

LBRO Corporate Plan 2009-2012

Incorporating Business Plan 2009-2010

**Moving Forward on
Prosperity and Protection**

March 2009

Foreword

The perceived failures of regulation associated with the unprecedented crisis in global financial markets raise critical questions for the better regulation agenda. The crisis has heightened awareness of risk. The nature and role of regulation has been the subject of immense media scrutiny and public debate, with many calling for greater, more stringent regulation. It would be understandable if it also weakened the appetite of policy makers and practitioners to focus on reducing the regulatory burden, and instead resulted in a kind of domestic regulatory protectionism.

But at the same time, the grave pressures on business makes it all the more important that regulatory frameworks support economic efficiency, without undermining key protections for consumers, workers, and the environment. The debate should not be about more or less regulation, but about better regulation - how to ensure that regulation is proportionate, accountable, consistent, targeted, transparent and based on a comprehensive assessment of risk. Better regulation drives prosperity and supports protection both for communities and compliant businesses – it can and must be a matter of ‘win-win’.

An enormous proportion of business regulation is experienced and enforced at local level, and LBRO was created to deliver the better regulation agenda at that level. In the current, tough environment for business and for communities our role is even more important in ensuring that local regulation provides proper protection and prepares for recovery and growth.

This is our second corporate plan. It describes our programmes and activity for the next three years. We thank all those stakeholders that have been involved in its development, and all those who are working with us on key projects. We particularly thank our colleagues at the Better Regulation Executive for their continued help and support.



Clive Grace
Chair



Graham Russell
Chief Executive

March 2009

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Corporate Plan, incorporating business plan 2009-2012

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Introduction

This is the second corporate plan of the Local Better Regulation Office (LBRO), covering 2009-2012. The plan includes:

- an overview of the purpose and statutory powers of LBRO;
- a description of our strategic objectives and programmed activities that will support the achievement of our mission and contribute to improving outcomes;
- key achievements over the last year and our focus for the year ahead;
- An outline of the resources required to deliver our programme of work over the next three years;
- A description of programme, risk, performance and financial management arrangements that will help to ensure effective delivery of our strategic objectives.

This corporate plan is supported by our strategyⁱ, published in October 2008. The strategy, formed through wide ranging consultation with partners and stakeholders, sets out our vision to support the continual improvement of local authority regulatory services and the local regulatory system to maximize the contribution that these services make to economic prosperity and business growth, while removing or reducing unnecessary burdens on compliant business to realise both time and cost savings.

Programmed activity for the next three years focuses on our three strategic objectives, using statutory powers awarded to LBRO through the Regulatory Enforcement and Sanctions Act 2008ⁱⁱ:

- Support service improvement and change in local authority regulatory services;
- Directly deliver consistency, principally through the primary authority scheme;
- Act to improve the local authority regulatory services system

LBRO is committed to being an excellent organisation, inclusive and open in our engagement and communication, robust in governance and influential through our strategic thinking. Our values, to be outcome focused, evidence based, creative, challenging and supportive, underpin all our activity.

About us

The Local Better Regulation Office (LBRO) has been set up by the Government to drive the wider regulatory reform agenda at local level and to support and incentivise improvement in local authority regulatory services (trading standards, environmental health, licensing and fire safety) to reduce unnecessary burdens on businesses and support economic prosperity.

The local regulatory landscape is complexⁱⁱⁱ, and LBRO works with a wide range of stakeholders, including:

- **beneficiaries** of better local regulation - business and consumers;
- **customers** of LBRO products and services aimed at improving local regulation – local authority regulatory services;
- **partners** with whom LBRO will work to achieve its outcomes – national regulators, regulatory departments, and professional and representative bodies, including LACORS
- **sponsors** the Better Regulation Executive (the sponsor unit that has established LBRO), other relevant government departments and the devolved administrations.

LBRO is accountable to the Secretary of State through the sponsor, the Better Regulation Executive within the Department for Business, Enterprise and Regulatory Reform (BERR). LBRO operates as an executive non-departmental public body (NDPB), in accordance with a management statement and financial memorandum agreed with the sponsor department.

LBRO is governed by a Board, whose 8 non-executive members have experience across business, consumer, local authority and public and private sectors. We have an executive staff of 25 with diverse backgrounds in business, central and local government, regulatory services and the public and private sector.

Mission

Our mission is to secure the effective performance of local authority regulatory services in accordance with the principles of better regulation. Improved local authority regulatory services can demonstrate their significant contribution to the delivery of economic prosperity and community wellbeing, while unnecessary burdens on well-run compliant businesses can be significantly reduced.

Vision and outcomes

Our vision is based on securing positive demonstrable differences for our stakeholder groups:

For businesses: legislation is simpler to understand and its interpretation and enforcement are consistent across the UK. Time and cost savings arise from streamlined procedures. There is improved access to expert advice about regulatory issues that businesses can trust, giving them more confidence to invest and grow. Burdens on the law abiding are reduced, due to the curtailment of unnecessary intervention and protection from unfair competition. Companies have a greater say in local regulation, both directly and through their representative bodies, resulting in policy reflecting the real issues of concern. Many businesses benefit from working in close partnership with their local authority.

For communities: people are better protected from rogue traders, in a consistent way across the UK. Consumers express more satisfaction with the service they receive and their voice is heard in local regulation. Proper consideration is given to the health and safety of employees, whatever their circumstances. Local environments are more valued by those living or working there, due to factors such as improved air quality and reduced fly-tipping, supported by effective community initiatives.

For local authority regulatory services: legislation is easier to advise on and apply. Time and cost savings result from streamlined procedures and the reduction or burdens resulting from the adoption of common frameworks. The principles of better regulation are understood and accepted. Self assessment and development are the rule, with reference to a single standard of excellence. A partnership approach to working with businesses is common and there are fewer upheld appeals against sanctioning decisions.

For national regulators and other partners: policy goals are achieved through the active engagement of national and local regulators in a cohesive system. Clear relationships exist with local authority regulatory services, while open communications channels enable changes in priorities to be well signaled and managed, achieving both flexibility and assurance. The messages sent to local authorities are consistent, allowing them to focus resources in a way that meets community and national needs and assists with the creation of prosperity.

Key achievements

Our vision for success is ambitious, yet we are confident the progress we have made with the commitment of stakeholders across the regulatory landscape places us in a strong position to deliver success.

Businesses are beginning to benefit from the intensive development of the Primary Authority scheme over the last 12 months, with a number of major retailers involved in the testing phase. The first phase of the data and intelligence system is in place and we have issued statutory guidance in support of the scheme. We have also worked with the Better Regulation Executive to develop the statutory instruments to support the system. We are now fully prepared for commencement in April 2009, supporting businesses to form partnerships and realise benefits through improved advice and reduced inconsistency.

Working directly with a large number of local authorities^{iv}, we have developed a range of tools to support regulatory services on an improvement journey, including the first iteration of a common excellence standard, mechanisms to identify the outcomes and impact of local regulation and working with businesses to create opportunities for regulatory officers to better understand the business environment through the Trading Places programme.

Using programme funding, we continue to support capacity building in the sector, including working with LACORS to support leadership development, sponsoring the Beacon theme 'Cutting Red Tape' and encouraging greater collaboration between authorities through funding regional co-ordination and regional pilots of shared services.

We have launched a wide ranging programme of research and evaluation to drive improvement in the regulatory system, including launching the first 'map' of the local regulatory system, commissioning a comprehensive survey of business and consumer perceptions, exploring the use of the national enforcement priorities and understanding national threats and local service delivery. LBRO is actively using research and evidence to advise government, and in the last year, we have provided advice to the Health and Safety Review, the Consumer Law Review and Anderson Review of Guidance.

Our programme activity is underpinned by open and transparent engagement with our partners and stakeholders. This includes working closely with business representatives, the Department for Communities and Local Government, LACORS and the other local government central bodies. We continue to bring partners together to improve the regulatory system through the world class coalition and early evaluation has demonstrated the value of this approach to participants. Further information will be available in LBRO's annual report, which will be published in June 2009 and made available at www.lbro.org.uk.

Focus for the year ahead

Our activities are informed by our statutory responsibilities, our key programmes and the needs of our stakeholders. The current economic climate underlines the need for a particular focus on supporting businesses and communities, not only through the recession, but also to prepare for opportunities that lie beyond^v.

LBRO will contribute to deliver the Government's Action for Business^{vi} programme, led by the Department of Business, Enterprise and Regulatory Reform, focusing on:

- making UK regulation simpler and more proportionate; and
- maintaining focus on the Enterprise Strategy – ensuring the UK is the best place in the world to start and grow a business.

We will also support the Welsh Assembly Government's programme to lead the country out of recession and prepare for the upturn, including the Flexible Support for Business initiative. LBRO will also contribute to the Programme for Improvement, continuing improvement in local government across Wales.

Primary Authority^{vii}, commencing in April 2009 will form the main focus of our activity and contribution to the Action for Business programme in the year ahead. The Primary Authority scheme is one of the most significant developments in local regulation in a decade providing local authorities and businesses with a unique opportunity to form partnerships to support both prosperity and protection. Extensive support will be provided to businesses wishing to establish a partnership, including working together with the business and the primary authority to embed effective working relationships.

We will address the recommendations of the Regulatory Reform Committee inquiry *Getting Results*, the Anderson review and the Health and Safety Review through programme activity. We will also continue to work closely with colleagues at the Department for Business, Enterprise and Regulatory Reform to support the Consumer Law Review and alternative sanctioning powers (under the requirements of Part 3 of the Regulatory Enforcement and Sanctions Act^{viii}). These recommendations are set out below for reference.

Regulatory Reform Committee recommendations^{ix}

Recommendation 8: BRE strengthen its channels for obtaining grass roots information from the level of individual businesses and individual local authorities. BRE should use its contact with the Local Better Regulation Office as one means of achieving that objective.

Recommendation 9: BRE become more actively involved in facilitating greater sharing of best practice...Local Better Regulation Office should be involved in articulating the local authority perspective.

Recommendation 27: We recommend that a cost/benefit analysis of the retail enforcement pilot be undertaken.

Anderson review recommendation^x:

Recommendation 10: Professional bodies, local authorities and regulators should examine how to broaden the skills of inspectors so that they can better provide advice and guidance that is based on the experiences and needs of business sectors. A sector-based approach to advice from inspectors would help to reduce the burden on business of seeking information about, and complying with, the array of regulatory requirements across their business.

Improving outcomes from Health and Safety review recommendations^{xi}:

Recommendation 2: To improve outcomes in lower risk, small businesses in the regulatory areas employers associate with health and safety:

- the Local Better Regulation Office should work together with the HSE and the Local Authorities Co-ordinators of Regulatory Services (LACORS) to design a new scheme that would allow small firms to demonstrate in a single process their compliance in a range of regulatory areas associated with health and safety
- the Local Better Regulation Office should work with local authorities to consider additional benefits for firms that have demonstrated compliance through the scheme, learning from the experience of the retail enforcement pilots and the work of Sarah Anderson's "Review of Guidance".

Strategic objectives and programmes 2009-2012

LBRO's strategic objectives are delivered through a series of interconnected programmes, outlined below. Objective 2; directly deliver consistency, is the focus of our direct service provision through the primary authority scheme, providing direct benefits to businesses by reducing costs and unnecessary burdens. Objective 1 focuses on working with local authorities to provide tools and techniques that regulatory services can use to support their own improvement, whilst objective 3 focuses on the wider system in which regulatory services operates, including relationships with national regulators and central government. Here the focus is on working with a coalition of partners to reach agreement about common systems that impact on regulatory services, including data requests, risk assessment frameworks and competency frameworks.

Many of these programmes continue or build upon our work to date, including the development of an excellence standard to support sector led improvement in regulatory services, preparing for the refresh of the national enforcement priorities and supporting leadership development in the sector. Our programmes are driven by information and evidence, including the findings of government policy reviews, independent research such as the MORI business perceptions survey^{xiii} and expertise from other organisations involved in local regulation and the local government improvement agenda.

The programme plan for 2009-2012, including resource allocation, can be found at **Annex 1**.

Performance Indicators

Annex 2 shows the framework used to develop LBRO's indicators, and to connect shorter-term activity and outputs, to longer-term outcomes. Our three year performance indicators are shown below. One year performance indicators are shown in the programme plan at Annex 1.

3 year indicators
85% of businesses state regulatory services understand their business
Increase in the percentage of businesses that see regulatory services as fair and helpful (NI 182)- baseline to be established in June 2009
400 Primary Authority partnerships exist, covering at least 200 businesses
95% of businesses that seek a Primary Authority relationship are successful
80% of businesses and local authorities that are within a Primary Authority partnership report satisfaction
85% of businesses in a Primary Authority relationship report that the advice they receive from local authorities is very/fairly consistent.
Demonstrable progress in performance against the national enforcement priority indicators (NI 173, 183, 184, 190, 194)
50% of local authority regulatory services engaged in local area agreements.
10% reduction in the actual burdens on local authority regulatory services

Governance Framework

The four key areas of LBRO's governance framework are leadership and capability; stakeholder engagement, performance and control; and risk management. The LBRO board provides challenge to ensure that the organisation's overall vision and outcomes are achieved. Rigorous and professional debate help to ensure a high standard of performance, which includes the achievement of targets, appropriate risk management, and accurate and timely information provision. A summary of our approach to each element of the governance framework is described below.

Leadership and capability

The statutory and corporate leadership of LBRO lies with the Board, led by the Chair who is directly accountable to the Secretary of State. Wider responsibility lies with the Shared Leadership Group, comprising both the LBRO Board and the senior management team. The LBRO Board determines the vision, objectives and outcomes within the mission established for LBRO by Parliament, and the senior management team, led by the Chief Executive (who is also a Board member and the Accounting Officer), is responsible for the operational management of LBRO.

LBRO is committed to developing its capability and capacity, aiming to have the right people in place at non-executive and executive level, at the right time, with the right skills to deliver its objectives. LBRO aims to be a high performance organisation with a clear line of sight from strategic objectives to individual goals.

Our values, to be outcome focused, evidence based, creative, challenging and supportive, underpin the policies, practices and procedures that together make up the People Strategy. These policies and practices are effective and transparent, and comply with the relevant legislative frameworks and good practice. They align, wherever practicable, with those of our sponsor department, whilst recognising that LBRO's size may mean this aspiration is sometimes inappropriate.

The structure of the Shared Leadership Group is shown at Annex 5.

Stakeholder engagement

Stakeholder engagement is an essential dimension of all LBRO activity and a key driver for energising the organisation to achieve its strategic corporate objectives through the establishment of creative and innovative partnerships, networks and other relationships. High profile engagement is led by the Board, coordinated by the Director of Policy and Engagement and supported by the senior management team and executive. Through a comprehensive approach to stakeholder relations, we aim to:

- gather intelligence to understand the experience and perspectives of all stakeholders
- ensure constructive collaboration and partnership in the delivery and dissemination of LBRO projects
- maintain a positive and credible public profile amongst all stakeholder audiences and the wider public
- create opportunities for stakeholders to come together and share perspectives and experience
- create open and transparent processes for the development of LBRO strategy, policy and guidance to ensure the organisation engages delivery partners in an open and transparent manner and treats all stakeholders fairly and with respect

Performance and control

The board serves as the key control mechanism within the organisation. LBRO senior management report regularly (every six to eight weeks) to the board and strategic issues are raised and discussed. The status of financial spend, programme management and performance management are reported regularly as detailed below, and a forward programme for review of key governance policies, such as health and safety, complaint management, gifts and hospitality, freedom of information, and environmental impact is in place.

Financial management

LBRO is owned and funded by the Government and receives the majority of its income as 'grant in aid' from its sponsor department. In 2008/09, the first full year of operation, the allocation was £4.4million. In 2009/10 the funding is £4.1 million.

Additionally, the Welsh Assembly Government has commissioned LBRO to undertake further specific regulatory projects in Wales.¹

This funding is to cover the operation of the organisation and delivery of the strategic objectives, often through providing incentive based funding to local authority regulatory services. The funding is primarily for revenue spending; in 2008/09 an element (approx £150,000) was spent on capital, including development of the Primary Authority database. There will be further sums to be capitalised on this database during 2009/10.

An analysis of income and expenditure projections for the period of this corporate plan is included at Annex 3.

As a non-departmental public body, LBRO adopts high standards of probity, accountability, transparency and governance, keeping control of expenditure on an ambitious delivery plan. Procurement follows strict government standards, and the three board members serving as the Audit Committee provide a strong assurance function, including a review of the annual accounts, internal controls, procedures and risk management.

LBRO's Birmingham offices are leased on a 'five plus five' year lease and ICT equipment is provided on a managed service contract. A large number of support services are externally sourced, including payroll and pension administration, internal audit, legal and human resources advice, and office facilities. Until March 2009, financial processes, including payment of invoices and bank reconciliation, were outsourced. It was decided for service quality and value for money to implement a new finance system and bring these services 'in house' from April 2009. This will ensure that LBRO has the appropriate and timely management information to support service delivery and provide assurance that public funds are being used effectively and efficiently.

Additional financial documents will be made publicly available on the LBRO website at www.lbro.org.uk.

¹ The agreed level of funding from Welsh Assembly Government for 2009-2010 to undertake distinct programme activity in Wales is £300,000. This information replaces projected figures stated in table 2.

Programme management

Responsibility for project management is shared throughout the organisation, with projects and programmes co-ordinated by a dedicated programme manager and overseen by a representative of the senior management team. The status of programmes and associated risks are considered by the programme management group and reported to each Board. Programme management is based on a 'gateway' approach, with controls at key decision points such as project initiation, analysis and design stage, development and implementation.

Performance Management

Performance management processes are embedded throughout the organisation. Key performance indicators are derived from our strategic objectives, and are reported to Board on a quarterly basis and appropriate action taken to address issues arising. Key performance indicators for 2009 and beyond have been developed to chart milestones in programme and project delivery, and ultimately, measure change in the regulatory system for the benefit of stakeholders, including beneficiaries, customers, partners and sponsors.

Risk Management

LBRO recognises that effective risk determination and management underpins sound corporate governance and is crucial to achieving its objectives. LBRO has adopted a risk management strategy that is relevant to the size and nature of the organisation, managing risks at both corporate and programme level. The corporate risk register is considered by a dedicated risk management group and the status of risks is reported to the Board on a regular basis.

Independent audit has recently identified LBRO's risk management reporting processes as best practice.

Annex 1: LBRO Programme Plan 2009-2012, including key performance indicators and outcomes

Strategic Objective 1: Support service improvement in regulatory services				
Programme	Project Activity		One year performance indicators	Resources 09-10 £'000
	Year 1 2009-2010	Years 2-3 2010-2012		
<p>Outcome and customer focus</p> <p>Supporting local authorities in shaping service delivery around the needs of local communities and businesses to deliver better outcomes through the provision of tools and techniques, and dissemination of best practice and guidance. This programme includes a focus on the relationship between local authority regulatory services officers and businesses, and improving understanding of the business environment through the Trading Places^{xiii} programme.</p>	<ol style="list-style-type: none"> 1. Increasing LARS awareness of business through the Trading Places scheme 2. Improving LARS involvement in economic development, working with sector bodies including guidance on supporting businesses and communities during a recession and beyond 3. Dissemination of tools to support LARS to measure outcomes and impact 4. Working with Beacon authorities and work to identify and disseminate best practice on key outcomes 	<p>Activity will focus on improving the relationship between regulatory services and businesses by improving understanding of different business sectors and cultural diversity in business advice and support.</p> <p>The Trading Places scheme will be evaluated and opportunities sought to develop the scheme as appropriate.</p> <p>This will be supported by identification and dissemination of best practice, including areas identified by local authorities completing self assessment through the excellence standard framework.</p>	<p>750 trading places placements completed</p> <p>Evidence that 50% of local authorities are applying improved understanding of risk based concepts</p>	280
<p>Leadership</p> <p>Focusing on equipping staff within regulatory services with the skills and capability to lead and deliver in a rapidly changing environment, working with closely with LACORS, TSI and CIEH</p>	<ol style="list-style-type: none"> 5. Directly support the LACORS/ KBA Solutions leadership programme for regulatory services 6. Leadership development, working with the professional bodies to promote sustainable solutions 7. Professional development, working with the professional bodies to develop a module focusing on better regulation principles 	<p>Working closely with the professional and representative bodies, LBRO will develop tools to provide tailored support to LARS, addressing specific challenges faced by regulatory leaders.</p>		85

Strategic Objective 1: Support service improvement in regulatory services				
Programme	Project Activity		One year performance indicators	Resources 09-10 £'000
	Year 1 2009-2010	Years 2-3 2010-2012		
<p>Capacity and collaboration</p> <p>Seeking greater efficiency through collaboration, co-ordination, co-operation and sharing of services, and encouraging local authorities to work together where appropriate to tackle cross boundary issues through the sharing of resources, intelligence and best practice.</p>	<p>8. Improve regional shared working through regional co-ordination and regional working</p> <p>9. Working with local authorities through Regional Improvement and Efficiency Partnerships and others for use of tools in service improvement</p> <p>10. Promote best practice approaches to shared services</p> <p>11. Continue work with new unitary authorities to embed better regulation approaches</p>	<p>Anticipating greater financial pressures, LBRO will continue to supporting authorities to achieve greater efficiency through innovative approaches to sharing services, expertise and capacity.</p> <p>LBRO will advance evidence to demonstrate the benefits of shared services and more effective joint working through appropriate means, including policy advice to government.</p> <p>LBRO will continue to support the improvement journeys of local authorities, including those with facing particular challenges or difficulties</p>	<p>Evidence that work in the area of capacity and co-ordination (such as shared services, regional co-ordination etc) demonstrates efficiencies and effectiveness</p>	270
<p>Risk based regulation</p> <p>Exploring ways to support local authorities to embed a comprehensive approach to risk across all regulatory activities, including work focused on priority setting, lessons learned from the retail enforcement pilot, implementing the recommendations to improve outcomes in lower risk, small businesses and preparations for the use of more proportionate (Macrory) sanctions as set out in Part 3 of the Regulatory Enforcement and Sanctions Act</p>	<p>12. Work with the HSE and LACORS to develop scheme to support small business compliance with health and safety</p> <p>13. Disseminate lessons learned from the retail enforcement pilot</p> <p>14. Prepare a list of national enforcement priorities for Welsh local authorities</p> <p>15. Work with LARS to explore consistent approaches to proportionate sanctioning</p>	<p>Activity will focus on providing tools to support regulatory services embed comprehensive risk assessment across all activities. This will include updating and refreshing the national enforcement priorities in England and supporting the effective use of Macrory sanctioning powers.</p>	<p>Evidence that 50% of local authorities are applying improved understanding of risk based concepts</p>	140

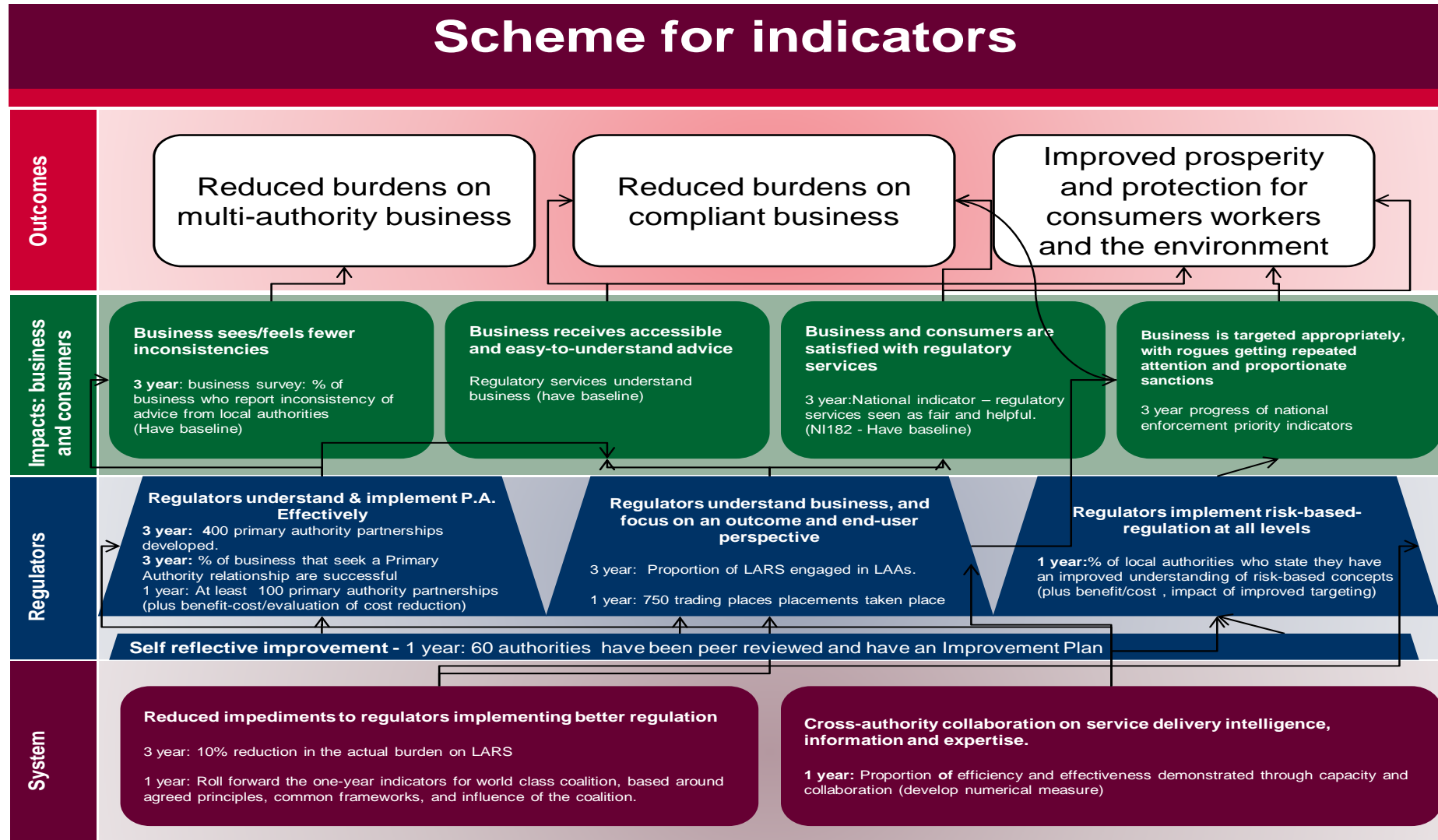
Strategic Objective 2: Directly deliver consistency				
Programme	Project Activity		One year performance indicators	Resources
	Year 1 2009-2010	Years 2-3 2010-2012		
<p>Primary Authority</p> <p>The implementation and successful operation of the primary authority scheme as established by the Regulatory Enforcement and Sanctions Act 2008. Investment in the data and intelligence system that underpins the successful operation of primary authority partnerships will ensure that the system is fit for purpose and meets the needs of local authorities and others. This system will provide invaluable data and intelligence for primary and enforcing authorities for both advice and enforcement, and reduce costs for businesses and local authorities through greater efficiency.</p> <p>From commencement, LBRO will register partnerships, provide guidance and help resolve disputes to support businesses in accessing the scheme and local authorities in their roles as primary or enforcing authorities. Direct support from LBRO will include setting up appropriate mechanisms to ensure consistency and quality of advice provided by primary authorities, ensuring enforcing authorities receive adequate guidance, training and support and demonstrating to businesses the value of the scheme in driving prosperity nationally and locally. Establishing and supporting partnerships will be prioritised in the first 6-9 months of operation, and flexibility maintained to respond to need in the system.</p>	<p>16. Develop primary authority, including:</p> <ul style="list-style-type: none"> • IT database development • Establishing governance arrangements • Establishing networks <p>17. Deliver primary authority, including:</p> <ul style="list-style-type: none"> • Supporting set up of partnerships • Servicing determinations <p>18. Marketing and promotion</p> <ul style="list-style-type: none"> • Ongoing training support to LARS • Promoting the scheme to new sectors • Marketing the scheme to encourage take up • Encourage the development of centres of excellence 	<p>Activity will build on strong foundations and seek to promote the scheme widely to businesses to ensure significant numbers of businesses take up the opportunity to develop a primary authority partnership.</p> <p>The scheme will improve the quality of advice to business and provide dispute resolution, but also provide the means to share good practice across the sector.</p> <p>LBRO will work with the professional and representative bodies to develop primary authority within the competency framework for regulatory officers.</p> <p>LBRO will also look to work with partners and local authorities to resolve other areas of inconsistency in the local regulatory system</p>	<p>100 primary authority partnerships (by March 2010)</p>	<p>510</p>

Strategic Objective 3: Improve the system				
Programme	Project Activity		One year performance indicators	Resources
	Year 1 2009-2010	Years 2-3 2010-2012		
<p>Developing a world class system</p> <p>Working with a coalition of local authority regulatory services, national regulators, professional bodies and other key stakeholders, this programme seeks to reduce costs for local authorities, agree a common understanding of the environment and standards for world class local authority regulatory services and to understand and to build consensus about the necessary systemic conditions for excellence. These conditions are being considered through a series of modules, focusing on risk, priorities, data sharing, competency and the impact and outcomes of local regulation.</p>	<p>19. Develop the Mapping the Landscape report</p> <p>20. Agree and test the excellence standard framework</p> <p>21. Work with the coalition and LARS through modules of activity focused on common systems and greater alignment</p> <ul style="list-style-type: none"> • Competency • Risk • Priorities • Data sharing • Outcomes and impacts <p>Sanctioning and advice on the application of Macrory powers</p>	<p>Using LBRO's unique position within the regulatory landscape, LBRO will facilitate activity to strengthen the relationship between national regulators and local authorities to support improvements in the system and outcomes for businesses and consumers.</p> <p>To improve alignment in the system, additional modules of joint activity between LBRO, the world class coalition and local authority regulatory services will be developed as appropriate</p>	<p>60 authorities have been self-assessed and have an improvement plan</p> <p>70% of coalition partners demonstrate behavioural change which delivers benefits to local authorities in subsequent years</p> <p>Principles of approach to common frameworks developed and agreed with world class coalition partners and such change will lead to benefits to business and consumers in subsequent years</p>	255
<p>Advice and Policy</p> <p>Using evidence collected through our work and commissioned research and evaluation, LBRO will act as a source of advice on both local authority regulatory services policy and practice, working with LACORS on behalf of the sector.</p>	<p>22. Gather evidence through the LBRO policy register to improve regulations</p> <p>23. Engagement with the policy development cycle</p> <ul style="list-style-type: none"> • EU Services Directive • Consumer Law Review • National threats 	<p>LBRO will strengthen its capacity to influence policy and the design of regulations through the provision of evidence and data regarding the local regulatory system.</p>		30

Organisation Objective: Excellent Organisation				
Programme	Project Activity		Evaluation measures/ key milestones	Resources
	Year 1 2009-2010	Years 2-3 2010-2012		
<p>Stakeholder engagement and communications</p> <p>LBRO aims to be a responsive organisation that understands the needs and interests of its stakeholders. This programme will use open and transparent approaches to engage stakeholders in all aspects of our work to promote local better regulation across the regulatory landscape.</p>	<ol style="list-style-type: none"> 1. Delivery of stakeholder engagement strategies for priority stakeholder groups: <ul style="list-style-type: none"> • Business • Consumers • Regulatory services/ local government • Partners- MOUs • Sponsors and influencers 2. Board stakeholder engagement activity 3. Conference and events presence, including co-sponsorship of LGA 2009 and LBRO annual conference 4. Communications and publications 5. Website, intranet and CRM content 	<p>Reflecting activity in the series of stakeholder engagement strategies, LBRO will continue to build effective relationships and ensure high level engagement supports the achievement of our strategic objectives and key outcomes.</p> <p>Where appropriate, we will develop additional memoranda of understanding with key partner agencies.</p>	<p>Stakeholder survey (Sept 09) shows that a majority of key stakeholders believe that:</p> <ul style="list-style-type: none"> • LBRO understands their interests and needs. • LBRO has formed effective partnerships and collaborated with them in delivering its projects. • LBRO has a positive and credible public profile. • LBRO is the thought leader for better local regulation. <p>LBRO has an open and transparent approach to developing strategy, policy, projects and guidance</p>	120
<p>Organisation and governance</p> <p>LBRO is committed to embedding robust and effective policies and processes regarding risk management, financial management and human resources that meet statutory requirements and represent best practice for non-departmental public bodies.</p>	<ol style="list-style-type: none"> 6. Financial management 7. IT- data, website and CRM 8. Service transformation programme 9. Risk management and legal advice 	<p>LBRO will continue to develop and review its policies, processes and procedures that underpin the organisation, including governance policies and robust management controls.</p>	<p>Key milestones will include:</p> <ul style="list-style-type: none"> • Publication of annual accounts and financial statements 	6

Organisation Objective: Excellent Organisation				
Programme	Project Activity		Evaluation measures/ key milestones	Resources
	Year 1 2009-2010	Years 2-3 2010-2012		
	10. Premises and facilities management 11. Governance development 12. Human resources 13. Board support for strategy and scrutiny role		<ul style="list-style-type: none"> Internal audit schedule as set out in LBRO Audit Plan External audit of financial statements and accounts 	
Strategy and Research LBRO will influence the regulatory system through developing and promoting an effective strategic direction for better local regulation, articulated through our corporate documents, policy advice to government and our support to local authorities. We will develop a research and evaluation strategy to support this work, and develop stronger performance management to measure our impact.	14. Influencing through thought leadership 15. LBRO strategy for better regulation 16. Develop a research and evaluation strategy, including an approach to research knowledge management and the identification and evaluation of best practice 17. Strategic planning, programme and performance management	Strategic development will include continuing to strengthen our data and evidence base on better local regulation and the local regulatory system through considered programmes of independent research and evaluation. This will include refreshing the survey of business and consumer perceptions on the impact and role of regulation. Evidence will underpin our strategy, and our strategic thinking on better regulation will be tested rigorously with partners and stakeholders. We will use strategic thinking to influence the system through various channels, including high profile stakeholder engagement, direct programme work with local authority regulatory services and providing policy advice to government.	Key milestones will include: <ul style="list-style-type: none"> Development of LBRO strategy Development of research and evaluation strategy Publication of LBRO corporate plan Publication of annual report Evaluation measure: Stakeholder survey shows that a majority of key stakeholders believe that LBRO is the thought leader for better local regulation.	50

Annex 2: Performance indicator framework 2009-2012



Annex 3: Income and Expenditure projections 2008-2013 (Table 2)

LBRO Local Better Regulation Office	2008-09 latest forecast £'000	2009-10 original budget £'000	2010-11 original budget £'000	2011-12 original budget £'000
Non-programme (admin) spend				
Total employees	1,488	1,616	1,616	1,616
Total board	273	243	243	243
Other employee & agency costs	287	189	189	189
Total employees & board	2,048	2,048	2,048	2,048
Premises	156	149	149	149
Transport - travel & subsistence	119	109	109	109
Supplies & services	341	247	247	247
Capital charges	51	51	51	51
Total non-programme	2,715	2,604	2,604	2,604
Programme spend				
Support service improvement				
Outcome & customer focus	210	280	280	280
Leadership	105	85	85	85
Capacity & collaboration	332	270	270	270
Risk based regulation	200	140	140	140
Directly deliver consistency				
Primary authority	425	510	510	510
Improve the system				
Developing a world class system	236	255	255	255
Advice & policy	-	30	30	30
Excellent organisation				
Stakeholder engagement & comms	239	120	126	126
Organisation & governance	35	6	-	-
Strategy	137	50	50	50
Total programme	1,919	1,746	1,746	1,746
Total expenditure	4,634	4,350	4,350	4,350
Grant In Aid	(4,400)	(4,100)	(4,100)	(4,100)
Welsh Assembly Government grant ²	(234)	(250)	(250)	(250)
Total income	(4,634)	(4,350)	(4,350)	(4,350)

² The agreed level of funding from Welsh Assembly Government for 2009-2010 to undertake distinct programme activity in Wales is £300,000. This information replaces projected figures stated in table 2.

Division of administration to programme expenditure (Table 3)

1. Analysis in Corporate Plan

	2008-09 latest forecast £'000	2009-10 original budget £'000	2010-11 original budget £'000	2011-12 original budget £'000	2012-13 original budget £'000
Total non-programme	2,715	2,604	2,604	2,604	2,604
Total programme	1,919	1,746	1,746	1,746	1,746
Total expenditure	4,634	4,350	4,350	4,350	4,350
Total non-programme	59%	60%	60%	60%	60%
Total programme	41%	40%	40%	40%	40%
Total expenditure	100%	100%	100%	100%	100%
Direct programme salaries	348	412	412	412	412

2. Analysis after apportioning direct programme salaries to programmes

	2008-09 latest forecast £'000	2009-10 original budget £'000	2010-11 original budget £'000	2011-12 original budget £'000	2012-13 original budget £'000
Total non-programme	2,367	2,192	2,192	2,192	2,192
Total programme	2,267	2,158	2,158	2,158	2,158
Total expenditure	4,634	4,350	4,350	4,350	4,350
Total non-programme	51%	50%	50%	50%	50%
Total programme	49%	50%	50%	50%	50%
Total expenditure	100%	100%	100%	100%	100%

Annex 4: Performance Assessment 2008-2009 (Table 4)

One year indicators 2007-8			
Programme	Indicator	Comments	Status
Best practice and guidance	1. Work on best practice, including work on Beacons and national enforcement priorities, incentivises behavioural change in local authorities through demonstration effect and action research.	LBRO sponsored the Beacon theme 'Cutting Red Tape', the applications involving 18 local authorities. Working with the Improvement and Development Agency, LBRO has facilitated opportunities to disseminate learning to other local authorities to incentivise change. 90% of local authorities who have taken part in dissemination events stated that they are considering following up examples good practice for use within their own authority.	Complete-further development ongoing
	2. Evidence at least 40 local authorities introducing or committed to introducing new tools and techniques with clear benefits in subsequent years to business and consumers.	As of March 2009, 224 local authorities across England, Wales, Scotland and Northern Ireland are working with LBRO in project or pilot work exploring new approaches and techniques to deliver better local regulation. Proportionately, LBRO is working with a greater number of upper tier authorities, and projects within the business plan for 2009-2010 will address district council engagement through projects such as improving two tier working.	Complete-further development ongoing
Efficient and effective service delivery	3. Evidence of at least 50 per cent of local authority regulatory services making use of the national enforcement priorities in setting service delivery priorities.	A representative survey of English heads of regulatory services carried out between Feb-March 2009 shows that 95% (latest available figure) of local authorities make use of the national enforcement priorities in service planning.	Complete
	4. Regional coordination provides measureable efficiency savings to local authorities and shows evidence of producing benefits to business and consumers in subsequent years.	In addition to providing funding for regional co-ordination, four regional pilots have been established focusing on regional working that brings together trading standards and environmental health services. End of year reporting due at the end of March	Ongoing activity
	5. Evidence of increased understanding of practical application of Macrory powers with at least six local authorities with clear benefits to consumers and business in subsequent years.	In thinking about the use of Macrory powers by local authorities, LBRO carried out an exercise with Westminster City Council to test the methodology of the Hampton Implementation Review within a local authority setting. The recommendations of this exercise	Ongoing activity

One year indicators 2007-8			
Programme	Indicator	Comments	Status
		<p>have informed the development of the excellence standard to ensure that the standard is fit to make an assessment of readiness to receive Macrory powers. These findings were shared with representatives of the LBRO reference panel, comprising of over 20 local authority heads of service.</p> <p>LBRO continues to work closely with the Better Regulation Executive on this issue and will work with the world class coalition in 2009-2010 to ensure consistency of advice surrounding the use of alternative sanctioning powers by local authorities and national regulators.</p>	
Leadership culture and capacity	6. Evidence of professional associations and pilot group of local authority regulatory services committed to use of a comprehensive leadership model based on the better regulation agenda.	<p>LBRO funding for the LACORS/ KBA Strategic Leadership in Modern Local Government programme has provided 19 places for regulatory leaders. Feedback on the programme has been extremely positive, with the average score being 3.96 out of a total score of 4.</p> <p>LBRO is working with CIEH and TSI, in conjunction with an academic institution to take forward work in this area.</p>	Complete-further development ongoing
	7. A lessons learned framework to evaluate the implementation of the retail enforcement pilot has been designed, dissemination of the results has commenced, and there is evidence of at least 20 local authorities adopting a joint working model	<p>24 local authorities are engaged in the retail enforcement pilot project, adopting a joint working model, with lessons learned shared between cluster groups at quarterly user group meetings.</p> <p>A lessons learned framework has been designed and agreed. 35 interviews and 2 focus group meetings have taken place with those involved in REP or joint working models.</p> <p>Work has been commissioned to develop case studies on the business experience of REP with a final report due for completion in April 2009, and analysis of qualitative data to develop a toolkit for dissemination. This work will be completed by September 2009.</p>	Complete-further development ongoing

One year indicators 2007-8			
Programme	Indicator	Comments	Status
	8. Engagement with stakeholders and improved design of the primary authority scheme leads to increased confidence of successful implementation that will deliver clear benefits for business and local authorities.	<p>LBRO has hosted a number of workshop events to enable stakeholders to directly contribute to the design and development of the scheme.</p> <p>73% of delegates stated they have a better understanding of Primary Authority and 82% said they now have a better appreciation of how the LBRO approach will impact on their work (Wales). (07/05/08)</p> <p>62% of delegates stated they have a better understanding of Primary Authority and 55% said they now have a better appreciation of how the LBRO approach will impact on their work (Birmingham). (01/05/08)</p> <p>Initial evaluation of 6 primary authority road shows have identified that 82% stated after the road show they understood their role as an enforcing authority under primary authority and 63% found the IT demonstration and the workshop on inspection very useful/useful.</p> <p>Extensive testing involving 12 businesses and 16 local authorities has resulted in improvements to the design of the scheme.</p> <p>LBRO has worked closely with the Better Regulation Executive on engagement regarding the statutory instruments, affecting changes to the instruments via both learning through engagement and analysis.</p> <p>Consultation responses received from local authorities and representative and professional bodies to the draft statutory guidance have resulted in changes.</p> <p>LBRO have provided information sessions to all local authorities in England, Scotland, Wales and N Ireland on primary authority before commencement of the scheme.</p>	Complete

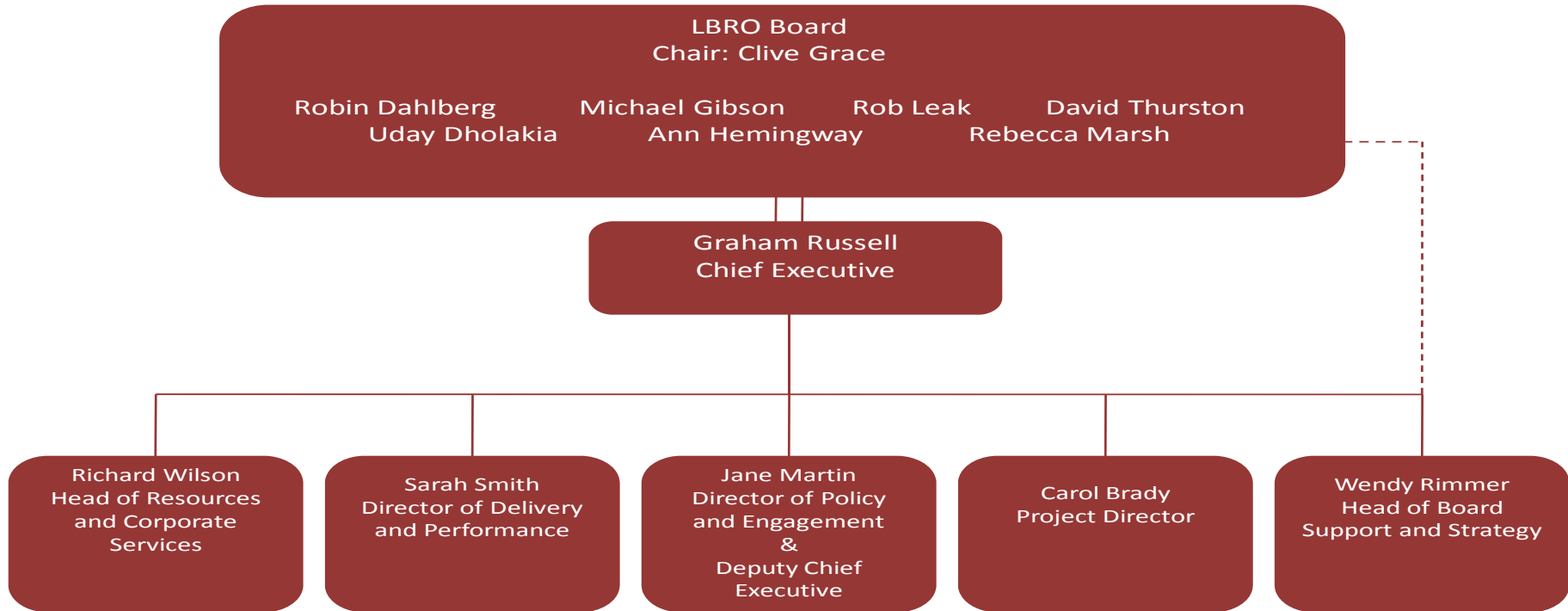
One year indicators 2007-8			
Programme	Indicator	Comments	Status
Developing a world class regulatory system	9. Behavioural change in coalition partners (evidenced by evaluation) delivers benefits to local authorities in subsequent years.	Seven of the eight coalition partners interviewed believe that the world-class programme will change/change to some extent their decisions in the future.	Complete
	10. Principles of approach to common frameworks developed and agreed with world class coalition partners (which is evidenced by evaluation), and such change will lead to benefits to business and consumers in subsequent years.	All of the coalition partners interviewed agree/ agree to some extent with the principles of the world-class programme. The support for common frameworks has been maintained, with most partners being supportive of the excellence standard and common frameworks.	Complete-further development ongoing
Advice and Policy	11. Clear examples where LBRO policy advice on relevant areas (e.g. Enterprise Strategy, Consumer Protection Regulations) has led to improvement in regulations in terms of benefits to both businesses and consumers.	<p>We have directly affected the recommendations of the Anderson Review (e.g. Recommendation 10 about competency in local authorities), and provided advice to the Health and Safety Review and the Consumer Law Review.</p> <p>In Anderson, Recommendation 10 states "professional bodies, local authorities and regulators should examine how to broaden the skills of inspectors so that they can better provide advice and guidance that is based on the experiences and needs of business". This recommendation is as a result of direct consultation with LBRO.</p> <p>LBRO is currently participating in early development of the Home Office's Draft Mandatory Code of Practice for the Alcohol Industry.</p>	Ongoing work

Three year indicators					
Objective	Indicator in 2008-2011 corporate plan	Progress by March 2009 and comments	Revised Indicator (2009-2012)	Target 2011	Target 2012
Support service improvement in local authority regulatory services	10 per cent increase in business and consumer satisfaction with local authority regulatory services activities to achieve LBRO statutory purpose of reducing unnecessary burdens on business and ensuring effective protection for consumers, workers and the environment	LBRO commissioned a national survey of business and consumer satisfaction with regulatory services, establishing a baseline for future improvement. This indicator has been clarified to align with NI 182. Additional indicator has been added to focus on business understanding, reflecting questions in the LBRO/ MORI business perception survey.	Increase in the percentage of businesses that see regulatory services as fair and helpful Percentage of businesses who state regulatory services understand their business (baseline 76.6%)	To be established in June 2009	To be established in June 2009 85%
	Minimise the number of appeals against local authority sanctioning decisions that go to tribunal and are successful in either overturning the sanction, or lowering its level	LBRO continues to work closely with the Better Regulation Executive on the issue of alternative sanctioning powers and will work with the world class coalition in 2009-2010 to ensure consistency of advice surrounding the use of alternative sanctioning powers by local authorities and national regulators.	This indicator has been deleted awaiting further development on Macrory sanctioning.	N/A	N/A
	An improvement in joint working and intelligence gathering by local authority regulatory services leads to demonstrable evidence of an increase in protections for consumers, and reductions in burdens for compliant businesses.	One year indicators on joint working (Retail Enforcement Pilot) show good progress in the last year.	Demonstrable progress in performance against the national enforcement priority indicators (NI 173, 183, 184, 190, 194)	To be established in June 2009	To be established in June 2009

Three year indicators					
Objective	Indicator in 2008-2011 corporate plan	Progress by March 2009 and comments	Revised Indicator (2009-2012)	Target 2011	Target 2012
		Given the difficulties in providing robust data to measure this indicator, this has been replaced with two indicators focusing on ensuring protection for consumers and a reduction in burdens on business through a focus on national priorities.	Proportion of local authority regulatory services who are engaged in local area agreements		50%
Directly deliver consistency, principally through the primary authority scheme	At least 200 businesses have a primary authority partnership	The last financial year has been focused on the design and development of the primary authority scheme, preparing for 6 th April 2009, when partnerships can begin to be registered. This indicator has been revised to clarify it relates to the number of partnerships ^{xiv} , rather than the number of businesses.	400 primary authority partnerships exist, covering at least 200 businesses	200 partnerships	400 partnerships
	95 per cent of businesses that seek a primary authority relationship are successful	The last financial year has been focused on the design and development of the primary authority scheme, preparing for 6 th April 2009, when partnerships can begin to be registered.	Percentage of businesses that seek a primary authority relationship and are successful	95%	95%
	80 per cent of businesses and local authorities that are within a primary authority partnership report satisfaction	Progress as above.	Percentage of businesses and local authorities that are within a primary authority partnership and report satisfaction	80%	80%

Three year indicators					
Objective	Indicator in 2008-2011 corporate plan	Progress by March 2009 and comments	Revised Indicator (2009-2012)	Target 2011	Target 2012
		Another indicator has been added to focus on the intended outcomes of the scheme, to reduce inconsistency experienced by business. Baseline taken for the LBRO/MORI business survey (2008).	Percentage of businesses in a primary authority partnership which report that the advice they receive from local authorities is very/fairly consistent	80%	80%
Act to improve the regulatory system	75 per cent of local authorities report reduced burdens resulting from the adoption of common frameworks	<p>The world class programme aims to reduce burdens and costs for local authorities by developing and agreeing common frameworks in key modules, including data sharing, risk assessment, competency and prioritisation. Work in this area is progressing well (please see one year indicators above).</p> <p>This indicator has been clarified to provide more robust evidence regarding the scale of the burden placed on local authority regulatory services.</p> <p>LBRO will undertake work with CIPFA to measure the reduction in burdens achieved through the data sharing module.</p>	Percentage of reduction in the actual burdens on local authority regulatory services.		10%

Annex 5: Shared Leadership Group Organisational Chart April 2009



Annex 6: Mapping programmes to the better regulation principles- illustrative examples

Better Regulation Principle	Programme/ project	Beneficiaries	Comments
Consistency	<p>Primary Authority</p> <p>World class modules:</p> <ul style="list-style-type: none"> • Competency • Risk • Data sharing <p>Regional co-ordination and regional working, two-tier working</p> <p>Policy advice to government</p>	Business, local authorities, consumers	<p>Primary authority will increase consistency for businesses trading across council boundaries through the formal relationship between the business and the primary authority, providing authoritative advice and agreeing inspection plans.</p> <p>The world class modules will increase consistency for businesses by aligning frameworks that impact on local authority enforcement, including competency of officers, risk assessment schemes and data sharing, to create common systems for LARS officers.</p> <p>Regional co-ordination and regional working will bring together local authorities and tiers of government to develop consistent approaches across regions and beyond through improved communication and project based initiatives targeting areas of highest risk.</p> <p>To address inconsistency that arises from poor regulations, LBRO's programme of policy advice will advise and support policy depts and national regulators in the creation of effective regulations.</p>
Accountable	<p>World class modules:</p> <ul style="list-style-type: none"> • Outcomes and impact <p>Best practice:</p> <ul style="list-style-type: none"> • Beacons • Business support <p>Trading Places</p>	Business, communities	<p>By improving LARS ability to demonstrate their impact and ability to deliver outcomes, including economic prosperity, LARS will be more accountable to both business and the wider community.</p> <p>Disseminating best practice, including the work of the Beacon winners for 'Cutting Red Tape', will support local authorities to engage business in positive ways and build a relationship of trust. Businesses will benefit from accessible, useable support and guidance, including sector specific products and from understanding what they can expect from regulators to support businesses in achieving compliance.</p> <p>One key project to improve regulators understanding of the business environment is the Trading Places scheme. This allows LARS officers to spend time in a business environment to understand business drivers and the challenges they face in achieving compliance.</p>

Better Regulation Principle	Programme/ project	Beneficiaries	Comments
Targeting	Retail Enforcement Pilot National enforcement priorities Single compliance project	Business, consumers, communities	<p>Lessons learnt from the Retail Enforcement Pilot will support LARS to make better use of joint working models, gathering intelligence to target activity on the areas of highest risk while reducing burdens on business through fewer, more effective inspections.</p> <p>Using national enforcement priorities in service planning will ensure that LARS focus resources and activities on national priorities for enforcement, those areas that carry highest risk or require a collaborative approach to enforcement in order to control risk.</p> <p>The recommendation from the HS review, the single compliance project, will help SMEs to demonstrate their compliance across a range of functions and thereby provide valuable information to support targeted activity based on risk.</p>
Proportionate	Sanctioning Proportionate sanctioning scenarios Professional development	Business	<p>Considering approaches to the application of sanctions, and guidance on the use of Macrory sanctions, with the world class coalition will ensure consistency in their application by LARS and national regulators.</p> <p>Through testing of different sanctioning scenarios, local authorities will feel confident to apply a range of sanctions that are proportionate to the non-compliance. This work with local authorities will be supported through work on professional development and embedding the principles of better regulation in continuous professional development for LARS officers.</p>
Transparent	Leadership Professional development	Business	<p>Seeing businesses as customers of regulatory services will require a cultural shift for many LARS services. This is dependent on effective leadership, and LBRO, working with KBA/ LACORS and CIEH and TSI are supporting leadership development for regulatory officers. This will create leaders that can create a clear vision for their service that is built around the needs of business, and articulate this vision to staff.</p> <p>Likewise, professional development work includes a focus on building relationships with business and embedding the behaviours of better regulation.</p>

References

- ⁱ The LBRO strategy 2008-2011 is available at http://www.lbro.org.uk/FileUploads/20081021_LBRO_Strategy_2008-11.pdf
- ⁱⁱ The Regulatory Enforcement and Sanctions Act received Royal Assent in July 2008. Part 1 of the Act, establishing the Local Better Regulation Office, came into force on 1st October 2008. Part 2 of the Act relating to the Primary Authority Scheme commences on 6th April 2009.
- ⁱⁱⁱ LBRO's Mapping the Local Authority Regulatory Services Landscape report, published in November 2008, provides a guide to the complexity of the regulatory system. It is available at [http://www.lbro.org.uk/FileUploads/20081111_LBRO_Mapping_72PP_NEW_AMENDS\(Web\).pdf](http://www.lbro.org.uk/FileUploads/20081111_LBRO_Mapping_72PP_NEW_AMENDS(Web).pdf)
- ^{iv} To date, LBRO has worked directly with 49% of all local authorities in England, Scotland, Wales and Northern Ireland on project activity
- ^v This is the theme of the New Opportunities White Paper, prepared by the Cabinet Office and published in January 2009. It can be found at <http://www.hmg.gov.uk/newopportunities.aspx>
- ^{vi} More information on the Action for Business programme can be found at <http://www.berr.gov.uk/aboutus/corporate/performance/actionforbusiness/index.html>
- ^{vii} For more information on Primary Authority, please visit www.lbro.org.uk
- ^{viii} More information on Part 3 of the Regulatory Enforcement and Sanctions Act 2008 can be found at <http://www.berr.gov.uk/files/file47135.pdf>
- ^{ix} A report of the Regulatory Reform Committee report Getting Results. The Better Regulation Executive and the Impact of the Better Regulation Agenda, can be found at <http://www.publications.parliament.uk/pa/cm200708/cmselect/cmdereg/474/47404.htm>
- ^x The Anderson Review The Good Guidance Guide: taking the uncertainty out of regulation can be found at <http://www.berr.gov.uk/files/file49881.pdf>
- ^{xi} Improving outcomes from health and safety: a report to Government from the Better Regulation Executive can be found at <http://www.berr.gov.uk/files/file47324.pdf>
- ^{xii} LBRO/ Ipsos MORI: Business Perceptions of Local Authority Regulatory Services: 2008
- ^{xiii} LBRO's Trading Places programme provides regulatory officers with placement opportunities in business. Further information can be viewed at www.lbro.org.uk
- ^{xiv} A primary authority partnership is defined as a business in partnership with a local authority for a single category of a relevant function