



Swyddfa'r Prif Weinidog a'r Swyddfa Cabinet
Office of the First Minister and Cabinet Office

Simon Thomas AM
Chair of the Finance Committee
National Assembly for Wales
Cardiff Bay
CF99 1NA

26th May 2017

Dear Mr Thomas,

Finance Committee inquiry – The financial estimates accompanying legislation

Thank you for the invitation to give evidence to the Finance Committee's inquiry into the accuracy and reliability of the Regulatory Impact Assessments (RIAs) prepared by the Welsh Government to accompany legislation.

Please find attached a paper updating the Committee on current processes and changes made to the Welsh Government's RIA guidance since the Fourth Assembly. I look forward to discussing this with the Committee on the 7th June.

Yours sincerely,

Andrew Hobden
Economic Advisor
Welsh Treasury

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Finance Committee Paper on Regulatory Impact Assessments (RIAs)

Introduction

1. This paper provides an update to an earlier Welsh Government paper about Regulatory Impact Assessments (RIAs) which was submitted to the previous Finance Committee in January 2016.
2. The Welsh Government's Legislation Handbook on Assembly Bills, a guidance document for Welsh Government staff, has been revised to reflect a number of changes, such as those made to Standing Orders since the Fourth Assembly. This includes the chapter on RIAs, which reflects changes to SO 26.6. The intention is to publish the revised handbook in the summer.
3. In addition, a number of changes have been made to the guidance and processes around RIAs to reflect feedback received during the Fourth Assembly.

Roles and responsibilities

4. Responsibility for preparing the RIA for an Assembly Bill rests with the Bill team in the relevant policy department and the Senior Responsible Officer (SRO) for the Bill. Advice and technical support is provided to policy teams by Welsh Government economists and other analytical teams (such as the Statistical Directorate and the social research team).
5. Prior to the introduction of a Bill, the Chief Economist's team is responsible for reviewing each RIA on behalf of the relevant Accounting Officer/Additional Accounting Officer to ensure it meets HM Treasury Green Book and Standing Order requirements. The intention of this review is to provide assurance that the methodology adopted to identify and assess costs and benefits is appropriate; the evidence on costs and benefits has been presented in a proportionate and balanced way and that key uncertainties and any effects that could not be quantified have been highlighted. The review does not involve the examination of individual calculations or checking the raw data within an assessment.

Process for developing an RIA

6. The development of an RIA should be a continual part of the policy-making process and started as early as possible. To reinforce this, the revised RIA guidance sets out a more clearly defined, staged approach to the development of an RIA. It is expected the RIA will evolve throughout the Bill process as the policy becomes clearer; the evidence base is developed and feedback from stakeholders is included. The following is a summary of the key stages in the process:
 - i. **Policy Development Stage** – work on the RIA should begin early in the policy-making process. The first stage should focus on defining the policy problem, establishing the rationale for government intervention, identifying alternative options (both legislative and non-legislative) and developing the

evidence base. There should also be an initial attempt at a cost-benefit analysis including the identification of the main parties likely to be affected by the proposals and an initial estimate of the likely costs and benefits.

- ii. **Consultation/Draft RIA** – the initial option appraisal should be firmed up to provide a more detailed, quantified assessment of the costs and benefits associated with each option. The draft RIA should be published as part of any consultation or draft Bill exercise.
 - iii. **Final RIA** – at this stage, the RIA should focus on the preferred option with the cost-benefit analysis updated to reflect final policy details and any evidence or feedback received from stakeholders during the consultation process. The RIA forms Part 2 of the Explanatory Memorandum and is laid alongside the Bill.
 - iv. **Amending stages** – The Explanatory Memorandum (including the final RIA) should be revised to reflect any amendments made to the Bill during Stage 2 proceedings. This also provides an opportunity to incorporate any new evidence which has been received during the scrutiny of a Bill.
7. The adoption of this staged approach strengthens the process and final RIA in a number of ways. Firstly, policy teams will be encouraged to start documenting their analysis at an earlier stage of the policy-making process and ensure that the analysis can be used to inform policy decisions. Secondly, publishing a draft RIA alongside any consultation document will improve stakeholder engagement by providing stakeholders with an opportunity to review the assessment and underlying assumptions and enable them to provide additional/alternative evidence to help inform the final RIA. Finally, publishing a rigorous options appraisal at the consultation stage will enable the final RIA to focus on the costs and benefits of the preferred option (the proposed legislation). This should reduce the length and complexity of the final RIA.

Improving the clarity and consistency of RIAs

8. In evidence presented to the previous Constitutional and Legislative Affairs Committee's Making Laws in the Fourth Assembly inquiry, the Auditor General for Wales expressed concern about the clarity and consistency of RIAs and suggested this would be improved by the inclusion of a standard summary table alongside each RIA.
9. The Welsh Government accepted this suggestion and introduced a standard summary table, which has been used in all RIAs for Welsh Government Bills introduced in the current Assembly term. The summary table has been included at the start of each RIA and has been designed to clearly present all the information required by Standing Orders as well as key information from a value for money (VFM) perspective. The inclusion of brief explanatory text is intended to allow the reader to gain an understanding of the costs and benefits without having to refer to the detailed analysis.

10. Explanatory memoranda produced for Bills introduced this Assembly term have also featured improved 'signposting'. In the case of RIAs, this has included clearly identifying the preferred option in the summary table and directing the reader to where in the RIA the relevant analysis of costs and benefits can be found.

Subordinate legislation

11. Another concern raised during the Fourth Assembly was that RIAs did not always include an assessment of the costs and benefits of associated subordinate legislation and that this impinged on the Assembly's ability to effectively scrutinise the legislation.

12. It has always been the case the RIA should include a best estimate of the costs and benefits of any associated subordinate legislation and the relevant section of the RIA guidance has been re-written to strengthen this point. Policy teams will (in most cases) be expected to prepare an RIA to accompany the subordinate legislation when it is laid in the Assembly. This is in line with the Welsh Ministers' RIA Code.

13. While every reasonable effort is made to express costs and benefits in monetary terms, there are circumstances in which it is very challenging to identify certain costs or benefits in such terms with any precision – for example, where there is a significant degree of uncertainty about the potential impact of a proposal or where the detail in subordinate legislation depends on decisions which are yet to be made. The options in such circumstances are to provide a range for possible monetary values or, exceptionally, to express effects in qualitative terms. It is important to be transparent about the existence and nature of such potential impacts.

Presentation of costs and benefits

14. During the Fourth Assembly, the Auditor General for Wales and the Finance Committee expressed concern that the presentation of monetised costs and benefits in certain RIAs was potentially misleading. As explained at the time, the presentation of monetised benefits alongside costs is a standard approach in economic appraisal and is intended to support the value for money assessment.

15. Nevertheless, the Welsh Government has considered the presentation of costs and benefits in RIAs. For complete transparency, the standard RIA summary table has been designed to report costs, cost-savings and benefits separately and in both undiscounted and present value terms. Net present value (NPV) is also recorded on the RIA summary table to support the assessment of value for money. A similar approach will be taken to reporting costs and benefits in the main body of the RIA.

Appraisal period

16. Consideration will be given to the appropriate appraisal period in an RIA on a case-by-case basis. While the standard appraisal period is expected to remain five to ten years, it is acknowledged that in some cases – in particular, where the

legislation has a longer-term focus – it would be more appropriate for the RIA to feature a longer appraisal period. The RIA guidance has been strengthened to cover this issue.

17. The key point explained in the guidance is that a steady-state should be reached on costs and benefits before the end of the appraisal period. Where costs and benefits are expected to continue beyond the end of the appraisal period, this will be explained in the RIA.

Public Policy Institute for Wales (PPIW) report on impact assessments

18. In April 2016, the Public Policy Institute for Wales (PPIW) published a report looking at the use of impact tests in Welsh Government¹. It was commissioned by the then Permanent Secretary as part of the Reducing Complexity programme. The project touched on RIAs but focused on impact assessments (IAs) more generally, including those on equalities, rights of children and young people, Welsh language and biodiversity.
19. The report highlighted a complex system of IAs in Wales, with more assessments required than in any of the other jurisdictions considered by the author. It was considered the complexity of the system meant IAs were often not completed at the right time or properly and undermined the value that IAs add to the policy-making process.
20. The report made a number of recommendations including, improving the stewardship of the overall IA process in Wales; developing a clearer statement of purpose around IAs; aligning IA processes with the requirements of the Well-being of Future Generations (Wales) Act 2015 and improving the integration and design of IAs.
21. The previous Permanent Secretary established a working group in Welsh Government to consider the PPIW report and take this work forward. A number of workstreams have been set-up to re-design IA processes; improve the integration of IAs with the policy-making process and improve training. The elements of this work related to IAs more generally is expected to be completed by spring 2018 and the aspiration is that improvements thereafter to the ways in which such impact assessments are conducted will have a positive impact on the future preparation of RIAs.

Post-Implementation Reviews

22. As noted in the previous paper, there are a number of different aspects which could feature in a post-implementation review and the scope, timing and coverage of any review will vary from one piece of legislation to another.
23. Welsh Government policy departments have been asked to provide an update on post-implementation reviews to inform this section of the paper. The following is a summary of the reviews which have been completed or are nearing completion:

¹ http://ppiwi.org.uk/files/2014/10/Reducing-Complexity-and-Adding-Value_FINAL-30-Apr.pdf

- A review of the operation of the Further and Higher Education (Governance and Information) (Wales) Act 2014 has been undertaken and was published in August 2016;
- The implementation of the Agriculture Sector (Wales) Act 2014 is currently being reviewed in line with the statutory requirement stipulated by the Act. The review will include the impact on agricultural workers, employers and the agricultural sector in general. The report is expected to be published in the autumn;
- An independent review is currently underway looking at the Control of Horses (Wales) Act 2014;
- Reviews have been commissioned on parts of the Housing (Wales) Act 2014:
 - PACEC have been commissioned to undertake an evaluation of Part 1 of the Act (Rent Smart Wales), the final report is expected to be published in the autumn.
 - The University of Salford is in the process of evaluating Part 2 of the Act (homelessness). An interim report is expected shortly with the final report expected by spring 2018.
- The impact evaluation for the Human Transplantation (Wales) Act 2013 is being undertaken by GfK and will be completed by December 2017. Qualitative work involving members of the public and medical staff has also been undertaken, the final report for this component is expected by the summer.

24. A number of pieces of legislation enacted during the Fourth Assembly are still in the process of being implemented and will be subject to review at the appropriate time. Given the early stage of this work, there are no generalisable findings available from post-implementation reviews at this point. This is something which will be considered as the body of evidence grows.

25. The section of the legislation handbook covering post-implementation reviews has been updated by the social research team in Knowledge and Analytical Services (KAS). The list of issues which may be considered by a post-implementation review includes consideration of financial impacts and whether there are significant differences between forecast costs, cost-savings and benefits and outturn costs, cost-savings and benefits.

Welsh Government
May 2017

Sir Derek Jones KCB
Ysgrifennydd Parhaol
Permanent Secretary



Llywodraeth Cymru
Welsh Government

Jocelyn Davies AM
Chair of the Finance Committee
National Assembly for Wales
Cardiff Bay
CF99 1NA

2016 January 2016

Dear Jocelyn,

Finance Committee's legacy – Financial scrutiny of legislation

I am grateful to the Finance Committee for this opportunity to give evidence on the important subjects of how the costs, benefits and other financial impacts of the Welsh Government's Legislative Programme in the Fourth Assembly have been assessed and how these will be reviewed. The attached paper provides a response on each of these points.

This is the first term in which the National Assembly has had full primary law-making powers and I am proud of the significant contribution that the civil service has made in supporting Ministers to bring forward 26 Government-proposed Bills in this term, 22 of which are now Acts of the Assembly. This achievement should not be under-estimated. While I acknowledge and support the Committee's view that it is quality, not quantity, that is important, it is nevertheless the case that the organisation has had to develop its legislative capacity substantially to deliver this programme, and at times it has been a steep learning curve. Overall I believe that my colleagues have achieved a considerable amount in supporting Ministers to propose new laws for the benefit of people in Wales.

At the same time, this is the first term in which this has been done and this means there is much to learn and improve. The legislation brought forward by the Welsh Government is fundamentally a matter of political judgement. But I am committed to continuing to improve the administrative approach to planning, managing and delivering legislation, and to supporting Ministers as effectively as possible in reaching those judgements. Refining our approach to assessing the costs, benefits and other impacts of primary legislation is an important part of that learning, so I welcome the Committee's continuing interest in this area.

Yours,
Derek



Finance Committee Paper on Regulatory Impact Assessments (RIAs)

Introduction

1. The purpose of a Regulatory Impact Assessment (RIA) is to provide the National Assembly, Welsh Ministers, the Accounting Officer and stakeholders with an assessment of the likely impacts of legislation. Such an assessment is crucial to the effective scrutiny of proposed policy changes.
2. Each RIA also aims to meet the requirements of Standing Order 26.6(vi) by presenting a best estimate of the costs of proposed legislation, identifying on whom those costs fall and the timescales over which the costs are expected to arise.
3. While Standing Orders do not explicitly require the assessment of a range of options or the identification of benefits, their inclusion is an important part of the assessment from a Value for Money (VFM) perspective, attempting to set out to the Assembly and stakeholders how the benefits associated with a legislative proposal might help to balance additional costs. The requirement underpinning an RIA therefore has much in common with the requirement placed on Accounting Officers to assess objectively the VFM of all government actions (legislation, regulation, policy, programmes and projects). In consequence, the process for developing an RIA reflects the principles set out in HM Treasury's "Green Book" on how to ensure that VFM has been achieved and demonstrated.
4. The process, structure and content of RIAs have been considered in two recent reviews:
 - The Constitution and Legislative Affairs Committee made a number of recommendations around the structure and content of Explanatory Memoranda and RIAs in 'Making Laws in Wales' (published October 2015).
 - The Public Policy Institute for Wales (PPIW) has been commissioned to review impact assessment processes (including RIAs) in Wales as part of the reducing complexity agenda. This review, which is being led by Dr Clive Grace, is expected to report in January 2016.

The process followed for undertaking RIAs of Government-proposed Assembly Bills

5. The RIA for Government-proposed Assembly Bills has in most cases to date been completed by the relevant policy team - often with specialist input from Welsh Government economists and the other analytical teams - although in some cases the policy team has commissioned external consultants to undertake the assessment. Welsh Government Economists have produced guidance on undertaking RIAs aimed at policy teams working on Assembly Bills. This guidance follows the approach set out in the HM Treasury Green Book: Appraisal and Evaluation in Central Government. The guidance is

currently being reviewed and will be published as part of the refreshed Legislation Handbook on Assembly Bills.

6. The following is a summary of the process for developing an RIA as set out in the current guidance:

- The first stage of the RIA process is to set out all credible options which could achieve the stated policy objectives. The list of options will include a 'Do Nothing' option to act as the baseline scenario. Policy teams are also recommended to consider any realistic 'Do Minimum' options to test whether a large proportion of the claimed benefits under the preferred option could be delivered at a lower cost.
- Having identified a set of options, the next stage is to consider which organisations and/or sectors are likely to be affected under each option. They could include the public sector, private business, the voluntary sector and the general public. While the focus of the RIA should be on impacts within Wales, the assessment should also consider impacts at the UK level (for example, if the proposals impact on the Ministry of Justice).
- Each RIA seeks to identify the cost in the 'Do Nothing' (or baseline scenario) and the additional costs associated with each option. These costs may be economic, social or environmental and can be transitional or recurrent. The preferred approach is to monetise all costs, although a qualitative description of costs will be included where monetisation is not practicable. An appraisal period is selected which is considered long-enough for a 'steady state' to be reached on costs. For most Assembly RIAs, this has tended to be 5 years although this has been extended to 10 years for some RIAs. Where costs are expected to continue beyond the selected appraisal period, this is identified in the RIA narrative.
- Having identified and monetised costs, the next part of the analysis is an assessment of the anticipated benefits. As with costs, the benefits can be economic, social or environmental. The benefits are monetised where possible to enable an objective decision to be made on Value for Money, although, in practice this tends to be more difficult than monetising costs. Where it is not possible to monetise benefits, RIAs are expected to provide the best possible evidence on the nature and scale of those benefits in order to ensure that the trade-offs between costs and benefits across the various options are made as explicit as possible.
- The monetised costs and benefits are discounted (using the HM Treasury central discount rate) to reflect the social rate of time preference¹. This is a standard approach in economic appraisal.
- In addition to the cost-benefit analysis there are a number of specific policy impact assessments that form part of the policy development process. Some of these impact assessments are a legal requirement (for

¹ There is evidence showing that society generally prefers to receive goods and services now rather than later and to defer expenditure until later years. This is known as time preference. In economic appraisal a declining weight is attached to costs and benefits that occur in future years to reflect this time preference.

example, 'Equality and Human Rights' and 'Children and Young People') whilst others (for example, the competition assessment) reflect good policy practice. These supplementary assessments could be seen as providing more detail on the distribution of costs and benefits across particular groups and sectors, and are therefore consistent with the cost-benefit analysis and draw on the same sources of evidence.

- The preferred option is selected on the basis of the above assessment with the decision explained in the RIA.
 - The final chapter of the RIA relates to the Post-Implementation Review, setting out the planned approach for monitoring, reviewing and evaluating the policy. Current guidance on this chapter of the RIA in the Legislation Handbook, was prepared in conjunction with Welsh Government's Knowledge and Analytical Services division (KAS). One of the areas identified in the guidance as appropriate to consider is whether estimated costs and benefits have been realised and where appropriate the reason for any variance. The First Minister has committed to reviewing the current Legislation Handbook on Assembly Bills and to publishing the revised version in his response to the Constitutional and Legislative Affairs (CLA) Committee report on Making Laws in Wales.
7. In most cases, given the forward looking nature of RIAs, there will be some degree of uncertainty in the assessment of costs and benefits and a number of assumptions will have to be made. Where this is the case, the levels and areas of uncertainty are explained in the RIA. Where appropriate, cost estimates are presented in ranges and/or sensitivity analysis is undertaken.
 8. The evidence needed to inform an RIA varies from one Bill to another and typically comes from a variety of sources. Key to the development of meaningful RIAs is the involvement of stakeholders. While stakeholders are involved currently in the development of RIAs, this is an area which could be improved upon further.
 9. To add maximum value, the development of the RIA should be a continual process. An initial impact assessment should be completed at an early stage of the policy making process, with the assessment refined at key stages throughout the process (for example, consultation, draft Bill and introduction). Indeed, the RIA could perhaps best be seen as simply the formal documentation of the evidence needed to ensure that the relevant legislation has been designed to be fit for purpose.
 10. The First Minister has committed, in his response to the Making Laws in Wales report, that policy teams will usually be required to publish a draft financial assessment alongside any draft Bill. The recent draft Bills on Additional Learning Needs and the Minimum Unit Price of Alcohol have been accompanied by a draft RIA.

11. Earlier consideration and more effective stakeholder involvement are expected to lead to an improvement in the quality of RIAs when Bills are introduced into the Assembly.

How costs and benefits are currently presented in RIAs

12. For more complicated Bills, such as those containing a number of quite distinct proposed policy changes, it is recommended that a separate RIA is completed for each proposal. It is recognised that in some cases this has led to quite lengthy and complicated Explanatory Memoranda.
13. To aid the reader, each RIA has included a summary table(s) drawing together the costs and benefits of the preferred option(s) and, where there is more than one proposal, presenting the overall cost of a Bill. The costs are presented both undiscounted and in present value terms. The Welsh Government recognises that concerns have been raised by the Auditor General for Wales and Finance Committee around the presentation of costs and benefits in RIAs and in particular that the presentation of monetised benefits alongside cash costs is potentially misleading - this is certainly not the intention. The presentation of monetised benefits alongside costs is a standard approach in economic appraisal and is intended to support the Value for Money assessment.
14. In light of the recommendations made on recent Bills by the Finance Committee and those made by the CLA Committee in their report on Making Laws in Wales, Welsh Government officials are undertaking a review of the structure, content and presentation of RIAs and how best to meet the requirements set out under Standing Order 26.6(vi). However, the review will need to ensure that the Value for Money element of the assessment is retained. As part of the process, an initial meeting has been held with the Wales Audit Office to discuss the evidence they have given on various RIAs and consider how information could be better presented. The review is ongoing and will also need to take into account any changes to Standing Orders in respect of Explanatory Memoranda which may arise from the CLA Committee's recommendations to the Business Committee in the Making Laws in Wales report and any recommendations in the PPIW report. The guidance on RIAs will be updated accordingly as part of the refreshed Legislation Handbook on Assembly Bills and will then be published.

The process for updating RIAs as and when subordinate legislation is drafted and costed

15. Where possible, a best estimate of the cost of any associated subordinate legislation will be presented in the RIA accompanying an Assembly Bill. Where this has not been possible it has generally been because the detail of the subordinate legislation was not known at the time of producing the Bill RIA.

16. Section 76 of the Government of Wales Act 2006 required Welsh Ministers to make a code of practice setting out their policy on the carrying out of Regulatory Impact Assessments for subordinate legislation. This code identifies a limited number of exceptions whereby subordinate legislation would not require an RIA. However, in the majority of cases an RIA is completed for subordinate legislation.
17. The approach taken in developing an RIA for subordinate legislation is broadly similar to that set out above for Assembly Bills. In some cases, where the subordinate legislation is as envisaged when the Bill was introduced, the RIA accompanying the subordinate legislation will replicate the Bill RIA. In other cases, more detail will be included or more substantial changes will be required in the RIA accompanying the subordinate legislation. For example, the RIA accompanying subordinate legislation on Developments of National Significance reflected further stakeholder engagement and policy refinement undertaken following the enactment of the Planning (Wales) Act 2015.
18. The Welsh Government does not re-visit and update an RIA produced for an Assembly Act once subordinate legislation has been drafted and costed.

What assessments have you already made regarding the accuracy of RIAs for Bills passed this Assembly?

19. In the current term, the emphasis has been on making the RIA which is published on introduction of proposed Legislation as accurate as possible. The RIA process is overseen by Welsh Government economists with input from KAS and the Legislative Programme and Governance Unit. The purpose of this is to try to ensure a consistent approach to RIAs; the appropriate and balanced use of data and evidence; and compliance with Standing Order and HM Treasury Green Book requirements
20. To date, no retrospective assessment of the accuracy of RIAs has been undertaken by the Welsh Government. As explained in the section below, it is considered too early to have undertaken a post-implementation review of many pieces of primary legislation passed during the current term.

How you plan to undertake post legislative scrutiny of the cost of legislation that was enacted in the Fourth Assembly

21. The Legislation Handbook stipulates that the Explanatory Memorandum which is completed for each Assembly Bill should outline the planned approach for the post-implementation review of the legislation. There are a number of different aspects that could be covered by a post-implementation review and the scale and coverage will vary from one piece of legislation to another.

22. The Legislation Handbook provides policy teams with guidance on planning for post-implementation review, this guidance is consistent with the HM Treasury “Magenta Book”. As mentioned above, the Legislation Handbook is being reviewed and will then be published.
23. In some cases the post-implementation review may include a review of the expected costs and benefits of the legislation: for example, in respect of the Mental Health (Wales) Measure 2010 the Minister for Health and Social Services has confirmed a cost benefit analysis will be undertaken in a proportionate way, and will draw on the wider available research evidence and data which has been routinely collected since the Measure was implemented.
24. For many of the pieces of legislation enacted during the Fourth Assembly we have not yet reached the point where a post-implementation review is considered appropriate. For example, the Local Government Byelaws (Wales) Act 2012 was the first Government-proposed Bill to become an Act of the Assembly: it received Royal Assent on 29 November 2012 but was not fully commenced until 30 March 2015.

How the cumulative cost of legislation in the Fourth Assembly is being measured

25. The narratives accompanying the 2015-16 and 2016-17 draft budgets have included assessments of the additional cost (in the relevant year) to Welsh Government of legislation (including both enacted legislation and Bills that had been introduced in the Assembly). The assessments include additional funding provided by the Welsh Government to, for example, local authorities and the NHS to implement legislation. The narratives are predominantly based on information in the RIAs but also reflect any revisions made to costings subsequent to the publication of an RIA.
26. The issue of the cumulative cost of legislation was raised by Finance Committee in correspondence with the Minister for Finance and Government Business during 2015. The following extract, taken from the Minister’s letter of 10 June 2015, remains valid:

“The RIA process does not include as a standard requirement an assessment of the cumulative impact of policy changes and new Welsh legislation on the private sector as a whole. To require this in every case would be disproportionate. However, RIAs have considered the cumulative impact of policy where a particular sector has been

impacted by a number of new policy or legislative changes. This approach is in line with current guidance from HM Treasury”.

27. The consultation process gives stakeholders the opportunity to bring to the Welsh Government’s attention any instances where they believe effects may impact cumulatively on a particular sector, and the Welsh Government will continue to make an assessment of such impacts on a case-by-case basis.

Welsh Government
January 2016