

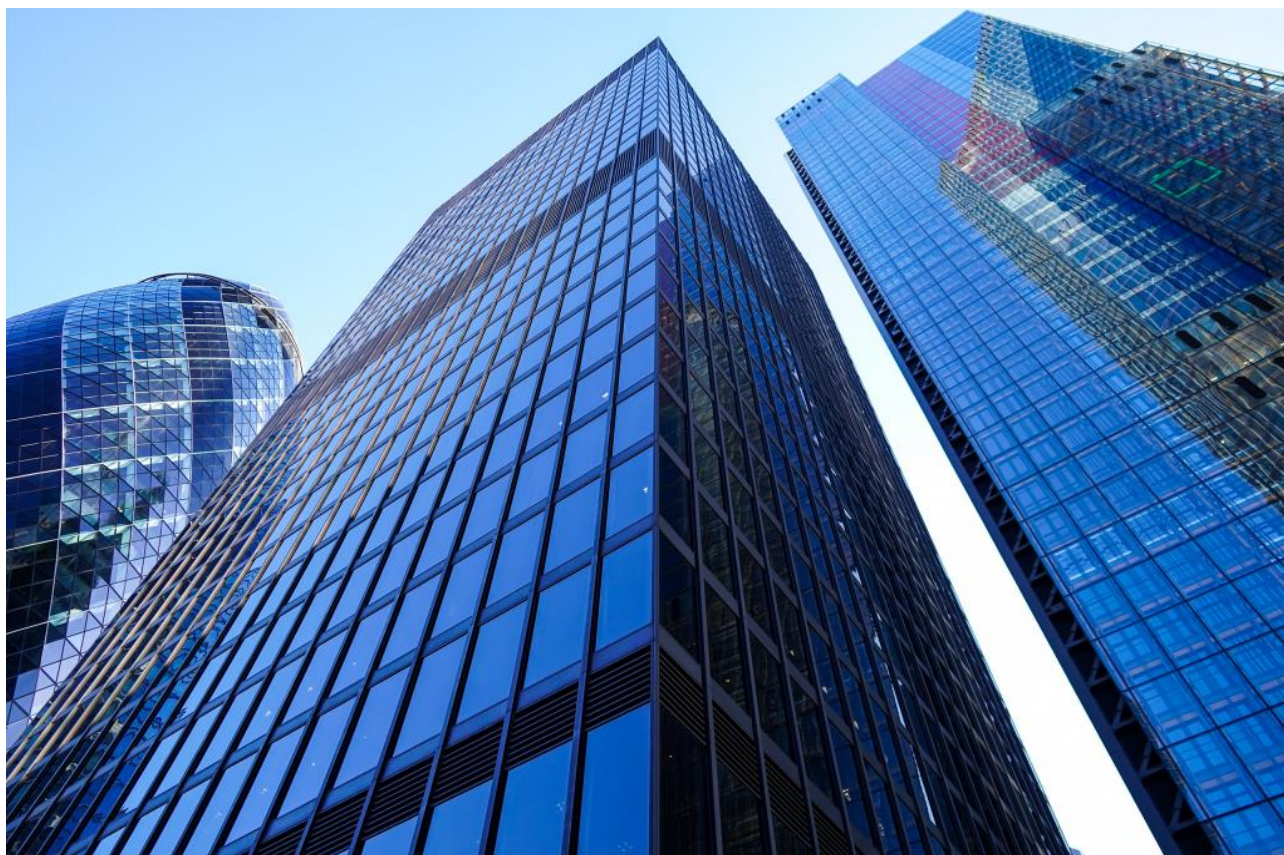
UK Regulators' Network

Strategy 2024-27

Public consultation

Issued 14 December 2023

Please send any responses by email to consultation.ukrn@caa.co.uk, with the subject title 'UKRN Strategy Consultation response', by 5pm, 31 January 2024





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1. About UKRN

- 1.1. The UK Regulators' Network is a members' organisation, formed by a community of UK regulators in 2014 to support their work through facilitating collaboration. We can best be described as an *unincorporated association of member regulators*. From our own research, our institutional form appears to be unique in the UK and abroad.
- 1.2. Our priorities and focus therefore reflect the common interests of our members.
- 1.3. A small core team of UKRN staff – mostly resourced through secondments from members – coordinate and plan our activities which has included:
 - Providing forums to connect people working on similar topics or in similar professions (our Networks), to share and develop best practice.
 - Supporting regulators to deliver joint work to address shared concerns such as cost of capital and cost of living crisis.
 - Organising events to bring regulators, academics, government and other key stakeholders together to discuss big issues.
 - Representing members' shared interests and priorities in engagement with government, the wider regulatory community, consumer organisations, thinktanks and other parties.
 - Providing and promoting opportunities to promote the purpose and value of independent regulation with stakeholders and government.

This consultation

- 1.4. We are asking for general comments on how we can most effectively deliver our objectives and outcomes, and views on how we can best work together with external partners and as a community of regulators. **We are not at this stage seeking detailed input to our strategy.**
- 1.5. When responding, please state whether you are representing an organisation, or responding as an individual.
- 1.6. Please send any responses via email to consultation.UKRN@caa.co.uk with the subject title "UKRN Strategy Consultation response", by **5pm, 31 January 2024**.
- 1.7. **For further detail on our approach to this consultation, including confidentiality and data protection, please refer to our supporting consultation guidance document published alongside this document, at www.ukrn.org.uk.**

2. Our Strategy

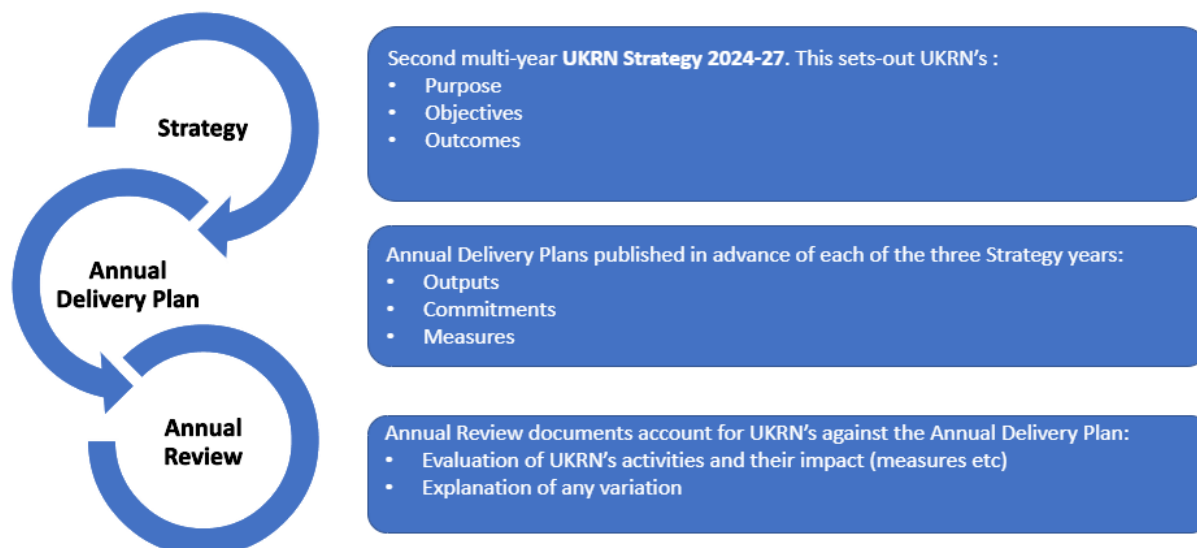
- 2.1. This UKRN Strategy 2024-27 sets out our overarching strategy for the next three years, from April 2024.
- 2.2. It has been developed through extensive engagement with our members, our independent Expert Panel¹, as well as key stakeholders from government and external partners.
- 2.3. We received a wide range of input that reflects the diverse nature of our members. Because it is difficult to define a “one size fits all” strategy we have focussed on areas of greatest shared interest, where collaboration can add most value.

Shaping UKRN’s future

- 2.4. Key principles that we have incorporated in our thinking reflect what we have been told by members that they:
 - Strongly support maintaining the institutional form and independence of UKRN.
 - Universally value UKRN’s collaboration focus – networking and information sharing.
 - Have an appetite for UKRN to use its convening power to do more on horizon-scanning for the biggest disruptors and issues of cross-cutting interest.
 - Share agreement on the focus on vulnerability, net zero and cost-of-living.
- 2.5. During 2022, we reviewed our governance to reflect the growth of our Network coverage, and the need to be more agile and responsive. This led to a revised purpose and design principles that guide how we work, as set out in the next section.
- 2.6. This Strategy represents the next step of UKRN’s evolution – it articulates a set of core objectives and outcomes that are deliberately high-level and strategic, and we have avoided being prescriptive as our strategy needs to allow flexibility to tackle risks and take opportunities in the years ahead.
- 2.7. Each year we will provide a forward Annual Delivery Plan that sets-out the outputs we seek to achieve against the Strategy objectives, including how we will measure performance.
- 2.8. The backward-looking Annual Review documents will account for our performance and impact and provide valuable lessons for the next Annual Delivery Plan.

¹ [UKRN expert panel | UKRN: the UK Regulators Network](#)

UKRN Business Planning



2.9. Additionally, we will produce a one-off 10 Year Review document for publication on our anniversary, in March 2024.

2.10. In summary, by 1 April 2024 we plan to publish:

- Second multi-year **Strategy 2024-27**. This will set out our guiding strategy for the next three years, explaining our core objectives which guide our work prioritisation, and the real-world outcomes we will work towards against those core objectives. This will deliberately be a high-level strategic document, which will enable UKRN to operate with flexibility and agility through our annual delivery plans.
- **Annual Delivery Plan 2024-25** will set out the outputs we seek to deliver over the first year of the Strategy.
- **Annual Review 2023-24** will review UKRN's performance over the final year of our first Strategy.
- **10-year review 2014-2024** will be a high-level publication setting out how UKRN's members – in working together over our first 10 years – have delivered more through mutual collaboration.

2.11. We will also update our internal governance documents, including our processes and procedures, to reflect the changes to our membership structure and operating model.

3. Our Purpose and How We Operate

Our purpose as agreed during our internal governance review in 2022 is

As a member-led organization, UKRN strives to deliver excellence through collaboration. We will:

- **Promote collaboration and knowledge sharing**
- **Champion effective regulation**
- **Deliver efficiencies and shared objectives**

How we operate

- 3.1. UKRN was established by founding regulator members in March 2014 as a collaboration network for the largest economic regulators. It was set up as a basis for effective co-operation between the regulators on important issues and to encourage greater efficiency and better results for businesses, consumers and the economy.
- 3.2. The focus of UKRN is collaboration. This includes our core activity of running a number of Networks, as well as hosting and facilitating stakeholder events for our members. We are also increasingly acting as a convening group for cross-regulator initiatives for our members, often aligned with Government's priorities. Examples of this work include our work on Regulators' Accountability, Open Banking, Cost of Capital and Cost of Living. We are also moving towards leading and delivering work in thought-leadership, research and projects.
- 3.3. UKRN's activities can be characterised as covering three areas – with collaboration accounting for the majority of UKRN core team resource:
 - **Collaboration** includes resources to coordinate and service UKRN's many networks, groups and governance – running meetings, responding to enquiries and linking activities. This also includes all UKRN events, including support for events held in partnership (such as with WIG and the Collaboration Network).
 - **Operational support** includes UKRN support for efficient running of members operations – such as COOs, HR Directors, D&I activities and any future Jobs Board, and also reporting on UKRN's performance.
 - **Project-based / thought-leadership** includes engaging government and key stakeholders to horizon scan for issues relevant to our membership, and focused projects in response to members' needs (which sometimes can be in relation to government interest such as cost-of-capital methodology). This would also involve engagement with thinktanks and UKRN

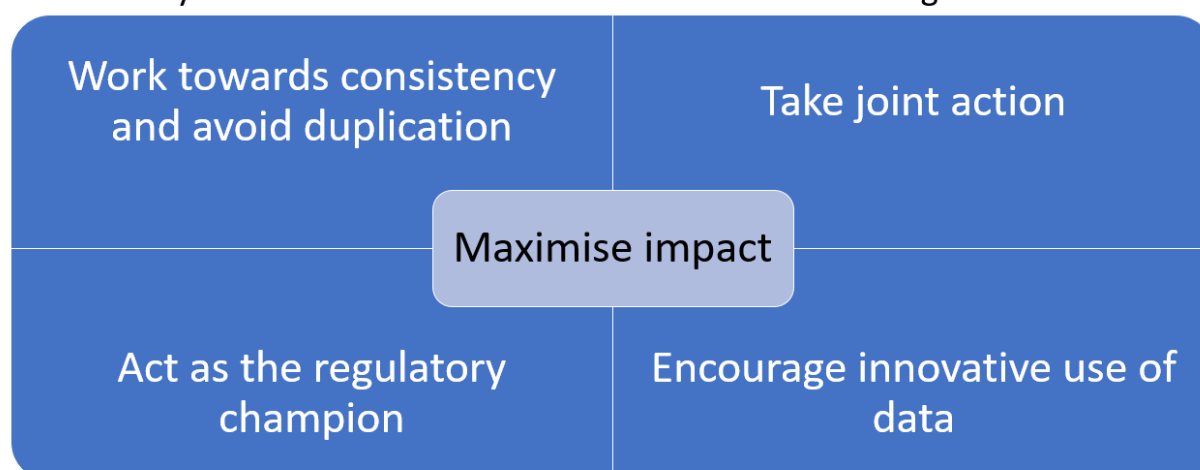
attendance at events and conferences on behalf of our regulator community to explain the benefits of effective and independent regulators, to engage on our priorities, and to help create new and more effective regulatory approaches.

- 3.4. The overarching principle for UKRN work is that we focus on those things only UKRN can do. By forming effective internal and external partnerships, we are vigilant as to when work is best undertaken elsewhere and take an agile approach to our own portfolio.
- 3.5. This and other ‘design principles’ that characterize how we work were defined during our 2022 internal governance review.



UKRN’s design principles: how we achieve *excellence through collaboration*

As a **member-led** organisation, the UKRN should focus on those things only the UKRN can do. UKRN collaborates across regulators to



UKRN Membership model

- 3.6. From the 1st April, 2024 we are simplifying our membership structure and moving to a new tiered approach. This recognises that over time the distinction and benefits between Associate Members and Full Members has fully converged and is not representative, and that the current unique ‘observer’ status of the CMA is likely to be something that other future members may wish to share.
- 3.7. Our simplified structure is as follows:

Tier 1 & Tier 2 members have access to all UKRN’s collaboration, governance, operational and thought-leadership activities. Their logo would be included on all branding/marketing materials including our website.

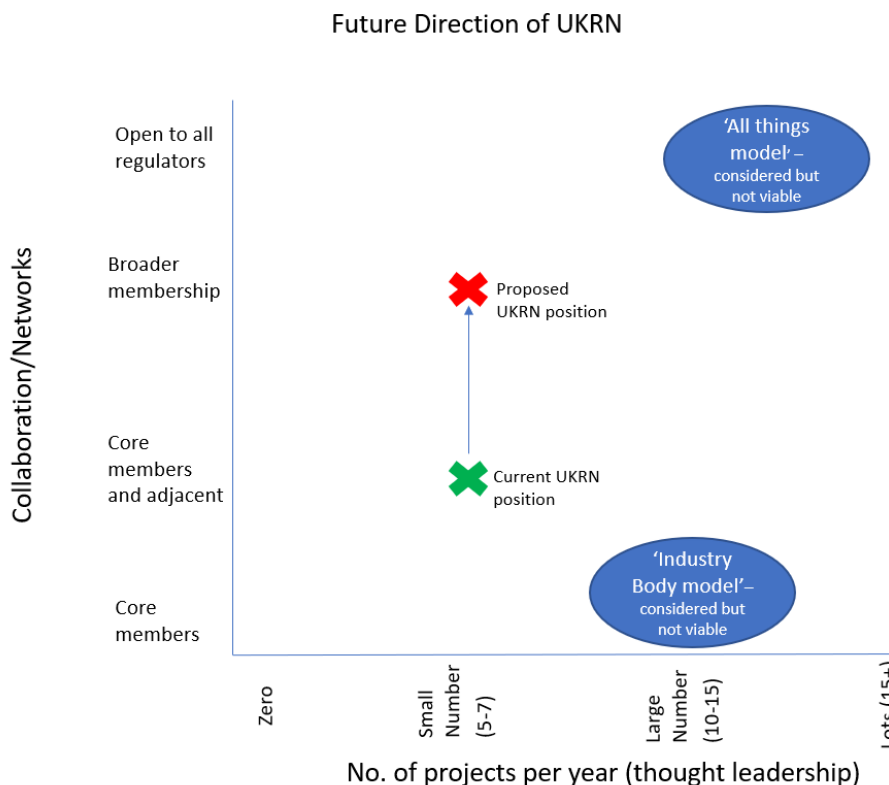
- **Tier 1** – members with more than 200 employees (this would include current full members).
- **Tier 2** – members with less than 200 employees – distinction allows for a lower annual contribution that reflects the smaller size and capacity to engage of these members.
- **Tier 1a** (Observer) is reserved for members with overarching powers. Members would have access to the same provisions as Tier 1 & 2, however they would be by default opted-out of UKRN positions, due to their overarching powers. They may also wish to not be included on our branding/marketing materials and will need to inform us of such when joining UKRN. Opt-ins would be by request.
- **Tier 3** network members have access to fully participate on up to 4 of UKRN's collaboration Networks, plus full access to our operational support (for example our pending Jobs Board, next Gen NEDs, collaborative events with external such as WIG etc). They may be able to join further networks through additional contributions. They will not be included in our governance meetings, and in our branding/marketing materials.

3.8. Membership fees will continue to be advised on an annual basis by the UKRN Director who is accountable for UKRN finances, and any change to the amount will be tabled and approved by UKRN CEOs. Further information on membership structure is covered in our internal governance documents.

The institutional form and future direction of UKRN

3.9. UKRN members have consistently told us it is important that UKRN remains a member-led organisation, of the regulatory community and independent from government. This is central to our consideration of our 'institutional form' and future direction of UKRN.

3.10. However, in order to adapt and grow as an organisation, and have the agility to respond to changes in our members priorities, we will be moving to a 'hybrid' operating model. The diagram below best represents the shift from our current operating model to our new position, as well as positions we considered but ultimately discounted as they are not compatible with our institutional form:



- 3.11. In practice this will mean we continue with our networks and collaboration, (increasing the membership for our networks where appropriate) but will take on a specific (and targeted) number of projects or research pieces on behalf of our members.
- 3.12. This model also allows for UKRN to manage an increase in Tier 3 membership in a controlled manner which in turn has the benefit of increased revenue to support the UKRN team.
- 3.13. As part of this approach, we revising our internal governance processes and procedures for decision making and prioritisation to deliver this model.

4. How We Prioritise

- 4.1. Members and stakeholders have told us it is important that UKRN is agile and able to adapt to address new risks and take new opportunities to deliver core objectives.
- 4.2. Over the period of our second Strategy 2024-27, UKRN will continue to develop its internal governance procedures in order to prioritise new work including new Networks and time-limited projects, and if needs arise to prioritise existing work.
- 4.3. It is proposed that UKRN team resourcing is allocated in accordance with the core objectives and outcomes set out in the next section. We have developed more detailed internal guidance but have reflected the **key criteria** that we will use for prioritisation below, in conjunction with our core design principle that UKRN will focus on those things only UKRN can do.
- 4.4. We think such key criteria are particularly relevant when faced with unexpected requests or potential project ideas through our future of regulation and horizon scanning work. This will allow UKRN to accept new work and potentially pause/drop work that doesn't fall within the parameters of our prioritisation. We believe it will also give greater transparency to our members, government and external stakeholders on what we can and cannot do with our limited resources.
- 4.5. Below is the list of key criteria/questions we would ask when evaluating the case to take on new work:
 - Does it align with one or more of UKRN's core objectives?
 - Is interest shared across our membership? In particular:
 - is this area tackling real or potential consumer harm?
 - does it represent the common interests of a significant group of members?
 - is there a gap in this area where joint-action would best be focussed?
 - Are members who don't share the interest able to step-back?
 - Does it fit with UKRN's Design Principles?
 - this specifically includes that should something that only the UKRN can deliver – and we should seek alternative options if more efficient.
 - Does UKRN have the resources and capability to take this on? If not, is it higher priority than any current work?
 - Is there support of the UKRN Director/CEO?
 - Is there support from UKRN's Expert Panel?
 - Is this an area sponsored by CEOs/ SRG?
 - Is there additional value in UKRN leading on this issue, as opposed to individual members doing so?



4.6. More substantive detail on the prioritisation model will be included in our governance processes. Critically, the criteria listed will give greater confidence to our members and empower UKRN to make decisions on prioritisation.



5. UKRN’s Core Objectives and Outcomes

The following section sets out **six** core objectives and a selection of outcomes that we will seek to work towards through the programme of work and outputs that will be specified in our annual delivery plans. Please note:

- outcomes are written in terms of what we intend the world to look like at the end of the Strategy – these are things where the UKRN has significant control. We have tried to think in terms of things we may be able to measure at least indirectly (for example via surveys).
- potential outputs (ie specific projects etc) and measures (KPIs) will go into the Annual Delivery Plan(s) and these are the things that we can flex each year to changing circumstances, to best deliver our stated outcomes.

Core objectives have been developed in response to member engagement and UKRN’s existing Purpose to and they reflect the future direction of UKRN– with our first core objective being our overarching objective to promote collaboration and including elements of operational support and targeted thought-leadership on members shared key priorities, as reflected below and by direction of SRG and CEOs.

Core objective	Proposed Outcomes
<p>Promoting collaboration</p>	<p>1. The UKRN itself* and our members are clearly able to show the added value of the collaborative activities – both in respect of common shared interests, and in facilitating collaboration between members and external parties in order to promote shared interests.</p> <p><i>*This includes developing measures to demonstrate the operational efficiency of UKRN, to be detailed in our Annual Delivery Plans and included as measures in Annual Reports.</i></p>
<p>Supporting the Net Zero transition</p>	<p>2. UKRN has championed the role of regulators in driving net zero, and address risks of climate change with partners and key stakeholders, including government.</p> <p>3. UKRN has brought-about a better understanding of the impacts, benefits and risks of the net zero transition for those in vulnerable circumstances.</p>



<p>Addressing vulnerability</p>	<p>4. UKRN has maintained and broadened our members’ knowledge and understanding of relevant vulnerability issues and cost-of-living issues, having built and facilitated engagement with relevant external stakeholders.</p> <p>5. UKRN has facilitated improved outcomes for consumers through facilitating greater cross sector data sharing in instances where there are consumer benefits.</p>
<p>Supporting sustainable economic growth</p>	<p>6. UKRN has supported the building of capability and capacity across member regulators to better support members’ contribution to sustainable growth, investment and innovation.</p>
<p>Championing effective regulation and telling our story</p>	<p>7. UKRN has supported the understanding of the role of regulation, within government, regulated parties and consumers.</p> <p>8. UKRN has acted to inform and support the evolution of regulatory practice, to meet current and future regulatory challenges.</p>
<p>Making regulation an attractive career choice</p>	<p>9. UKRN has facilitated recruitment, retention and diversity in regulators.</p>