

ACTION PLAN ADDRESSING THE FINDINGS ARISING FROM THE LSB'S WELL-LED REVIEWS

Theme	Action	Lead	Status/ Timetable	Review
Governance				
1) Meaningful consideration of the relevant regulatory objectives when decisions are taken.	<p>SMT to ensure coversheets for discussion and decision papers submitted to the Board consider each regulatory objective as part of the Impact Assessment</p> <p>Amend the impact assessment on the Board papers template so all the regulatory objectives are fully considered and any identified risks to the objectives are mitigated.</p> <p>Ensure there is a full audit trail for Board decisions in Board minutes</p> <p>Annual business plans will include an analysis showing how the priorities set by the Board support the regulatory objectives and mitigate risks to those objectives.</p> <p>Review the risk register to ensure it aligns with the regulatory objectives and captures the key risks to those objectives and the evidence bearing on likelihood and impact of those risks</p> <p>Independent governance review consider sample audit Board papers to assure regulatory objectives & consumer interests are properly considered</p>	<p>SMT</p> <p>SMT</p> <p>DoG</p> <p>DoG/VP</p> <p>SD/SMT</p> <p>DoG</p>	<p>November 21</p> <p>November 21</p> <p>November 21</p> <p>February 22</p> <p>February 22</p> <p>October 22</p>	BSB

<p>2) Ensuring the interests of the public and consumers are properly considered, and the views of the profession do not outweigh this when taking key decisions.</p>	<p>Ensure active use of the impact assessments attached to Board papers. Where the impact assessment indicates the potential for a negative impact on the regulatory objectives, or a positive impact on the profession is indicated against a negative or neutral impact on the regulatory objectives, a comprehensive discussion of the issue should be minuted.</p>	SMT	November 21	BSB
<p>3) Ensuring the decision-making process for major decisions follows CRL's procedures.</p>	<p>The independent governance review will be asked to audit Board decisions, chosen at random, to ensure decision-making procedures are being followed.</p>	DoG	October 22	BSB
<p>4) Ensuring the Board is provided with sufficient information to support key regulatory decisions.</p>	<p>The Executive will ensure that the Board is provided with all the information and analysis needed to support effective decision-making, including, where relevant, a costed analysis of options and an analysis of risks. This will identify 'significant' decisions in terms of, for example, novelty, contentiousness, or repercussion, and set out appropriate governance arrangements.</p>	SMT	February 22	BSB
<p>5) Ensure the governance architecture is fit for purpose, accessible and up-to-date.</p>	<p>The 2022 external governance review will assess the governance structure and make recommendations in light of the LSB's report.</p> <p>The key governance documents continue to be reviewed annually by CRL's Board.</p>	DoG DoG	October 22 May 22	BSB
<p>6) Ensuring that a complete and comprehensive set of governance arrangements is in place to ensure effective regulation, including governance procedures, processes for decision-making, scheme of delegation and publication policy</p>	<p>CRL has well documented governance arrangements and key governance documents are published on the website. These include: the Board Code of Conduct, Scheme of Reservation and Delegation, Transparency Policy, Board, committee and panel periods of appointments; and CRL's Standing Orders which include the arrangements for managing potential conflicts of interest, and the recruitment of the CEO and appointments to boards and committees. The annual review of the governance framework will be considered by the Board at its meeting in May 2022 and in addition the independent governance review will be asked to provide assurance on CRL's governance arrangements, including in relation to decision-making processes as set out at Themes 3 and 5 above.</p> <p>The Transparency Policy is due for review and will be considered by the Board at its meeting in May 2022. Ensuring that the policy is consistently applied remains a priority and consideration will be given to a more rigorous approach to the publication of Board papers and the reasons for withholding publication. Consideration will also be given to ensuring that decisions in relation to non-</p>	DoG DoG	October 22 May 2022	FO

	confidential items made by the Board outside of formal Board meetings are reflected in the minutes of the next public Board meeting and published on the website.			
7) Ensuring that learning and engagement informs regulatory work	While we are able to demonstrate strong evidence of stakeholder engagement and a broad range of engagement activities including, hosting discussions and commissioning research, we will strengthen our approach as per Themes 9 and 13 below and also ensure that horizon scanning and research about market issues are also considered as a means to improve our regulatory impact.	SMT	October 22	FO
The Board				
8) The Board only takes key decisions with appropriate supporting material.	See action for Theme 4 above			BSB
9) The Board pays sufficient regard to the impact on the public, including consumers when making decisions and does not disproportionately focus on the impact of its work on the Profession.	<p>In addition to the Impact Assessment (see above) the Board papers will set out, where relevant, the arrangements for engaging consumer representatives and record the views of consumer representatives and other relevant stakeholders where decisions are sought from the Board.</p> <p>In assessing the performance of CRL's communications and engagement strategy, the Board and SMT will consider the diversity, as well as the number, of stakeholders responding to consultations.</p>	<p>SMT</p> <p>SMT</p>	<p>February 22</p> <p>October 22</p>	BSB

<p>10) The Board takes responsibility for the organisation's performance within the statutory framework of regulatory objectives and performance obligations within which it operates.</p>	<p>Add to Board self-assessment questions: "The Board takes responsibility for the organisation's performance within the statutory framework of regulatory objectives and performance obligations within which it operates."</p> <p>The Executive is held to account through monitoring of progress against strategy using the business plan, which is reviewed at each meeting. Updates are provided by the Executive to the Board and there is effective challenge by the Board to the Executive. In addition, papers on key areas of policy outside the strategic objectives are provided at each meeting and there is effective discussion and challenge. The Chair meets with the CEO weekly and with other Executive members monthly. Each Board member has a specific portfolio responsibilities and meetings are held with the Executive prior to each Board meeting.</p>	Board	November 21	BSB
<p>11) The Board develops its own policies for staff and board and committee recruitment.</p>	<p>The Board's Standing Orders include the arrangements for the recruitment of the CEO and appointments to boards and committees. Additional detail is also contained in the Board, committee and panel periods of appointments policy. CRL conducts open recruitment and appointment campaigns for all vacancies.</p> <p>A review of HR policies for CRL adapted from CILEX policies is currently underway and will be captured within the shared service project.</p>	DoG	May 2022	FO
<p>The Executive</p>				
<p>12) The Executive consistently provides the Board with the information it needs to take effective decisions.</p>	<p>See action for Themes 4 & 10 above.</p>	Board/ SMT	November 21 onwards	BSB
<p>13) The stakeholder engagement strategy builds partnerships with its target organisations relevant to its PLE activities and the transparency standards project.</p>	<p>The Communications & Engagement Strategy focuses on ensuring effective communication and engagement with stakeholders, identified through the strategy implementation plan, which is agreed by the Board. For PLE, the communications and engagement will be built from the consumer strategic objective and priorities identified for 2022.</p>	JGB	July 22	BSB

<p>14) Ensuring that CRL understands the resources it needs to perform its regulatory duties and that it manages its finances accordingly.</p>	<p>This was flagged during CRL's annual assessment review and clear direction was given regarding scope for improvement in terms of how CRL articulates the work we are doing and why, and how we use our resources to deliver against deadlines. We will be subject to a further assessment against this outcome in June 2022.</p> <p>We have already changed the organisational structure which will allow us to be more agile in responding to business need and allocating resources more effectively across the organisation. A number of other actions have also taken place:</p> <ul style="list-style-type: none"> • The Chief Operating Officer and the Director of Operations have taken up their new roles. • An Interim Director of Governance has been appointed. • The Director of Governance's role has been amended so that enforcement has moved to the Director of Operations and the new appointment will have responsibility for legal and policy as well as governance. A national recruitment campaign is underway to appoint to the position. • The campaign to appoint to the new role of Manager of Policy and Stakeholder Engagement has started. <p>In light of the FO review we will also ensure that we are able to demonstrate that CRL provides value for money regulation.</p>	<p>SMT</p>	<p>June 2022</p>	<p>FO</p>
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