

## **Annex A: Ensuring the quality of our policy advocacy**

- 1 Our impact depends to large part on the quality of what we do, and it is essential that our work is credible and robust. It will often come under serious scrutiny from those we are trying to persuade and in particular from those whom we are criticising or arguing against, and it needs to be able to withstand such scrutiny. This means that our research needs to be conducted properly, our analysis needs to be coherent, accurate and fair, and our proposals need to be workable.
- 1.1 This paper identifies the key principles we follow in undertaking policy advocacy work and sets out a more detailed project protocol for GB work, which is [will be] mirrored by parallel processes for all other parts of the organisation.

### **Key principles**

- 2 In carrying out our work, we will:
  - Adopt appropriate standards, including those laid down by relevant external bodies such as the Market Research Society
  - Work in accordance with our statutory basis and with Memoranda of Understanding
  - Put the results of our work into the public domain wherever possible, subject to appropriate checking, internal discussion etc.
  - Take proportionate action to check our facts prior to publication, having assessed likely risk
  - Make our own decisions but first find out what others think and recognise the legitimacy of other stakeholders' perspectives
  - Maintain dialogue with stakeholders – consumer organisations, providers, regulators and government – during a project, and work with others where this will help us to achieve our objectives and result in greater benefits for consumers
  - Test our thinking with colleagues and where appropriate external experts
  - Maintain our freedom to use information gathered in the course of a project but:
    - be clear about the terms on which information obtained from others will be used and verify the factual information with the provider; and
    - be clear about the context and timetable for putting the information into the public domain – “no surprises”
  - Be alert to the fact that our own value judgments may influence the design and aim of research, the collection of data, the interpretation of the findings and the use we make of the research findings
  - Have due regard to the ethical implications of our actions
  - Embed equality considerations, and our understanding of the diversity of consumers and their experiences, attitudes and needs, at every stage of a project.
  - Explain why we have made our decisions and take responsibility for them
  - Acknowledge those who have helped us and disclose funding sources.

2.1 The project protocol which follows is designed to ensure that these commitments are embedded in the work of Consumer Focus.

### **Project protocol for GB work**

3. This is a short protocol to guide the production of major research and policy projects. The protocol also sets out the outline processes which ensure that our externally-funded development projects meet their objectives and satisfy funders' requirements. It should be read in conjunction with other relevant processes and paper.

### **Performance Management Framework**

3.1 Consumer Focus has developed a Performance Management Framework to ensure the successful development and delivery of the work it undertakes. Consumer Focus' Corporate Plan focuses efforts on achieving results that are fundamental to the organisation's success, while a comprehensive Annual Plan clearly sets out the work that will be undertaken in the fiscal year to deliver a fair deal for consumers.

3.2 A project management approach, based on the principles of the recognised PRINCE2 project management methodology and tailored for use by Consumer Focus, has been developed to promote high quality deliverables.

3.3 All work undertaken by Consumer Focus undergoes a systematic process in which projects are planned, developed, delivered and evaluated. Successes and ongoing lessons learnt are fed back into the process to allow Consumer Focus to continually improve its ability to deliver high quality results.

### **The Process**

4 The Pride in Performance framework supports the organisation in delivering beneficial outcomes to consumers by positioning itself to be accountable for achieving the best value for consumers from its efforts.

4.1 The framework manages the development and execution of work around 4 key stages:

1. Development
2. Translation
3. Delivery
4. Monitoring and evaluation

4.2 During the annual development stage Consumer Focus reviews its strategic direction over the coming three-year period. This results in the review of its identity and the identification of key priorities resulting in the production of a corporate plan.

4.3 During the translation stage, the organisation begins the process of developing business cases to identify the work that the organisation will undertake in the coming fiscal year. This results in the production of an annual plan.

4.4 The Delivery stage is the heart of the organisation project management process. Consumer Focus has established a formal system to effectively translate Programmes from the Annual Plan into specific, measureable actions, with defined

outcomes. The system includes the creation of a Project Initiation Document, detailed Quarterly Reports and an End Project Report.

- 4.5 Throughout the process of implementing Consumer Focus's annual plan, ongoing performance monitoring occurs to ensure that work is delivered effectively and efficiently. In addition to quarterly project reporting, Consumer Focus has adopted a Balanced Scorecard approach to monitor the execution of its strategic direction.
- 4.6 Planned policy and research work will be based around our annual workplan cycle. For unplanned work we will follow the same procedure at all stages of a project.

### **Responsibility and accountability**

- 5 Programme Leads are responsible for ensuring that all programme staff understand their responsibilities in terms of the quality of work and are complying with relevant processes.
  - 5.1 They also provide regular progress reports to the Deputy Chief Executive, which in turn form a quarterly report to SMT and the Board, and they provide an important challenge function in terms of the quality of the analysis.
  - 5.2 For all individual projects there will be a project team, led by a project leader, who will normally be a Senior Policy Advocate or Principal Policy Advocate (or in the case of campaign-led projects, their public affairs counterparts). The project leader will be responsible for pulling together the right team of people to support the project, drawing on resources from across the organisation (such as research, public affairs, media relations and publishing colleagues), and have primary responsibility for the accuracy of work. Programme Leads have overall responsibility for quality across work programmes.

### **Scoping**

- 6 The purpose of scoping is to help decide, within our corporate objectives and a work plan area, what specific work we should be doing, what work is highest priority for us, and to ensure that we are not duplicating the work of others.
  - 6.1 Following extensive internal and external discussion, the Senior Management Team then the Board each year considers businesses cases for all proposed GB projects. The projects which get the go-ahead form a draft annual plan, which is then the subject of formal consultation with stakeholders. Once the annual plan is agreed, each project is developed further through a Project Initiation Document. The project leader should then agree key dates, ensuring that this is included in the publication schedule which is held by the Publishing team; all changes to this should be discussed well in advance with the Publishing team.

### **Partnerships**

7. For GB projects, formal partnership working needs to be agreed by the main Board. We must always have a written agreement with regard to projects we carry out in partnership with other organisations. This agreement is signed by both parties prior to the work commencing and normally includes:
  - deliverables
  - timescales
  - fees and costs

- key responsibilities
- approval requirements and processes
- rights over publication (copyright)
- rights over use (intellectual property).

7.1 Other less formal collaborations and alliances may not need Board approval or written agreements – if in doubt, this should be discussed with the Board Secretariat.

### **Carrying out research**

8 Research may be done in-house or we may commission work from an external party. If we use a market research agency to conduct qualitative or quantitative research, they must work in line with the Market Research Society Code of Conduct.

8.1 As noted above, for all projects, there will be an identified person with lead responsibility – this includes commissioned work and partnership working, where an identified person must be in place as manager of the work or holding the relationship with the other organisation(s). This will normally be an SPA or PPA. Overall responsibility rests with the Programme Lead.

8.2 We have detailed guidelines for commissioning and contracting research and staff must follow the procedures laid down in these guidelines. The Principal Researcher is the custodian of these and responsible for updating them to ensure their fitness for purpose. The Principal Researcher also acts in an advisory role to project and contract managers.

### **Verification**

9 The accuracy of draft reports will be verified, where appropriate, by contributors or third parties. Factual checks should include sending drafts to those we criticise and giving them a chance to respond to factual content. They should always be given a reasonable time to respond. Whenever we send drafts for checking, we should remind recipients about confidentiality. We should, however, always make clear that the final decision on any changes rests with us.

9.1 In the case of some information relating to energy and post, consultation with companies is required by section 29 of the Consumers, Estate Agents and Redress Act 2007 – if in doubt, please discuss this with the Head of Company Performance and Consumer Experience.

9.2 External contractors should provide us with assurance that their processes include appropriate checking of data analysis, facts etc.

9.3 We must undertake detailed verification ourselves, by someone other than the person leading the project, where there is considered to be a high degree of risk, for example the proposed publication identifies and criticises individual companies or people or where our findings are dependent on our use of statistics.

### **Review**

10 Draft reports will be discussed within and between programme teams. All draft reports and significant consultation responses should be circulated within Consumer Focus, usually giving at least two weeks for comment. They should be sent routinely to all

SMT members and programme leads, indicating whether their input on a particular piece of work is essential or optional, and to other colleagues depending on the topic.

- 10.1 Draft reports should also be circulated to at least one expert, ideally two, from outside the organisation. One of the two experts could be a Board member with expertise on the issue – in the case of the main Board, this information is available in the Board register of expertise, which is available from the Secretariat. In some instances we may need to offer a nominal fee to external experts (other than Board members) for undertaking this work.
- 10.2 All reports identified as raising potential issues around defamation will be approved by our defamation lawyer, prior to publication. The Programme Lead is responsible for ensuring this happens, in conjunction with the Communications team.
- 10.3 Publishing staff will take responsibility for proof reading the text of all reports prior to publication, although policy staff should deliver a high quality final draft.

### **Approval**

- 11 Draft reports will, in the first instance, be approved by the Programme Lead. Where they raise a higher degree of risk, or where the Programme Lead is also project lead, they should go to the Deputy Chief Executive for sign-off. This may then lead to further cross-organisation discussion and sometimes a Board decision, in cases where the issue is considered to be ‘high risk, high salience, high novelty’ (see Board paper 15.4, 3 February 2009, for more details).

### **Dissemination/Publication**

- 12 Written publications must be in accordance with our brand guidelines.
- 12.1 We have a number of ‘no surprises’ agreements in place, for example with BIS – this means we should give relevant bodies reasonable warning that we intend to launch a piece of work. This also applies to organisations named in our work. It is the responsibility of media relations colleagues to ensure that these arrangements are followed. There are also a number of Memoranda of Understanding, primarily with regulators, ombudsmen and other consumer bodies – details are available from the Head of Secretariat.
- 12.2 Board members should also be advised in advance that we are about to publish a report, and given a short note on ‘lines to take’; this information should also be circulated to SMT members and other colleagues as appropriate.

### **Evaluation**

- 13 Each project will conclude with an End Project Report, which seeks to capture lessons for the future as well as assess the project’s overall impact. Every year, we will commission at least one in-depth independent evaluation of a key project or programme of work.