

Consultation on our approach to Performance Review

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1. Introduction

Our role and the performance review process

1.1 The Professional Standards Authority for Health and Social Care (the Authority) was established on 1 December 2012, taking over the functions of the Council for Healthcare Regulatory Excellence. We are an independent UK body. Our role and duties are set out in the Health and Social Care Act 2002. We oversee the work of the 10 statutory regulators of health and social care professionals:

- **The General Chiropractic Council (GCC)** which regulates chiropractors in the UK
- **The General Dental Council (GDC)** which regulates dentists, dental nurses, dental technicians, dental hygienists, dental therapists, clinical dental technicians and orthodontic therapists in the UK
- **The General Medical Council (GMC)** which regulates doctors in the UK
- **The General Optical Council (GOC)** which regulates optometrists, dispensing opticians and student opticians in the UK
- **The General Osteopathic Council (GOsC)** which regulates osteopaths in the UK
- **The General Pharmaceutical Council (GPhC)** which regulates pharmacists and pharmacy technicians in Great Britain
- **The Health and Care Professions Council (HCPC)** which regulates arts therapists, biomedical scientists, chiropodists/podiatrists, clinical scientists, dieticians, hearing aid dispensers, occupational therapists, operating department practitioners, orthoptists, physiotherapists, practitioner psychologists, prosthetists/orthotists, radiographers and speech and language therapists in the UK.
- **The Nursing and Midwifery Council (NMC)** which regulates nurses and midwives in the UK and nursing associates in England
- **The Pharmaceutical Society of Northern Ireland (PSNI)** which regulates pharmacists in Northern Ireland
- **Social Work England (SWE)** which regulates social workers in England.

The performance review process

1.2 The Authority has a duty to report to Parliament each year on 'how far, in the opinion of the Authority, each regulatory body has complied with any duty imposed on it to promote the health, safety and well-being of [users of health care, users of social care in England, users of social work services in England and other members of the public]'.¹

1.3 We fulfil this duty by undertaking annual performance reviews of each regulator. These reviews assess the performance of the regulators against our Standards of Good Regulation (the Standards) which set out the outcomes that we expect regulators to achieve.

¹ Paragraph 16 (1A) of the NHS Reform and Health Care Professions Act 2002, as amended.

We last reviewed the performance review process in 2014/15, and implemented our current process in 2016. We decided to revisit our approach to ensure it continues to be proportionate and effective.

What we've done so far

- 1.4 We carried out a public consultation between December 2020 and March 2021. You can read the outcome of the consultation in [this report](#).
- 1.5 The responses to the consultation showed clear support for speeding up the publication of our reports, improving our engagement with regulators and other stakeholders and making our reports clearer. There was also support for developing our understanding of risk.
- 1.6 We have already committed to introducing the following changes from January 2022. We will:
 - Do more work in year, with the aim of publishing our reports within three months of the end of the period on which we are reporting
 - Engage with a broader range of stakeholders
 - Make our reports clearer and more concise and, where appropriate, include proportionate recommendations
 - Develop our understanding of risk including profession-specific risks and use this to inform the scope of our reviews.
- 1.7 In our first consultation, we asked respondents for feedback on whether we should continue looking at the regulators' performance against all of the Standards every year. All stakeholder groups supported a move towards a more targeted and proportionate approach, we are committed to exploring more radical changes to the review process so that we target our reviews towards those areas of work and those regulators where we have evidence of concerns. We intend that this will mean our resources are focused on the greatest risks to public protection.
- 1.8 The government is considering reforms to regulators' powers in order to make professional regulation 'faster, simpler and more responsive to the needs of patients, professionals, the public and employers'.² Our performance review process will, therefore, need to be flexible enough to accommodate any changes to the way the regulators operate. Such changes may mean that new or different risks emerge, and we need to be able to evaluate these and how the regulators address them. While we consider that our process is likely to be sufficiently flexible to enable us to do this, we would welcome comments on whether any changes in our process would help us ensure this.

This consultation

- 1.9 We are developing a new approach to performance review that will entail a periodic review with monitoring between to allow us to track regulators'

² The government consulted on reforming professional regulation in late 2017/early 2018. See <https://www.gov.uk/government/consultations/promoting-professionalism-reforming-regulation> for more information.

performance each year, respond to risks³ as they arise, and report to parliament according to our statutory duty.

- 1.10 The process will be flexible, responsive and proportionate. For both the periodic review and monitoring processes, the extent of our review will depend on the risks and issues we identify so that we focus our resources on areas and regulators where we identify risks and spend less resource on those where we have fewer concerns.
- 1.11 In the new process, we will gather and analyse information throughout the year. We will raise any concerns with regulators during the year to allow them to respond and act on this information. This process should enable us to identify changes in performance earlier and will give regulators an earlier indication of concerns.
- 1.12 We also plan to engage more closely with stakeholders, particularly with patients and the public and will use a more structured and targeted approach. This feedback from stakeholders will help us identify risks to public protection, and so inform the scope of our reviews.
- 1.13 While the new process is intended to reduce the overall burden of performance reviews, some regulators who currently have less intense annual reviews may find that in some periodic review years the new process is more extensive than currently.
- 1.14 We expect to take a decision on implementation in January 2022.
- 1.15 We welcome responses to the questions posed in this consultation paper from all stakeholders. Please send them to PRConsultation@professionalstandards.org.uk no later than **21 December 2021**. In light of the pandemic, we would strongly urge respondents to submit their responses by email or to contact us if this is not possible.

Next steps

- 1.16 We will analyse the responses to this consultation and report our findings to our Board in January 2022. We expect to settle any changes to the process then and to adopt them in April 2022. The transition period will require careful planning, and we believe that this should provide sufficient time for us and the regulators to adapt to any changes. However, we will keep this timescale under review.

2. Developing our approach

- 2.1 In developing our approach, we have worked to the assumptions summarised below:
 - We want to make our performance reviews more proportionate, maintaining our focus on public protection. Reducing the burden is desirable, but does not outweigh our focus on public protection.
 - Performance reviews are designed to give sufficient, rather than total, assurance about a regulator. We will never know everything about a

³ Where we refer to 'risk' in this paper, unless otherwise stated, this refers to risk to public protection due to poor regulatory performance.

regulator, and we should take account of the fact that regulators have their own assurance processes and oversight from Councils.

- We accept a certain level of risk in our oversight. The longer the period between periodic reviews, the greater the risk of our knowledge of performance decreasing. However, this will be addressed by our monitoring work, including greater stakeholder engagement, and enhancing our understanding of profession-specific risks. Our processes will be flexible to adapt to the different risks and rates of change of the different regulators. We will also need to be able to respond to changes brought about through reform. There is also a risk in not changing our processes; continuing our current approach of looking at every Standard in detail every year means that we may not be able to sufficiently target our resources to the areas of highest risk.
- The periodic review and monitoring processes are inextricably linked. The more we know through monitoring and previous reviews, the less information we should need to seek through a periodic review.
- Periodic reviews should be similar in intensity to a current annual review. The overall burden of a full cycle should be less burdensome on the regulators than the current equivalent period, though individual regulators may receive greater scrutiny than others on the basis of risk.
- The process will be designed to enable us to use more of our capacity to dedicate to work to improve regulation.

Question 1: Do you agree with our assumptions? Please provide reasons for your answer.

3. What would a periodic review look like?

- 3.1 In a periodic review, we will look at the information we have in respect of each of the Standards. We will undertake an analysis of the information we hold, including of any correspondence and complaints we receive, and the outcomes of our Section 29 work. We will consider the decisions taken in previous years, information available publicly, information shared by the regulator and feedback from stakeholders. We will identify where we need to gather more information and what tools we should use to do so, and this will determine the scope of our review. The periodic review is our opportunity to look in depth at regulators so that we have a detailed view of their performance and this will likely mean that periodic reviews will be more intensive than monitoring reviews.
- 3.2 We will consider the factors set out in Section 6 to guide the scope of periodic reviews. We expect that in some cases a periodic review may not be much more intensive than a monitoring review; if we have no concerns or areas where we need more information, we may not need to undertake any significant enquiries.
- 3.3 A periodic review should provide us with a good understanding of how a regulator is currently performing, and we will use our findings to inform our future work in respect of that regulator, including any areas for focus following

the periodic review. Depending on our findings, we will set out how we propose to monitor the work of the regulator in future years.

The periodic review process

Regular information gathering

- 3.4 Figure 1 below sets out an indicative timeline for our work during the year. It is not intended to be prescriptive. The timings, level of detail required, and resources required will vary between regulators (we do not, for example, predict that we will need to monitor publications on a monthly basis, or check the register so frequently, for all regulators). It will also vary for individual regulators over time as we are likely to monitor regulators more closely in years where we have concerns. We will review and analyse information during the year, rather than collating this at the end of the review period. This will allow us to look at performance in the course of the year, and address concerns as we become aware of them. We will gather information from these various sources to support our assessment against each of the Standards.

Figure 1

Task	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
Meeting with regulator												
Review of Council papers												
Council observation												
Review of publications												
Register check												
S29 outcomes & LPs review												
Concerns review												
Dataset review												
Focused stakeholder engagement												
Ongoing stakeholder engagement - e.g. emails and calls												

Regular contact with regulators

- 3.5 We will have regular meetings with regulators to inform ourselves of developments and discuss any issues that concern us. We already have regular meetings like this with some regulators and have found these beneficial in building relationships. We hope that this will mean that there are no surprises at the end of the year in terms of performance review outcomes and that regulators can address early any issues we identify.
- 3.6 As part of this more frequent engagement, we will work with the regulators and their Councils to understand their assessment of risks.
- 3.7 We will discuss with each regulator the most appropriate format and timings for these meetings.

Council observation and review of papers; Register check; Publications review; S29 outcomes and learning points; Concerns review; Dataset review

- 3.8 We currently undertake all these tasks. These are key processes that enable us to build an up-to-date picture of performance across the year. We will continue to do so.

Stakeholder engagement

- 3.9 We want to improve engagement with stakeholders to improve our understanding of how they perceive regulators' work. Responses to our first consultation are guiding our work in this area. We will:
- develop a better understanding of who our stakeholders are (recognising that stakeholders might be specific to areas of each regulator's work)
 - engage more with the public, patients and service users and groups that represent them
 - gather feedback from all stakeholders in a much more focused and targeted way than we do currently
 - make it easier for stakeholders to provide feedback to us – for example, by holding meetings with them.
 - We will keep the regulators informed of the feedback we gather from stakeholders and, where we identify risks or particular concerns, may seek a response from the regulator.

Audits

- 3.10 Alongside the tasks outlined at Figure 1, we will have the option to look at a regulator's processes through audits. We have in recent years only carried out audits of fitness to practise, but we would expect to audit other areas of work (e.g. registration and illegal practice).
- 3.11 Our audits have up to now involved very detailed audits of a large number of cases. We believe that we can reduce the number of cases that we look at and dedicate more resources to gaining a wider understanding of a particular area, for example by holding interviews with staff to understand processes better. We may also wish to see a regulator's work in practice, for example through observing an education and training quality assurance visit. We would expect this to be done within the resources that we currently use to undertake audits.
- 3.12 As noted in paragraph 1.8 above however, we are mindful that significant changes to regulators' processes may require us to look in more detail at those processes. This may be in the short term, to understand the impact of any changes, or in the longer term, to review any new risks. In particular, we are mindful that one of the changes being explored, 'accepted outcomes' could result in a change in our Section 29 oversight.⁴ We may need to use targeted audits to help us understand and mitigate such risks.

Formal questions

- 3.13 We also expect to continue to seek detailed information through written questions to the regulator in respect of individual risks or queries. However, we hope that through improved communication and engagement with regulators, we will be able to reduce the occasions when this is necessary.

⁴ See our response to the Government's consultation https://www.professionalstandards.org.uk/docs/default-source/publications/consultation-response/others-consultations/2021/authority-response-to-consultation-on-regulating-healthcare-professionals-protecting-the-public.pdf?sfvrsn=7a1a4920_4

Question 2: Do you agree with our proposed approach to periodic reviews? Are there areas that should be looked at as part of every periodic review. Please provide reasons for your answer.

Question 3: Do you think the areas we will look at to form our evidence base are appropriate? Are there any other areas we should explore to enhance the evidence we collect? Please provide reasons for your answer.

4. What will happen in the years without a periodic review?

- 4.1 The periodic review should enable us to get a sufficient picture of the regulator's performance to use as a basis for our monitoring until the next periodic review. However, we still need to monitor performance, identify new risks and report to Parliament in the intervening years.
- 4.2 We will monitor the information described at Figure 1. However, depending on the findings of the periodic review and what our monitoring tells us about risk, this may be less intensive than for a periodic review. For example, we may not need to undertake register checks in a monitoring year and may undertake less detailed stakeholder engagement.
- 4.3 As with the periodic review process, the workload will be spread across the year, which will enable us to provide outcomes to regulators and publish our reports sooner. We plan to introduce a target to publish reports within three months of the end of a review period.

Monitoring unmet Standards

- 4.4 We will continue to monitor and report on unmet Standards annually until we are satisfied that the Standard is met. We will work with regulators to understand the level of monitoring needed – for example, having regard to the progress of any improvement programmes it may undertake.

Monitoring concerns about performance

- 4.5 Where we have evidence of deteriorating performance, or serious concerns are being raised by stakeholders, we will consider whether we need to do further work to assess performance.
- 4.6 This is likely to involve making further enquiries or undertaking audits. As with the periodic review process, we will be clear about what we consider when determining whether further information is required during a monitoring year.
- 4.7 We could bring a periodic review forward if we were sufficiently concerned about the performance of a regulator.

Major changes

- 4.8 Where a regulator introduces significant changes to its processes or rules, we are likely to wish to assess the impact of these changes either through audit or

other monitoring. We will consider the most appropriate time and method for doing so in the light of the particular initiative involved.

Question 4: Do you agree with our proposed approach to monitoring performance in the years between periodic reviews? Please provide reasons for your answer.

5. Length of cycle

- 5.1 We have been reviewing options of a cycle length of three, four or five years for our new approach.
- 5.2 Moving to multi-year cycle arguably poses greater risk in that we may know less about a regulator's performance in the intervening years. We aim to address this by our monitoring in these years.
- 5.3 The greater the time between periodic reviews, the more likely it is that we will need to undertake more detailed reviews in monitoring years. We expect that we would need to undertake more out of cycle reviews to look at specific issues in a five-year cycle. For example, if we saw an issue or change in the second year of a three-year cycle, we may decide to wait to the full review in the following year to review the issue in detail. If the same scenario arose in a five-year cycle, it might not be appropriate to wait three years and we would need to use resource out of cycle to investigate. This could reduce any resource savings that we might otherwise see from a longer cycle.
- 5.4 A further important consideration is the confidence stakeholders have in our performance reviews. While respondents to the initial consultation did not disagree with moving away from an annual cycle, some cautioned against moving to a cycle that was too long.
- 5.5 We therefore propose that we move to a three-year cycle from 2022. We think this cycle length is the right touch to ensure we can oversee the regulators effectively while reducing the burden of oversight. However, we also recognise that not all regulators will have changed significantly over three years. We would reserve the right to defer some aspects of a periodic review to the next cycle if no evidence of concerns had arisen and no major changes had taken place. We will keep the cycle length under review and will change this if it becomes apparent this is too frequent or too lengthy.

Question 5: Do you think we have identified the right factors to consider when determining the length of review cycle? Please provide reasons for your answer.

Question 6: Do you agree that a three-year cycle would be appropriate? Please provide reasons for your answer.

6. Factors we will consider when deciding how we undertake each review

- 6.1 It is important that we and our stakeholders are clear about what we will be taking into account when we decide the scope of our periodic reviews and when we consider undertaking more detailed work in monitoring years.
- 6.2 We set out what we consider to be the main factors below. These are, necessarily, general and our over-arching aim must be to have the flexibility to act if we feel that public protection requires it. We will use all the information described in Figure 1 to inform our decisions.

Periodic reviews

- 6.3 Periodic reviews are an opportunity to understand a regulator's performance across all the Standards and to identify any concerns that may need further exploration.
- 6.4 In deciding the scope of them, we propose to look at:
- Length of time since the regulatory function has been reviewed in detail
 - Any gaps in our understanding of how a regulator is performing
 - Outcomes of previous performance reviews
 - Information that identifies a significant concern which could affect performance against a Standard or amount to a risk to public protection
 - Significant change to a process that substantially reduces our understanding of that process
 - New or significant risks arising from registrants' practice or the health care environment, particularly where these do not appear to be being addressed
 - Other significant concerns that may impact public protection.

Question 7: Do you agree that these are the right factors for us to consider when deciding the areas we look at during periodic reviews? Are there any that you would like to see added, removed or amended?

Further review out of cycle

- 6.5 In many cases the routine monitoring that we undertake will be sufficient to enable us to report confidently to Parliament about the regulator's performance. However, we will seek further information and undertake audits where we consider that public protection requires it, or we need it to determine whether a Standard is met. The sort of factors that we will use include:
- The outcome of previous reviews, including unmet Standards that require monitoring
 - Information that identifies a significant issue with a regulator's process that could affect public protection or performance against a Standard

- Major change to a process which we have not had the opportunity to review and which may affect public protection or performance against a Standard
- Request by a regulator to review a Standard that is currently not met to judge whether it may now be met
- Other concerns which suggest a risk to public protection or that a Standard is not met.

Question 8: Do you agree that these are the right factors for us to consider when deciding to look in more depth at particular areas outside of periodic reviews? Are there any that you would like to see added, removed or amended?

Undertaking a full periodic review out of cycle

6.6 We would only bring forward a regulator's periodic review where we had concerns that a regulator was not functioning effectively and protecting the public in several areas. We would use the same factors as for a further review out of cycle (with the exception of a request by a regulator to review a Standard), but multiple factors would need to be met that went across a range of regulatory functions.

Question 9: Do you agree that the factors for bringing forward a regulator's periodic review should be similar to those for undertaking reviews out of cycle? Do you think this is an appropriate threshold? Are there any that you would like to see added, removed or amended?

Determining the order of regulators within a cycle

6.7 There are a number of factors we will take into account when determining the order of regulators in the first cycle we undertake. We expect that we would then keep a similar cycle but may need to make changes by exception. The areas that we will consider are:

- Risk of poor performance, including Standards not met
- Recent further reviews undertaken, to outline amount already known and further work likely to be needed in a full review
- Size of regulator and likely resources for a periodic review
- Current review period and whether this would need to be extended or shortened.

Question 10: Do you agree that these are the right factors for determining the order for regulators in the cycle? Are there any that you would like to see added, removed or amended?

How would this be implemented?

6.8 Implementing the process is likely to be somewhat complex because our existing process is currently weighted to the end of the performance review

year, and we are moving to a process where the work (including greater stakeholder engagement) will be spread throughout it. This will require careful planning to move from the current to the new process. As we are moving from annual reviews to periodic reviews, we will need to consider how we maintain appropriate oversight of the regulators who have their first periodic review later in the cycle. We are undertaking further work to explore the options around transition and identify the best approach.

7. Impact assessment of the proposals

- 7.1 We are keen to ensure that we understand any impact or burden that our proposals are likely to create so that we can consider any changes that may be appropriate.
- 7.2 We remain mindful of the potential impact of any changes we explore throughout this review process. We seek views from those affected, and particularly the regulators and others who respond to our performance reviews of the likely impact of the changes to the process that we have outlined here.

Question 11: Please set out any impacts that the proposals set out in this paper would be likely to have on your organisation or considerations that we should take into account when assessing the impact of the proposals.

- 7.3 In all stages of our review, we will consider whether there are significant equality implications, either positive or negative, for our stakeholders. We have not identified any significant negative equality or diversity implications from our proposals and expect there to be a positive benefit for patients, service-users and the public by the improved scrutiny of regulators that an updated process would provide.
- 7.4 We would, however, welcome any feedback to ensure we consider all relevant issues. We would welcome any comments about the impact that these proposals will have.

Question 12: Are there any aspects of these proposals that you feel could result in differential treatment of, or impact on, groups or individuals based on the following characteristics as defined under the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex

- Sexual orientation
- Other (please specify)

If yes to any of the above, please explain why and what could be done to change this.

8. Summary of questions and how to respond

Summary of questions

Question 1: Do you agree with our assumptions? Please provide reasons for your answer.

Question 2: Do you agree with our proposed approach to periodic reviews? Are there areas that should be looked at as part of every periodic review. Please provide reasons for your answer.

Question 3: Do you think the areas we will look at to form our evidence base are appropriate? Are there any other areas we should explore to enhance the evidence we collect? Please provide reasons for your answer.

Question 4: Do you agree with our proposed approach to monitoring performance in the years between periodic reviews? Please provide reasons for your answer.

Question 5: Do you think we have identified the right factors to consider when determining the length of review cycle? Please provide reasons for your answer.

Question 6: Do you agree that a three-year cycle would be appropriate? Please provide reasons for your answer.

Question 7: Do you agree that these are the right factors for us to consider when deciding the areas we look at during periodic reviews? Are there any that you would like to see added, removed or amended?

Question 8: Do you agree that these are the right factors for us to consider when deciding to look in more depth at particular areas outside of periodic reviews? Are there any that you would like to see added, removed or amended?

Question 9: Do you agree that the factors for bringing forward a regulator's periodic review should be similar to those for undertaking reviews out of cycle? Do you think this is an appropriate threshold? Are there any that you would like to see added, removed or amended?

Question 10: Do you agree that these are the right factors for determining the order for regulators in the cycle? Are there any that you would like to see added, removed or amended?

Question 11: Please set out any impacts that the proposals set out in this paper would be likely to have on your organisation or considerations that we should take into account when assessing the impact of the proposals.

Question 12: Are there any aspects of these proposals that you feel could result in differential treatment of, or impact on, groups or individuals based on the following characteristics as defined under the Equality Act 2010:

- Age
- Disability
- Gender reassignment
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- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- Other (please specify)

If yes to any of the above, please explain why and what could be done to change this.

How to respond

- 8.1 You can respond to this consultation paper by email:
PRConsultation@professionalstandards.org.uk.
- 8.2 Due to the pandemic, we strongly urge responses by email or through our survey. If this is not possible, our postal address is:
- Professional Standards Authority
 157-197 Buckingham Palace Road
 London
 SW1W 9SP
- 8.3 If you have any queries, or require an accessible version of this document, please contact us on 020 7389 8030 or by email at
PRConsultation@professionalstandards.org.uk.
- 8.4 Please return your response to us by **21 December 2021**.

9. Confidentiality of information

- 9.1 We will manage the information you provide in response to this discussion paper in accordance with our information security policies which can be found on our website (www.professionalstandards.org.uk).
- 9.2 Any information we receive, including personal information, may be published or disclosed in accordance with the access to information regimes (primarily the Freedom of Information Act 2000 (FOIA) the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).
- 9.3 If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with

obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential.

- 9.4 If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality will be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Authority.
- 9.5 We will process your personal data in accordance with the DPA and in most circumstances this will mean that your personal data will not be disclosed to third parties.

10. Our consultation process and feedback

- 10.1 Our consultation process is based on the current Cabinet Office principles on public consultation, 'Consultation principles: guidance'.⁵ When conducting public consultations on aspects of the Authority's work we aim to:
- Be clear about both the consultation process and what is being proposed. This gives respondents the opportunity to influence our thinking and consider the advantages and disadvantages of our proposals
 - Consult formally at a stage where there is scope to influence the policy in order that consultations have a purpose.
 - Give enough information to ensure that those being consulted understand the issues and can provide informed responses. We include assessments of costs and benefits of the options considered.
 - Seek collective agreement before publishing a written consultation particularly when consulting on the new proposals.
 - Consult for a proportionate amount of time, taking a judgement based on the nature and impact of the proposals. Consulting for too long will unnecessarily delay policy development and consulting too quickly will not give enough time for consideration and will reduce the quality of responses.
 - Ensure our consultation is targeted to consider the full range of stakeholders, bodies and individuals affected by the policy and include relevant representative groups. Consider targeting specific groups if necessary.
 - Consider consultation as an ongoing process, not just about formal documents and responses.
 - Analyse responses carefully and explain the responses received and how they have informed the policy. Give clear feedback to participants following the consultation. Publish responses to the consultation within 12 weeks or explain why that it is not possible.

⁵ Cabinet Office. 2016. *Consultation principles: guidance*. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492132/20160111_Consultation_principles_final.pdf

- Allow appropriate time between closing the consultation and implementing the policy.

10.2 If you have concerns or comments which you would like to make relating specifically to the consultation process itself, please contact us:

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