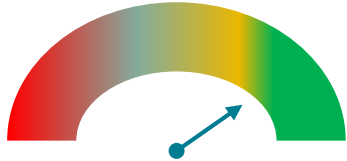


IGR and Greater Independence

Overall Programme Status: **GREEN**



Whilst CILEx/CRL are well-positioned to comply with the new IGR, there is a significant, but we believe, realistic, amount of work that needs to be undertaken to achieve and evidence compliance to the LSB. We have developed an IGR compliance action plan which will guide us through the next, critical stage of the project to ensure that IGR compliance is achieved in advance of the deadline. The LSB has made it clear that they are looking to CRL/CILEx to set the standard on IGR compliance and to be held up as a positive examples to others. The Greater Independence work has slowed to allow for greater focus on the time-critical IGR work, however, these two project streams are closely linked and undertaking a robust approach to IGR implementation is also facilitating a move towards greater regulatory independence, as well as helping us develop a better understanding of what greater independence could and should look like in the future.

Status Dashboard



IGR

Overall, good progress. All activities are on track and are being recorded via the Action Plan and monitored via regular Working Group communications and meetings. Although CRL/CILEx are on-track to comply with the IGR, evidencing this compliance is arguably more involved than first thought.



INDEPENDENCE

Research and analysis is on-going however, IGR implementation is currently taking precedence. We recommend that the Greater Independence report follows after IGR compliance is achieved, to manage risk but also because our thinking around the subject is evolving as the project progresses.

RISK MANAGEMENT

To monitor existing or identify new risks:

- Waiver update – no identified requirement
- Potential risk to note – overloading of key staff members (juggling projects and BAU)
- We will continue to horizon-scan for risks

Key:



On track



Needs support to get back on track



Needs significant support to get back on track

Project Highlights: Key deliverables

Past reporting period **Q4 2019/Q1 2020**

- Produced updates for both Boards
- Attended Working Group meetings
- We held more face-to-face meetings with CILEx/CRL employees to discuss IGR implementation and to discuss Greater Independence measures
- We produced an IGR action table, based on LSB guidance, focusing on what has to be done in order to demonstrate compliance
- We developed a number of templates to guide thinking and direct input from CRL/CILEx to demonstrate IGR compliance
- Carried out research in to regulatory independence in other sectors and industries
- Carried out research in to ways to benchmark and measure regulatory independence
- Discussed IGR training requirements with Director of HR and members of the Working Group are now developing training content
- We met with Kingsley Napley to discuss the re-draft of the Protocols which now neatly complement the Working Group efforts to evidence IGR compliance.
- Letter to the LSB advising we believe we will be compliant for 23 July deadline without a need for any LSB waivers

Next reporting period **Q2 2020**

- Produce updates for both Boards
- Finalise IGR implementation work and prepare to present certificate of compliance at the next CRL Board in May
- Finalise new protocols
- Finalise contract for support services
- NEDs Steering Group meeting
- Meeting with LSB to check intended changes meet their expectations
- Continue to progress Greater Independence work – but IGR compliance remains the priority and must not be jeopardised.

Exception reporting: Issues mitigation

IGR

- We have created an Action Plan (including task owners and work status) which relates back to each of the IGR and what needs to be done in order to evidence compliance in each case. The Protocols have also been re-drafted to follow this model so comparison between documents is simpler and we think that this approach could be the sort of template approach that the LSB would appreciate and could even recommend to others.
- Overloading key staff risk: Mitigated by prioritising IGR for July deadline and identifying support staff who have joined the Working Group

Greater Independence

- As IGR compliance should be complete by May, this still leaves time within our contract to produce a greater independence report and recommendations looking at the potential next steps for CILEx and CRL as they move towards even greater regulatory independence. It should be noted too that within the Action Plan we have been capturing examples of actions that CRL/CILEx could take in order to move towards Greater Independence which may make sense to tackle alongside, or soon after, IGR implementation