

# UK Regulators' Network Strategy 2024-27



#### **Contents**

1.	CEO's Foreword	3
2.	About UKRN	4
3.	<u>Our Strategy</u>	5
4.	Our Purpose and How We Operate	7
5.	How We Prioritise	11
6.	UKRN's core objectives and outcomes	13



#### 1. CEOs' Foreword

- 1.1. The UK Regulators' Network (UKRN) has for the last 10 years supported and enabled member regulators to deliver more for consumers and the public, and more quickly, on shared key challenges through collaboration.
- 1.2. As a diverse group of regulators, we deliver a broad range of benefits. In some cases, we hold companies to account by administering, enforcing, and, for some members, setting regulations that protect the interests of consumers and the public, including the most vulnerable. Some of us provide advice and guidance that instils trust and confidence in markets and the economy. We take a long-term approach, providing stability and confidence that supports investment, innovation and economic growth, and protects the environment.
- **1.3.** Our role is more important than ever, with the sectors we regulate facing many new challenges and opportunities not least from emerging technology and the fight against climate change. This has been reflected in new duties that many of us have recently been given.
- 1.4. Getting the balance right between our objectives means being more agile and adapting quickly as these challenges and opportunities arise. It requires us to work with consumers and the public, government, and businesses on key areas such as the economy and environment to ensure business deliver on expectations.
- **1.5.** Our impact as regulators, especially on shared challenges that span regulatory boundaries, can be all the more effective by working together.
- **1.6.** This second three-year Strategy for 2024-27 sees a renewed commitment from all of us to support UKRN in helping us collectively rise to our shared challenges to be more than the sum of its parts. Our Strategy sets out our response through 6 core objectives (see Section 6 for more detail):
  - 1. Promoting collaboration
  - 2. Supporting the Net Zero transition
  - 3. Addressing vulnerability
  - 4. Supporting sustainable economic growth and resilience
  - 5. Championing effective regulation and telling our story
  - 6. Making regulation an attractive career choice
- 1.7. It also sets out the unique nature of this collaboration, how we work together as regulators, and our core high-level objectives for the next three years. We will continue to be flexible in responding to new risks and opportunities in the more detailed UKRN Annual Delivery Plans, the first of which is published alongside this document.
- **1.8.** We are confident that in working together through the collaborative support of the UKRN we will continue to deliver the UKRN's vision of **excellence through collaboration**.

UKRN CEOs have signed below to indicate their commitment to working together, within our respective powers and remits, to deliver UKRN's Strategy for 2024-27.







**Paul Arnold MBE** 



Deputy Chief Executive Officer, Information Commissioners Office





John French

Chief Executive, the Utility Regulation (NI)







**Emma Lovell** 

**Chief Executive, Lending Standards Board** 









Rob Bishton

Chief Executive, UK Civil Aviation Authority







**Chris Hemsley** 

**Managing Director, Payment Systems Regulator** 





**John Larkinson** 

Chief Executive, Office of Rail and Road









**Richard Moriarty** 

**Chief Executive, Financial Reporting Council** 







David Black

**Chief Executive, Ofwat** 







**Nikhil Rathi** 

**Chief Executive, Financial Conduct Authority** 





### **SSRO**

Single Source Regulations Office





**Chief Executive, Single Source Regulations Office** 





Undai Dans

Dame Melanie Dawes, DCB

**Chief Executive, Ofcom** 







**Nausicaa Delfas** 

**Chief Executive, The Pensions Regulator** 







Frie Marko

Fiona MacGregor

Chief Executive, Regulator of Social Housing



## ofgem

Mars

**Jonathan Brearley** 

**Chief Executive, Ofgem** 







**Paul Philip** 

**Chief Executive, Solicitors Regulation Authority** 





1.9. While the Competition and Markets Authority participates in the UKRN as an observer and is therefore not a signatory to this Foreword, it engages regularly with regulators through the UKRN, consistent with the Government's Strategic Steer for it to work with regulators particularly on cross-cutting challenges, and supports the UKRN's mission.



#### 2. About UKRN

- 2.1. 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.
- 2.2. Our priorities and focus therefore reflect the common interests of our members.
- 2.3. 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, such as key challenges for the economy, society and the environment.
  - Presenting regulators' shared priorities and impact in engagement with government, the wider regulatory community, consumer organisations, thinktanks and other parties.
  - Providing opportunities to engage stakeholders and government on the purpose and value of independent regulation.



#### 3. Our Strategy

- 3.1. This UKRN Strategy 2024-27 sets out our overarching strategy for the next three years, from April 2024.
- 3.2. It has been developed through extensive engagement with our members, our independent Expert Panel<sup>1</sup>, as well as key stakeholders from government and external partners.
- 3.3. 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

- 3.4. Key principles that we have incorporated in our thinking reflect what we have been told by members that they:
  - 1. Strongly support maintaining the institutional form and independence of UKRN.
  - 2. Universally value UKRN's collaboration focus networking and information sharing.
  - 3. 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.
  - 4. Share agreement on the focus on vulnerability, net zero and cost-of-living.
- 3.5. 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.
- 3.6. 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.
- 3.7. 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.
- 3.8. The backward-looking Annual Review documents will account for our performance and impact and provide valuable lessons for the next Annual Delivery Plan.

Page 10 of 19

<sup>&</sup>lt;sup>1</sup> UKRN expert panel | UKRN: the UK Regulators Network



#### **UKRN Business Planning**



Second multi-year UKRN Strategy 2024-27. This sets-out UKRN's:

- Purpose
- Objectives
- Outcomes

Annual Delivery Plans published in advance of each of the three Strategy years:

- Outputs
- Commitments
- Measures

Annual Review documents account for UKRN's against the Annual Delivery Plan:

- Evaluation of UKRN's activities and their impact (measures etc)
- Explanation of any variation
- 3.9. Additionally, we will produce a one-off 10 Year Review document for publication on our anniversary, in March 2024.
- 3.10. 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 highlevel 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.
- 3.11. We will also update our internal governance documents, including our processes and procedures, to reflect the changes to our membership structure and operating model.



#### 4. 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

- 4.1. 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.
- 4.2. 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.
- 4.3. 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-ofcapital 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.

- 4.4. 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.
- 4.5. 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

Work towards consistency and avoid duplication

Maximise impact

Act as the regulatory champion

Encourage innovative use of data

#### **UKRN Membership model**

- 4.6. From the 1<sup>st</sup> 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.
- 4.7. 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.



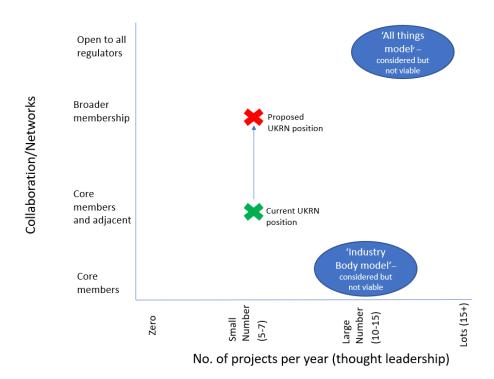
- Tier 1 members with more than 200 employees (this would include current full members).
- Tier 2 members with less than 200 employees distinction allows for a lower annual contribution that reflects the smaller size and capacity to engage of these members.
- Tier 1a (Observer) is reserved for members with overarching powers. Members would have access to the same provisions as Tier 1 & 2, however they would be by default optedout 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 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.
- 4.8. 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

- **4.9.** 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.
- 4.10. 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:



#### **Future Direction of UKRN**



- 4.11. 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.
- 4.12. 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.
- 4.13. As part of this approach, we revising our internal governance processes and procedures for decision making and prioritisation to deliver this model.



#### 5. How We Prioritise

- 5.1. 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.
- 5.2. 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.
- 5.3. 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.
- 5.4. 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.
- 5.5. 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:
    - o is this area tackling real or potential consumer harm?
    - o does it represent the common interests of a significant group of members?
    - o is there a gap in this area where joint-action would best be focussed?
    - o 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?



5.6. 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.



#### 6. 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 thoughleadership on members shared key priorities, as reflected below and by direction of SRG and CEOs.

Core objective	Proposed Outcomes
Promoting collaboration	<ol> <li>The UKRN itself* and our members are 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.</li> <li>*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.</li> </ol>
Supporting the Net Zero transition	<ol> <li>UKRN has championed the role of regulators in driving net zero, and address risks of climate change with partners and key stakeholders, including government.</li> <li>UKRN has brought-about a better understanding of the impacts, benefits and risks of the net zero transition, including for those in vulnerable circumstances.</li> </ol>



Addressing vulnerability	<ol> <li>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.</li> <li>UKRN has facilitated improved outcomes for consumers through enabling greater cross sector data sharing in instances where there are consumer benefits.</li> </ol>
Supporting sustainable economic growth and resilience	6. UKRN has supported the building of capability and capacity across member regulators to better support members' contribution to sustainable growth, investment and innovation.
Championing effective regulation and telling our story	<ol> <li>UKRN has supported the understanding of the role of effective regulation, within government, regulated parties and consumers.</li> <li>UKRN has acted to inform and support the evolution of regulatory practice, to meet current and future regulatory challenges.</li> </ol>
Making regulation an attractive career choice	9. UKRN has facilitated recruitment, retention and diversity in regulators.