



2022 ENVIRONMENTAL BODY (EB) SATISFACTION SURVEY | ACTION PLAN

The 2022 EB Satisfaction Survey continues to show strong overall satisfaction for Entrust's regulatory services. Overall satisfaction recorded in the 2022 EB Satisfaction Survey was **76 per cent (2021: 85 per cent)**, which was a nine per cent decrease on the 2021 satisfaction score and seven percentage points below the score recorded for 2020.

All three core satisfaction measures remain high at:

- 82 per cent agree that they 'understand the role that Entrust undertakes as Regulator of the LCF' (2021: 92 per cent);
- 80 per cent agree that 'Entrust staff are very professional when dealing with me and my EB' (2021: 84 per cent); and
- 66 per cent agree that 'overall Entrust provides high quality services' (2021: 79 per cent).

Looking back over 2021/0222, it should be noted that Entrust transitioned out of a prolonged period of 'lighter touch' regulation, which was brought about in response to the pandemic (for example, supporting EBs in managing projects during this period). In moving out of the pandemic, we therefore moved back to a more robust, and more challenging regulatory approach. Naturally, this transition raised several challenges, which, taken together, we believe negatively affected EB's satisfaction scores.

As such, the Action Plan developed in response to these scores will be used to help improve our services and performance, ensuring that our activities as a regulator continue to be in alignment with what stakeholders expect of us and that EB satisfaction scores are, where possible, improved going forwards.

ACTION POINT	ISSUES IDENTIFIED & ACTION TAKEN	METRIC	RESPONSIBLE OFFICER(S)	TARGET DATE
1	<p>REGISTRATION PROCESS:</p> <p>The bottom line is that a robust registration process, as opposed to a lighter framework during the Pandemic, is believed to have resulted in an overall decline in EB satisfaction the due to its added complexity and demands on time and effort. Moreover, the lack of adequate stakeholder communication when we returned to pre-Pandemic processes is believed to have caused some level of confusion and frustration with EBs.</p> <p>To help address these issues going forwards, we should: (1) strive to provide as much clarity as possible on the rationale behind further changes, minimising the potential for confusion and frustration among applicants who might be unclear about why we are taking certain measures. More than that, though, we must: (2) be consistent in communicating these changes in an understandable and timely manner; ensuring that EBs / Project Applicants know and understand what is expected of them.</p> <p>In addition, we should: (3) strive to be more proactive and resourceful when it comes to offering assistance to EBs who are experiencing difficulty in dealing with added requirements. This might, for example, involve providing specialised resources or tools that could potentially help simplify the process for EBs, such as: revising online guidance materials; producing bespoke FAQs that address common problems in an easy-to-understand manner; exploring the use of 3rd Party Software to allow applicants to ‘sense-check’ applications prior to submission, as well as triaging support where appropriate; revising the layout of the website to help direct applicants / EBs to the right information quickly and effectively.</p>	<ul style="list-style-type: none"> • Regular meetings between Communications & Policy & Reg. • Ensure updates to website and guidance materials reflect changes to the Registration Process. • Write and implement new policy - News briefing plan for returning to normal service after a period of exceptional circumstances. • Ensure all proposed changes are clearly communicated by news items, ADEB meetings and e-Communications 	<ul style="list-style-type: none"> • Policy and Regulations Manager (PRM) • Chief Operating Officer (COO) • Communications Manager (CoM) 	Ongoing

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2	<p>COMPLIANCE REVIEW PROCESS:</p> <p>We understand how difficult it can be for EBs who are not expecting added levels of scrutiny or challenge in the compliance and assurance process. As such, we are working hard to equip our team with the tools and resources needed to provide EBs with full transparency over the process, so that they can better understand what is being asked of them and have clear explanations about why any changes are happening in the first place.</p> <p>Generally speaking, we believe that with a focus on: (1) open communication; (2) understanding EB needs and providing them with tailored support throughout the compliance and assurance process, and (3) working hard to improve transparency over the end-to-end process (e.g. making EBs more aware of our Breach Management Framework and how this relates to compliance inspections) we can make the wider compliance and assurance process as streamlined and efficient as possible. This will help us catch any issues before they evolve into more serious problems and reduce the potential for confusion and frustration among certain EBs, and the pressure this can have on EB satisfaction scores.</p>	<ul style="list-style-type: none"> • Regular meetings between Comms. Compliance, P&R & Stakeholders • Ensure updates to website and guidance materials reflect changes to the compliance & assurance process. • Continue with the current procedure to follow up on Satisfactory and below Satisfaction Scores and to consider EB feedback. • Continue to coach to compliance through our reviews and publicise examples of common non-compliance issues and advice on how to avoid breaches 	<ul style="list-style-type: none"> • Compliance Manager (CM) • COO • CoM 	Ongoing

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3	<p>PROJECT SITE VISITS (PSVs):</p> <p>By taking a thoughtful and collaborative approach, collecting and taking on board in-depth feedback from a wider range of EBs, we have developed with an action plan that will: (1) ensure that PSV reports are submitted to a high standard going forwards, and; (2) address historic concerns that EBs have had over the wider reporting process.</p> <p>These steps have been laid out in the following document: <u>“October 2022: ADEB PSV Action Plan,”</u> which was developed following the most recent ADEB meeting. However, the key steps we have committed to taking have also been summarised below.</p> <p>First, we have mandated that all relevant EBs receive a copy of the PSV reports once completed, ensuring that EBs receive full transparency over the end-to-end process going forwards. Second, to inform EBs of the date and time of PSVs so that they can support Entrust in carrying out its regulatory duties and liaising with the various projects. Third, to assess and consider where it is practical to combine PSVs with EB visits, so as to minimise the administration burden on EBs. Fourth, to clarify Entrust’s Breach Management Guidance, including possible remedial actions, to provide a “joined-up” approach over the end-to-end process. And finally, to provide EBs with training on Due Diligence checks that should be carried out on Project Applicants, to mitigate the risk of non-compliant projects being supported by EBs in the future.</p>	<ul style="list-style-type: none"> • Distribute copies of PSV reports to EBs • Inform EBs of PSVs ahead of time. • Combine PSVs with EB visits where possible. • Clarify Breach Management Guidance where appropriate. • Provide EBs with ‘due diligence’ training with regards to Project Applications. 	<ul style="list-style-type: none"> • CM • COO • CoM 	Ongoing

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5	<p>STAFF TRAINING & DEVELOPMENT:</p> <p>While we recognise that Entrust has been through a transition period over the last twelve months—with several staff-members leaving the company—we have, in recent months, filled all outstanding staff vacancies and now find ourselves in a position to move forward with a complete team. Moreover, with the addition of fresh skills and experience to the company, from a wide range of backgrounds, we have a great opportunity to expand our capabilities and deliver even better results for stakeholders. For this reason, it’s important that we focus on training and development over the next twelve months.</p> <p>This being the case, we will focus on two staff-related areas over the next several months: (1) Training and Development, and; (2) cultivating a more ‘joined up approach’ between the different teams in the company. This will include strengthening internal systems and processes; creating a more joined-up approach between different business functions; and offering staff regular opportunities to develop both professionally and personally. One such example that has already been discussed at a recent Management Meeting will be to invite all staff to attend at least one PSV over the course of the next year, giving everyone a frontline perspective on the work that we do, as well as encouraging them to build stronger networks with each other.</p>	<ul style="list-style-type: none"> • Invite all staff to attend PSV within one year. • Regular Communications Bulletin to #AllStaff. • Collective Staff training plan 	<ul style="list-style-type: none"> • CM • COO • CoM 	Ongoing

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6	<p>STAKEHOLDER COMMUNICATIONS:</p> <p>We believe a lack of clear and transparent stakeholder communication, with regards to changes in our regulatory approach during 2021/2022, had, on occasion, resulted in a disconnect between Entrust and our stakeholders. When EBs feel that their concerns are not being listened to or addressed, they may begin to feel frustrated and unsatisfied, which we believe has been reflected in the EB satisfaction survey.</p> <p>As a result, we are currently developing several areas for improvement which will ultimately be reflected in the Communications Strategy Report in March 2023. In principle, however, we must: (1) communicate any potential changes with EBs in advance and provide them with clear explanations regarding their purpose and benefits. This can be done through various channels, such as surveys, phone calls, newsletters, updates to the website, social media and so on. In addition, we should: (2) be proactive in providing assistance to EBs who find themselves struggling with any new requirements, or processes introduced as part of this transition period. This can be achieved through regular Communications meetings with Policy & Registrations / Compliance, which will, in turn, allow us to identify specific requirements for further communications input at the outset and address these issues before they become more serious concerns. And finally, we should: (3) ensure that online guidance materials—a major information vector for EBs—are updated in line with change stakeholder expectations and requirements. This will likely involve materially redesigning and updating the website, alongside associated content and website layout.</p>	<ul style="list-style-type: none"> • Scope Web Development update with various suppliers. • Deliver beta-test of 3rd party software. • Rewrite Breach Management Guidance • Work with the PRMr to rewrite all remaining guidance materials and tie into web dev. • Develop Entrust digital footprint on LinkedIn & Twitter. • Regular meetings with P&R & Compliance to ensure “joined-up” working approach. • Attend INF Form & ADEB meetings 	<ul style="list-style-type: none"> • CM • COO • CoM • PRM 	Ongoing