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Llywodraeth Cynulliad Cymru  
Welsh Assembly Government

David Melding AM  
Chair of the Audit Committee  
Cardiff Bay  
Cardiff  
CF99 1NA

26 November 2008

*Dear David*

### **POLICY STATEMENT ON INSPECTION, AUDIT AND REGULATION**

Today I published for consultation a Welsh Assembly Government Statement on Inspection, Audit and Regulation in Public Services in Wales. I attach a copy of the Press Release and the statement itself. The consultation runs until the end of February 2009, and I would welcome your Committees' views on the statement, and on what I see as an important element of the drive to improve the delivery of public services in Wales.

*Yours  
Andrew*

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# Inspection, Audit and Regulation in Wales

## Policy Statement

Issued for Consultation  
November 2008



Llywodraeth Cynulliad Cymru  
Welsh Assembly Government



Welsh Assembly Government

**INSPECTION, AUDIT AND  
REGULATION IN WALES**

Issued for consultation  
26th November 2008

## MINISTERIAL FOREWORD

*One Wales* affirms the Welsh Assembly Government's commitment to accountable, citizen-centred public services, and to a strategy for the continual improvement of local services. This statement sets out, for consultation, the part the Government expects inspection, audit and regulation to play in fulfilling that commitment.

Public services are provided on behalf of citizens (who pay for them through taxation) for the benefit of citizens. Inspectors, auditors and regulators also act on behalf of citizens. They report on services to provide assurance and to enhance accountability, promote improvement, and inform government policy to help develop better services. They help ensure the transparency that leads to better decisions and better outcomes.

Inspection, audit and regulation bodies in Wales have already shown they can act powerfully to protect citizen interests and to promote service improvement. This statement shows how we aim to make them more consistently effective, within a coherent framework of policies and procedures for public service improvement. A great deal of progress has been made in developing a more coherent and unified inspection and regulatory system by the Welsh Assembly Government and the inspection bodies. This consultation allows us to pause and review progress and explore how the system can be further improved. We need to ensure that the inspection regime is fit for purpose, provides assurances for our citizens yet at the same time avoids any unnecessary burdens. The challenge is to get the right balance.

The primary responsibility for services rests with those who provide them, working within policies and performance frameworks set by government. They must effectively plan and deliver (or commission) services, manage performance and account to the public. Inspectors and auditors provide an independent check, using professional expertise and backed by legal powers. Regulators who register services or service operators (thus allowing them to operate) help ensure minimum standards and provide a formal recourse if regulations are not met.

Inspectors, auditors and other regulators cannot and should not oversee everything service providers do. They must have good intelligence systems to guide their programmes of work. They must assess how to carry out their work to best effect. They must target their work in proportion to the interests of citizens and the likely benefits. They must report their findings promptly and clearly, in ways most likely to achieve their purpose.

They must work closely with the services they inspect, audit or regulate, without compromising their independence, to facilitate their work and to help services improve. They must work closely with government, also without compromising their independence, to help in the evaluation and development of policy and to guide further support or intervention. But most of all they must represent the interests of citizens, without fear or favour.

**Andrew Davies AM**  
**Minister for Finance and Public Service Delivery**

## 1. A COMPREHENSIVE APPROACH

- 1.1 This statement sets out the Welsh Assembly Government's policy on inspection, audit and regulation – collectively referred to here as “external review”. It deals with the external review of public services – by the Welsh Assembly Government itself, by the Auditor General for Wales and bodies such as the public service inspectorates. It deals with the external regulation of businesses – under policies led largely by the UK government but implemented in part by devolved and other local bodies, including local authority regulatory services. It sets out a framework capable of including other forms of regulation and bringing them into a more comprehensive and co-ordinated approach.
- 1.2 The purposes of public services inspection are to promote citizen interests and provide public accountability, to encourage improvement in services and to inform government policy. The purposes of business regulation are to protect public interests and to create a level playing field in which business can thrive. Citizen interests are the primary focus of both.
- 1.3 External review must be well co-ordinated, proportionate to the overall public interest and must itself deliver value for money. Within their respective formal arrangements, the external review bodies must follow principles of good governance and accountability. They must be strong, adaptable and able to work well together. Their collaboration must be supported by adequate joint organisational arrangements and agreed procedures.
- 1.4 Our policy shares much common language with other UK governments but operates within a distinct Welsh policy context. We:
  - put citizens first as our guiding principle;
  - recognise the vital role in this of live, on-site external review;
  - expect external review to play a full part in a programme of promoting high performance, continuous improvement and innovation and promoting value for money;
  - see the benefit of strong sectoral inspectorates with professional authority in their own fields;
  - recognise effective partnership across organisational boundaries as key to success.
- 1.5 This policy forms a key part of an ambitious programme for public services improvement, that includes agreed principles for citizen-centred governance, public engagement, national standards and performance frameworks, local services boards, public sector management development and shared procurement initiatives. This policy shares the same principles. It is another way in which we are engaging in constructive dialogue and collective action to bring about improvement. We shall continue to take forward this agenda, through this and allied policies, in a coherent way.

1.6 We shall issue guidance from time to time on the way we expect external review bodies and others to follow the principles and implement the proposals contained in this statement.



## 2. CITIZEN FOCUS

- 2.1 External review must focus primarily on the interests of our citizens. It will tell the story of how citizens use services: how easy it is to find out about what they need, to get in touch and find the right services, how they are treated, how much say they have and how well services are tailored to their particular needs, the range and quality of those services and how effective they are in achieving the required outcomes.
- 2.2 It will examine how responsive public services are to the needs of citizens – in the way they operate, the way they are run, the way they co-operate with each other, the way they involve citizens, seek their views and act on comments and complaints, and the way they reshape services to meet the changing needs and expectations of citizens. It will consider the stewardship of services on behalf of citizens: their governance and management, use of public money and their own accountability to the public, in accordance with the principles of citizen-centred governance<sup>1</sup>.
- 2.3 The citizen-centred approach embodies principles of equality, fairness, social justice and human rights. No-one should be denied opportunities because of their race, ethnicity, disability, gender, sexual orientation, age or religion. Good services benefit everyone but poor or patchy services may disproportionately disadvantage those already at a disadvantage through personal or social circumstances. Within a general duty to the public as a whole, therefore, external review bodies must have particular regard to individuals and groups who are so disadvantaged, at particular risk or least able to promote or defend their own interests.
- 2.4 Research<sup>2</sup> shows that most citizens are poorly informed about the role of external review bodies, although knowledge is higher among those directly involved in services subject to inspection. Citizens are most interested in issues that have an immediate and local impact on their lives. They value the independence of external review bodies and value public involvement in the process. External review bodies must, therefore, continue to develop the ways in which they relate directly to citizens and involve them in their processes.
- 2.5 External review will report openly to the public and to the elected representatives of the public (subject to certain constraints). Individual service reviews will report on citizen experience locally – through surveys, case studies and the views of individuals and groups interviewed. National studies, area overviews and annual reports will draw those

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<sup>1</sup> <http://new.wales.gov.uk/topics/improvingservices/workingtogether/governance/principles/?lang=en>

<sup>2</sup> Including:

*Putting up with second best: summary of research into consumer attitudes towards involvement and representation*, National Consumer Council, 2002;

*Scrutiny and the Public: Qualitative Study of Public Perspectives on Regulation, Audit, Inspection and Complaints Handling of Public Services in Scotland*, Scottish Government, 2007;

*Looking out from the middle: User involvement in health and social care in Northern Ireland*, Social Care Institute for Excellence, 2008.

findings together to provide a powerful account of that citizen experience. There should be particular links with formal audit and scrutiny processes in local and national government.

## **Proposals**

- 2.6 We expect external review bodies to build on existing good practice in:
- representing citizen interests;
  - consulting citizens (especially those who receive services) about what they do and how they do it; and
  - involving citizens (where practical and appropriate) in processes of external review.
- 2.7 We shall seek agreed timescales with external review bodies for the publication of their reports, with a view to making their findings as accessible as possible to the public.
- 2.8 We shall work to increase the extent to which external review informs and is informed by the scrutiny functions of elected representatives, at local level and through the committees of the National Assembly for Wales.

### **3. PROMOTING IMPROVEMENT**

- 3.1 The primary responsibility for improving services rests with those who provide and commission them, within the requirements of legislation and government policy. Public authorities and those who work on their behalf need effective systems to ensure they fulfil requirements, achieve value for money, develop their services, manage their performance and account to the public, with the aim of continuous improvement. External review can complement these responsibilities but cannot replace them.
- 3.2 We are reviewing frameworks of national standards, performance measurement systems, outcome targets and delivery agreements, with the aim of producing more coherent and effectiveness frameworks. External review should be aligned with and complement these, and participate in the process of reviewing their effectiveness.
- 3.3 External review bodies should seek to promote improvement, in the way they use self-assessment, involve staff and peer reviewers and provide clear evidence-based judgements. They should present their findings and recommendations as straightforwardly and constructively as possible, without shirking difficult messages. They should use their collective findings, particularly good practice examples, to promote improvement more generally. Business regulators should continue to offer advice to those they regulate to promote compliance.
- 3.4 They should carry out their work and present their findings in ways that promote service development and innovation, with particular regard to collaboration between public bodies. While external review necessarily assesses compliance with existing service standards and rightly draws attention to risks associated with change, it must balance these perspectives against the need to adapt and respond to changing circumstances and expectations. They have a particular role in validating improvements and highlighting critical success factors, in individual services and in partnerships.
- 3.5 External review bodies should have active working relationships with all those involved in public service improvement, to help direct support where it is most needed. There should, however, be clear distinctions between formal external review work – inspection, audit, regulation – and development work. There must be a particularly clear distinction between formal external review activity (undertaken in accordance with statutory powers and subject to the principles of proportionality and public reporting) and any advisory or improvement work undertaken on behalf of the subject body itself (which the body is free to choose to have), to guard against conflicts of interest or perceptions that external bodies are reviewing their own work. Similarly, bodies whose primary purpose is not external scrutiny (such as improvement agencies), should be careful to avoid confusion or duplication between their work and external review.

3.6 When external review finds cause for serious concern, the external review bodies will share this information and act upon it in accordance with agreed protocols. Where review bodies have enforcement powers in their own right, they should implement these in ways designed to achieve outcomes in the overall best interest of citizens. We subscribe to the Enforcement Concordat issued in 1998 and subsequent good practice guide<sup>3</sup> and expect regulatory enforcement in Wales to follow the principles set out in those documents or any subsequently agreed replacements.

### **Proposals**

- 3.7 We shall work with external review bodies, individually and collectively, and other relevant bodies to enhance the contribution of external review to service improvement.
- 3.8 We shall streamline processes for exchanging information and acting collaboratively to support improvement, especially through timely support and intervention where that is required.
- 3.9 We shall support collaboration in highlighting good practice and service innovation, to promote learning and development across Wales.
- 3.10 Our Local Government Measure will clarify and strengthen the role of external review in the Wales Programme for Improvement, through improvement assessments.
- 3.11 We have introduced a new protocol for dealing with serious concern in local government services, building on experience and research of what works best. We have also included provisions in the proposed Local Government Measure which give appropriate statutory backing to the principles of that protocol.

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<sup>3</sup> *Enforcement Concordat: Good Practice Guide for England and Wales*, Department of Trade and Industry, 2003.

## 4. INFORMING POLICY

- 4.1 Our commitment to public services improvement requires a much more systematic approach and much more collaboration across the whole public services landscape. The external review bodies are part of that landscape. While they must be independent in exercising their core functions, they must not be isolated.
- 4.2 The external review bodies have different organisational status and different relationships with the Welsh Assembly Government. All must have sufficient professional independence in carrying out and reporting on their external review functions. All must be able to share information in the wider public interest and to contribute their knowledge and experience to policy development.
- 4.3 We wish to place our relationships with external review bodies on a more systematic footing, and to enhance the parts they play in informing government policy and in national scrutiny. We wish also to see that the intelligence from external review is used most effectively, to guide support and intervention, to recognise achievement and to promote good practice, service development and effective collaboration.
- 4.4 The Beecham Review<sup>4</sup> proposed far more collaboration in delivering public services and far more openness in information about the performance of public services. We wish to strengthen the arrangements for exchanging service performance information between public service bodies, external review bodies and the Government, in order to:
- enhance public reporting and democratic accountability;
  - aid the processes of assessment that underlie a proportionate approach to inspection, audit and regulation;
  - enable earlier recognition of problems and more timely support and intervention to bring about necessary improvements;
  - provide a fuller and more reliable evidence base for the development of national policies.

### Proposals

- 4.5 We shall develop better co-ordinated arrangements across the Welsh Assembly Government for the way in which we set priorities, commission or request work from external review bodies and the way in which we respond to the findings of such work.

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<sup>4</sup> *Beyond Boundaries: Citizen-Centred Local Services for Wales*, Report to the Welsh Assembly Government, June 2006.

- 4.6 We shall agree a formal protocol or code of practice on relationships between Welsh Assembly Ministers and the inspectorates within the Welsh Assembly Government (the Care and Social Services Inspectorate Wales (CSSIW) and the Healthcare Inspectorate Wales (HIW)) to confirm their professional independence in carrying out their external review functions.
- 4.7 We shall enhance our capacity and procedures to use the findings of external review, alongside other relevant evidence, to develop national policy.
- 4.8 We shall pilot area or regional evaluations of public services, involving external review and other relevant bodies, to draw out lessons locally and nationally.

## 5. PROPORTIONALITY

- 5.1 Inspection, audit and regulation should be proportionate – to risk, scope for improvement, likely benefit and the interests of citizens. The concept of proportionality must apply – visibly – in how much activity takes place and where it is directed.
- 5.2 The broad priorities for external review are set by legislation and government policy, which in turn reflect perceptions of public interest. These priorities and perceptions may change in the light of experience: we shall keep them under review and issue further guidance as required.
- 5.3 Within the broad priorities set by legislation and policies, we endorse the moves being made by external review bodies to tailor their activities more explicitly and systematically in accordance with the principle of proportionality. In doing so, they should have regard to:
- inherent levels of risk in the services or activities reviewed, in terms of the *likelihood* of detriment to individual citizens and citizen interests and the gravity or extent of the possible *impact* or *harm* caused;
  - citizen views and concerns, as expressed through surveys, consultations, complaints, representative organisations, elected representatives or directly to external review bodies;
  - Ministerial concerns and priorities;
  - the adequacy of systems within reviewed bodies to detect poor performance, deterioration in performance and actual detriment and harm;
  - information already available about service management, performance and outcomes;
  - the capacity and record of the organisation or organisations concerned in setting service standards, managing performance and accounting publicly for performance;
  - the presence and effectiveness of other forms of quality assurance, scrutiny and public accountability;
  - the time elapsed since the services concerned were last subject to external review.
- 5.4 The external review bodies should establish (jointly or severally as appropriate) clear processes for making such an assessment. This process of assessment may be shared with the body concerned (as with the improvement assessment of local authorities under the Wales Programme for Improvement) but the external review body itself must retain responsibility for its own contribution to that joint process and its own decisions that follow from it.

5.5 There should be a clear link between the assessment and the amount and focus of external review activity that follows it. As reviewed bodies improve their own performance management, scrutiny and public accountability arrangements, they should expect a lessening of the amount of external review activity directed at primary information gathering and performance assessment, in favour of more selective reality checking and thematic approaches.

### **Proposal**

5.6 We shall work with external review bodies to establish systems of co-ordinated assessment of service performance, governance and management, risks and priorities on a regular basis (annually for major public bodies) and for that assessment to inform:

- visibly proportionate programmes of external review;
- programmes of support and intervention by other bodies.



## **6. CO-ORDINATION**

- 6.1 We have already achieved significant rationalisation of external review bodies and functions, through the creation of the Wales Audit Office, HIW and CSSIW and through the transfer of benefit fraud inspection to the Wales Audit Office, and Mental Health Act Commission responsibilities and some of the work of the Welsh Risk Pool to HIW. Wales now has strong inspection, audit and regulatory bodies, able to exercise professional authority in their respective sectors and to provide a coherent view of services. We shall maintain our pragmatic approach to achieving further rationalisation within service sectors.
- 6.2 Substantial progress has already been made in co-ordinating the work of external review bodies, through the Heads of Inspectorates Forum, the Health and Social Care Concordat<sup>5</sup>, arrangements supporting the Wales Programme for Improvement and through the external review bodies working together on particular initiatives. We believe co-ordination should become more systematic both within service sectors and across the board. We want to see further progress in planning programmes, exchanging information, co-ordinating assessment, scheduling work, carrying out joint work, forms of reporting and the analysis and use of findings. We shall promote organisational arrangements that support co-ordination.
- 6.3 We believe the most effective co-ordination is achieved by the voluntary co-operation of the external review bodies themselves. We shall facilitate that co-operation, issue guidance where appropriate and use more formal measures where that may be most productive.
- 6.4 Our proposed local government measure will strengthen arrangements for external review under the Wales Programme for Improvement, through the co-ordinating role of the Auditor General. We intend to establish similar lead co-ordinating roles within service sectors.

### **Proposals**

- 6.5 We shall widen the scope of the Heads of Inspectorates Forum to include other external review bodies operating in Wales.
- 6.6 We shall support organisational arrangements (such as joint posts or a joint secretariat) and technical developments (such as tools to aid information sharing and scheduling) to promote co-ordination.

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<sup>5</sup> See [www.walesconcordat.org.uk](http://www.walesconcordat.org.uk)

- 6.7 Our Local Government Measure will secure greater collaboration between local government auditors, regulators and inspectors, in particular through an improvement assessment undertaken by the Auditor-General for Wales and a timetable for regulation and inspection drawn up by the Auditor-General for Wales in collaboration with other regulatory and inspection bodies.
- 6.8 We shall promote lead arrangements within each major sector of public services (education, health, social care), under which the major inspectorate will co-ordinate work undertaken by other external review bodies (in a way similar to that undertaken by the Auditor General for local authorities as a whole under the Wales Programme for Improvement).

## **7. MAKING BEST USE OF RESOURCES**

- 7.1 The resources allocated to external review represent an investment in citizen interests, through promoting service improvement, better use of public money and enhanced democratic accountability. All concerned must use that investment as efficiently and effectively as they can. External review also places demands on the resources of the bodies subject to the activity. This cost must be carefully balanced against the public interest in and the benefits of the activity being carried out.
- 7.2 We expect external review bodies, along with other public bodies, to achieve efficiencies in their use of financial resources. Some will be achieved through greater proportionality and greater co-ordination as set out earlier in this paper. Other efficiencies may be found through collaboration, through more standardisation of systems and through better use of new technologies. External review bodies should share with other public services the attempt to move more routine transactions onto cheaper web-based and other electronic channels, to free more expensive human resources for use where they are most needed.
- 7.3 External review bodies should seek to add value in the way in which they use their own staff and the way in which they involve staff from other bodies in their activities, to develop learning and spread expertise.
- 7.4 We expect the external review bodies to monitor and adapt their use of resources to meet the requirements of a sustainable future, as set out in national policies, working to the Green Dragon Standard<sup>6</sup> or equivalent.

### **Proposal**

- 7.5 We shall require external review bodies we fund directly to achieve efficiency savings in line with targets set for other public bodies and to adapt their use of resources to meet the requirements of a sustainable future, as set out in national policies.
- 7.6 We shall explore the scope for further efficiencies in CSSIW, Estyn and HIW through greater use of shared services.

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<sup>6</sup> See [www.greendragonems.com](http://www.greendragonems.com)

## 8. BETTER REGULATION

### UK government policy

- 8.1 “Better regulation” is the name given to a set of policies led by the UK government, aimed primarily at regulation affecting business. Its scope includes five major regulators (the Financial Services Authority, Food Standards Agency, Health and Safety Executive, Environment Agency and Office of Fair Trading) and local authority regulatory services, including environmental health, fire safety, licensing and trading standards. The implementation of these policies, however, involves a mix of devolved and non-devolved responsibilities and – as the *E. coli* inquiry has demonstrated – there is no clear divide between the regulation of business and public services as far as citizen interests are concerned. In addition, the public services inspectorates also inspect and regulate many businesses that provide health and social care and education services. It is therefore vital that UK and Wales policies and their implementation are properly aligned.
- 8.2 The Hampton review<sup>7</sup> set out principles for better regulation:
- Regulators, and the regulatory system as a whole, should use comprehensive risk assessment to concentrate resources on the areas that need them most;
  - Regulators should be accountable for the efficiency and effectiveness of their activities, while remaining independent in the decisions they take;
  - No inspection should take place without a reason;
  - Businesses should not have to give unnecessary information, nor give the same piece of information twice;
  - The few businesses that persistently break regulations should be identified quickly;
  - Regulators should provide authoritative, accessible advice easily and cheaply; and
  - Regulators should recognise that a key element of their activity will be to allow, or even encourage, economic progress and only to intervene when there is a clear case for protection.

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<sup>7</sup> Philip Hampton: *Reducing administrative burdens: effective inspection and enforcement* HM Treasury, March 2005

8.3 The UK government has carried out reviews of the five major regulators listed above to assess their compliance with these principles. It has produced a statutory Regulators' Compliance Code<sup>8</sup> (which currently does not apply to regulatory functions exercisable only in or as regards Wales). It has established the Local Better Regulation Office to promote the effective delivery of local authority regulatory services. The Rogers review<sup>9</sup> has proposed enforcement priorities for these services. The UK government is now considering a code for public services inspectorates (which would affect non-devolved inspectorates working in Wales).

### **Welsh Assembly Government policy**

8.4 We work with the Better Regulation Executive in the UK government and with the Local Better Regulation Office to promote a consistent approach across the UK. We wish also to ensure that our own priorities, as set out in *One Wales*, are properly reflected in all external review programmes in Wales. For example, the drive to rid business of excessive bureaucracy is fully consistent with the *One Wales* aim of stimulating enterprise and business growth; the principles of citizen-centred services, of promoting a healthy future, a fair and just society and a sustainable environment mean that drive must be properly balanced with the promotion and protection of the interests of citizens as consumers and residents.

8.5 The Rogers review proposed the following enforcement priorities for local authority regulatory services:

National enforcement priorities:

- air quality
- alcohol licensing
- fair trading
- hygiene of food businesses
- improving health at work
- animal and public health

Potential local enforcement priorities:

- local environmental quality
- under-age sales
- operation of the housing health and safety rating scheme
- licensing of housing in multiple occupation
- consumer credit

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<sup>8</sup> Department for Business, Enterprise and Regulatory Reform: *Regulators' Compliance Code*, December 2007 ([www.berr.gov.uk/files/file45019.pdf](http://www.berr.gov.uk/files/file45019.pdf)).

<sup>9</sup> Peter Rogers: *National Enforcement Priorities for Local Authority Regulatory Services*, Cabinet Office, March 2007

- imported food
- contaminated land
- noise nuisances

8.6 We invite views on these priorities – in particular, whether the list of national priorities is right for Wales.

### **Regulation of businesses and voluntary organisations providing health and social care and education services and registered social landlords**

8.7 We expect the regulation and inspection of businesses and voluntary organisations carried out by the public services inspectorates to continue to follow the Hampton principles, insofar as is consistent with statutory requirements and Welsh Assembly Government policies (including those set out earlier in this statement).

8.8 We have recently commissioned a review (the Essex review) of arrangements for the regulation and inspection of registered social landlords and are now considering its recommendations. We shall ensure that the new arrangements accord with the general principles and are appropriately co-ordinated with other forms of external review.

### **Other forms of regulation**

8.9 We expect other forms of regulation (for example, industry-specific requirements and some forms of professional regulation) to follow the same broad principles set out in this statement. We similarly expect regulation and inspection carried out by other public bodies to follow the same principles. We are currently reviewing the regulatory regime for the farming industry.

### **Proposals**

8.10 We shall work with the UK government and other devolved administrations to seek appropriate alignment of policies and implementation across the UK.

8.11 We shall take steps to make the Regulators' Compliance Code applicable to all relevant regulatory functions in Wales.

8.12 We expect all who exercise regulatory functions in Wales to follow the principles of Better Regulation.

- 8.13 We shall establish active links with the Local Better Regulation Office, the Welsh Local Government Association, local authority regulatory services and other relevant bodies to promote more effective regulation in Wales.
- 8.14 We shall reform our arrangements for regulating and inspecting registered social landlords, taking into account the recommendations of the Essex review, to bring them into line with the principles of this policy statement.
- 8.15 We are working with others to change the regulatory regime for farmers, to make it more proportionate, efficient and effective.

## **COMMENTS**

### **1. General**

We welcome comment on the overall aims and principles set out in this statement. Please help us by grouping these under chapter headings, as far as this is practical. Among questions you may wish to address are the following:

Do you agree with the overall aims and principles set out in this statement?

How can external review bodies demonstrate their accountability to those they represent and those they serve, and how can they best demonstrate the progress they have already made and intend to make in the future in line with this policy statement?

How can links between external review bodies and the citizens whose interests they represent best be enhanced?

How can the necessary dialogues between the external review bodies and those they review best be taken forward?

What other steps might the Welsh Assembly Government take to achieve the aims of this statement?

### **2. Specific proposals**

We welcome comment on the specific proposals. Please help us by giving the paragraph reference for each proposal on which you make comment.

### **3. Rogers review**

We welcome comment on the proposed enforcement priorities set out in the Rogers review and their applicability to Wales.



Please send comments by e-mail or letter by February 27<sup>th</sup> 2009 to:

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