It was intended that the original aims of the Convention on Biological Diversity would carry through the legislative process. However, during the course of our detailed study into the historical perspective of the legislation governing zoos, we have identified areas where deviations from the original intentions have occurred. This relates to the hierarchical importance placed on various conservation measures as implemented in the European Directive and carried through to the Zoo Licensing Act. By the time these measures reach the SSSMZP, the impetus shifts, from species recovery and conservation education, to conservation, education (not necessarily ‘conservation education’) and research. A more comprehensive explanation of this “Chain of Influence” effect is provided in Appendix 2. The availability of a set of clear, unambiguous guidelines for inspectors to work to is crucial to the success of the inspectorate, and this is something we recommend should be addressed as a result of this study.

## **Zoo Licensing Process**

The amended ZLA sets out measures for a licensing and inspection process for zoos in England. A brief outline of this process is described below; however for the detailed process, definitions and special circumstances, the Act should be consulted.

All zoos in the UK must operate under a licence issued under the ZLA by the local authority. For existing zoos, the licence is valid for a period of 6 years. The issue of a zoo licence depends on a satisfactory inspection being carried out by zoo inspector(s) appointed by the Secretary of State. An inspection will cover all features of the zoo which are directly or indirectly relevant to the health, welfare and safety of the public and the animals. The licence is then issued by the local authority and will include conditions and/or recommendations which must be met by the zoo (normally within a specified timeframe). The amended ZLA now makes it a mandatory requirement that conditions are attached to all zoo licences requiring the zoo to make certain contributions to the conservation of biodiversity.

The final responsibility for issuing and monitoring zoo licences rests with the local authority for the area in which the zoo is situated. Administrative control of the Act is the responsibility of the Global Wildlife Division of DEFRA.

## **Frequency of Inspections**

Inspections of zoos holding an existing licence are carried out by Secretary of State (SoS) Zoo Inspectors during the third year of the licence (a “periodical inspection”) and again no later than six months before the expiry date of the licence (a “renewal”

inspection). For most zoos, one inspector from both lists of SoS Zoo Inspectors will carry out periodical and renewal inspections as part of an inspection team along with local authority representatives and zoo personnel. The local authority is also obliged to arrange “informal” inspections for each year the licence is in force when there are no other inspections planned. Informal inspections do not require the presence of a SoS Zoo Inspector, however they must be carried out by a person “*appearing to the authority to be competent for the purpose of the inspection*”. Since 2000, zoos are asked to complete a pre-inspection audit form prior to periodical and renewal inspections for scrutiny by SoS inspectors before the inspection is performed.

### **3. Research method**

The most appropriate theoretical discipline to apply to this task is that of Evaluation Research. Evaluation Research is a method of applied research, which aims to produce information about the implementation, operation, and ultimate effectiveness of policies and programmes designed to bring about change (Clarke 1999: 35). The first question considered in this study was “what ‘change’ does the zoo inspection mean to bring about”? Considerable thought and time was given during this study to the history, purpose, evolution and implementation of the Zoo Licence, and to the Act, for which the Licence is the instrument.

The emphasis of Evaluation Research is to ascertain cause-and-effect relationships between programme activities and outcomes. Furthermore, the idea is not just to discover whether a programme works, but also to explain how it works (Clarke 1999:4).

The next logical question was, how do the instrument and the process work, and how successful are they in bringing about the required change? This requires data, and good data require consistent recording of process results.

In this case, the minimum required data would be the ‘change’ from unacceptable to acceptable compliance with modern zoo standards. Unfortunately the means to house, catalogue and monitor Zoo Inspection results have not previously existed - there is not even a centralised list of UK zoological collections.- and, therefore, this data was not available for this study.

There are a number of other recognised and professionally acceptable methods of data collection. Some of the best-known methods are by questionnaire; interview; focus group; observation; documentation search; and many varieties or combinations of each.

Such a wide choice recognises that different methods are appropriate for different situations (Patton 1986: 215), and a pragmatic approach allows for the integration of a variety of methods in a single evaluation study (Clarke 1999: 62). Four out of the five methods above were utilised for this enquiry.

Next, there are, according to one opinion, five key points of evaluation (Smith *et al* 1997: 17):

- **Expose conflict:**

The consultants interviewed and questioned the DEFRA representatives closely to establish the underlying need for this investigation. Critical evaluation requires

looking at who defined the programme indicators in the first place and for what purpose (Clarke 1999:6)

- **Allow stakeholders input to design process:**  
In the absence of good data, the consultants chose to utilise stakeholders as their main source of opinion regarding the design of any future method of appraisal
- **Maintain contact throughout:**  
The Zoos Forum provided a representative body of stakeholder opinion with which to maintain contact.
- **Clearly define nature and scope of programme to be evaluated:**  
The consultants shifted the focus of their inquiry from the Performance of Inspectors to the Efficacy of the Inspection (including the Inspectors)
- **Consider the context of the evaluation:**  
The consultants dedicated a major portion of time available to considering the historical, purposeful and external context of the evaluation.

There is a common understanding in evaluation that to disentangle the meaning and pursuit of “success” is an intrinsic part of the evaluation process (Smith and Cantley 1985: 173). In the early stages of the assignment, the consultants posted several major questions to guide their enquiry e.g.,

- What is the ‘root’ motivation for the inspection? Are the values being inspected clear and clearly articulated?
- How effective is the inspection regimen at present? Does this have some bearing on the ‘performance’ of the inspectors?
- What is needed to improve or develop the value of the activity being inspected?

Eight different research methods were used in this study. The methodology for each is given below:

### **1. Context**

One small group of interviewees (referred to in this report as “interested parties”), influentially placed just outside the immediate area of interest, in wildlife conservation, research, education, animal welfare and the media, were contacted in an attempt to identify the context of our investigation.

A covering letter explaining our study, and giving brief background information on the legislation involved, was developed, along with a simple questionnaire (included in Appendix 1). Consultees were approached either in person, e-mail or by telephone by one of the authors.

In an attempt to discover whether other European countries have adopted a policy for appraisal where an inspection process has been developed, we failed to raise a response from the European Association of Zoos and Aquaria (EAZA), however the Environment Directorate General of the European Commission was unaware of any other such initiative.

### **2. Instrument**

The maintenance of a list of zoo inspectors and the option to develop standards of modern zoo practice by the Secretary of State is enshrined in the Zoo Licensing Act. The Department has recently amended the list of zoo inspectors and, as a part of this study, we attempted to discover the process by which new inspectors were selected. This was mostly accomplished by reviewing copies of advertisements and other

information provided by DEFRA to applicants for the post, and by discussing the selection process with those personally involved. DEFRA also provided us with [anonymous] details of qualifications and experience of successful applicants.

### **3. Stakeholder consultation**

Individuals directly involved in the zoo licensing process, “stakeholders”, were canvassed by questionnaire. Our main reason for this consultation was to gauge the strength of opinion about the need for appraisal, in order to help us make a case for or against an appraisal scheme. Before any sort of appraisal scheme can be implemented, it is important that all stakeholders who may be affected by such a scheme are consulted. This is vital, not only to gauge the strength of feeling on certain issues, but also to encourage those most closely affected by any adopted changes to accept any proposed scheme as something they contributed to. In designing our questionnaires and contacting people in this manner, we felt we could reach a large body of opinion; however we accepted that a weakness of any results obtained would be that such opinion is inevitably subject to the bias of the respondents.

Three groups of stakeholders were identified for this investigation: Zoos and local authorities (the clients), and the Secretary of State’s Zoo Inspectors.

Different questionnaires were drafted for each of the three groups (included in Appendix 3). A small sample of questionnaires was sent to selected recipients initially to test the wording of the questionnaires and to identify any problems. Slight alterations were made to the final versions before the bulk mailing was carried out. Consultees were sent a paper copy of the questionnaire by post. All questionnaires were anonymous, to encourage respondents to provide their honest opinion about the inspection process, without prejudice.

All zoo inspectors currently listed by the Secretary of State were sent a questionnaire (except for Andrew Greenwood – co-author of this report). This was reinforced by an email to all parties from DEFRA encouraging a response. A total of 44 zoo inspectors was consulted.

From past experience of canvassing local authorities, response rates can be low when requesting information about a subject of which relatively few authorities have direct experience. In view of this, it was decided to consult initially those local authority representatives that attended the Zoo Inspectors Training Seminar held in Bath by DEFRA in 2002. It was felt that by canvassing these officers we would be targeting people with experience and an interest in the zoo licensing process. In order that we did not exclude any other interested local authority officers, the investigation was also advertised on the EHC-net email list sent out to environmental health officers by the Chartered Institute of Environmental Health and this generated a small number of requests from other local authorities to be included in our study. A total of 57 questionnaires was sent. Only English authorities were approached for the purposes of this investigation.

In order to get a good cross section of responses from different types of zoo collections we attempted to canvass all zoos in England. In the absence of any list of zoos being held by DEFRA, we used IZVG’s own in-house list. To encourage a response, and to try to ensure that no licensed collections were inadvertently omitted, the investigation was advertised on the ZooNews email list, an independent

publication sent weekly to many zoos in the UK. In total, 166 questionnaires were sent to zoological collections in England.

Responses were logged into a database, to assist with our data analysis.

#### **4. Review of Zoo Standards 1999**

The report commissioned by DETR in 1999 on the review of the zoo standards was consulted, in order to identify any areas of overlap with this study.

#### **5. Licensing regimes of comparable inspectorates**

A number of inspectorates were contacted, mostly via telephone or email in the first instance, to request information on their basic function and performance management measures. It was attempted to consider a range of comparable inspectorates, either through their connection with the inspection of animals, or their administration by a government department. Responses were summarised.

#### **6. Observation of a zoo inspection**

One of the authors of this report (SH) attended a zoo inspection as an observer (with the permission of all parties) in order to gain direct experience of the process, to observe the “performance” of a zoo inspector, and to look out for potential for inconsistency. His findings are summarised.

#### **7. Review of findings from Zoo Inspectors’ Training Seminar**

DEFRA provided us with copies of the seminar evaluation forms from delegates. These, in conjunction with DEFRA’s own report on the seminar, were used to gauge the success and level of interest in training for those involved in the inspection process.

#### **8. Review of zoo inspection reports from defined collections**

In the absence of centralised records at DEFRA, we decided that we should attempt independently to obtain a selection of reports from inspections of licensed zoos. It was decided to concentrate our efforts on a number of defined, very similar, collections. Reports, pre-inspection audit forms and copies of licences were requested from the chosen centres. These were reviewed by us in an attempt to identify any inconsistent approach from inspectors. For some of the collections chosen, IZVG has direct knowledge of the standards at the centres. It was therefore possible for us to identify some situations where we know that inspectors have missed, or not commented on, potential problems.

The variety of inspection report forms used since the licensing process began make direct comparison between centres difficult. Without restricting our sample to similar collections, or those of which we have a direct knowledge, the extraction of meaningful data from a range of inspection reports would have been impossible.

## **4. Results**

### **4.1 Context**

The results of the questions posed to our “interested parties” were used to put the general view of zoos in context. A major finding of our contextual search was that, of the people surveyed, not one respondent said that they believed that zoos in general were making the most of their opportunities for conservation.

#### **Setting the appraisal of zoo inspectors’ performance in context**

Any appraisal of zoo inspectors’ performance needs to be set in context. The context, in this case, is the role and function of zoos, about which opinions can be diverse, and not infrequently emotive. Thus, while the World Conservation Union has clearly mandated the zoo community with the role of *ex-situ* and *in-situ* species conservation in a Policy Statement on Captive Breeding (IUCN1987), there is at least one consortium of animal welfare organisations that is dedicated to the “long-term aim of phasing out zoos”.

The general public in the UK are clearly dedicated zoo-goers with some 14 million zoo visits annually at home (Federation of Zoological Gardens of Great Britain, personal communication). Overseas, British visitors make up 20% of all the visits to Sea World of Florida, and are the majority tourist visitors to most Mediterranean animal parks. There has been no overall analysis as to the reasons for these zoo visits, nor the benefits achieved.

Nevertheless, the future of zoos is likely to be affected by current legislation. Zoos are now required by law, enshrined in the Zoo Licensing Act 1981 (Amendment) England and Wales Regulations 2002, to meet their conservation mandate, which may go some way to placate their critics: “... *UK zoos have two years to shape up or ship out and we will be watching them closely. If they do not, they will have the law to answer to*” (Travers, 2000). Ultimately, however, real pressure will come from a public whose opinion moves towards, or away from, a belief that zoos are fundamentally important to biodiversity conservation.

The Zoo Licensing Act, recently amended as a result of the EC Zoos Directive, is implemented by local authorities with the assistance and guidance of the Secretary of State’s Zoo Inspectors, so the Inspectors have a pivotal role to play in the future well-being and function of zoos in England.

How, then, can the ‘performance’ of zoo inspectors be appraised in such a way that such appraisal may contribute towards the improved ‘performance’ of modern zoo practice? This is what we mean by setting the appraisal of zoo inspectors in context.

We felt that the three contextual frames needed were historical, purposeful and external:

1. who required, and now requires, the licensing and inspection of zoos, and why?
2. what are the standards and aspirations against which to judge and improve the role and function of a modern zoo?

3. what is the climate of opinion within which we set about enabling zoo inspectors to facilitate change and improvement?

We set about our contextual search in the following ways.

1. A relatively fresh eye was brought to the task of unearthing the background and motivation of the inspection and to create a logical flow chart from the Zoo Licensing Act 1981 to the current Inspection Report Form (see Chain of Influence, Appendix 2).

The result has significant contextual value. Implicit in the Aim of Directive 1999/22/EC, Council of The European Union, which draws inspiration from the Convention on Biological Diversity 1992, there is an irrefutable challenge to zoos: *“The objectives of this Directive are to protect wild fauna and to conserve biodiversity by providing for the adoption of measures by Member States for the licensing and inspection of zoos in the Community, thereby strengthening the role of zoos in the conservation of biodiversity.”*

The Zoo Licensing Act followed suit with measures that were almost identical to those in the Directive. The clarity of the challenge had already been dulled by a change of emphasis in the Secretary of State’s Standards, which had been revised before the Directive was incorporated into the Act, but the original intent, and thus context, remains unambiguous within the Act and the Directive.

2. The Zoo Licence accredits a zoo with the basic standard by which it may legally function. The zoo inspector may also use the inspection to encourage the zoo to aspire to standards higher than the minimum requirement. In many cases, to do so the inspector’s own breadth of knowledge must necessarily be greater than the zoo’s. The information, guidelines, and measures needed to appraise the knowledge and performance of the inspector are therefore the same as for the licence, and considered elsewhere in this report.

However, the absence, until now, of an historical perspective, an aim, a centralised inspection reporting and monitoring system, and an unambiguous set of Standards, is relevant to the context of assessing and improving the role and function of the modern zoo.

3. In order to canvass an external, but informed body of opinion, we approached a sample of UK-based Chief Executive Officers, Directors and Chairs of wildlife organisations (“interested parties”), most of which have an international remit, for an opinion on zoos.

Without exception, they all agree that zoos, safari parks and aquaria have the opportunity to play a valuable role in our modern world, both as a real life experience of other species that share the planet, when housed appropriately, and as an important vehicle to convey the need for conservation and sustainability. However, not one respondent believes that, by and large, zoos are making the most of the opportunities to do either. Some of our respondents asked not to be identified. Full results of the survey are presented in Appendix 1, but a selection of quotations will illustrate the general view:

*“many zoos are thinking about this role very narrowly, and not making the most of the opportunities that they have for enlightening and enthusing visitors about the diversity and significance of the natural world, and their role in maintaining it”. (Dr Georgina Mace FRS, Institute of Zoology).*

*“opportunities should be taken to deliver a stronger Conservation Message” .*

*“A large number are trying to take their roles seriously, but there are still many where the conditions for the animals kept are not always suitable, the educational aspect is neglected, information presented is out-of-date or very poorly presented using inadequate presentation media (this is an area most zoos in the UK could pay attention to), some are still glorified theme parks with the sole aim being recreation with very little or no conservation message or benefit.”*

Not unexpectedly, respondents representing animal welfare organisations were most sceptical about the ability of zoos to deliver conservation.

*“... while zoos exist, it is essential that they are required to provide the highest possible standards of animal welfare as well as making a significant contribution to conservation and education. I believe the new (Secretary of State’s) standards will make life very tough indeed for zoos and for those zoos that only pay lip service to these objectives.” (W. Travers, Born Free Foundation).*

*“The majority of (zoos) appear to put entertainment value and visitor throughput above animal welfare, education and conservation. More emphasis should therefore be addressed to these opportunities to benefit the public awareness of wildlife issues and to benefit the protection of wildlife and habitats through better use of captive wildlife exhibits.” (Peter Davies, World Society for the Protection of Animals)*

Less expectedly, the heads of research and conservation units, even when closely aligned with zoos, are little more encouraging in their opinion.

The Chair of an international conservation council and the Executive Director of an international conservation society believes that *“the younger generation (c. eleven years) doesn’t like zoos. They quite like safari parks but not animals in cages”*.

We found it hard to get an opinion from conservation journalism. However, the Editor of a nature magazine agreed *“there are obviously cases where zoos can help”*. Voicing the public perception from a position of some advantage she adds, *“conservation is not, though, the main role of a zoo.”* For those zoos that do claim the conservation high ground, this respondent may be doubting their dedication when warning *“but only if (the need for conservation and sustainability is conveyed) appropriately and honestly”*.

We intentionally stayed outside the arena of professional zoo educators, already converted to the “cause”.

Mark Boulton, long time Director of the International Conservation Education Centre and now a conservation education consultant, appears to veer towards wildlife centres when thinking of good examples of conservation education in zoos when he says *“Edinburgh (Zoo) for instance, the Wildfowl & Wetland Trust, and a number of Otter Sanctuaries open to the public appear to be doing very well.”*

The Director of a conservation institute, with a considerable international throughput of future conservationists, introduced a positive note whilst, at the same time, pointing out a shortcoming of the questionnaire that *“omits the key issue of raising funds and running projects that make a direct contribution to in-situ conservation, e.g. WCS’ International Program, ZSL’s Conservation Programme, DWCT’s overseas work.”* In fact this is the response that reflects most closely Article 9 of the Convention on Biological Diversity, which encourages contracting parties, wherever possible, to operate in countries of species’ origin.

In conclusion, therefore, appraising the performance of zoo inspectors should be seen in the context of

- the legal and moral obligation of the process to make the conservation of biodiversity the prime motivation of zoos, with real and positive consequences in the country of species’ origin
- the opinion of their professional peers and doubtless some of the public that zoos don’t achieve as much as they should.

The ideal as set by the Directive and the Act is therefore the context in which the zoo inspection process should be judged.

## **4.2 Instrument**

### **Secretary of State’s Zoo Inspectors**

Section 8 of the amended ZLA requires the Secretary of State to compile a list of two parts. The first part (List I) comprises of veterinary surgeons with *“experience of animals of kinds which are kept in zoos or which in the Secretary of State’s opinion might so be kept and shall be competent to advise about the implementation in zoos of the conservation measures referred to in Section 1A of the [amended] Act”*. The second part, List II includes persons who *“shall be competent in the Secretary of State’s opinion to ... inspect animals in zoos, to advise on keeping them and on their welfare, to advise about the implementation in zoos of the conservation measures referred to in Section 1A [of the amended Act], and to advise on the management of zoos generally”*. List II inspectors are predominantly zoo directors and senior zoo curators.

### **Secretary of State’s Standards**

Section 9 of the amended ZLA allows the Secretary of State to specify standards of modern zoo practice with respect to the management of zoos and the animals in them. The original standards were reviewed in 1999-2000 and were published as the Secretary of State’s Standards of Modern Zoo Practice (SSSMZP) in 2000.

The SSSMZP is a large document, incorporating a series of defined standards covering areas such as animal welfare, management, conservation, public safety, records and other legislative areas, a series of appendices providing guidance on zoos’ implementation of the Standards, plus suggested pre-inspection audit and inspection forms.

The inspection form acts as a template for inspectors to record their comments about selected areas considered important by the Secretary of State, and consists of a series of “Yes”, “No” and “N/A” checkboxes. However, there is no legal obligation for

SoS inspectors to use these forms so long as they “have regard” to the Standards when making their inspection.

## **Zoo Inspector Recruitment**

Following the acceptance of the 1981 Act, the Secretary of State compiled the two lists of zoo inspectors, following the advice of the British Veterinary Association and the zoo associations, as required by the Act. These lists remained largely unchanged until 2000, when the Department decided to revise them, by advertising for candidates, with a view to appointing more inspectors and widening the fields from which they were drawn. It was hoped to encourage “new blood”, to increase the numbers of inspectors specialising in less common fields such as aquaria and invertebrates, and to remove inspectors who had retired from the zoo field. [Following the devolution of government, Scotland and Wales now maintain their own lists of inspectors].

It is relevant to this project to review this recruitment process, as it illustrates the Department’s perception of what is required from inspectors, and the qualifications of the newly appointed inspectors can be examined to try to determine a “benchmark” minimum level of experience for future use.

### ***Skills and qualifications required***

In addition to the prescribed requirements laid out in the Act for inspectors to be added to either list, DEFRA described further skills required by them for the post. All candidates were expected to “*demonstrate a strong commitment to the highest standards in zoos and considerable and ongoing practical experience*”. Accurate observation and recording, and timely and accurate reporting were also deemed essential. All zoo inspectors were expected to possess a high level of interpersonal skill, observational and reporting abilities, as well as the ability to maintain objectivity.

### ***New recruits***

The Department recruited twelve new List I and 6 new List II inspectors as a result of the 2000 advertising campaign. As is required in section 8 of the ZLA, representatives of the British Veterinary Association (BVA) and the Federation of Zoological Gardens (Zoo Fed) were consulted on the additions to the lists. Applicants supplied written information of their suitability to the Department and this, in addition to any personal knowledge the BVA/Zoo Fed representatives had of the applicants, was used to determine their suitability. In the absence of any laid-down criteria or guidance for the inclusion of inspectors to the List, suitability was determined by loosely defined criteria that had been discussed by the Zoos Forum. These were that candidates should:

- currently, or very recently, have had “hands-on” practical experience with zoo animals or the zoo environment
- offer an appropriate length of experience in the field

The BVA and Zoo Fed representatives told us that they did not find the recruitment exercise particularly satisfactory due to the lack of written criteria, although they felt it important that they should still be allowed a discretionary approach. It was also felt that that the recruitment process should be undertaken more frequently, and it was suggested to the Department that it should be an annual or biennial event. The final decision on the selection of candidates rests with the Secretary of State.

As part of this study, DEFRA supplied us with details of the qualifications and length of zoo experience of the newly appointed inspectors so that we could try to formulate a recommended minimum entry level for future recruits and to establish core competences. Of the List I inspectors, eight of the twelve individuals each brought over ten years experience in the field. Two List I inspectors had only five and seven years experience, however these individuals brought specialist skills in invertebrates and aquaria/reptiles and were appointed specifically to strengthen the inspectorate in these areas. In addition to the basic veterinary qualification, five of the twelve newly appointed List I inspectors had specialist certificates or diplomas in relevant areas such as zoo and wild animal medicine, laboratory animal science or fish health and production. New List II inspectors all had fifteen or more years experience in the zoo/exotic animal field.

### ***Training***

Following the appointment of new inspectors, and influenced by the changes to zoo legislation, the Department decided that some training should be offered to all zoo inspectors on the inspection process. This was approached in two ways – the development of a Handbook providing guidance on how collections could meet the SSSMZP, and by the organisation of a Zoo Inspectors Training Seminar, which was held in 2002 for zoo inspectors and local authority officers. In addition, newly-recruited inspectors undertake a “shadowing” process, accompanying experienced inspectors on three inspections, before starting on their own.

## **4.3 Stakeholder Consultation**

### ***Questionnaires***

The raw data for each of the three questionnaires mailed out are included in Appendix 3 of this report. These data have been used to develop general opinions from our respondents. Response rates were as follows:

Zoo inspectors - 80% (35 replies). We had responses from 83% of List 1 inspectors and 75% of List 2 inspectors.

Local authorities - from 57 questionnaires sent to local authorities, we had a 70% response (40 replies).

Zoos – a total of 166 questionnaires were sent to zoological collections in England, generating a response from 80 (48%).

### ***Defects in performance and the need for performance evaluation***

Questions were aimed at identifying any problems stakeholders had found with the inspection process. The results of this area of investigation are summarised below:

- 100% of zoo inspectors felt that they had a good understanding of the inspector's role, the Zoo Licensing Act, the Zoos Directive and the Secretary of State's Standards of Modern Zoo Practice. Ninety per cent of zoos found that zoo inspectors demonstrated a good knowledge of the legislation. Zoo inspectors were seen to conduct their inspections competently and professionally by 85% of zoos and 87% of local authorities.
- Sixty-two per cent of zoos find the inspection process valuable or extremely valuable, with only 6% indicating that they gain little benefit.

- Problems with the inspection process have been experienced by 21% of local authorities; however, where respondents indicated the reason, this was due to administrative delays and overlap with Health and Safety legislation rather than a lack of expertise from inspectors.
- Only 5% of responding zoos have ever made a formal complaint to their local authority about the conduct of a SoS zoo inspector.
- With the notable exception of “Associated legislation” (e.g. electrical and fire safety and refuse disposal), the majority of zoo inspectors rated themselves as competent or highly competent to inspect and advise zoos on all areas referred to in the inspection form.
- **However, 73% of local authorities (n=27/37), 69% of zoos (n=48/70) and 31% of zoo inspectors (n=11/36) felt that there is a real need to instigate some form of performance evaluation for zoo inspectors.**

### **Consistency**

The questionnaire attempted to highlight any areas of the inspection process where inconsistencies have arisen. The Department highlighted inconsistency as one of the main reasons for complaint about the licensing process.

- Ninety four per cent of zoo inspectors reported that they use the recommended inspection form, printed as an Appendix to the SSSMZP, when conducting their inspection.
- Only 4% of zoos complained specifically of inconsistent knowledge between zoo inspectors.
- Fifty-six per cent of zoos felt that it is a good idea to use the same inspectors for each inspection. Some respondents noted that it would be helpful to have at least one regular inspector in an attempt to improve consistency.
- Fifty-six per cent of zoo inspectors declared that they were aware of an inconsistency in the general level of knowledge between zoo inspectors. There was a small number of comments relating to a lack of technical knowledge or confusion about legislation, and the experience of List I (veterinary) inspectors was questioned where such individuals do not have experience of many zoo collections. (It is possible that these apparent inconsistencies are sorted out at the report preparation stage and are not transmitted to the zoo operator).
- The main areas of the inspection process identified by zoo inspectors where inconsistency tends to arise were:
  - Ethical review process
  - Research
  - Conservation
  - Public safety
  - Education
  - Inspection of specialist collections, such as aquaria
- **In response to a question about the benefits an appraisal scheme for zoo inspectors might achieve, 76% of responding local authorities, 64% of zoos**

**and 50% of zoo inspectors felt that the major benefit would be improved consistency.**

### ***Training***

Our questionnaires included questions about training requirements, which is one possible tool for the performance management of zoo inspectors. Perception of a need for training may indicate certain areas where there are problems with the inspection process.

- Fifty two per cent of local authorities felt that zoo inspectors required further training on the inspection process. Of these, 76% felt that this training should be compulsory. Seventy one per cent of zoos felt that there was a need for compulsory training of zoo inspectors.
- All responding zoo inspectors indicated that they would attend, and benefit from, non-compulsory training (31% of these would only attend if this training was financed by DEFRA). Sixty-nine per cent of inspectors would support compulsory training as a condition for inclusion on the list and no inspector indicated that they would resign if this was instituted.
- Each group of respondents was asked in which areas they felt training would be beneficial, and their responses were as follows:

#### **Zoos**

Ethical review process  
Provision of a suitable environment  
Associated legislation (fire, electrical safety, refuse disposal, CITES etc).

#### **Local authorities**

Conservation  
Education  
Research  
Legal requirements of ZLA  
Administration and conduct of inspections  
Maintenance of consistency

#### **Zoo inspectors**

Legislation  
Miscellaneous provisions (insurance, toilet facilities etc.)  
Public safety  
Education

### ***Options for an appraisal scheme***

Each group of respondents was asked to indicate a preference, or to supply an alternative, from a series of proposed options for the performance management of zoo inspectors.

Two proposed options were preferred by our respondents – an appraisal of zoo inspectors' performance by questionnaire, to be completed by zoos and/or local authorities; or observation at inspections by external inspectors. One other popular choice was a combination of several of the proposed options; however this may be an anomaly caused by the design of our questionnaire (respondents were asked to tick one option only – those respondents ticking more than one box were categorised by us as preferring a combination approach; however they may simply have been indicating those options they thought were reasonable, rather than their preferred approach).

Periodic examination, self-certification, and an investigation protocol for complaints against inspectors (without a performance appraisal scheme) were least favoured.

Alternative proposals offered by the respondents included the following:

- Initial training, followed by continued professional development (CPD) with external assessment, which might include a peer review element
- Compulsory training with observation by external assessor every 2 years
- Self assessment prior to inspections, then peer appraisal following inspection
- Interview and re-evaluation at set intervals
- Self-certification of CPD, questionnaire to be completed by zoo, and assessment of quality of reporting by DEFRA

### ***Appraisers***

Since one of our proposed options would require the completion of a questionnaire at the time of the inspection by a zoo or local authority representative, respondents were asked whether they would be prepared to conduct such an appraisal.

Eighty seven per cent of local authority officers indicated that they would. Eighty per cent of these stated that they would require further training on the scheme before they would be prepared to perform such appraisals. Similarly, 70% of zoo representatives indicated a willingness to conduct appraisals, with 39% of these requesting further training.

### ***Review of results, frequency of appraisal and finance***

Zoo inspectors were asked who should review the results of any appraisal scheme and were asked to indicate their preference for, or suggest an alternative to, our suggested options. Fifty-six per cent of inspectors felt that DEFRA should review the results. Twenty-two per cent felt that a nominated panel of zoo inspectors would be the most appropriate option, and 14% requested a combination of the suggested reviewers be used (but this always included DEFRA).

Sixty-one per cent of zoo inspectors felt that a frequency of one appraisal every five years was appropriate, whilst 25% preferred a two-year interval.

All responding local authorities and 92% of zoo inspectors believed that DEFRA should finance the cost of any appraisal scheme introduced. Expense was cited by all groups as one of the major drawbacks to the introduction of any appraisal scheme.

### ***Anticipated benefits and drawbacks***

By far the highest perceived benefit of an appraisal scheme for SoS zoo inspectors was an improvement in the consistency of inspections. Other expected benefits include improving the credibility and transparency of the inspection process; maintenance of an up-to-date understanding of current legislation and the role of zoo inspectors; raised standards in zoos; and the identification and removal of substandard inspectors.

Drawbacks recognised by all groups included expense, time and added bureaucracy, and difficulties in selecting impartial, knowledgeable assessors. It was also felt that an appraisal system could affect the way in which inspectors conduct their inspections – some respondents felt that if inspectors were being appraised on

their performance, they may feel pressured into applying the Standards too rigorously, or may shy away from controversial decisions. Each group of respondents also felt that the introduction of an appraisal scheme might deter inspectors from remaining on the List. (In fact, when questioned, not a single inspector indicated that he or she would resign from the List were an appraisal scheme to be introduced).

## **Discussion of results**

The responses show that all groups are generally satisfied that the Secretary of State's zoo inspectors are knowledgeable, professional and competent.

However, despite the questionnaire not revealing any widespread problems with the licensing process, the enquiry has clearly shown that, with the exception of zoo inspectors themselves, the majority of stakeholders felt that there should be some form of performance management for zoo inspectors.

Every group believed that an improvement in consistency would be the major benefit of introducing an appraisal scheme. The Department has indicated to us that the problem of inconsistency between inspectors is one of the main reasons for informal complaint about the inspection process. The improvement of consistency is therefore perceived to be a key issue when considering a suitable method for the appraisal of inspectors. Inconsistency between inspectors can take many forms, including differences in conducting and reporting on the inspection, level of knowledge about various aspects of zoo management and relevant legislation, and interpretation and application of the Standards. Some inconsistencies, perceived to relate to inspectors, may in fact be the responsibility of local authorities (see section 4.8)

The questionnaires did not reveal any significant difference between the knowledge and competence of List I compared to List II inspectors. There were some occasions where inconsistency of knowledge between zoo inspectors was noted; however it was pointed out that, since inspections are carried out by a team and gaps in knowledge are generally filled by another team member, this does not seem to be a major problem. It has to be accepted that, since the inspectorate is appointed on the basis of their experience, there will inevitably be differences in that experience and the level of knowledge. The difficulty this presents is that, in the absence of a baseline level of competence for zoo inspectors, it is impossible to determine whether some zoo inspectors are under-performing, or whether some are excelling. It must also be appreciated that in certain situations there may be more than one valid opinion on a subject. This does not in itself constitute a lack of competence in inspectors, but is another area where inconsistency could be perceived to occur.

One area of inconsistency that was highlighted was a lack of knowledge among inspectors about specialist collections such as aquaria. The Department has anticipated this, and has attempted to rectify the situation by the active recruitment of inspectors with specialist experience, and the appointment of inspectors to particular inspections having regard to their special skills.

A number of areas were identified as a result of this consultation exercise where there is a perceived need for an appraisal system. These were:

- Consistency
- Better understanding of the role/legislation by inspectors

- Maintenance of quality of zoos – animal welfare, public safety, facilities
- Performance of zoos in conservation/education/research
- Credibility and transparency of the inspection process

We considered each of these areas as subjects for an appraisal system. However, it was felt that the majority of these issues could not be improved by appraisal alone, and would be better improved through training. It was decided to request the opinion of further stakeholders in the areas of animal welfare and the credibility of the inspection process. Animal welfare groups – the World Society for the Protection of Animals (WSPA), Royal Society for the Prevention of Cruelty to Animals (RSPCA), Born Free Foundation (BFF) and the Joint Management of Species Committee (JMSC – a branch of the Zoological Federation of Great Britain and Ireland) were consulted. Their responses called for further training and appraisal of zoo inspectors to improve animal welfare and proper monitoring of, and public access to, inspection findings.

## **4.4 Review of Zoo Standards 1999**

The Department of the Environment, Transport and the Regions (now part of DEFRA) commissioned a review of the Secretary of State's Zoo Standards which was undertaken in 1999 by external contractors ("The Zoo Standards Review Group" – ZSR). The remit for this project was to revise the Secretary of State's Standards; to review the inspection form; and to recommend how consistency in applying the Standards might be improved. The latter requirement is of relevance to this project, and we have highlighted a number of the group's findings below:

### ***Inconsistency***

The ZSR reported that "*inconsistency in inspection has been a concern for a number of years*". There were "*anomalies and inconsistencies in the legislation relating to zoos*", which the ZSR attributed to the fragmented development of this area of law, both in respect of its history and in the several Ministries responsible for implementation. In contrast to our study, which has also revealed anomalies (see page 10), the difficulties identified in the original review were related to the fact that one piece of legislation had been designed to cover the whole spectrum of zoos, from small, single species exhibits, to large zoos and safari parks. Additionally, it was noted that similar establishments, such as private wild animal collections and circuses, were treated inconsistently, as they fall outside the Zoo Licensing legislation. A lack of a standard approach for zoo inspections was also suggested as a factor causing inconsistency.

Various methods were suggested to improve consistency, including:

- Highly detailed prescriptive standards
- Greater supervision by DETR
- The use of a Chief Inspector to correlate, oversee and monitor the operation of the Zoo Licensing Act

In considering these suggestions, it was noted by ZSR that "*detailed and prescriptive standards would stifle innovation and discourage new concepts*". The use of a Chief Inspector, as used by the Wildlife and Countryside Inspection regime (see section 5.3), was considered. However, ZSR believed that the situations inspectors are called upon to inspect under the ZLA are often more complex than those seen under the Wildlife and Countryside Act, and the appointment of a Chief Inspector could lead

to a more prescriptive regime. The appointment of a Chief Inspector had also previously been considered, and rejected, by an in-house review of the ZLA in 1996 (DoE, 1996). The ZSR recommended that local authorities be required to provide DETR with copies of completed pre-inspection audit forms, inspection reports and licences for collation, stating that “*a greater overseeing role, greater transparency of inspector’s reports and increased coordination by DETR would help [to improve consistency] tremendously*”.

ZSR noted that consistency of inspections was improved by the fact that [at that time] the majority of inspections was performed by a minority of inspectors. Whilst this undoubtedly did improve consistency, it was not considered conducive to a fair, transparent system and, since the 1999 review, additional inspectors have been appointed to the List.

### ***Appointment of zoo inspectors***

It was acknowledged in the review that DETR would wish to add individuals to the List of inspectors in the future, and ZSR felt that general guidelines should be adopted. Their recommendations were for:

- A minimum of five years involvement in the field to a significant level
- Inspectors to be subject to self-certification every five years, requiring them to provide supporting evidence of Continuing Professional Development, attendance on courses etc.

For List I inspectors, it was additionally recommended that these veterinary surgeons should “*preferably be the holder of a relevant post graduate qualification*” [such as a Certificate or Diploma in Exotic or Zoo and Wild Animal Medicine].

### ***Training***

In their review, ZSR stated that “*a major weak point in the current system is the lack of specific training of inspectors*”. They found that, at the time of the review, training was almost non-existent and it was felt that existing inspectors could be better informed. It was acknowledged in the review that expanding the list of inspectors would tend to decrease consistency, unless training could be improved. As a consequence of this, ZSR recommended that “*formal training be introduced and participation be made a formal requirement of inspectors*”.

In addition, it was recommended that the Zoos Forum be requested to consider inspector training, undertake the generation of guidance notes to supplement the Standards, and encourage the production of newsletters to keep the Inspectorate informed. Two of these recommendations are now being implemented, and guidance is being produced by members of the Zoos Forum in the form of the “Zoos Forum Handbook”.

## **4.5 Licensing regimes of comparable inspectorates**

We examined the functions of a selection of other inspectorates to identify methods of performance management in current use, and their respective merits. We chose six different inspectorates, either government-run or animal-related, for the purpose of this study. These were:

- RSPCA Inspectorate
- State Veterinary Service
- RCVS Riding Establishments Inspectorate
- Office for Standards in Education Inspectorate (Ofsted)
- Her Majesty's Planning Inspectorate
- Wildlife Inspectorate

Two of these inspectorates - the Wildlife Inspectorate and the Riding Establishments Inspectorate - seem to be very similar in structure to the zoo inspectorate. Under both schemes, as with the zoo inspectorate, inspectors are appointed by virtue of their knowledge and experience as experts on a part-time, fee-paid basis. We have examined the assessment frameworks for these inspectorates in some detail, since we felt it possible that they could form the basis of a similar scheme for the zoo inspectorate. Whilst the other inspectorates are not as closely comparable to the zoo inspectorate (the positions are salaried and in some cases there are very large numbers of employed inspectors), we were able to extract useful information on the monitoring and appraisal methods used, which we have summarised below.

### ***Wildlife Inspectorate***

The Global Wildlife Division of DEFRA maintains the Wildlife Inspectorate. It currently consists of almost 100 inspectors, who are appointed to the panel having offered specified required skills (as described in the advertisement for the position), and having completed, and successfully been assessed on, a programme of a minimum of two accompanied mentored inspections with experienced colleagues. Inclusion of inspectors on the panel is revised every four years, allowing the Department to easily remove retired or inactive inspectors.

Inspectors are expected to attend an annual two-day training course, run and financed by DEFRA, to update their skills. Included in this training are two sessions on Health and Safety. Occasional additional training opportunities are also offered. The Wildlife Inspectorate is currently investigating the possibility of setting up a separate Health and Safety training session, to be run by DEFRA's central Health and Safety advisors.

Performance of the inspectorate is monitored in two ways. Following each inspection, a report form is submitted to the Global Wildlife Division, which is assessed by the Wildlife Inspector team as a quality assurance measure. The performance of the inspectorate is measured as a whole via the monthly monitoring of expenditure and performance against agreed targets for numbers of inspections. Feedback from partners and customers is also taken into consideration.

### ***RCVS Riding Establishment Inspectorate***

The Riding Establishment Inspectorate is managed jointly by the Royal College of Veterinary Surgeons (RCVS) and the British Veterinary Association (BVA). The RCVS is required by the Riding Establishments Act 1964 and 1970 to appoint

veterinary surgeons or practitioners qualified to inspect riding establishments, on behalf of the local authority, for the purposes of deciding whether or not to grant a licence to operate.

Criteria have been established for entry to the panel. Inspectors must:

- Be aged less than 65 years
- Have 5 years post RCVS registration experience
- Carry out a minimum of 30% equine work as a part of their normal employment
- Attend a one-day induction training course
- Attend compulsory refresher courses once every five years
- Be approved by the Riding Establishments Committee

Training is offered annually at venues around the UK. Inspectors are expected to finance their own attendance at a training session (currently approximately £250 every five years). The training courses consist of lectures by saddlers and specialist vets, illustrations of particular problems, and a visit to a riding establishment where inspectors are given training on areas they are expected to cover on an inspection. Attendees are asked to evaluate the course at the end of the day, but it is not considered necessary to test participants on their assimilation of the training provided.

Guidance on how to conduct an inspection has been produced by the BVA, and is currently being revised. There is a standard inspection form that inspectors are expected to use.

There is no formal appraisal scheme in place for the Riding Establishment Inspectorate. However, the Riding Establishments Committee has recently engaged in a pilot scheme where a sample of local authorities are being contacted to request copies of inspection reports, in order that standards of reporting can be monitored. This work is being undertaken by the Chairman of the Committee as a part of his role, and it is consequently reported to be at negligible financial cost.

### **Framework for inspectorates**

From the inspectorates we have investigated, a number of performance management methods have emerged as being commonly used. These include:

- Set criteria for inclusion into the Inspectorate
- Compulsory initial and ongoing training
- Provision of guidance material on the performance of the role
- Review of inspection reports to monitor standards

**Table 1. General framework for inspectorate performance management**

<b>Inclusion criteria</b>	The provision of such criteria clarifies the basic requirements of the post, and can be used as an aid to assist with the appointment of new recruits. It is to be expected that salaried inspectors will be required to meet set criteria before their appointment, however the provision of criteria for inclusion for freelance inspectors will help to facilitate and standardise their recruitment.
<b>Training</b>	Training is a key feature of all but one of the inspectorates we considered. Greater levels of compulsory training are required from salaried inspectors, however both part-time inspectorates also require attendance at compulsory training sessions at regular intervals. Notably, some of this training was financed personally by the inspectors, rather than by the administering body.
<b>Guidance</b>	Standard forms for reporting inspection findings, and Handbooks providing guidance on the requirements of inspections were methods used to direct inspectors towards “best practice”. In one inspectorate Handbooks were available for purchase by inspectors rather than being provided free of charge.
<b>Monitoring</b>	The most variable aspect of the inspectorates we considered was the method used to monitor the standard of the inspections. Methods ranged from no monitoring to a highly complicated structure including review by senior officials, feedback questionnaires and on-site assessment of inspectors’ performance. The most complicated monitoring schemes had been developed for large, salaried inspectorates.

## **4.6 Observation of zoo inspection**

During the course of this study, one of the authors, who was previously unfamiliar with the process (SH) attended a zoo inspection as an observer (with the permission of all parties) in order to gain direct experience of the process, to observe the “performance” of a zoo inspector, and to look out for potential for inconsistency.

The zoo inspector involved was relatively new to the role, and their candid and helpful attitude with which the inspection was discussed with us following the site visit was extremely helpful to us in identifying areas of concern. As a result of this observation, we were able to identify at least some areas that have the potential to cause inconsistencies of opinion to arise between inspectors:

Zoo inspectors –

- Are not trained to be familiar with electrical inspection reports and job sheets
- Are not briefed on the meaning and implication of laws relating to Public or Employer Liability
- Are not taught the statutory requirements relating to public facilities e.g. toilets
- May not be given a view of all earlier relevant inspection reports or the pre-inspection audit before the inspection
- May not be fully cognisant of the special needs of all species

- May become confused by differences between the European Directive, the ZLA, and parts of the SSSMZP.

Although the zoo inspector was courteous, consistent in judgement, and gave clear and unambiguous advice when confident of the facts and regulations, there was some disagreement between the inspector and the zoo representative over the specialised care of some species. When assessing the “Conservation, Education and Research” contributions, the zoo inspector advised that it was not obligatory to meet all three criteria and it was mutually agreed with the zoo that Education was the most appropriate option to take. **Both conservation and education are mandatory requirements** and must be carried out by all collections. This highlights an area where lack of training can result in inconsistent advice being provided to zoos and, thus where the inspection process may not function effectively in furthering the intention of the legislation. The zoo inspector expressed some discomfort regarding the levels of training that had been provided, which was restricted to shadowing an experienced inspector on three occasions.

## **4.7 Review of findings from the Zoo Inspectors’ Training Seminar**

DEFRA held a training seminar for zoo inspectors and local authorities in April 2002. This comprised a two day course, the first including an introduction, a short training video, and a series of Workshops which focused on the updated SSSMZP; and the second comprised a question and answer session and the opportunity to feedback comments from the trainees. Over 100 delegates attended the seminar, however a disappointing number of List I zoo inspectors managed to attend, largely due to the dates clashing with a veterinary congress meeting. Since formal training has only been offered to zoo inspectors on two previous occasions, the last being in 1991, we felt it appropriate to review the comments from delegates, in order to identify any general consensus of opinion on such training opportunities or the subjects covered.

Workshops were held on the following subjects:

- Zoo inspections – problems and best practice
- Conservation/Education/Research – thresholds to be met by zoos
- Local Authority problems – best practice including Health and Safety issues
- Veterinary Standards
- Ethical Review Process

The workshops were chaired by members of the Zoos Forum who invited open discussion with delegates on defined issues. A summary of the outcome from each workshop was provided on the second day of the seminar, and is to be disseminated in hard copy to delegates shortly. Major findings were:

- 97% of delegates responding to an evaluation questionnaire said that they would attend a similar event
- Preferred training frequency was every two years
- The training video was received very positively [the Zoos Forum is currently investigating the production of a purpose made video following this success]
- The training improved the majority of delegates’ understanding of the SSZMZP

- Areas where delegates felt further training necessary were Conservation, Education, Research, zoo closures, and the application of the Standards to small collections
- Delegates found the seminar an excellent opportunity to share and exchange professional experiences with colleagues, particularly since participants included both zoo inspectors and local authority officers

Overall, the training seminar was very positively received by the majority of respondents.

## **4.8 Review of zoo inspection reports for defined collections**

A major zoological organisation in the UK provided us with recent zoo licensing inspection reports, copies of licences and, where available, past reports for all its collections. These collections are essentially very similar in nature, hold a limited range of animal types and are, to a considerable extent, centrally managed and serviced from a main collection. This provided us with a good opportunity for direct comparison of the behaviour of both inspectors and the licensing authorities.

The reports and licences were reviewed for a selected range of parameters, some of which were largely the responsibility of the local authorities and some of the inspectors.

### ***Local Authority responsibilities***

1. Number of inspectors – half of the centres had been inspected by two Secretary of State listed inspectors, and half by one, which presumably correlated with their level of dispensation under Section 14 of the ZLA. It was unclear what the criteria for differentiation were, however, as the number of specimens did not correlate with the level of dispensation in two collections. In those cases where multiple reports were available, this number of inspectors was consistent for each centre.
2. Selection of inspectors – this is a responsibility of DEFRA (or the appropriate devolved national authority), rather than the local authority. Only one inspector was common to any two centres. It is surprising that one of the centres was inspected (under a 14(2) dispensation) by an inspector who is the veterinary surgeon to the main collection.
3. Frequency of inspections – with the exception of one centre, which had been recently opened, the most recent report for each centre was for a relicensing inspection. In one case the date of the previous inspection was not noted on the form, but in all the others it was clear that the previous periodical inspection (due in the third year of the six year period) had not been carried out.
4. Conditions – in all cases, the conditions recommended by the inspector(s) had been applied to the Zoo Licence. Some authorities took the opportunity to attach a schedule of required improvements under the Health and Safety at Work Act (1974). However, when compliance with previous conditions was examined, which it is the local authorities' responsibility to oversee, one collection was noted to have failed to comply with any previous conditions

(from six years before), and another with a condition about the frequency of veterinary visits.

### ***Inspectors' responsibilities***

In this section, we confined our review to the veterinary aspects of the collections, including frequency of visits, record keeping, veterinary facilities, and post mortem arrangements. This was for two reasons – firstly because these seemed to be issues at most inspections, and secondly because each inspection team contained a SoS List 1 veterinary inspector, who might have been expected to take a reasonably consistent view. The opinions of the inspectors were noted and whether or not they had applied a relevant condition.

1. Frequency of veterinary attendance – the recommendations for attendance by the centres' external consulting vets varied from 2-monthly to 6-monthly. In those centres where the subsequent outcome was recorded, one adopted monthly visits (after a recommendation of 2-monthly) and another still had not adopted the recommended 3-monthly visits 6 years later. This latter non-compliance was noted by the inspectors, but they failed to make their supporting recommendation into a condition.
2. Presence of a treatment room – in two of the collections this was considered unnecessary by the inspectors as, in practice, all sick animals could be taken to the vet's surgery. In two collections there was a treatment room, in one its completion was recommended, and in another the construction of a room recommended six years previously had still not been completed.
3. Post mortem arrangements – these differed between the main centre, which had one arrangement, and all the others which had the same alternative arrangement. In two centres, the main one and the one inspected by the consulting veterinary surgeon for the main centre, the arrangements were approved without comment. In all the others, the inspectors did not approve the arrangements as satisfactory, either for carrying out the examinations or communicating the findings to the vets. Although the issue of veterinary records was made a condition on all but one licence, the post mortem arrangements were made the subject of a condition on only two.

## **5. Summary of Results**

From our research methods employed, we have identified a number of important issues that could possibly be solved through some sort of performance management system. These are summarised in Table 2.

We have proposed solutions to the main issues identified in Table 2, and intend to develop a proposal for an effective and beneficial performance management system based on our findings.

**Overall, our research clearly indicates a greater need, and support for, training than for appraisal.**

**Table 2. Summary of research findings, and their suggested solutions**

	<b>Issues identified:</b>	<b>Proposed solutions:</b>
<b>1. Stakeholder consultation</b>	<ul style="list-style-type: none"> <li>▪ Perceived need by zoos and local authorities for a performance management system for zoo inspectors</li> <li>▪ Perceived benefits of a system are improved consistency and transparency, and maintaining up to date knowledge</li> <li>▪ All zoo inspectors indicated a willingness to attend training in their role</li> <li>▪ Zoos are not seen to be achieving their full potential in their conservation role</li> <li>▪ Preferred appraisal methods were appraisal by zoos, local authorities or external assessor at the time of an inspection</li> </ul>	<ul style="list-style-type: none"> <li>▪ Introduce a compulsory training scheme, funded by DEFRA, to improve consistency in understanding and the positive application of Standards by inspectors, and to maintain current knowledge</li> <li>▪ Introduce appraisal system of inspectors to take place at the time of inspection</li> </ul>
<b>2. Review of Zoo Standards 1999</b>	<ul style="list-style-type: none"> <li>▪ Inconsistency among inspectors in application of Standards</li> <li>▪ Future need for additional inspectors</li> <li>▪ Lack of training for inspectors</li> <li>▪ Lack of centralised information</li> </ul>	<ul style="list-style-type: none"> <li>▪ Develop criteria for future inclusion on the List of inspectors, to include a compulsory training element to improve consistency</li> <li>▪ Recommend that data be centralised with DEFRA</li> </ul>
<b>3. Review of comparable inspectorates</b>	<ul style="list-style-type: none"> <li>▪ Set criteria for inclusion into Inspectorate</li> <li>▪ Compulsory initial and ongoing training</li> <li>▪ Provision of up to date guidance material</li> <li>▪ System monitoring</li> </ul>	<ul style="list-style-type: none"> <li>▪ Develop criteria for inclusion on to Inspectorate, compulsory training programme, and monitoring system</li> <li>▪ Provide guidance material</li> </ul>
<b>4. Observation of a zoo inspection</b>	<ul style="list-style-type: none"> <li>▪ Lack of training of inspectors in certain issues</li> <li>▪ Evidence of some confusion on the requirements of recently introduced changes to zoo legislation</li> <li>▪ Inspectors do not always have sight of all previous zoo inspection findings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Provide training in areas where knowledge is currently deficient</li> <li>▪ Recommend centralised record keeping and improved provision of information to inspectors (or guidance to local authorities)</li> </ul>
<b>5. Findings from Zoo Inspectors' Training Seminar</b>	<ul style="list-style-type: none"> <li>▪ Vast majority of delegates would attend future training events</li> <li>▪ Training was found by delegates to improve understanding of Standards and provided an excellent opportunity to exchange professional experiences with colleagues</li> </ul>	<ul style="list-style-type: none"> <li>▪ Implement a regular training event</li> </ul>
<b>6. Review of inspection reports from defined collections</b>	<ul style="list-style-type: none"> <li>▪ Highlighted administrative errors by local authorities</li> <li>▪ Revealed inconsistency between inspectors, both in recommendations made, and decision to make any recognised non-compliance with Standards subject to a Condition of the licence</li> <li>▪ Lack of monitoring system to identify administrative errors or other problems with the system</li> </ul>	<ul style="list-style-type: none"> <li>▪ Provide training to local authorities on the proper administration of the Act</li> <li>▪ Provide training to inspectors to improve consistency</li> <li>▪ Develop a monitoring system to identify errors</li> </ul>

## **6. Compiled conclusions**

### **Prerequisites to Appraisal, Training or Evaluation**

We believe that a number of components must be in place before fully effective training or assessment can occur. These have been identified as:

- A mission statement or aim of the inspection
- An understanding of the historical perspective of the inspection
- Core competences required of inspectors
- The existence of clear, unambiguous standards to work to
- The existence of an effective monitoring system

### ***Aim / Mission Statement***

We consider that the inspection process would benefit from an Aim and that inspectors would find a simple and memorable Mission helpful. We have developed a proposed Mission Statement based on the aim of the EC Zoos Directive:

COUNCIL DIRECTIVE 1999/22/EC  
of 29 March 1999  
relating to the keeping of wild animals in zoos  
Article 1

Aim:

“The objectives of this Directive are to protect wild fauna and to conserve biodiversity by providing for the adoption of measures by Member States for the licensing and inspection of zoos in the Community, thereby strengthening the role of zoos in the conservation of biodiversity.”

Mission Statement of the Secretary of State’s Zoo Inspection (example):

**“To promote and monitor improved standards of animal care and the development of the proactive conservation of biodiversity”**

Such a statement could best be developed by the Zoos Forum.

### ***Historical Perspective***

We recommend that a thorough understanding of the history and progress and, therefore, direction, of the Zoo Licensing Act will give the inspectors a sense of purpose and momentum that will be an incentive towards meeting the Aim.

This report includes a historical perspective by providing a chronological map of events (Chapter 3), and by making logical linkages between the Zoo Licensing Act 1981 and the current Zoo Inspection Report (see Chain of Influence Appendix 2).

There is another trail, which might be called the Political Record, which describes the actual order of events. It does not follow the logical route, and it explains why the chronological order is not as one might expect. Although not included here, this too is part of the story.

### ***Core Competences***

It is not possible to appraise performance, nor even to consider training, without first identifying the areas of competence required. We believe the following are necessary competences for inspectors:

- **Knowledge of legislation and process** – Convention on Biological Diversity; EC Zoos Directive; Zoo Licensing Act 1981 and 2002 amendment; Secretary of State's Standards of Modern Zoo Practice; Pre-Inspection Audit; Zoo Inspection Report form; administrative protocol; and the correct use of recommendations and conditions.
- **Competence in subject areas** – conservation measures; zoo education; husbandry and veterinary care; health and safety; public facilities; byelaws, utility standards and legal requirements; records, registration and controls
- **Active experience** – referenced; active, practical implementation; advisory
- **Professional behaviour** – relationship; helpfulness; transparency
- **Communication** – an ability to leave the zoo with a clear idea of how to comply with recommendations and conditions and how this fits into the zoo's overall development towards the Aim.

### ***Monitoring System***

Appraisal or evaluation is not possible without comparative data, and the collection of data relies upon the discipline and continuity of recording and research. A centralised, filing, monitoring and evaluating system is urgently required on several levels to allow:

- a complete history of recommendations and conditions made on previous inspections of a given zoo, so that their original purpose and current progress may be reviewed on site;
- the monitoring of progress of individual zoos towards a satisfactory standard in every area;
- the monitoring of progress of the zoo community towards the Aim of the Directive;
- the monitoring of the efficacy and efficiency of the Zoo Inspection process in improving and maintaining standards;
- the monitoring of individual zoo inspectors for corrective purposes

This could be achieved quite simply, if DEFRA were to encourage local authorities to make annual returns of all inspection reports, pre-inspection audits and licences. It would, however, require a member of staff to read through these reports to look for any obvious inconsistency, and to facilitate the provision of previous reports to inspectors before they are asked to inspect collections. It would be up to DEFRA to decide whether every return was monitored. A more time-efficient approach may be to monitor only a proportion of the returns, in the absence of any specific problems with the inspection process. An annual report should be compiled by DEFRA based on these annual returns, with the intention of picking up any areas where the training of zoo inspectors may be beneficial.

The design of the inspection form as it currently stands makes it very difficult to monitor progress and compliance with the Standards (as we discovered when trying to compare reports for section 4.8 of this report). We recommend that the Department undertake to revise the inspection form to make the quantitative analysis of data possible. A suggested method for this would be to require the award of an overall rank or grade for each section of the inspection, e.g.

Section	Rank				NOTES example
	Below standard	Adequate	Good	Excellent	
1. Provision of food and water		✓			
2. Provision of suitable environment	✓				Recommend it be made a condition of licence that penguin accommodation is resurfaced. See notes in report.
3. Provision of animal health care				✓	Fully staffed and equipped veterinary facilities on-site
4. Provision of opportunity to express most normal behaviour		✓			

The use of such a system would allow zoos to be compared with each other irrespective of the size and type of collection (except in their conservation and education contributions, which have to be commensurate with their size), as well as to monitor the progress of individual zoos over a number of years. It will provide information on whether zoos are *improving*, rather than showing that they are simply meeting the Standards.

During the course of this study, as in a previous review of the ZLA (DoE, 1996; DETR 1997; DETR 1998), calls were made by animal welfare organisations to make the results of zoo inspections available to the public in order to improve transparency of the zoo inspection process. At present, this depends on the individual policies of the licensing local authorities; however the maintenance of centralised records by DEFRA would make this possible were it an option the Department decided to pursue.

It was noted in 1996 that the Department “has an incomplete record of inspection results and suffers from poor feedback from local authorities” (Federation of Zoological Gardens 1996). The government proposed to seek more information from local authorities on the operation of the Act as a consequence of their in-house review carried out in 1997 (DETR 1997). To date, this has not been undertaken despite it being possible under section 230 of the Local Government Act 1972.

We recommend that DEFRA adopt a centralised monitoring system, which will be of great value to the inspection process and the maintenance of standards in zoos.

### **Standards**

Inspectors must have a clear, unambiguous set of Standards to which to work. Currently the Standards are confusing, particularly with regard to the Conservation Measures required by the Act as amended and interpreted by the Secretary of State’s Standards (see Chain of Influence Appendix 2).

The recently published (intended to be regularly revised and updated Zoos Forum Handbook) and the provision of training for inspectors should do much to improve this.

### **Performance management theory – appraisal or training?**

The objective of the project was “to furnish the Department with the information required to make a decision on whether an appraisal system is required to analyse the performance of Zoo Inspectors and, if so, what form it should take.”

Our first conclusion is to find that the terminology used – appraisal and performance – is not wholly appropriate.

Appraisal is defined as ‘*estimate the value or quality of...*’(Oxford English Dictionary). We suggest that it is not possible to estimate the value of the zoo inspector without having a clear understanding of what the inspection is expected to achieve. We have attempted to address this by identifying an overall Aim and by drafting a Mission Statement for the Inspection (Chapter 6). The *quality* in this context relates to performance of the inspectors.

Thus, in this report, rather than “appraisal” we have referred to “performance management”, which includes both appraisal and any other methods used to improve or monitor performance.

We found that it was not possible to analyse the performance of inspectors without performance criteria against which to make a judgement. We have tried to address this by drafting some Core Competences for inspectors (Chapter 6).

Appraisal of zoo inspector performance alone cannot satisfy all the perceived needs of the stakeholders (consistency, credibility, transparency), as each appraisal is necessarily isolated. The first step was to place the appraisal of inspectors in the context of the whole history, purpose and method of the inspection process (Section 4.1). This gave us a much clearer sense of what the inspection and the licence were trying to achieve, hence how the inspectors can best further their purpose, and how best to evaluate the performance of inspectors in this role.

In other words, there is a Need (good husbandry and biodiversity conservation), there is an Aim (European Directive), there is a Means (Zoo Licensing Act), there is a Method (Zoo Inspection), with a Mission (example drafted). And there are Secretary of State’s Zoo Inspectors to guide, encourage, inspect and, occasionally, to warn zoos regarding their progress towards achieving the Aim at an appropriate level.

Our recommendation, therefore, is not just for Inspector Performance Appraisal but rather for improved management with continual evaluation of the whole dynamic inspection process, *including* the zoo inspectors. Performance appraisal is another layer of inspection – inspecting the inspectors. In discussing the choice of research design, the author of *Evaluation Research* explains that inspection is a top down approach concerned with codes of practice and minimum standards. Auditing, monitoring, inspecting, do not in themselves constitute evaluation (Clarke 1999: 7).

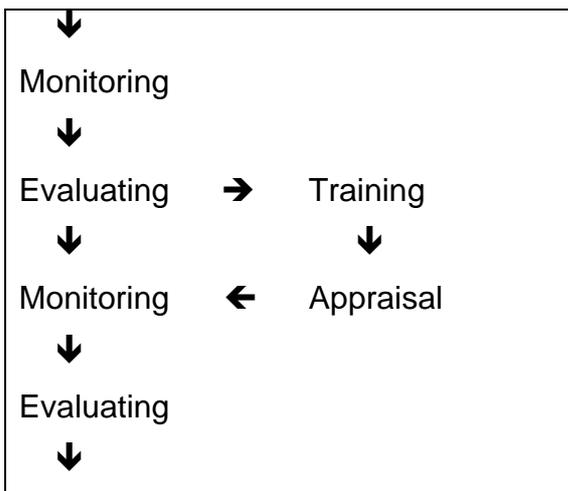
There are no rigid rules in evaluation; the art is to create a design and to gather information that is appropriate for a specific situation and policymaking context (Patton 1987: 9). Monitoring and recording data are the prerequisites of evaluation.

Monitoring is the ongoing generation of data. Evaluation judges merit or worth at a certain point of the activity life cycle (Clarke 1999:5).

Evaluation of the effective role of inspectors, may, in due course, indicate a need to appraise their performance in some subjects. However, in such cases, appraisal would be chosen as the best means available to *evaluate* the inspectors role within the inspection process.

The most important value of evaluation is not to prove but to improve (Stufflebeam and Shinkfield 1985: 51). The need is to continually improve and progress rather than attain and maintain a fixed standard, which is why evaluation, rather than inspection, is what is needed here.

The results of our research indicate that, before there can be any suggestion of appraisal, zoo inspectors, individually, need to attain a minimum, consistent level of competence in a number of fields. This level of competence will not be realised without some form of compulsory training. Because it is a time of change in the history and evolution of zoos and aquaria, training will need to be both compulsory and regular. Feedback from the Monitoring and Evaluation processes will help to establish, change or fine-tune the need for training (see Figure 1).



**Figure 1.**  
Sequence of performance management system

It is recommended that an improved management system of the zoo inspection process be designed which incorporates training, monitoring and evaluation. The appraisal of zoo inspectors should be a part of this, and the system should seek to improve the whole inspection. The zoo inspector has the opportunity to play the roles of arbiter, consultant, advisor, and guide, and is thus the key person in the whole collaborative endeavour to bring about *“improved standards of animal care and the development of the proactive conservation of biodiversity”*.

The design of the system should be stakeholder-based as advocated in *Responsive Evaluation* (Stake 1975), *Utilization Focused Evaluation* (Patton 1986) and *Participatory Evaluation* (Fink 1993). Stakeholder based evaluation facilitates:

- the utilisation of the findings by all participants
- a better understanding of all perceptions
- a better chance of ‘buy in’ by all groups

We are reminded that evaluators have a moral responsibility to act as advocates for powerless stakeholder groups (Clarke 1999: 26), and the most important stakeholders of all are the endangered species represented in our zoos.

## **7. Framework, timescales, risks and implications**

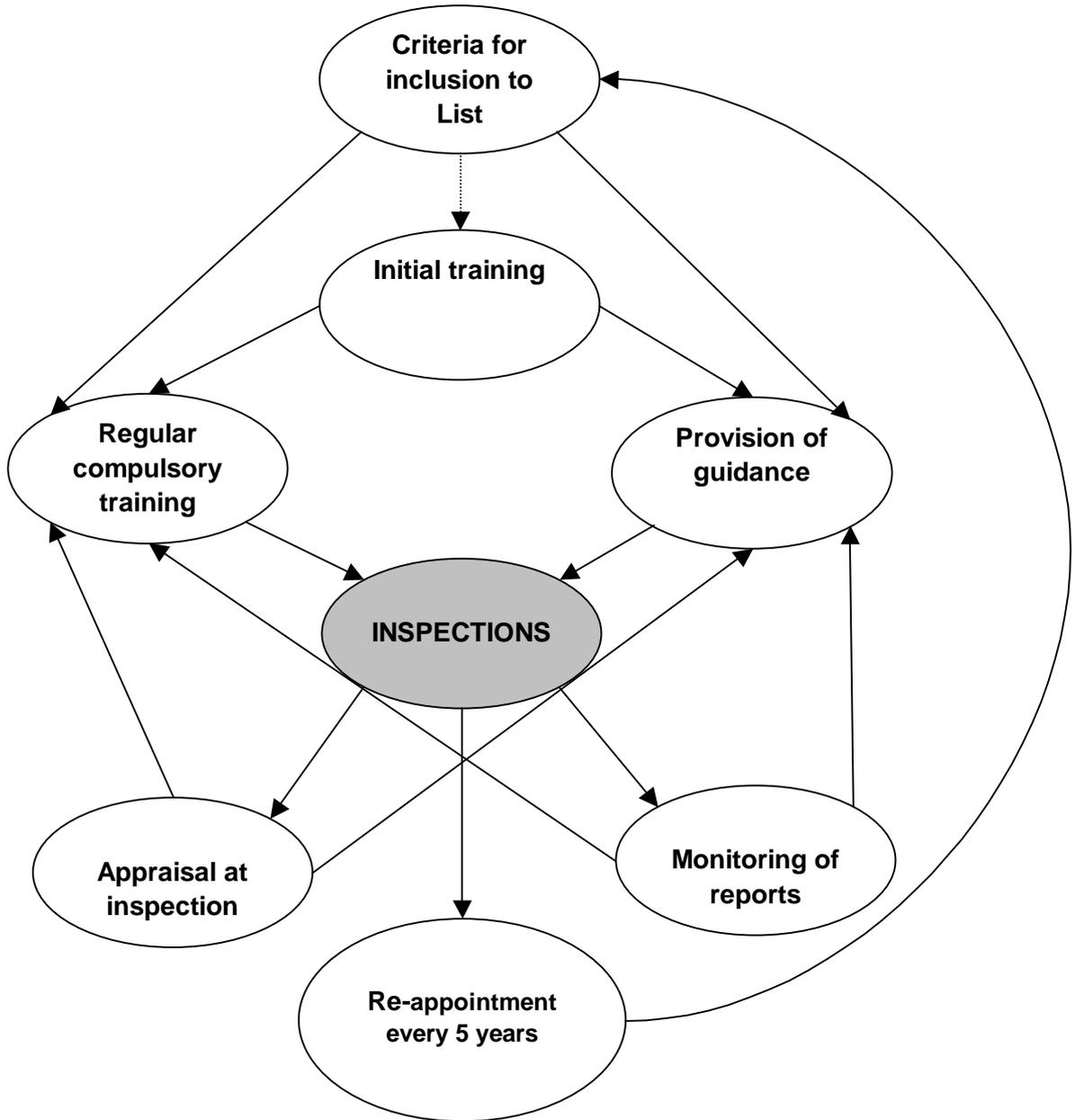
As discussed above, whilst we were requested to develop an *appraisal scheme* for zoo inspectors, we instead offer what we consider to be the best overall solution to encompass the perceived needs of the stakeholders and other parties consulted in this study. Our proposal is for an Integrated Performance Management System, which includes, as a component, an element of appraisal.

### **Factors which must be in place before any system can be introduced**

Chapter 6 of this report highlights a number of factors which must be agreed on before any kind of performance management can occur. These are:

- **a mission statement or aim for the inspection**  
Our suggested draft is “To promote and monitor improved standards of animal care and the development of the proactive conservation of biodiversity”.
- **The historical perspective of the inspection**  
This is outlined in this report (see Chapter 2 and Appendix 2). We believe that an understanding of the historical perspective of the inspection process is vital to the inspectors’ role, and we would recommend that training on this be given as part of the initial training for zoo inspectors.
- **Core competences required of inspectors**  
It is vital to the success of any performance appraisal system that core competences for the role are defined. These include the attributes necessary to fulfil the task in a satisfactory manner. We have drafted suggested core competences for zoo inspectors in Chapter 6 of this report, and recommend that such competences be regularly reviewed as the scheme develops. It is not expected that inspectors should enter the inspectorate fully competent in all these areas, but their achievement should be the aim and focus of any training provided. The competences developed could, however, be re-worked to provide more basic “criteria for inclusion” which *would* be required of applicants *before* appointment to the list (see below).
- **The existence of an effective monitoring system**  
There needs to be some way of monitoring both performance of the inspection process and the inspectors. We have proposed a scheme to collect and manage this information in Chapter 6 of this report.
- **The existence of clear, unambiguous standards to work to**  
As discussed, some Standards, particularly those relating to Conservation, Education and Research, are ambiguous, and have been interpreted differently by inspectors. Further clarification of the Standards is required. In the short-term, this may be achieved through the provision of guidance (already produced in the form of the Zoos Forum Handbook).

**Figure 2.**  
**Flowchart of Framework for Zoo Inspector Integrated Performance Management System**



## Proposed Framework

Our proposed Integrated Performance Management System is designed to run on a five-yearly cycle to allow recruitment and retirement at regular intervals. Each of the steps proposed in the flow chart in Figure 2 are explained in more detail below:

1. **Criteria for inclusion to list** – based around the Core Competences, the Criteria should be basic entry requirements to be met by all successful applicants. An example of appropriate criteria could include:

All applicants should:

- Be aged under 70 years old
- Have a minimum of five years *direct* experience in the zoo field
- Currently be *actively* engaged in the zoo field, i.e. be a practising zoo vet, curator or zoo director
- Possess the skills necessary to conduct a professional inspection and complete a comprehensive report in a timely manner, without prejudice
- Be approved by the Secretary of State, and the representatives of the British Veterinary Association and the Federation of Zoological Gardens of Great Britain and Ireland
- For List I inspectors, be a registered member of the Royal College of Veterinary Surgeons

DEFRA may wish to reserve the right to waive certain criteria in exceptional circumstances, to allow them to appoint specialists in minority fields.

2. **Initial training** – We recommend that an initial training course be completed by all new and revalidated inspectors. Already there is a requirement for new inspectors to complete a minimum of three inspections shadowing an experienced inspector, and we recommend that this should continue in addition to a basic training course. The initial training could be carried out on the first annual training session for each 5-year block, and should include a basic briefing on the historical perspective of the process, and an overview of the Core Competences. Attendees at this initial training could be appraised at the end of the course, to assess their competence to carry out inspections independently. We intend that this session be held just after the list is revised, allowing all new inspectors to attend their initial training as soon as possible. The content of this initial course will be expected to change from one course to the next as the Core Competences develop, based on how the inspectorate performs.

3. **Regular training** – We propose the instigation of a system of one-day annual training events, to be held at various zoos across the country, to be financed for zoo inspectors by DEFRA. Annual attendance at such training should be encouraged; attendance at 2 training days per 5-year period should be compulsory. The agenda for each year's training could be decided by the Zoos Forum, based on an annual return from DEFRA in view of feedback from monitoring system. Training should be provided by experienced inspectors, or other specialists e.g. Health & Safety experts, conservationists, zoo educators, animal welfare groups etc. The first session in each five-year period will consist of the basic training for new inspectors, and is likely to be skipped by the majority of experienced inspectors. Attendance by an inspector at the initial or regular training days as a course instructor should count towards their compulsory attendance of the training programme.

4. **Guidance** – Guidance on the Standards and the inspection process should be easily accessible to all zoo inspectors. The Zoos Forum Handbook, currently being developed, will form the basis of the guidance material required and is being circulated to inspectors as hard copy as well as being available on the internet. Additional resources include easy access to the Annual Report and minutes of the Zoos Forum, which are available on DEFRA's website, allowing zoo inspectors to keep abreast of current issues in the zoo field. The production of an intermittent newsletter by DEFRA is encouraged, to notify inspectors about any changes to legislation, and to provide details on the timing and agenda of training days.

5. **Appraisal at inspection** – In view of the opinion of zoos and local authorities that some form of appraisal for zoo inspectors is necessary, to improve credibility of the process, we recommend that on-site appraisal be carried out both by local authorities *and* zoos via an easy-to-complete questionnaire, asking basic questions about their experience of the inspection based on core competences identified for inspectors, to be returned to DEFRA. Our suggestion is based on a questionnaire produced by Ofsted as a part of the monitoring system for school inspectors (see Appendix 4). As well as providing information on the conduct of the inspection, this will also provide an opportunity for parties to air any concerns or grievances to the Department and may highlight areas where additional training is required.

We recommend that such appraisals be carried out for the inspection team as a whole, rather than one questionnaire per inspector. However, there should be a clear opportunity for respondents to make comments on individual inspectors, and this section of the report should be scrutinised closely by DEFRA in order to identify any defects in performance by individual inspectors.

By requesting that zoos *and* local authorities independently complete appraisal questionnaires, this should ensure a fair and non-discriminatory application of the appraisal system, and should remove any personal bias from disgruntled zoo operators.

Co-ordination by DEFRA is likely to be easier if every inspection is appraised. Appraisal questionnaires could be sent out by DEFRA with the inspector appointment letter to the local authority for distribution at the inspection. This approach will generate a large volume of returns for the Department, however it may be decided that it is only normally necessary to scrutinise a selection of the returns received.

It is recommended that the Department endeavour at the least to read the comments section of each appraisal questionnaire, in order to identify any specific complaints about the performance of individual inspectors. We suggest that any inspector receiving more than two formal complaints in the five-year period be subject to an investigation into their competence. Where complaints are found to be justified, inspectors could be required to re-train, or be dismissed from the list for unacceptable performance.

6. **Monitoring of reports** – As discussed in section 5.9, returns of inspection reports, pre-inspection audits, licences and evaluation questionnaires should be made to DEFRA for annual review. This will provide data on the performance of the inspection process and individual inspectors, and the improvement of zoos, as well as highlighting areas where additional training of inspectors would be beneficial. Having such information on file will represent a valuable source of data on the

compliance of zoos with the European Zoos Directive and the SSSMZP and assist future research.

**7. Re-appointment** – We recommend that a formal schedule of re-appointment every five years be instigated. Existing inspectors should be expected to meet the standard Criteria for Inclusion at re-appointment in addition to their fulfilment of the compulsory training element of the performance management system. Any inspector not meeting the Criteria for Inclusion, or having been judged as not displaying an acceptable level of performance (either by not attending the compulsory training, or by having more than two justified complaints made against them in the 5 year period) should not be re-appointed.

It is important for the successful running of the inspectorate that there is a system in place to maintain optimum numbers of inspectors to perform the role. A five-yearly recruitment scheme will encourage new inspectors, and the re-appointment system will filter out those inspectors leaving the field or retiring, and will allow for their dismissal should their performance or attendance at training not be adequate. An optimum number of inspectors should be agreed, in order to enable the smooth running of the inspection process, whilst ensuring that resources are not wasted in training larger numbers of inspectors than necessary.

### **Identified risks**

Risks were considered early on in this research as a result of the feedback from our consultation process, and we have endeavoured to minimise these in our design of the performance management system. Identified risks included zoo inspector non-compliance, unwillingness of local authorities and zoos to complete appraisal of inspectors, and a lack of support for any appraisal system. In light of our consultation, these specific risks did not prove to be a problem. By encouraging respondents to offer their own solutions during the consultation process, it was hoped that stakeholders would be encouraged to buy into our final recommendations as something to which they contributed. Whilst the majority of zoos and local authorities indicated that they would be willing to conduct appraisal, they requested that further training be provided. We suggest that the questionnaire be designed with ease of completion in mind, to remove any need for training.

Other drawbacks identified by respondents included cost, bureaucracy, time, biased assessors and the resignation of inspectors from the List. We have endeavoured to minimise these issues in our development of the framework. The scheme is designed to be as simple as possible to administer, whilst providing a real benefit to the performance of the inspectorate. Costs have been considered below in Table 3. Requiring both zoos *and* local authorities to complete appraisal questionnaires has minimised the possibility of bias from assessors.

It is possible that the compulsory element might prove to be too onerous for some inspectors; we have anticipated this and believe that an appropriate level of attendance has been proposed.

**Table 3. Cost of Integrated Performance Management System**

Stage	Costs
<b>Criteria for inclusion to List</b>	No cost once criteria developed. Will save time and improve efficiency of recruitment process.
<b>Initial training</b>	No additional expense, above that incurred by the regular training.
<b>Regular training</b>	Annual one-day event. Costs would include venue hire, catering, and provision of travel/subsistence expenses for inspectors. Overall costs would depend on the number of delegates expected to attend. The two-day training seminar run by DEFRA in 2002 cost a total of £18,492.81. This included accommodation costs for delegates, but not travel and subsistence expenses paid to zoo inspectors attending the seminar. Local authority delegates were asked to pay a fee of £180 each to attend. Likely costs for a similar one-day course, without accommodation, for 50 delegates held at a UK zoo could be as low as £1000 (Chester Zoo, 2003).
<b>Guidance</b>	The Zoos Forum is producing the Handbook, which is being published on the internet and is therefore at negligible cost. Newsletters could be produced when necessary, and should cost no more than the production of a standard circular.
<b>Appraisal at inspection</b>	Once the questionnaires have been designed, costs will only be for printing. Distribution of questionnaires could be done at the same time as local authorities are notified of their appointed inspector, so this would not be an additional cost. The only significant cost would be the provision of staff time at DEFRA to co-ordinate their distribution, and to collate the results. It may be possible that this could be done as an extension of an existing role, or as a student project.
<b>Monitoring of reports</b>	The only significant cost would be in providing the personnel at DEFRA to collate the reports and produce an annual report.
<b>Re-appointment</b>	There will be a small amount of administrative work, in contacting existing candidates, and advertising the position. The selection of inspectors is generally carried out as part of a professional role (i.e. by Zoos Federation, BVA, Zoos Forum), and therefore incurs no additional cost to the Department. The production of Criteria for Inclusion will increase the efficiency of the appointment process.

### **Implications for effectiveness of inspectorate**

We cannot see any reason why the introduction of our proposed framework should reduce the effectiveness of the inspectorate. Indeed, we believe that proper training and guidance should *improve* the effectiveness of the inspectorate, and ultimately improve standards in zoos.

### **Timescale**

It was acknowledged when designing the proposed Performance Management System that zoo inspectors are extremely busy people. In view of this, we have tried to make only reasonable demands for compulsory training. It is accepted that inspectors will not be able to attend every meeting. We propose that the regular training be held on a set date every year, e.g. the first Monday in June, so that delegates always know when the next one will be and can plan, and indicate to DEFRA, their attendance well in advance. If low numbers of zoo inspectors are expected in any particular year, it is possible that invitations could be extended to local authority officers in order to make the training day worthwhile.

The proposed Performance Management System should be phased in, as inspectors cannot be expected to be appraised until they have been given adequate training.

We recommend that the training scheme should be set up as a priority, with the first session concentrating on the Core Competences proposed. Attendance at this first session should be compulsory (and count as one of the two attendances required in the five year block). In addition, it should immediately be made a requirement that the List be reviewed every 5 years.

We anticipate that the first training day could be planned a year from our recommendations being accepted. Criteria and appraisal questionnaires could be developed during this time, and appraisals should begin once the first training session has been completed.

### **Training seminar**

Whilst outside the remit of this study, we feel it important to note that the Zoo Inspectors' Training Seminar, held in 2002, which included both Secretary of State Zoo Inspectors and local authority representatives was very positively received and stated to be of help to all delegates. We recommend that such inclusive seminars be held regularly, in addition or possibly tacked onto, the regular training proposed for zoo inspectors.

## **8. Recommendations to government**

Rather than a recommendation for an appraisal system *per se*, we recommend that the Department adopt our proposals for an Integrated Performance Management System, as described in Chapter 7 of this report. An important part of this system is the emphasis placed on the regular training of zoo inspectors.

**Major recommendations resulting from this study are that the Department should:**

- 1. Develop a mission statement for the Secretary of State's Zoo Inspection.**
- 2. Provide training and guidance to zoo inspectors on the historical perspective and aim of the inspection process.**
- 3. Develop a series of Core Competences required of zoo inspectors.**
- 4. Clarify the Secretary of State's Standards of Modern Zoo Practice, particularly with regard to the Conservation, Education and Research requirements of the Zoo Licensing Act (England and Wales) Amendment Regulations 2002.**
- 5. Require returns of inspection documents from local authorities, and adopt a centralised record keeping and monitoring system for this information.**
- 6. Adopt an Integrated Performance Management System for Secretary of State's Zoo Inspectors.**

Other recommendations:

7. The Department should review the design of the inspection report form to allow the quantitative analysis of data, and to facilitate monitoring the improvement of zoos in attaining higher standards of modern zoo practice.
8. We recommend that the Department pursue its intention to hold inclusive training seminars for both zoo inspectors and local authority officers, and possibly also to extend them to zoo directors, in addition to training implemented specifically for Secretary of State's Zoo Inspectors.
9. From the limited number of inspection reports we were able to assess, we identified serious problems with the administration of the Act by local authorities, particularly their failure to enforce conditions attached to licences, and the omission of the required number of inspections during the licensing period. The Department needs to address this problem as a matter of urgency.

## **9. Implications of devolution**

Powers for the inspection of zoos are now devolved in Scotland and Wales to the Scottish Executive and the National Assembly for Wales. This devolved status allows Scotland and Wales to create their own lists of zoo inspectors as required by the Zoo Licensing Act 1981, independent of the Secretary of State's List for England. At the time of devolution in 1999, we understand that Scotland and Wales were provided with the existing Secretary of State's List as a basis for their own list of inspectors. However, since the recruitment exercise by DEFRA in 2000, this may have resulted in inspectors being listed to inspect zoos in England, whilst not appearing on lists for Scotland or Wales.

Whilst being devolved governments, we believe it is a sensible undertaking for DEFRA and devolved parliaments to consult and cooperate where possible, in order to maintain fair, consistent standards throughout the whole of the United Kingdom. We therefore recommend that the National Assembly for Wales and the Scottish Executive carry out their own consultation process with a view to adopting the recommendations made in this report. We suggest that efforts for the Integrated Performance Management System be combined between the three governments to develop a training, appraisal and monitoring scheme common to all zoo inspectors. Since the inspectors appointed to lists in England, Scotland and Wales are likely to greatly overlap, it is a sensible approach to combine resources in order to maintain a standard level of performance by all zoo inspectors in the United Kingdom.

We understand from the Department that the National Assembly for Wales and the Scottish Executive made financial contributions to the Zoo Inspector's Training Seminar held by DEFRA in 2002, which included delegates from England, Scotland and Wales, and see no reason why this co-operative relationship should not continue.

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## Abbreviations

BVA	British Veterinary Association
CBD	Convention on Biological Diversity
CPD	Continued Professional Development
DEFRA	Department for Environment, Food and Rural Affairs
DETR	Department of the Environment, Transport and the Regions
DWCT	Durrell Wildlife Conservation Trust
IZVG	International Zoo Veterinary Group
RCVS	Royal College of Veterinary Surgeons
SoS	Secretary of State
SSSMZP	Secretary of State's Standards of Modern Zoo Practice
"The Department"	Department for Environment, Food and Rural Affairs
WCS	Wildlife Conservation Society
ZLA	Zoo Licensing Act
Zoo Fed	Zoological Federation of Great Britain and Ireland
ZSL	Zoological Society of London
ZSR	Zoo Standards Review Group

# 11. Appendices

## Appendix 1. Results of Context questionnaire

Questions:

1. Do you believe that zoos, safari parks and aquaria in England represent an opportunity to play a valuable role in our modern world?
2. as a real life experience of other species that share the planet, when housed appropriately?
3. as contributing to the conservation of biodiversity, especially endangered species?
4. as providing opportunities for behavioural and other non-invasive research?
5. as a suitable place for appropriate recreation ?
6. as an important opportunity to convey the need for conservation and sustainability?
7. as a resource for formal school education?
  
9. Do you believe that, by and large, zoos are making the most of the opportunities you have identified?

### Compiled results:

Q1		Q2		Q3		Q4		Q5		Q6		Q7		Q9	
Y		Y		Y		Y		Y		Y		Y			N
Y		Y		Y		Y		Y		Y		Y			DK
Y		Y		Y		Y		Y		Y		Y			N
Y		Y			N	Y		Y		Y		Y			N
Y		Y		Y		Y			N	Y		Y			N
Y		Y		Y		Y		Y		Y		Y			N
Y		Y			N	Y			N	Y		Y			N
Y		Y		Y			N		N	Y			N		DK
Y		Y		Y		Y		Y		Y			N		DK

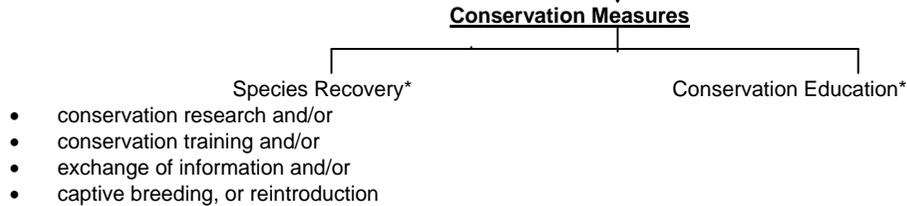
## Appendix 2. Chain Of Influence

Convention on Biodiversity (CBD) 1992  
**Article 9. Ex-situ Conservation**

- Ex-situ measures**
- (a) adopt measures for ex-situ conservation, preferably in-country
  - (b) establish facilities preferably in-country
  - (c) recovery, rehabilitation, preferably in-country, and reintroduction
  - (d) regulate and manage collection from the wild
  - (e) support ex-situ conservation preferably in-country

The intention for Ex-situ conservation is beyond doubt: Each contracting party shall *“Adopt measures for the recovery and rehabilitation of threatened species and for their reintroduction into their natural habitats under appropriate conditions.”*

Council of the European Union Directive 1999/22/EC  
**Article 3. Requirements applicable to Zoos**

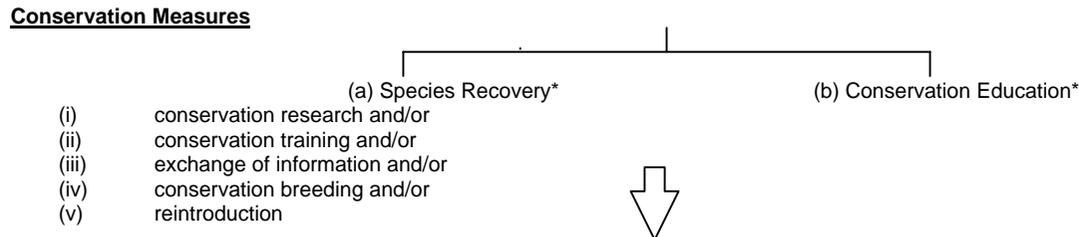


\*These headings are borrowed from CBD terminology and introduced to aid continuity

The EU Directive explicitly makes the connection: *“zoos throughout the Community (are to contribute) to the conservation of biodiversity in accordance with ... Article 9 of the Convention on Biological Diversity”.*

The Directive (Article 1) declares its Aim as the adoption of *“measures by Member States for the licensing and inspection of zoos in the Community, thereby strengthening the role of zoos in the conservation of biodiversity.”* So now the Zoo License and the Secretary of State’s Zoo Inspectors are explicitly implicated in the intent.

Zoo Licensing Act 1981 Including 2002 amendments.  
**1A Conservation measures for zoos**



The Zoo Act 1A further defines the Directive, separating reintroduction from captive breeding, and giving a numerical order to the five sub-measures, which are optional.

More significantly it maintains Conservation Education as a separate, obligatory requirement of the Act, sharing equal, non-optional status with Species Recovery





**Secretary of State's  
Inspection and  
Inspectors**

**Pre Inspection Audit**

	Conservation	Education	Research
Ex Situ		7.1 Plan and Policy	9.1 Coordination
6.3 Collection plan		7.2 Staff	9.2 Resources
6.4 Species management		7.3 Qualifications	9.3 Ethics
6.5 Studbooks		7.4 Facilities	9.4 Details
		7.5 Education levels	9.5 Grants
6.8 In Situ Resources		7.6 Local Authority	9.6 Publications
a.) Personnel		7.7 Networks	9.7 Links with Higher Education
b.) Financial		7.8 Consistency and effect	
c.) Training		7.9 Teaching aids	
d.) Other		7.10 Links with environment groups	
6.9 Fundraising		7.11 Exhibit labels	

The revised headings are now entrenched. The Audit suggests, in some detail, ways by which zoos may contribute towards in-situ conservation or in-country zoos. Unfortunately the damage, or at least the confusion, is now complete. Although there is no mention of conservation education in the audit, some Inspectors now judge that zoo labelling, that includes conservation information, meets the Conservation criterion.

More worrying still is a trend towards Conservation, Education and Research being seen as options. A one page briefing sheet for prospective Zoo Inspectors reads “... all zoos will have to satisfy conservation requirements before they are re-licensed. Zoos can meet these requirements through research, educational **or** breeding work (or a combination of these).”

If any doubt remains that there is inherent confusion in an understanding of the requirements, and therefore an area of potential inconsistency among Inspectors, a Consultation Paper released at the time of the European Directive reads as follows: “Zoos will be required to become involved more directly in the conservation of biodiversity, through educational projects of benefit to the conservation of species **and** by participating in measures such as breeding, or research(9).” Later the same paper advises: “There may be some zoos that are not currently undertaking the required measures, but these should be few as the Secretary of State’s Standards of Modern Zoo Practice already expects zoos to participate in conservation, education **or** research activities (13).”

A backward glance at the EU Directive or the Zoo Act, which require real contributions to the conservation of biodiversity *and* to conservation education, demonstrates the extent to which the Measures to be inspected, and the premise on which they are to be judged by the Inspectors, have strayed from their original intent. The implications for improving and maintaining standards and for motivating zoos to meet the challenge of biodiversity loss are serious. The Aim of the European Union Directive bears repeating: “The objectives of this Directive are to protect wild fauna and to conserve biodiversity by providing for the adoption of measures by Member States for the licensing and inspection of zoos in the Community, thereby strengthening the role of zoos in the conservation of biodiversity”, and, in the words of the CBD, “preferably in the country of origin”. Zoo Inspectors are the last link in the chain of influence that began with the Convention on Biodiversity, Article 9. It is vital that they have a clear and unambiguous understanding of its purpose and meaning before considering how to advise on its application.

## Appendix 3. Consultation questionnaires

### INVESTIGATION INTO THE NEED FOR ZOO INSPECTORS' PERFORMANCE APPRAISAL

## QUESTIONNAIRE – ZOO INSPECTORS

### Consistency

List 1 = 88% List 2 = 75%

Please indicate whether you are a list 1 (vet) or list 2 zoo inspector:

- Please indicate any specialised areas you specified on application to the List: %  
 General Collection **78%** General Birds **22%** Birds of Prey **25%** Waterfowl **17%**  
 Invertebrates **14%** Primates **22%** Aquaria **33%** Parrots **17%** Reptiles **25%**  
 Other: **3% (marine mammals)**
- How long have you been inspecting zoos under the Act?
- 0-4 years: **46%** 5-10 years: **11%** Over 10 years: **43%** Average length of service: **10 years**
- Approximately how many zoos do you inspect per year?  
 0-3: **67%** 4-6: **22%** 7+: **11%** Average number of inspections per inspector per year: **3**
- When conducting an inspection, do you always rigorously apply the Standards, and use the inspection form provided, or do you use any other inspection methods?  
 I use the Standards and the inspection form **94%** I use other methods **6%** (please outline): **combination of Standards and inspection form and own discretion.**  
*(14% of zoo inspectors did not answer this question, as they have not conducted an inspection yet).*
- Do you feel you have a clear understanding of the inspector's role? **Yes 100%**
- Would you say that you have a clear understanding of the EC Zoos Directive, the Zoo Licensing Act 1981 (as amended 2003) and the Secretary of State's Standards of Modern Zoo Practice? **Yes 100%**

- Please rate your competency to inspect and advise zoos on the following:

	Please rank, where 1 is little knowledge, and 5 is highly competent				
	1	2	3	4	5
Animal welfare				<b>28%</b>	<b>72%</b>
Animal management			<b>14%</b>	<b>42%</b>	<b>56%</b>
Conservation			<b>8%</b>	<b>42%</b>	<b>44%</b>
Education		<b>3%</b>	<b>36%</b>	<b>44%</b>	<b>17%</b>
Research			<b>23%</b>	<b>46%</b>	<b>31%</b>
Public safety		<b>3%</b>	<b>31%</b>	<b>33%</b>	<b>33%</b>
Records		<b>3%</b>	<b>8%</b>	<b>33%</b>	<b>56%</b>
Miscellaneous (insurance cover, toilet and disabled facilities, first aid etc)	<b>3%</b>	<b>25%</b>	<b>22%</b>	<b>36%</b>	<b>14%</b>
Associated legislation (electrical and fire safety, refuse disposal)	<b>6%</b>	<b>17%</b>	<b>49%</b>	<b>23%</b>	<b>6%</b>
CITES Legislation		<b>3%</b>	<b>41%</b>	<b>44%</b>	<b>12%</b>
Ethical review process		<b>3%</b>	<b>17%</b>	<b>46%</b>	<b>34%</b>

- In your experience of different inspection teams, are you aware of inconsistencies between the *general level* of knowledge between inspectors?

**Yes 56%**

Please give examples:

In your experience, are there any areas of the inspection process where inconsistency between inspectors tends to arise? (tick any that apply)

Provision of food and water **0%**

Provision of suitable environment **14%**

Provision of animal health care **19%** Provision of an opportunity to express normal behaviour **17%**

Provision of protection from fear and stress **6%** Conservation **31%** Education **28%**

Research **33%**

Public safety **31%** Records **22%** Miscellaneous (insurance, toilet facilities etc.) **14%**

Associated legislation (fire and electrical safety, refuse disposal) **19%** Ethical review process **36%**

Other: **Health and Safety. Adequate life support in aquaria.**



Other: Ability to work in team, ability to encourage good practice from operators, experience in zoos more important than paper qualifications, openmindedness.

20. How often do you think an appraisal system should be carried out?  
Annually 0% Every two years 25% 5 –yearly to coincide with the renewal of the list 61%  
Other: 14%
21. Who should review the performance appraisal results?  
DEFRA 56% A nominated panel of zoo inspectors 22% Zoos Forum 6% Independent organisation 3%  
Other: 14% (combination of the above: most including DEFRA)
22. Who should finance any appraisal scheme?  
DEFRA 92% Zoos 3% Local authorities 3% Other: 3%
23. What benefits would be achieved from a performance appraisal scheme?
- Guranteed standard of consistency (50%)
  - Correction of any identified problem/removal of substandard inspectors (11%)
  - Credibility (22%)
  - Raised standards in zoos (11%)
  - Transparency/public accountability (8%)
  - Competence of inspectors (8%)
  - Better knowledge of legislation (6%)
  - Demonstrate that an audit system is in place (6%)
  - None (14%)
24. Can you see any drawbacks to the implementation of an appraisal scheme?
- Increased bureaucracy (28%)
  - Expense (28%)
  - Deterrent for new inspectors (11%)
  - Impartiality of assessors difficult to maintain (14%)
  - Variation between assessors must be accounted for (8%)
  - Refusal of zoo inspectors to co-operate (3%)
  - No benefit to be gained (6%)
  - None (14%)

## QUESTIONNAIRE – LOCAL AUTHORITIES

1. How many zoos do you have licensed in your area?  
Total number in 38 authorities: 65 zoos, Average approx. 2 per authority.  
  
How many of each type of zoo do you have in your area?  
General mixed collection: small 14 medium to large 15 Aquarium 9 Bird park 17  
Farm park 3  
Invertebrate collection 4 Reptile/amphibian collection 3
2. On approximately how many zoo inspections have you accompanied a Secretary of State appointed zoo inspector? 0 8% 1-2 38% 3-5 30% 6+ 24%
3. In your experience of zoo inspections, have appointed zoo inspectors always conducted their inspections competently and professionally?  
Yes 87% No 13%  
If not, please explain: Only 1 comment: all inspectors very competent in field but those with specialist interest or knowledge concentrate on their strengths to the exclusion of everything else.
4. Would you say that you have a clear understanding of the EC Zoos Directive, the Zoo Licensing Act 1981 (as amended 2003) and the Secretary of State's Standards of Modern Zoo Practice?  
Yes 74% No 26% Would like further guidance on: Zoo Licensing Act 13%  
Standards of Zoo Practice 21%  
Conservation measures 45%
5. Have you experienced any problems with the zoo inspection process?  
No  Yes 21% If yes, please expand:  
Administrative problems; no clear guidance on procedure for new inspectors to refer to; revised Standards now overlap H&S legislation – lengthens inspection if this is assessed twice (by LA and ZI).
6. Have you ever received a formal complaint from a zoo about any part of a zoo inspection?  
No 95% Yes 5%  
If yes, what was the nature of the complaint? Inspector failed to thoroughly inspect accommodation, environmental enrichment, diet, drugs, treatments and capture equipment.
7. Have you ever received a complaint about the conduct and outcome of a zoo inspection from anyone else?  
No 92% Yes 8% If yes, what was the nature of the complaint?  
Outcome was not to their satisfaction.
8. Have you ever overruled advice given by a zoo inspector?  
No 100% Yes 0% If yes, please give details:

9. Do you think that the zoo inspectors you have experience of require further training on the inspection process?  
 No **52%** Yes **24%** Don't know **24%**  
 If yes, in which areas:  
 Provision of food and water **0%** Provision of suitable environment **3%**  
 Provision of animal health care **3%** Provision of an opportunity to express normal behaviour **0%**  
 Provision of protection from fear and stress **0%** Conservation **8%** Education **8%**  
 Research **8%**  
 Public safety **5%** Record keeping in zoos **0%** Miscellaneous (insurance, toilet facilities etc.) **5%** Associated legislation (fire and electrical safety, refuse disposal and CITES) **5%** Ethical review process **0%**  
 Other: **Legal requirements under ZLA; Amendments to ZLA; Administration and conduct of inspection; consistency.**
10. If you answered *Yes* to Question 9 above, do you think this training should be compulsory?  
 Yes **24%** No **76%**
11. Do you think the performance of zoo inspectors **needs** to be appraised?  
 Yes **73%** No **7%** Don't know **7%**
12. What benefits do you think an appraisal system for zoo inspectors would achieve?  
  - Consistency (76%)
  - Basic core competence (3%)
  - Confidence in system (5%)
  - Transparency (5%)
  - Maintain current knowledge (11%)
  - Prevents bad habits forming (3%)
  - None (5%)
13. Can you see any drawbacks to an appraisal system for zoo inspectors? Please explain:  
  - Bureaucracy (5%)
  - Who would be qualified to appraise? (8%)
  - May deter inspectors (21%)
  - Expense (5%)
  - Time (11%)
  - None (32%)
14. If an appraisal scheme for zoo inspectors were to be introduced, which of the following appraisal methods do you think would be reasonable to use? (please tick **one** only)
- 8%** self-certification by the zoo inspector of his/her competence/continued professional development  
**24%** appraisal of zoo inspector's performance by questionnaire, completed by zoos and/or local authorities  
**0%** by periodic examination  
**26%** observation at inspection by an external assessor  
**13%** compulsory training, with assessment of progress through the training period  
**5%** no performance appraisal, but an investigation protocol should an inspector's conduct be questioned  
**21%** another approach not listed here –please specify:

15. Who should finance any appraisal scheme?

DEFRA 100%   Zoos 0%   Local Authority 0%

16. Would you be prepared to conduct an appraisal of your appointed zoo inspector(s)?

Yes 17%                      No 13%                      Not without further training 69%

17. Please use this space to make any other comments, either on the possibility of an appraisal scheme for zoo inspectors, or on the inspection process in general:

- Inspectors need to feel part of a team – training is a vital part of this process. Annual contact should be made with LAs – too much can happen in 3 years.
- CPD and appraisals are two separate issues – CPD is about maintaining professional expertise and knowledge. Zoo inspectors regarded as “expert witnesses” and some form of CPD could support their status. The time and effort to set up some form of appraisal framework and programme would not improve the licensing process.
- The team approach of zoo inspectors will ensure a constant approach.
- Appraisors should attend third party inspections, not their own, to prevent bias. The appraisal of the LA part of the process could also then be assessed for DEFRA.
- Inspection is a team effort drawing on skills and experience of each member – this could be undone by appraisal of each other.

## QUESTIONNAIRE – ZOOS

1. Position: e.g. Curator, Director Director manager curator owner etc
2. Please indicate what sort of zoo your collection is:  
 General mixed collection: small **33%** medium to large **25%**  
 Aquarium **15%** Bird park **21%** Farm park **3%**  
 Invertebrate collection **1%** Reptile/amphibian collection **0%** Other: **Seal sanctuary 1%**
3. Are you a zoo inspector? No **89%** Yes **8%** If yes, please try to fill in this questionnaire from the point of view of the zoo. You will receive a separate questionnaire for your views as a zoo inspector.
4. On approximately how many zoo inspections have you accompanied a Secretary of State appointed zoo inspector? (tick one) 0 **1%** 1-2 **31%** 3-5 **44%** 6+ **24%**
5. Would you say that you have a clear understanding of the EC Zoos Directive, the Zoo Licensing Act 1981 (as amended 2003) and the Secretary of State's Standards of Modern Zoo Practice?  
 Yes **88%** No **13%**
6. Is it always the same zoo inspector(s) that inspect your zoo at full and periodical inspections?  
 Yes **23%** No **44%** Usually **24%** Don't know **10%**
7. Do you think it is a good idea to try to use the same inspectors for each inspection?  
 Yes **56%** No **24%** No preference **20%**
8. In your opinion, do you think the time zoo inspectors take to conduct a full or periodical inspection of your zoo is:  
 About right **89%** Too short **3%** Too long **8%**
9. In your experience of zoo inspections, have zoo inspectors always demonstrated a high level of knowledge and experience and understanding about the operation and management of a modern zoo?  
 Yes **81%** No **19%** If no, please provide further information:
- Inspectors lack sufficient knowledge about specialist collections/species/aquaria (8%)
  - Knowledge is out of date (1%)
  - Inspectors are not sympathetic to pressures of operating zoo (4%)
  - Inconsistent knowledge (4%)
  - Insufficient knowledge of Health & Safety legislation (1%)
10. Have inspectors always demonstrated a good knowledge of legislation and the Standards?  
 Yes **90%** No **10%**
11. In your experience of zoo inspections, have appointed zoo inspectors always conducted their inspections competently and professionally?  
 Yes **85%** No **15%** If not, please indicate why.
12. From your experience of zoo inspections in your zoo, how valuable *to you* do you find the inspection process?

Please tick, where 1 is little value, and 5 is extremely valuable

1	2	3	4	5
<b>6%</b>	<b>11%</b>	<b>22%</b>	<b>31%</b>	<b>31%</b>

13. In your experience, has your zoo ever rejected a zoo inspector appointed by DEFRA, and requested a substitution?  
 No **88%** Yes **12%** If yes, please explain why: **conflict of interest; neither appointed inspector had visited the collection in question before, and the zoo felt that continuity was essential.**
14. Do you think that zoo inspectors require further training in any of the following areas of the inspection process? (tick any that apply)  
 No further training **43%**  
 Provision of food and water **0%** Provision of suitable environment **15%**  
 Provision of animal health care **3%** Provision of an opportunity to express normal behaviour **6%**  
 Provision of protection from fear and stress **6%** Conservation **13%** Education **10%**  
 Research **7%**  
 Public safety **10%** Record keeping in zoos **7%** Miscellaneous (insurance, toilet facilities etc.) **11%**  
 Associated legislation (fire and electrical safety, refuse disposal, CITES) **15%** Ethical review process **17%**  
 Other:
- Specialist collection training (6%)
  - Knowledge of all kinds of animals (1%)
  - Communication techniques (1%)
  - Interpretation of Standards (4%)
  - Suitability of zoos for exotics (1%)
  - Assessment of financial restraints on zoos (1%)
15. Do you think that there is a **need** to introduce a performance appraisal system for zoo inspectors?  
 Yes **69%** No **31%**
16. Do you think there is a need for **compulsory training** of zoo inspectors?  
 Yes **71%** No **15%** Not sure **14%**
17. What benefits do you think an appraisal system for zoo inspectors would achieve?
- Improved quality of zoos (7%)
  - Consistency (64%)
  - Better understanding of role/updated knowledge (11%)
  - Removal of poor performers (6%)
  - Accountability/credibility (4%)
  - None (7%)
18. Can you see any drawbacks to an appraisal system for zoo inspectors? Please explain:
- Time (8%)
  - Expense (to zoos) (11%)
  - Bureaucracy (8%)
  - Repetitive (1%)
  - May deter inspectors from applying (6%)
  - Bias/lack of knowledge of appraisors (8%)
  - May affect the way in which inspections are carried out (too zealous/cautious) (7%)
  - Abuse of system (1%)

- Not necessary (6%)
- None (31%)

19. If an appraisal scheme of zoo inspectors were to be introduced, which of the following appraisal methods do you think would be reasonable to use?

(please tick **one** only)

6% self-certification by the zoo inspector of his/her competence/continued professional development

27% appraisal of zoo inspector's performance by questionnaire, completed by zoos and/or local authorities

10% by periodic examination

27% observation at inspection by an external assessor

7% compulsory training, with assessment of progress through the training period

9% no performance appraisal, but an investigation protocol should an inspector's conduct be questioned

14% another approach not listed here –please specify:

Combination of the above:

Self certification (3%)

Appraisal by questionnaire (9%)

Periodic examination (3%)

Observation by external assessor (6%)

Compulsory training (9%)

Investigation protocol (1%)

20. Would you be prepared to conduct an appraisal of your zoo inspector(s)?

Yes **44%**      No **30%**      Not without further training **27%**

Please use this remaining space to make any further relevant comments:

- More specialist knowledge required.
- Zoo inspectors remit needs to be clarified.
- Zoo inspectors are always professional.
- Proper training and assessment is vital.
- Zoo inspectors need to be flexible in their approach.
- Paperwork for zoos needs to be reduced.
- Greater training on variation between different sizes and types of zoos is required.
- Continuity of zoo inspector returning to same collection is a good idea.
- Inspection fees may be too high for small collections.
- It is too easy to get a licence.
- Impartiality of inspectors is very important.
- Rotation of inspectors round zoos gives a new viewpoint.
- LA inspectors are not always knowledgeable.
- Inspections should not be announced in advance.



### THE JUDGEMENTS MADE ABOUT THE SCHOOL

	Strongly Agree	Tend to Agree	Neither Agree nor Disagree	Tend to Disagree	Strongly Disagree
10 Judgements about the school and its main strengths and weaknesses are fair and accurate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11 The key issues do <u>not</u> provide a sound basis for future action	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### EVIDENCE GATHERING

	Strongly Agree	Tend to Agree	Neither Agree nor Disagree	Tend to Disagree	Strongly Disagree
12 The pre-inspection commentary did <u>not</u> fairly reflect the most important issues for the school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13 The team gathered a sufficient range and quantity of evidence to support the judgements made	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### COMMUNICATION

	Strongly Agree	Tend to Agree	Neither Agree nor Disagree	Tend to Disagree	Strongly Disagree
14 The oral communication of inspection findings was clear and helpful	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15 The report is fair and accurate and gives a clear and convincing picture of the school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16 There was <u>not</u> a good match between the oral feedback and the written report	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17 The summary report is <u>not</u> an accurate reflection of the principal findings in the main report	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### THE MANAGEMENT OF THE INSPECTION

	Strongly Agree	Tend to Agree	Neither Agree nor Disagree	Tend to Disagree	Strongly Disagree
18 The demands placed on you for information and documentation were reasonable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19 You were <u>unable</u> to contribute to the shape of the inspection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20 Inspectors were thoroughly prepared, understood the context of the school and age range of the pupils concerned	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### THE EFFECTS OF INSPECTION

21 Which of the following statements best describes how you feel about the effects of inspection?

The benefits from inspection outweigh the negative effects:

1

The benefits and negative effects are equally balanced:

2

The negative effects outweigh the benefits:

3

Please attach a separate sheet of paper if you have any further comments to make on the inspection which you believe are relevant, either positive or negative.

NAME: \_\_\_\_\_

DATE: \_\_\_\_\_

Thank you very much for taking time to fill in this questionnaire.

If you have any questions, please contact Susan Wilson on 020 7421 8608 or by e-mail at [swilson@ofsted.gov.uk](mailto:swilson@ofsted.gov.uk)