



ENTRUST Regulator Standards (ERS)

Self –assessment review for the financial year 2017/2018

June 2018

Introduction

In 2017 ENTRUST undertook a review of the ENTRUST Regulator Standards (ERS) to ensure they were still relevant and applicable to ENTRUST. A number of updates were identified, these were agreed by the ENTRUST Board in December 2017 and were published on the ENTRUST website in March 2018.

The ERS now consist of 31 standards spread across seven areas encompassing the regulatory work undertaken throughout the organisation. They reflect the Government's Regulators' Code which was published in April 2014 (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.

This report provides a summary of the self-assessment of our performance against the ERS during 2017/2018.

1. Policy review

1.1 Planning, reviewing and scoping

1.1A In reviewing the Regulations to ensure they are effective, proportionate and not unnecessarily burdensome, we will use an evidence-based approach to determining priority risks in accordance with the Regulators' Code.

Following submission to HM Revenue & Customs (HMRC) of our July 2017 Regulatory Improvements Report, we worked with HMRC to consider further policy changes to improve the regulation of the Landfill Communities Fund (LCF). Having received HMRC approval we updated our guidance relating to ENTRUST being informed if an Environmental Body (EB) intends to cease trading, wind-up or become insolvent and for an administrator, or liquidator to inform us of their appointment. HMRC also agreed our approaches to the closure of the LCF scheme in Wales, the future of the Accreditation Scheme and the targeting of our resources on a risk-based approach, in relation to chasing Statutory Annual Returns.

1.1B Proposed priority areas of potential change will be agreed by the Board

Any significant changes to the regulation of the scheme are ratified by the ENTRUST Board, prior to implementation. There were no changes to the Landfill Tax Regulations 1996 (Regulations) in 2017/2018.

1.2 Consulting

We will consult stakeholders in accordance with the Consultation Principles and report on the outcome of consultation exercises including providing appropriate feedback to those who took part.

We continue to consult with stakeholders on any changes to how the LCF is regulated. In this reporting period we have carried out several consultations and reviews:

- We consulted with the sector on the Risk Model used by our Compliance team to drive their inspection programme. The initial outcomes and the final conclusions of the consultation regarding the risk model were published on our website.

www.entrust.org.uk/assets/uploads/documents/Risk_model_consultation_report.pdf;

- We consulted with Accredited EBs on the future of the Accreditation Scheme. Accredited EBs were provided with the outcome of the consultation individually and two reports were uploaded to the website, one with initial findings and one with the final outcome.
(www.entrust.org.uk/news/end-of-the-accreditation-scheme/);
- We consulted with the Association of Distributive and Environmental Bodies (ADEB) on the development of our benchmarking data in particular to establish which metrics would be best. We published benchmarking data on our website which EBs can use to assess their performance against that of the sector.
(www.entrust.org.uk/news/eb-benchmarking-measures-and-data).
- We also consulted with ADEB on changes to the guidance relating to project costs and have produced a guidance note for EBs receiving funding from other EBs.
(www.entrust.org.uk/assets/uploads/documents/Funded_Environmental_Bodies_guid_e_July_2017.pdf); and,
- We consulted with EBs attending our Wales closure event to seek their views on our proposed guidance relating to the end of the scheme in Wales. Their comments helped form the finalised guidance and the training slides from the Wales event were published on the website.
(www.entrust.org.uk/news/updated-guidance-for-ebs-operating-in-wales).

1.3 Development of change proposals

In developing proposals for change we will consider risk and will assess which method would best achieve the intended outcome with the least burden for stakeholders.

Any proposals for change are reviewed by the Deputy Chief Executive (DCEO) and Operational Managers prior to their being taken forward to HMRC in the form of the Regulatory Improvements Report. When undertaking reviews the DCEO and operational managers assess how changes can be made to achieve the best outcome while at the same time minimising risk and the burden for stakeholders. Where necessary reviews also take into account the views of EBs and other stakeholders.

1.4 Reporting

We will provide a clear and timely report to the appropriate audience of the outcomes of any review, proposal or consultation.

In this financial year we have undertaken a range of reviews, proposals and consultations and have issued the following reports to stakeholders:

- A public version of our review of the closure of the scheme in Scotland was published on our website in August:
(www.entrust.org.uk/assets/uploads/documents/Scotland_LCF_Closure_Report.pdf);
- A public version of our Value for Money (VfM) report was published in October 2017:
(www.entrust.org.uk/news/lcf-value-for-money-vfm-2016-2017-report); and,
- On completion of our review on the usability of ENTRUST Online (EOL) a report on the outcomes was published on our website:
(www.entrust.org.uk/news/review-on-the-usability-of-eol)

2. Advice and guidance

2.1 Day to day advice and guidance

2.1A We will provide advice and guidance in accordance with the Regulator's Code which is appropriate, timely, and focused on assisting EBs to understand and meet their responsibilities, in accordance with the Regulators' Code. We will ensure that EBs feel confident that they can approach ENTRUST for advice and guidance without undue fear of enforcement action.

ENTRUST's advice and guidance on the operation of the LCF is continually available via our website, 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 monitor EBs satisfaction with our advice and guidance and include a question in the annual EB Satisfaction Survey to ensure that EBs feel comfortable approaching ENTRUST for advice and guidance

2.1B We will continue to move towards full e-delivery of our regulatory services and ensure that all guidance and information produced is easily accessible via our website.

We produce a large range of guidance and training resources, all available on our website (www.entrust.org.uk/need-help/training/). Any removal of paper forms is supported by a review of all relevant training resources to ensure that EBs have the resources available to complete the action online and a clear communication plan to inform EBs of the removal of paper forms, along with information about how to receive support if they need it.

2.2 Changes to guidance and to the Regulations

2.2A This part of the ERS requires that we advertise changes to the published guidance and provide stakeholders with clear and timely advice on the changes and the date on which they will take effect.

All guidance issued is published with the date on which it is due to come into effect and a note of the guidance (if any) which it supersedes (www.entrust.org.uk/guidance/guidance-documents). We have updated the manual four times in this reporting period. EBs are advised of any changes to the Guidance Manual via a news item and in our eNewsletters. The Guidance Manual is clearly structured so that it is clear which is the current version that EBs must adhere to. Old versions are available for reference. All changes are published in appropriate time so that EBs can prepare for any changes.

2.2B We will provide clear and timely advice and guidance to stakeholders on changes to the Regulations.

Any regulatory changes are communicated to EBs with accompanying advice in a timely manner. No regulatory changes have occurred in this reporting period however we have commenced our Wales closure plan to ensure EBs are well prepared for the closure of the scheme in Wales. This has included communications advising EBs of this change and an event held in Wales to specifically discuss the closure of the scheme there. Furthermore, we have added a question to the 2018 EB Satisfaction Survey to monitor awareness of the scheme closure in Wales.

2.3 Monitoring the effectiveness of advice and guidance

We will monitor the effectiveness of the advice and guidance delivered, and the mode of delivery, in order to ensure that advice and guidance, and mode of delivery, meets the needs of stakeholders.

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 in May/June 2017. The results showed that those who sought advice, guidance or information from ENTRUST in the last year expressed very strong responses, with 97 per cent of those surveyed stating that they were comfortable in approaching us for advice, guidance and information, 95 per cent of them found the advice useful and a similar 93 per cent felt they received a high level of support.

Further to our EB satisfaction survey we also monitor the effectiveness of advice provided by our Registrations function via our helpline survey and obtain Compliance Inspection feedback via our online compliance satisfaction forms. Overall satisfaction with our Compliance Inspections was 4.6 out of 5 (above the target of 4.5 out of 5). Satisfaction for our Helpline service showed that 90 per cent were satisfied or very satisfied. 89 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.

3. Training

3.1 Identifying the training needs of stakeholders

We will review stakeholders' training needs as a result of feedback from the delivery of advice, guidance, face to face training and through our website, and will review the training and induction programme to ensure it continues to meet stakeholders' needs.

To help assess the training needs of EBs we gathered feedback throughout 2017/2018 from a range of sources including the feedback given following training sessions, feedback gathered through the delivery of the Registrations team's daily activities, and 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 remains cost effective and continues to meet stakeholder's needs. ENTRUST's 2017/2018 Training Report and the 2018/2019 Training Strategy were agreed by the Board in March 2018 and published in April 2018:

www.entrust.org.uk/assets/uploads/documents/Training_Report_2017-2018.pdf

3.2 Delivering training

We will deliver a multi-channel training programme which meets the needs of stakeholders.

Our training strategy for 2017/2018 incorporated measures to deliver a programme which met the needs of all EBs through a range of channels. We updated our training materials throughout 2017/2018 to reflect changes in EOL and our guidance based on feedback from stakeholders. We also updated our guidance manual to include a section on the devolution of the UK LCF in Wales and created three new resources:

- An Introductory guide for EBs receiving LCF funds from other EBs,
- A guide on updating governing members; and
- An online EB enrolment module.

Further to amending and creating new guidance we also held a number of events over the 2017/2018 reporting period for stakeholders to attend including three basic training events, one open day and an event covering the closure of the LCF in Wales.

3.3 Staff training

3.3A We will ensure that all members of staff have the knowledge and skills to support those regulated by ENTRUST and understand the principles of good regulation and how ENTRUST delivers them.

The training needs of individual staff members are assessed through the annual appraisal process and incorporated into the team training programme. The training programme is developed to ensure that members of staff have the knowledge and skills to meet the needs of ENTRUST and those it regulates.

3.3B We will ensure that all members of staff are provided with training such that they are able to act in accordance with our service standards.

The staff training programme delivered in 2017/2018 incorporated a session on customer service, a review of ENTRUST's service standards and preparation for the General Data Protection Regulation (GDPR).

4. Data and information requests

4.1 Forms and data requests

4.1A We will provide guidance to EBs on the appropriate completion and submission of Statutory Annual Returns and other forms required to be completed by EBs.

We provide guides to completing the 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.

4.1B In seeking data from EBs, we will consider risk and will assess which method would best achieve the intended outcome with the least overall burden for those concerned. We will only collect and process essential data, including 'personal data', as required to regulate the fund.

We only ask for information from EBs if we believe it is necessary for our role in ensuring the compliant use of LCF funds and have undertaken multiple actions over the course of 2017/2018 to make sure that we do not request unnecessary information;

- In order to demonstrate compliance with the GDPR we have audited the data we collect and updated our Privacy Policy and Data Protection Policies and Procedures in accordance with the GDPR; and
- As an outcome of the compliance risk model consultation, we determined we should not make any unnecessary information requests at compliance inspections by not requesting information already held e.g. documents obtained at previous inspections.

In 2017/2018 it was necessary to request further information from a number of EBs. At HMRC's request a mid-year data collection exercise was undertaken in 2017/2018 involving EBs whose administration costs were above the 7.5 per cent guidance level in 2016/2017. EBs were asked to explain why this was the case, give a forecast of administration costs for

the rest of 2017/2018 and provide plans of how they would reduce their administration cost ratio. In November 2018 a follow-up request for more detail on administration costs was made to those EBs who forecast administration costs in excess of 7.5 per cent.

4.1C When seeking data from EBs, we will set a timetable for the submission of that data which is appropriate to the nature and extent of the request made.

All of the data requests made to EBs in 2017/2018 followed regulatory standards with regards to the timeframes given for the submission of data. For example, when requesting information relating to administration costs the timetable for information submission was made clear within the request and adhered to our regulatory powers to request information within 14 days, EBs were advised well ahead of the 14-day period that the request would be made. For compliance inspections we acknowledge that EBs might require more time to prepare and as such inspections are usually arranged (and EBs advised of what will be required) at least six weeks in advance of the visit day.

4.2 Design of new forms and revising existing forms

4.2A We will review Statutory Annual Returns and other forms required to be completed by EBs and will consult with stakeholders on the design and content of any new forms or formalised data requests.

We regularly review our forms on the basis of feedback provided by EBs through a range of sources including; the annual EB Satisfaction Survey, training day feedback forms and correspondence with the Registrations and Compliance teams. During 2017/2018, we revised the following forms:

- Both Forms 1 and 2 (Enrolment and Project Registration forms) have been reviewed and changes implemented to both to simplify the process for applicants and ensure that the most appropriate and relevant information is provided at application stage to improve the process; and
- The Statutory Annual Return (Form 4) was reviewed and updated on EOL in February 2018 to improve the clarity and navigation of the form.

4.2B In considering revisions or additions to forms, we will consider risk and whether an alternative method of seeking data would better achieve the intended outcome, and we will select the format which best achieves the intended outcome with the least burden for EBs.

When reviewing forms or making additions we always look to do so in a way which will minimise the regulatory burden placed upon EBs. As highlighted in the previous section we made changes to Forms 1, 2 and 4 to make them easier to use and ensure that we only request the information required to process the form. Further to this we are also in the process of moving towards 100 per cent e-delivery of our services including all forms, as they are quicker and easier to complete than paper versions.

On 1 April 2018 the paper version of the project registration form (Form 2) was withdrawn, in the lead up to this we updated all related training resources, communicated the change to EBs and provided additional support to EBs where required. We have also moved towards 100 per cent e-delivery of services in our compliance function and no longer issue a separate Compliance Satisfaction form following compliance visits, EBs are instead sent a hyperlink to the online survey.

5. Compliance

5.1 Appeals

We will provide a clear and impartial route to appeal against project application decisions. The route to appeal, either in person or in writing, will be clearly explained to applicants whose projects are not accepted.

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

(www.entrust.org.uk/projects/review-panel/)

5.2 Reviews

5.2A We will provide clear and timely guidance to EBs on what they can expect from a compliance review and what is expected from the EB before, at and after a compliance review.

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

5.2B We will allow EBs an appropriate period to respond to our compliance inspection report, and we will provide advice and guidance to enable the EB to address any issues identified in our compliance inspection report.

We allow EBs an appropriate period (28 days) to respond to our compliance inspection report unless serious non-compliance issues are identified in which case we would use the regulatory 14 day timescale for financial information. EBs are allowed additional time to introduce changes to policies/procedures etc and appropriate action plans and timescales are agreed as part of the EBs response.

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 report.

5.2C We will use a risk score to help determine how often each EB should be reviewed. Risk scores are generated automatically and incorporate the amount of funding involved, the number of projects approved and any history of non-compliance.

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 EBs activity and performance and are used to determine how often EBs are subject to compliance inspections.

The Risk Model, and risk indicators on which it is based, were reviewed and updated in consultation with EBs in May 2017. Our website was updated accordingly with an explanation of the risk assessment process, risk indicators and weightings were published:

(www.entrust.org.uk/assets/uploads/documents/Risk_Model_Indicators_September_2017.pdf)

6. Enforcement

6.1 Enforcement process

6.1A We will set out details of the enforcement policy, explaining how it will respond to non-compliance.

The Enforcement Framework is set out on the ENTRUST website and explains each step of the process when an issue of non-compliance with the Regulations is identified (www.entrust.org.uk/assets/uploads/documents/Enforcement_Framework.pdf). In line with best regulatory practice, we aim to manage an EBs failure to comply with the Regulations in a reasonable and proportionate manner.

6.1B In responding to non-compliance and acting within the enforcement process, we will consider risk and will assess which method of enforcement would best achieve the intended outcome with the least overall burden for those concerned.

In accordance with the enforcement process each case is set out in an enforcement matrix which is reviewed by the Compliance Manager and DCEO to ensure the appropriate level of enforcement action is applied.

6.1C As part of the enforcement process we will clearly explain to non-compliant EBs the actions required of them and why as well as providing opportunities for dialogue.

All enforcement letters clearly establish what an EB needs to do to rectify any incidences of non-compliance. As part of the process any EB subject to enforcement action is invited to provide further information and an explanation behind the non-compliance.

7. Transparency

7.1 Accessibility

This section of the ERS ensures that we provide details of our staff and contact details so 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 (www.entrust.org.uk/contact-us).

7.2 Publication of service standards

7.2A The ERS also commits us to publish our Customer Charter and service standards so that stakeholders know what they can expect of us. ERS also requires us to publish details of our performance against our service standards, as measured through feedback and the EB satisfaction survey.

Our Customer Charter and service standards were updated and published on our website in December 2017 (www.entrust.org.uk/about-us/standards-of-service/). These are reviewed every two years to ensure they remain fit for purpose. In 2017 a fundamental review was undertaken which included all ENTRUST staff to ensure that the standards fully represent the company as a whole.

7.2B We will publish details of our performance against our service standards, as measured through feedback and the EB satisfaction survey and appeals against our decisions.

The 2017 EB Satisfaction Survey ran from 18 May to 2 July 2017 and was published on the ENTRUST website in November 2017. A news item and the Company's Twitter feed were used to highlight the survey to stakeholders:

(www.entrust.org.uk/assets/uploads/documents/Environmental_Body_satisfaction_survey_results_2017.pdf).

7.3 Complaints handling

ERS requires us to publish a clear complaints policy so stakeholders understand how to make a complaint and how any complaint will be handled. We will publish anonymised accounts of the outcomes of formal complaints.

Our complaints procedure and whistle blowing policies are clearly laid out on the ENTRUST website and were reviewed in March 2018 (www.entrust.org.uk/about-us/complaints-process/). No formal complaints were lodged with ENTRUST in the 2017/2018 period.

7.4 Publication of anonymised data

We will publish anonymised data for a range of metrics including EB risk scores to allow EBs to benchmark their performance.

In December 2017 we published 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/assets/uploads/documents/Benchmarking_Data_for_EBs_2016_2017.pdf)

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. Each area of the ERS has been considered and evidence provided in support of the assessment made. All requirements of the ERS have been rated as green and assessed as met in 2017/2018.

APPENDIX

Appendix A - ENTRUST Regulator Standards - Annual Assessment - 2017 2018 - RAG matrix

ENTRUST

June 2018

ENTRUST Regulator Standards (ERS)

2017/2018 Annual Assessment

Function	Standard	Rating Red / Amber / Green	
1. Policy review	1.1 Planning, reviewing and scoping		
	1.1A	In reviewing the Regulations to ensure they are effective, proportionate and not unnecessarily burdensome, we will use an evidence-based approach to determining priority risks in accordance with the Regulators' Code.	Green
	1.1B	Proposed priority areas of potential change will be agreed by the Board.	Green
	1.2 Consulting		
	1.2	We will consult stakeholders in accordance with the Consultation Principles and report on the outcome of consultation exercises including providing appropriate feedback to those who took part.	Green
	1.3 Development of change proposals		
	1.3	In developing proposals for change we will consider risk and will assess which method would best achieve the intended outcome with the least burden for stakeholders.	Green
	1.4 Reporting		
	1.4	We will provide a clear and timely report to the appropriate audience of the outcomes of any review, proposal or consultation.	Green
2. Advice and guidance	2.1 Day-to-day advice and guidance		
	2.1A	We will provide advice and guidance in accordance with the Regulator's Code which is appropriate, timely, and focussed on assisting EBs to understand and meet their responsibilities.	Green
	2.1B	We will continue to move towards full e-delivery of our regulatory services and ensure that all guidance and information produced is easily accessible via our website.	Green

	2.2 Changes to guidance and to the Regulations		
	2.2A	We will consult with EBs on any new guidance to be published to ensure it meets their needs. We will advertise the publication of new guidance and changes to existing guidance and will provide stakeholders with clear and timely advice on their effects and the date on which they will come into force.	Green
	2.2B	We will provide clear and timely advice and guidance to stakeholders on changes to the Regulations.	Green
	2.3 Monitoring the effectiveness of advice and guidance		
	2.3	We will monitor the effectiveness of the advice and guidance delivered, and the mode of delivery, in order to ensure that advice and guidance, and mode of delivery, meets the needs of stakeholders.	Green
3. Training	3.1 Identifying the training needs of stakeholders		
	3.1	We will review stakeholders' training needs as a result of feedback from the delivery of advice, guidance, face to face training and through our website, and will review the training and induction programme to ensure it continues to meet stakeholders' needs.	Green
	3.2 Delivering training		
	3.2	We will deliver a multi-channel training programme which meets the needs of stakeholders.	Green
	3.3 Staff training		
	3.3A	We will ensure that all members of staff have the knowledge and skills to support those regulated by ENTRUST and understand the principles of good regulation and how ENTRUST delivers them.	Green
	3.3B	We will ensure that all members of staff are provided with training such that they are able to act in accordance with our service standards.	Green
4. Data and information requests	4.1 Forms and data requests		
	4.1A	We will provide guidance to EBs on the appropriate completion and submission of statutory annual returns and other forms required to be completed by EBs.	Green
	4.1B	In seeking data from EBs, we will consider risk and will assess which method would best achieve the intended outcome with the least overall burden for those concerned. We will only collect and process essential data, including 'personal data', as required to regulate the fund.	Green
	4.1C	When seeking data from EBs, we will set a timetable for the submission of that data which is appropriate to the nature and extent of the request made.	Green

	4.2 Design of new forms and revising existing forms		
	4.2A	We will review statutory annual returns and other forms required to be completed by EBs and will consult with stakeholders on the design and content of any new forms or formalised data requests.	Green
	4.2B	In considering revisions or additions to forms, we will consider risk and whether an alternative method of seeking data would better achieve the intended outcome, and we will select the format which best achieves the intended outcome with the least burden for EBs.	Green
5. Compliance	5.1 Appeals		
	5.1	We will provide a clear and impartial route to appeal against project application decisions. The route to appeal, either in person or in writing, will be clearly explained to applicants whose projects are not accepted.	Green
	5.2 Reviews		
	5.2A	We will provide clear and timely guidance to EBs on what they can expect from a compliance review and what is expected from the EB before, at and after a compliance review.	Green
	5.2B	We will allow EBs an appropriate period to respond to our compliance inspection report, and we will provide advice and guidance to enable the EB to address any issues identified in our compliance inspection report.	Green
	5.2C	We will use a risk score to help determine how often each EB should be reviewed. Risk scores are generated automatically and incorporate the amount of funding involved, the number of projects approved and any history of non-compliance.	Green
6. Enforcement	6.1 Enforcement process		
	6.1A	We will set out details of the enforcement policy, explaining how it will respond to non compliance.	Green
	6.1B	In responding to non-compliance and acting within the enforcement process, we will consider risk and will assess which method of enforcement would best achieve the intended outcome with the least overall burden for those concerned.	Green
	6.1C	As part of the enforcement process we will clearly explain to non-compliant EBs the actions required of them and why as well as providing opportunities for dialogue.	Green

7. Transparency	7.1 Accessibility		
	7.1	We will publish details of our staff and contact details so that stakeholders know who to contact and how to contact them.	Green
	7.2 Publication of service standards		
	7.2A	We will publish our Customer Charter and service standards so that stakeholders know what they can expect of us.	Green
	7.2B	We will publish details of our performance against our service standards, as measured through feedback and the EB satisfaction survey and appeals against our decisions.	Green
	7.3 Complaints handling		
	7.3	We will publish a clear complaints policy so stakeholders understand how to make a complaint and how any complaint will be handled. We will publish anonymised accounts of the outcomes of formal complaints.	Green
	7.4 Publication of anonymised data		
7.4	We will publish anonymised data for a range of metrics including EB risk scores to allow EBs to benchmark their performance.	Green	