



ENTRUST Regulator Standards (ERS)

Self–assessment review for the financial year 2021/2022

June 2022

Introduction

The ENTRUST Regulator Standards (ERS) consist of 21 standards spread across five areas encompassing the regulatory work undertaken throughout ENTRUST whilst delivering our statutory duty to provide HM Revenue & Customs (HMRC) with independent assurance that Landfill Communities Fund (LCF) monies are spent in compliance with the Landfill Tax Regulations (1996) (Regulations).

The ERS reflect the Government's Regulators' Code which was published in April 2014 (<https://www.gov.uk/government/publications/regulators-code>). The Regulators' Code provides a clear, flexible and principles-based framework for how regulators should engage with those they regulate. The standards were reviewed and updated in 2021.

This report provides a summary of our self-assessment of our performance against the updated ERS for 2021/2022. Each standard is listed below with evidence as to how ENTRUST has met the standard in 2021/2022.

1. Our duties and requirements

1.1 **We carry out our duties as the approved regulator for the Landfill Communities Fund (LCF) in accordance with the Terms of Approval (TOA)... *in order that...* We maintain compliance with HMRC's requirements and provide HMRC with independent assurance that LCF funds are spent in compliance with the Regulations.**

When carrying out compliance reviews, we ensure that the contents of the TOA are recognised, aligning any developments, or changes to our processes with our duties as set out in the TOA.

In October 2021, we identified during an internal review of our enrolment process, that ENTRUST Online (EOL) required updating to remove elements of data requested from individuals as part of our enrolment process. This change was implemented to better reflect the scope of our regulatory assurance work as set out by the TOA. Also, the TOA was incorporated into the ERS in the 2021 review to ensure that it remained central to our assurance work.

1.2 **We consult Environmental Bodies (EBs) and other relevant stakeholders regarding any potential changes to the Regulations, guidance or requirements... *in order that...* Stakeholder feedback has a central role in the development of proposals for change to the Regulations, ENTRUST's guidance, or our operational model.**

We continue to consult with Stakeholders on any changes to how the LCF is regulated and any changes to our training and guidance provision. In this reporting period we concluded one formal consultation on ENTRUST's training and guidance provision. The findings of the consultation were published in April 2022 and the recommendations, if not already actioned, will be implemented in 2022/2023. The final consultation report was published on the ENTRUST website:

www.entrust.org.uk/guidance/regulations/consultation-reports/

We also consulted EB's views via a survey regarding EOL in February 2022, requesting opinion on the service provided. The results of the survey are being analysed and the next steps being drafted for implementation. We note any comments received from EBs on the Annual Return and other Forms and make changes to the Forms if appropriate. In this reporting period we updated

the Annual Return Form (Form 4) to improve how we ask for information for EBs registering administration costs and the ENTRUST levy amount.

Any regulatory changes are communicated to EBs with accompanying advice in a timely manner. No regulatory changes have occurred in this reporting period. Any significant proposals for change are reviewed by the Chief Executive (CEO) and Senior Management Team (SMT) prior to being reviewed and approved by the Board and their submission to HMRC in the form of the Regulatory Improvements Report (RIR) or other policy specific papers.

All EB comments following compliance reviews are assessed and responded to. Combined with the EOL Survey, it was identified that further clarity was required on the document uploads page of EOL for compliance reviews. This is being prepared for implementation in 2022/2023.

1.3 We report on any outcomes of reviews and consultations, including providing appropriate feedback to those who took part... in order that... Stakeholders and EBs can be confident that their input is critical in shaping the future of the LCF and our operational framework.

When undertaking reviews, ENTRUST assesses how changes can be made to achieve the best outcome while at the same time minimising the administrative burden on Stakeholders and helping them to mitigate their risk of non-compliance with the Regulations. Where necessary, reviews also take into account the views of EBs and other stakeholders.

In 2021/2022, we issued the following reports to Stakeholders:

- The EB Satisfaction Survey Findings 22 September 2021: <https://www.entrust.org.uk/news/eb-satisfaction-survey-findings-2021>; and
- EOL Updates 31 January 2022: <https://www.entrust.org.uk/news/updates-to-eol-january-2022>

The findings for the Training and Guidance Provision consultation were published in April 2022 and the EOL Survey report was published in May 2022.

1.4 We provide clear and timely guidance to EBs on what they can expect, before, during and after a compliance review, providing assistance to guide EBs in continued compliance with the Regulations... in order that... EBs understand their responsibilities and have an appropriate period of time to respond to and make any interventions to address any non-compliance that are identified as part of the compliance review process.

ENTRUST has in operation defined processes and procedures, which include communicating the requirements of an inspection visit, or review to an EB. To inform EBs of the conduct of the inspection, they are issued with an email letter and a compliance inspection leaflet outlining our processes and the expectations of EBs during the compliance visit. Initial contact with EBs that are subject to review is normally made at least six weeks prior to a review commencing.

We allow EBs an appropriate period (28 days) to respond to any findings of our compliance inspection report unless serious non-compliance issues are identified, in which case we would require a response within the statutory 14 calendar day time limit. Furthermore, EBs are allowed additional time to introduce changes to any of their policies/procedures, implement any action plans in accordance with the timescales agreed with ENTRUST in the compliance inspection report.

We also obtain feedback on our compliance inspection review process via our online compliance satisfaction forms. The overall satisfaction with the advice and guidance provided in 2021/2022 was 4.2 out of 5, which was below our target 4.5. Having analysed these results, we decided to review our current system and seek more in-depth feedback from Stakeholders.

1.5 We set out details of how breaches in the Regulations are managed and how we consider risk... *in order that...* Stakeholders can be confident that we operate to achieve compliance with the least overall burden for those concerned.

ENTRUST's Breach Management Framework is set out on our website and explains each step of the process when an issue of non-compliance with the Regulations is identified:

<https://www.entrust.org.uk/environmental-bodies/breach-management/>

We also publish a quarterly report detailing regulatory breaches and how we work with EBs to resolve them. It also provides advice on how EBs can mitigate the risk of breaching the Regulations:

<https://www.entrust.org.uk/environmental-bodies/breach-management/breach-management-activity/>

1.6 As part of the breach management process, we clearly explain to non-compliant EBs the actions required of them, the reasons for these actions, as well as providing opportunities for dialogue... *in order that...* EBs understand their responsibilities and requirements to comply with the Regulations and have the opportunity to discuss any non-compliance with us.

In line with best regulatory practice, we aim to manage an EBs failure to comply with the Regulations in a reasonable and proportionate manner. In accordance with the breach management process each case is set out in a breach management matrix which is reviewed by ENTRUST's Compliance Manager (CM) and CEO to ensure the appropriate level of action is applied at each stage.

When we issue a breach management letter, we set out the action(s) that an EB needs to take to rectify the non-compliance. As part of the process any EB subject to breach management action is invited to provide further information and an explanation for the reason for their non-compliance. We also send with every Advice and Guidance Letter, a list of EB responsibilities, as part of our 'coaching to compliance' ethos.

1.7 In all areas, we only collect data (including personal data) when it is essential to the regulation of the LCF... *in order that...* We comply with all data legislation including the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 2018) and uphold the highest standards of data privacy.

We only request information from EBs when it is necessary for our role in ensuring the compliant use of LCF funds. We have undertaken multiple actions over the course of 2021/2022 to make sure that we do not request unnecessary information:

- We continue to anonymise personal data, in accordance with the ENTRUST Privacy Policy, on a monthly basis; and

- Compliance workbooks determine what information is required to carry out our compliance function. We developed a Compliance document upload facility via EOL to provide a secure and efficient option for EBs to submit information.

All data requests made to EBs in 2021/2022 made clear the timetable for any information to be provided within the request in accordance with our statutory powers of 14 calendar days.

For compliance inspections we acknowledge that EBs might require more time to prepare their response to our findings as such inspections are usually arranged (and EBs advised of what will be required) at least six weeks in advance of the visit day. Timescales are documented within compliance reports and the published compliance procedures and guidance notes on the website. Ad hoc requests for information also state a deadline for responses. In 2021/2022 we also made reasonable additional allowances, where requested, for difficulties that EBs may have experienced due to the Pandemic.

2. Training and guidance

2.1 **We provide information, advice, guidance and training which is accessible, timely, focused and provides Value for Money (VfM)... in order that... EBs understand they can approach us for advice and guidance, can utilise our training and guidance provision and gain greater understanding of their responsibilities.**

Despite the impact of the Pandemic, ENTRUST's advice and guidance on the operation of the LCF remained continually available via our website, through our email and telephone Helpline support functions and during compliance inspections to assist EBs in complying with the Regulations. All of our advice adheres to ENTRUST's Customer Charter.

We continue to respond to feedback from EBs about our Guidance Manual and, where appropriate, to implement any changes in policy, or processes. The Guidance Manual was updated twice during this period. The first in July 2021 with minor updates. A further update issued in December 2021 which clarified that guidance regarding the Conditions introduced in 2015, and guidance on the NHS using LCF funded facilities. EBs were updated on all Guidance changes via published news items on our website. All changes are published in appropriate time so that EBs can prepare for any changes. Our guidance in relation to the impact of the Pandemic continued to be reviewed throughout the period and updates were also published in June and December 2021.

We have also issued guides to completing the statutory Forms required by EBs, all of which are available on our website (www.entrust.org.uk/need-help/training/) and offer support via email and telephone. We also send email reminders to all EBs regarding the annual returns and the deadline for the submissions of this return.

We use a range of surveys and feedback mechanisms to monitor the effectiveness of the advice and guidance provided to Stakeholders. Having assessed this information we are assured that the needs of Stakeholders are being met. We carried out our annual EB Satisfaction Survey between May and August 2021. The results showed that those who sought advice, guidance or information from ENTRUST in the last year expressed very strong responses, with 100 per cent of those surveyed stating that they were comfortable in approaching us for advice, guidance and information, 94 per cent also found the advice useful and 93 per cent felt they received a high

level of support. Satisfaction for our Helpline service showed that 91 per cent were satisfied, or very satisfied. 92 per cent also reported that they had a good or very good experience of the Helpline Team. Finally, we continue to record all feedback relating to the Guidance Manual and maintain a log of issues raised.

2.2 We review Stakeholders' training needs as a result of feedback from all Satisfaction Surveys and other communications with stakeholders... in order that... Our training and guidance for all Stakeholders continues to be relevant, accessible and fit for purpose.

We continued to deliver out training events virtually due to the Pandemic. These events were held in September and November 2021 and in February 2021, but we also scheduled an additional event in June 2021 to meet Stakeholder's requirements.

The feedback from EBs' attendance at the training events was reviewed after each session and incorporated in the annual scheduled review of our training package, alongside feedback gathered through the delivery of the Registrations Team's Day to day activities, or through responses to the Helpline and EB Satisfaction Surveys.

This feedback was then incorporated into a review of the training and induction programme to ensure it remained cost effective and continued to meet stakeholder's needs. ENTRUST's 2021/2022 Training Report and the 2022/2023 Training Strategy were agreed by the Board in March 2022 and published in April 2022:

<https://www.entrust.org.uk/news/review-of-the-entrust-training-strategy-2021-2022>

Our training strategy for 2021/2022 incorporated measures to deliver a programme which met the needs of all EBs through a range of channels, including our LCF introductory videos and online training module for new EBs, or new Staff and volunteers of existing EBs. We updated our training materials throughout 2021/2022 to reflect changes and improvements in EOL and our guidance based on feedback from stakeholders. In this reporting period we have updated several guides to ensure they remain fit for purpose and reflect improvements we have made.

Due to the Pandemic, we were unable to operate our open-door policy for any EB who wishes to visit our office and meet our Staff through much of the period, however this is now possible and is again in operation.

3. How we prioritise our activities

3.1 In reviewing our operations, we use an evidence-based approach to determining priority risks in accordance with the Regulators' Code... in order that... All our operations are effective, proportionate and not unnecessarily burdensome.

The ERS by which this self-assessment is completed, have been developed based on the Regulators Code and best regulatory practice were reviewed and updated during the year.

When reviewing operations, we use the ERS to guide our processes, ensuring that the Regulators code is central to our review processes. As part of our continuous improvement programme, we regularly review our systems and operations and monitor feedback we receive from EBs to best inform our strategy for any developments to our processes.

The EB satisfaction survey process involved the development of a comprehensive action plan to address the risks that have been identified from the evidence provided by EBs. This is coupled with evidence from other forums, such as Association of Distributive and Environmental Bodies (ADEB), Information and Networking Forum (INF) and other communications.

3.2 We prepare a corporate plan annually which is approved by our Board and HMRC... *in order that...* Stakeholders can be assured that we are a transparent organisation, whose work is structured, planned and monitored, while delivering VfM.

Our Corporate Plan was developed, approved by the Board and HMRC and the final agreed version published on 31 March 2021 for the 2021/2022 financial year. This document explains how we:

- Mitigate the risk of financial loss to the Exchequer by providing HMRC with independent assurance that LCF monies are spent compliantly in accordance with the Regulations; and
- Continue to deliver the requirements of the TOA, which ensure that we fully support HMRC in regulating the fund and delivering the annual objectives and Key Performance Indicators (KPIs) set by HMRC.

3.3 We use a risk model to help determine how often each EB, or project should be reviewed. From the model, EB risk scores are generated based on their history within the LCF... *in order that...* EBs are not reviewed more often than is proportionate and necessary in order that we can provide assurance to HMRC that LCF monies are spent in accordance with the Regulations.

All EBs are awarded an individual risk score consisting of a number of key risk indicators, which are based on the data held on EOL. These risk scores are updated in real time and are based on an EBs activity and performance and are used to determine how often EBs are subject to compliance inspections. Our website details the risk assessment process, risk indicators and weightings used in the EB Risk Model:

<https://www.entrust.org.uk/environmental-bodies/compliance-process/>

The Risk Models are reviewed annually to ensure that they continue to reflect HMRC priorities for the Fund. Individual EB or Project risk scores are included in the compliance inspection reports. EB risk scores are one of the Benchmarking indicators which are also detailed within inspection reports and published on the website:

<https://www.entrust.org.uk/environmental-bodies/compliance-process/good-practice/>

4. Transparency and accountability

4.1 We publish several corporate documents including our Customer Charter, service standards, and details of our performance against these standards. These are measured through the feedback from the annual EB Satisfaction Survey... *in order that...* Stakeholders understand our service standards are transparent, know what is expected of us and understand our expectations of Stakeholders when working with our staff.

Our Customer Charter and service standards were updated and published on our website in December 2021 (www.entrust.org.uk/about-us/standards-of-service/). These are reviewed every two years to ensure they remain fit for purpose.

In the EB satisfaction survey, only 0.6 per cent believed ENTRUST not to be transparent in its activities. The EB Satisfaction Survey ran from May to July 2021 and the results were published on the ENTRUST website in September 2021. A news item, email communication sent to the main contact of all EB's and the Company's Twitter feed were used to highlight the survey to stakeholders:

<https://www.entrust.org.uk/about-us/environmental-body-satisfaction-survey/>

4.2 We publish details of our Staff and their contact details... *in order that...* Stakeholders know who to contact and how to contact them.

Details of all ENTRUST Staff including job titles, direct dial phone numbers and photographs are included on the 'contact us' page of our website. We use the ENTRUST website to ensure that all information relating to the regulation of the LCF is transparent and accessible at:

www.entrust.org.uk/contact-us

4.3 We set out a clear complaints policy and publish anonymised accounts of the outcomes of formal complaints... *in order that...* Stakeholders understand how to make a complaint, how any complaint will be handled and can view the results of the complaints process.

Our complaints procedure and whistle blowing policies are clearly laid out on the ENTRUST website and were reviewed in March 2021 as part of the website content review. No complaints were lodged with ENTRUST in the reporting period.

www.entrust.org.uk/about-us/complaints-process/

4.4 We provide a clear and impartial route to appeal against our decision to reject a project, or enrolment application. The route to appeal, either in person or in writing, is clearly explained to those whose applications are not accepted... *in order that...* Stakeholders have confidence in the projects and enrolment approval processes, their transparency, and that all applications that comply with the Regulations will be approved.

We have a clear, documented process for appeals and applicants have a clearly identified route by which they can appeal and provide representations associated with enrolments and project approvals:

[\(www.entrust.org.uk/projects/review-panel/\)](http://www.entrust.org.uk/projects/review-panel/)

Our EB enrolment and project application Review Panel met once in February 2022 to review rejected project and enrolment applications. The project application related to a specific user group project, which was not accessible to the general public. The EB did not attend the meeting and while the project was rejected, we agreed to raise the issue of specific user group projects with HMRC. This issue will also be included in our 2022/2023 RIR. The enrolment applicant attended the Panel and the Panel decided to request further information. Both applicants were advised in writing of the Review Panel's decisions;

5. Better regulation

5.1 We operate an ethos of coaching to compliance... *in order that...* We achieve the objectives of compliance through quality information, advice, guidance and training, reducing the need for breach management measures.

Our defined enrolment process requires the Registrations Team to contact new enrolments to talk through general EB responsibilities and to answer any queries before projects are submitted.

When issuing breach management letters, these are accompanied by a requirement to detail how the EB will change their processes to mitigate the risk of further breaches in the future.

As part of our ethos of 'coaching to compliance', we provide advice and guidance to enable the EB to address any issues identified in our compliance inspection reports.

5.2 In responding to consultations, developing proposals for change, revisions and additions to forms we consider risk and burden... *in order that...* We assess which method would best achieve the intended outcome with the least burden for Stakeholders.

We make recommendations to HMRC in a RIR every year. Our 2021 report was issued to HMRC in July 2021. Our suggested changes to how the LCF is regulated are based on our experience of regulating the fund and have been fully reviewed prior to inclusion in the report. Any evidence is also collected prior to the collation of the report to ensure any changes are evidence based and will be effective and proportionate.

When reviewing forms, or making additions we always look to do so in a way which will minimise the regulatory burden placed upon EBs. EOL is available for all reporting requirements as per our online delivery strategy. We look to constantly improve EOL and implement any improvements that will improve the usability of EOL and reduces the burden for EBs where possible.

5.3 We seek to understand those we regulate through regular liaison with representative groups and individual EBs in all our interactions with them... *in order that...* We understand the impacts and outcomes of our work on Stakeholders.

In regular meetings with EBs, via the ADEB and INF forums and our communication with individual EBs, we believe we fully consider their views and concerns, recognising the consequences of any changes to the Regulations, or our processes. After each ADEB meeting, or meeting with an EB Board, we record any points that they raise and where appropriate to address any issues or concerns raised, to ensure we are fully recognising how our regulatory role impacts EBs.

5.4 We ensure that all members of our Staff have the skills to assist Stakeholder enquiries, understanding the principles of good regulation and service standards... *in order that...* Stakeholders are confident in a quality service and consistent advice.

The training needs of our members of Staff are assessed through the annual appraisal process and are incorporated into their individual training programme. We also develop a collective training programme to ensure that members of Staff have the knowledge and skills to meet the needs of ENTRUST and those we regulate. The training plan is approved annually by the ENTRUST Board.

The Staff training programme delivered in 2021/2022 incorporated sessions on cyber security, well-being, fraud prevention, IT skills, and stress awareness.

Once appointed new members of Staff undergo a comprehensive induction plan that incorporate relevant training on UK GDPR and data protection, Health and Safety, Fire awareness and job specific training requirements.

5.5 We publish anonymised benchmarking data for a range of metrics including EB risk scores... *in order that...* EBs can measure their performance compared to other EBs.

In June 2021, we published our fifth set of anonymised data (provided by EBs via annual returns and other reporting requirements) against a set of key scheme metrics to enable EBs to benchmark their own performance against that of the Sector. The data was published alongside guidance instructing EBs on how to best make use of the information:

www.entrust.org.uk/news/environmental-body-benchmarking-data-2020-2021

Conclusion

The ongoing assessment of our work against the ERS throughout the year is key to ensuring that our regulatory activity follows the principles set out in the Regulator's Code and best regulatory practice. We believe that for each of the ERS, we believe that the evidence provided in the report, demonstrates that we have fully met the Standards.

All requirements of the ERS have been rated as green and assessed as met in 2020/2021. As set out in the Corporate Plan 2021-2024 we will review the ERS each year to ensure that they continue to both reflect recommended best practice and the latest standards for regulators.

APPENDIX

Appendix A - ENTRUST Regulator Standards - Annual Assessment - 2021 2022 - RAG matrix

ENTRUST

June 2022

ENTRUST Regulator Standards (ERS)

2021/2022 Annual Assessment

Section 1: Our duties and requirements				
Ref	Standard			Rating (Green, Amber, Red)
1.1	We carry out our duties as the approved regulator for the Landfill Communities Fund (LCF) in accordance with the Terms of Approval (TOA)	<i>In order that...</i>	We maintain compliance with HMRC's requirements and provide HMRC with independent assurance that LCF funds are spent in compliance with the Regulations.	Green
1.2	We consult Environmental Bodies (EBs) and other relevant stakeholders regarding any potential changes to the Regulations, guidance or requirements	<i>In order that...</i>	Stakeholder feedback has a central role in the development of proposals for change to the Regulations, ENTRUST's guidance, or our operational model.	Green
1.3	We report on any outcomes of reviews and consultations, including providing appropriate feedback to those who took part	<i>In order that...</i>	Stakeholders and EBs can be confident that their input is critical in shaping the future of the LCF and our operational framework.	Green
1.4	We provide clear and timely guidance to EBs on what they can expect, before, during and after a compliance review, providing assistance to guide EBs in continued compliance with the Regulations	<i>In order that...</i>	EBs understand their responsibilities and have an appropriate period of time to respond to and make any interventions to address any non-compliance that are identified as part of the compliance review process.	Green
1.5	We set out details of breaches in the Regulations are managed and how we consider risk	<i>In order that...</i>	Stakeholders can be confident that we operate to achieve compliance with the least overall burden for those concerned.	Green

1.6	As part of the breach management process, we clearly explain to non-compliant EBs the actions required of them, the reasons for these actions, as well as providing opportunities for dialogue	<i>In order that...</i>	EBs understand their responsibilities and requirements to comply with the Regulations and have the opportunity to discuss any non-compliance with us.	Green
1.7	In all areas, we only collect data (including personal data) when it is essential to the regulation of the LCF	<i>In order that...</i>	We comply with all data legislation including the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 2018) and uphold the highest standards of data privacy.	Green
Section 2: Training and guidance				
2.1	We provide information, advice, guidance and training which is accessible, timely, focused and provides Value for Money (VfM)	<i>In order that...</i>	EBs understand they can approach us for advice and guidance, can utilise our training and guidance provision and gain greater understanding of their responsibilities.	Green
2.2	We review Stakeholders' training needs as a result of feedback from all Satisfaction Surveys and other communications with stakeholders	<i>In order that...</i>	Our training and guidance for all Stakeholders continues to be relevant, accessible and fit for purpose.	Green
Section 3: How we prioritise our activities				
3.1	In reviewing our operations, we use an evidence-based approach to determining priority risks in accordance with the Regulators' Code	<i>In order that...</i>	All our operations are effective, proportionate and not unnecessarily burdensome.	Green
3.1	We prepare a corporate plan annually which is approved by our Board and HMRC	<i>In order that...</i>	Stakeholders can be assured that we are a transparent organisation, whose work is structured, planned and monitored, while delivering VfM.	Green

3.3	We use a risk model to help determine how often each EB, or project should be reviewed. From the model, EB risk scores are generated based on their history within the LCF	<i>In order that...</i>	EBs are not reviewed more often than is proportionate and necessary in order that we can provide assurance to HMRC that LCF monies are spent in accordance with the Regulations.	Green
Section 4: Transparency and accountability				
4.1	We publish several corporate documents including our Customer Charter, service standards, and details of our performance against these standards. These are measured through the feedback from the annual EB Satisfaction Survey	<i>In order that...</i>	Stakeholders understand our service standards are transparent, know what is expected of us and understand our expectations of Stakeholders when working with our staff.	Green
4.2	We publish details of our Staff and their contact details	<i>In order that...</i>	Stakeholders know who to contact and how to contact them.	Green
4.3	We set out a clear complaints policy and publish anonymised accounts of the outcomes of formal complaints	<i>In order that...</i>	Stakeholders understand how to make a complaint, how any complaint will be handled and can view the results of the complaints process.	Green
4.4	We provide a clear and impartial route to appeal against our decision to reject a project, or enrolment application. The route to appeal, either in person or in writing, is clearly explained to those whose applications are not accepted	<i>In order that...</i>	Stakeholders have confidence in the projects and enrolment approval processes, their transparency, and that all applications that comply with the Regulations will be approved.	Green
Section 5: Better regulation				
5.1	We operate an ethos of coaching to compliance	<i>In order that...</i>	We achieve the objectives of compliance through quality information, advice, guidance and training, reducing the need for breach management measures.	Green

5.2	In responding to consultations, developing proposals for change, revisions and additions to forms we consider risk and burden	<i>In order that...</i>	We assess which method would best achieve the intended outcome with the least burden for Stakeholders.	Green
5.3	We seek to understand those we regulate through regular liaison with representative groups and individual EBs in all our interactions with them	<i>In order that...</i>	We understand the impacts and outcomes of our work on Stakeholders.	Green
5.4	We ensure that all members of our Staff have the skills to assist Stakeholder enquiries, understanding the principles of good regulation and service standards	<i>In order that...</i>	Stakeholders are confident in a quality service and consistent advice.	Green
5.5	We publish anonymised benchmarking data for a range of metrics including EB risk scores	<i>In order that...</i>	EBs can measure their performance compared to other EBs.	Green