



National Audit Office

Assessing the Impact of Proposed New Policies

Appendices One, Two and Three

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Appendix One

Scope and Methodology

This report examined the quality of analysis in Impact Assessments, an area which previous National Audit Office reports have found to be a recurring weakness. It assessed the capability of departments to produce quality analysis and reviewed departments' internal processes for completing and scrutinising Impact Assessments to ensure that they are sufficient and proportionate. The report focuses primarily on the 50 Impact Assessments chosen for review including the staff and processes involved in their production.

Selected method

Document Review

We sampled 50 Impact Assessments from the population of 196 final Impact Assessments performed in 2008 recorded in the Better Regulation Executive's Impact Assessment Library¹. The sample was chosen to cover a number of different departments and size of Impact Assessment (as approximated by the average annual cost). The Impact Assessments were split into three groups consisting of: zero cost, £1 to £5 million pounds and over £5 million pounds.

For each Impact Assessment we obtained from the Department, or searched through published literature, to obtain the most up-to-date version possible. This resulted in some of the Impact Assessments having more recent updated costs and benefits than shown in the Better Regulation Executive's Impact Assessment Library.

In one case, Identity Cards for Foreign Nationals – PBS Tier 4 (Student), Marriage Categories and others, the Impact Assessment reviewed was an earlier iteration than the one found on the Library. In this instance we have conducted a subsequent analysis to ensure that the comments made and analysis performed are still relevant in relation to the most recent document.

Purpose

We reviewed the 50 Impact Assessments in order to:

- assess the overall quality of Impact Assessments; and
- explore whether Departments are applying a proportionate approach.

1 <http://www.ialibrary.berr.gov.uk/links/>

Selected method

We performed our review of the final Impact Assessments against three areas that drive the quality of Impact Assessment:

- **Option Development:** Review the number and type of options considered.
- **Option Appraisal:** Assess the breadth and depth of economic analysis, and whether the analysis is proportionate to the topic under review.
- **Reliability of appraisal:** Review the strength of the evidence base, the use of sensitivity analysis to test assertions, and the consideration of wider consequences.

We then assigned a provisional 'Red', 'Amber' or 'Green' rating for each category based on the results of this testing.

Quality assurance panel

Our review of each Impact Assessment was – by an independent quality assurance panel of three members, chaired by Dermot Glynn, from Europe Economics. Other panel members were Jose Seisdedos, an economist at the Better Regulation Executive and Robert Cook, an economist at the National Audit Office with no prior contact with the study team. The panel was considered sufficiently independent of the NAO study team, and had sufficient experience in Impact Assessments to make judgements on them. The panel moderated the NAO's provisional ratings and issued final ratings for each of the three criteria and an overall rating for each Impact Assessment.

Purpose

Moderated the NAO's provisional ratings, provide an expert economic assessment of the analysis and issue final ratings.

Selected method**Semi-structured interviews**

We conducted semi-structured interviews with the key staff involved in developing each Impact Assessment. For each Impact Assessment we aimed to meet with the policy team lead, the analyst and the Better Regulation Unit team member.

For the purposes of the study “Analysts” refers to a number of job roles including economists, operational researchers, statisticians and social researchers. The interviews used a standardised interview schedule for each category of respondent, with some open-ended questions asked of all categories.

In a minority of cases interviews were not possible due to staff turnover. However, we met the following:

Policy staff – 45 staff, covering 47 Impact Assessments

Analysts – 33 staff, covering 40 Impact Assessments

Better Regulation Unit staff – 17 staff, covering 47 Impact Assessments

Our questions covered the background to each Impact Assessment, the policy development process, the consideration given to key factors such as option development and economic analysis and the scrutiny process followed. We also collected information from staff about training and guidance and sought views on the strengths and weaknesses of the Impact Assessment process. A record of each interview was made during the meetings, with proforma interview sheets used to guide the interviews in specific areas such as development of scrutiny processes. The information was then collated to allow systematic analysis.

Purpose

We used our interviews to:

- gather supporting and background information on the Impact Assessments reviewed;
- collect evidence and staff views on the policy development process, and the scrutiny procedures in place; and
- assess departments’ capacity to deliver high quality Impact Assessments.

Selected method	Purpose
<p data-bbox="405 436 694 463">Chief Economist Interviews</p> <p data-bbox="405 472 868 528">We interviewed eight Chief Economists from the following departments:</p> <ul data-bbox="405 544 874 831" style="list-style-type: none"> <li data-bbox="405 544 794 571">● Business, Innovation and Skills (BIS) <li data-bbox="405 580 858 607">● Communities and Local Government (CLG) <li data-bbox="405 616 770 642">● Culture, Media and Sport (DCMS) <li data-bbox="405 651 874 678">● Environment Food and Rural Affairs (DEFRA) <li data-bbox="405 687 746 714">● Department for Transport (DfT) <li data-bbox="405 723 715 750">● Department of Health (DoH) <li data-bbox="405 759 619 786">● Home Office (HO) <li data-bbox="405 795 683 822">● Food Standards Agency <p data-bbox="405 846 912 1019">The interviews were conducted on a semi-structured basis, which included open ended questions where the respondents were encouraged to develop their comments in detail. Notes were taken for each interview and the results collated and analysed to identify key trends and common themes.</p>	<p data-bbox="954 472 1449 584">To provide an overview of the Impact Assessment process, particularly main strengths and weaknesses from the perspective of a senior figure involved in the scrutiny and sign-off process.</p>
<p data-bbox="405 1055 611 1081">Sensitivity analysis</p> <p data-bbox="405 1090 906 1350">We undertook sensitivity analysis on the Impact Assessments. Our work was based on the costing analysis undertaken by the departments' where provided for each Impact Assessment. We identified where key assertions had been made in the Impact Assessment which if changed could affect the overall decision made. In some instances these had been highlighted to the study team by the departmental staff who worked on the Impact Assessment.</p> <p data-bbox="405 1368 912 1695">The Net Present Value calculations were re-performed with the key identified assertions varied by 5 per cent, 10 per cent and 15 per cent. These variations could be increases or decreases, and be used on both cost assertions and benefit assertions. The final outcomes were compared to the original results and a judgement made as to whether the variances were significant enough to undermine the reliability of the decision made. The judgement used in reaching this conclusion was then reviewed by the independent quality assurance panel.</p>	<p data-bbox="954 1090 1449 1202">The analysis tested the reliability and robustness of the cost basis used in the Impact Assessments. This highlighted areas where the reliability of the option appraisal would be limited.</p>

Appendix Two

Table of Impact Assessments Sampled

This table presents the detailed ratings and values associated with the 50 Impact Assessments. The department names are those stated on the final Impact Assessment and may have subsequently changed due to machinery of government changes. Where the annual average cost or benefit is too low to appear due to rounding the value is shown as 0* and actual cost/benefit shown.

Impact Assessment Title	Summary	Annual Costs (£m)	Annual Benefits (£m)	Option Development	Option Appraisal	Reliability of Appraisal	Final Rating
Department for Business, Innovation and Skills (BIS)							
Regulatory Enforcement and Sanctions Bill Part 3	Give regulators access to an extended range of civil sanctions that will be an alternative to criminal prosecution in cases of non-compliance	47.2	145.0	●	●	●	●
Impact Assessment of Statutory Instruments implementing the Primary Authority Scheme	The Primary Authority Scheme ensures coordinated, consistent and proportionate local authority regulatory enforcement for those organisations that operate across more than one local authority.	21.1	54.7	●	●	●	●
Impact Assessment of Implementation of Internal Market Provisions of Batteries and Accumulators Directive (2006/66/EC)	These Regulations partially implement Directive 2006/66/EC on batteries and accumulators and waste batteries and accumulators and repealing another Directive.	8.0	Not quantified	●	●	●	●
Amendments to maternity and parental leave regulations and Paternity and Adoption leave regulations 2008	Changes are proposed to Maternity and Parental leave etc regulations to restore parity with the Sex Discrimination Act.	5.9	0	●	●	●	●
Extension of redress schemes to the gas, electricity and postal services sectors	To enable the Secretary of State to require members of the gas, electricity, and postal services industries to join approved statutory redress schemes whose decisions will be binding on industry members.	3.2	0	●	●	●	●
Impact Assessment of the application of the accounts and audit provisions of the Companies Act 2006 to Limited Liability Partnerships (LLPs)	Applying the accounts and audit provisions of the 2006 Companies Act to LLPs, to ensure benefits and savings are maintained.	0.35	6.7	●	●	●	●
Review of Export Control Legislation (2007) (also named as Trade in Goods [Categories of Controlled Goods] Order 2008)	Ensure the control over exports works towards open and responsible export, which benefits poor economies and limits the effects on UK business.	0.26	Not quantified	●	●	●	●
Impact Assessment of the proposed closure of the Wool Textile Export Promotion Levy	Reduce bureaucracy by closing the Wool Levy.	0	0.2	●	●	●	●

Impact Assessment Title	Summary	Annual Costs (£m)	Annual Benefits (£m)	Option Development	Option Appraisal	Reliability of Appraisal	Final Rating
Implementing the European Commission Decision on warnings for toys containing magnets	Implement Commission Decision requiring magnetic toys to display a warning about the health and safety risks.	0	0	●	●	●	●
The Companies (Reduction of Capital) (Creditor Protection) Regulations 2008	To implement a requirement introduced by Directive 2006/68/EC that the creditors of a public company can only object to a reduction in the company's share capital if they can credibly demonstrate that their claims are at stake as a result of the proposed reduction.	0	Not quantified	●	●	●	●
Communities and Local Government (CLG)							
Impact Assessment of Implementation of Cave Review of Social Housing Regulation	The Cave review made a series of recommendations that this Impact Assessment implements.	3.2	0	●	●	●	●
Amendment to Homelessness Legislation to Remedy an Incompatibility with ECHR	Remedy an incompatibility with EU law over the treatment of homeless people applying for social housing.	0.41	0	●	●	●	●
Proposal to provide "exemption" tenancies for the purposes of delivering Family Intervention Projects	Incentivise the release of more local authority land for development as affordable housing.	0.11	Not quantified	●	●	●	●
Tolerated Trespasser Provisions in Housing and Regeneration Act	To remove the problems which the tolerated trespasser legal doctrine has caused for landlords and tenants.	0	0* (£45k)	●	●	●	●
Impact Assessment of regulations to progress stalled reviews of mineral planning permissions	Complying with EIA directive by progressing reviews of environmental impacts of mineral sites previously stalled from a lack of information provided.	0	0	●	●	●	●
Impact Assessment of Exempting some Local Authorities from the HRA Subsidy System	To allow some Local Authorities to run live pilots of self-financing schemes rather than current system of redistributing revenues through the subsidy system.	0	8.6	●	●	●	●
Impact Assessment of changes to fire safety legislation on sub-surface railway stations	To simplify fire safety regulations as they apply to sub-surface railway stations reducing the burden on both business and enforcing authorities.	0	3.0	●	●	●	●

Impact Assessment Title	Summary	Annual Costs (£m)	Annual Benefits (£m)	Option Development	Option Appraisal	Reliability of Appraisal	Final Rating
Impact Assessment of Homeowners Mortgage Support Scheme	Introduce support to help ensure households which suffer temporary income problems are able to reduce their monthly mortgage payments to a sustainable rate.	6.2	15	●	●	●	●
Department for Culture, Media and Sport (DCMS)							
Gambling Commission Fees from August 2008	Yearly review of fees for gambling licence purchased from the Gambling Commission.	0.26	0.3	●	●	●	●
Department of Education (DfE)							
Amendments to the Education (Independent Schools Standards) (England) Regulations	Necessary amendments to reflect current guidance and legislation and also to reduce the administrative burden on independent schools.	0	18	●	●	●	●
Department for Environment Food and Rural Affairs (DEFRA)							
Impact Assessment of transfer of private sewers and lateral drains to statutory water and sewerage companies	Transfer sewers in private ownership connected to public sewer network into the ownership of the statutory Water and Sewerage Companies.	133.0	187.0	●	●	●	●
The Fluorinated Greenhouse Gases Regulations 2009	Intervention required to meet EC regulations that are designed to improve reporting, leakage checking, labelling, company certification and personnel registration requirements for equipment involving certain greenhouse gases in five industrial sectors.	77.5	118.0	●	●	●	●
Impact Assessment of the Environmental Damage Regulations (England) and the Environmental Damage Regulations (Wales) 2008	Transposes EU Directive on Environmental Liability (ELD), to create incentives to minimise the number and severity of cases of environmental damage.	15.0	19.0	●	●	●	●
Impact Assessment of EUP Implementing Measures for Simple Set Top Boxes	To implement restrictions on power consumption of simple set-top boxes during active function and whilst in off-mode and standby states.	12.95	70	●	●	●	●
Impact Assessment of EUP Implementing Measure for External Power Supplies	To implement restrictions on power supply units to increase efficiency and reduce CO ₂ emissions.	6.8	10.1	●	●	●	●
Impact Assessment of EU proposals for an EU School Fruit Scheme	Evaluation of voluntary EU wide fruit and vegetables scheme for the supply of fruit and vegetables into schools.	5.8	5.8	●	●	●	●

Impact Assessment Title	Summary	Annual Costs (£m)	Annual Benefits (£m)	Option Development	Option Appraisal	Reliability of Appraisal	Final Rating
Impact Assessment of Uplands Entry Level Stewardship	Considers the design of Uplands Entry Level Stewardship, which is the replacement to the Hill Farm Allowance, and how to maintain and improve the biodiversity, natural resources, landscape and historical values of England's uplands.	2.65	23.7	●	●	●	●
EU Proposal for a Regulation of the EP and Council on spirit drinks above 15 per cent alcohol	To implement the new EC regulation covering the definition, description, presentation, labelling and protection of geographical indications for spirit drinks above 15 per cent.	0.48	Not quantified	●	●	●	●
Measures to protect marine biodiversity in Lyme Bay	To implement fisheries management measures that best protects the biodiversity of an area of Lyme Bay.	0.22	Not quantified	●	●	●	●
The Organic Products Regulations 2009	Amend existing regulation to reflect the introduction of new EU Regulations on organic production and to streamline the approval process for the organic control bodies.	0* (£14k)	0.1	●	●	●	●
Department for Transport (DfT)							
Impact Assessment of Regulation of Number Plate Supply in the UK – Show Plates	Clarify the position of exemptions under the Road Safety Act for producing or selling number plates that do not comply with current show plates legislation.	1.0	7.2	●	●	●	●
Impact Assessment of Retrofitting of Mirrors to Increase the Field of indirect Vision (Blind Spot) of Goods Vehicles	Introduces a retrospective change to bring into line with EU directives requiring new categories of mirrors to be fitted to increase field of vision.	0.6	9.9	●	●	●	●
The Merchant Shipping (Vessel Traffic Monitoring and Reporting Requirements) (Amendment) Regulations 2008	Comply with EC Directive by making amendments to existing UK legislation in monitoring merchant shipping.	0* (£41k)	Not quantified	●	●	●	●
Impact Assessment on the mutual recognition of seafarers' certificates issued by the Member States and amending Directive 2001/25/EC	Comply with EC Directive intended to foster the professional mobility of seafarers within the European Union by facilitating the mutual recognition of certificates of competency.	0	0	●	●	●	●

Impact Assessment Title	Summary	Annual Costs (£m)	Annual Benefits (£m)	Option Development	Option Appraisal	Reliability of Appraisal	Final Rating
Amending The Traffic Signs Regulations and General Directions to improve signing of safety cameras	Amendments made to current legislation to ensure consistency of camera signings across speed limits.	0	Not quantified	●	●	●	●
Department of Health							
Health Care and Associated Professions (Miscellaneous Amendments) Order	Changes the governing structures of the regulatory bodies, including a move to full appointed councils, and changes to make them more accountable to Parliament.	0.3	0	●	●	●	●
Nursing and Midwifery (Amendment) Order 2008	Changes the governing structures of the Nursing and Midwifery Council including a move to fully appointed council, and changes to make it more accountable to Parliament.	0	0	●	●	●	●
Department for Innovation, Universities and Skills							
Legislative Reform Order to amend the Weights and Measures Act 1985	Remove the burden of requiring the services of both an inspector and an approved verifier where relevant equipment is being adjusted to read more accurately.	0	0.6	●	●	●	●
Department for Work and Pensions							
The Fixed-term Employees (Prevention of Less Favourable Treatment) Amendment Regulations 2008	Amending regulations to ensure agency workers are treated in the same way as all other employees with regard to entitlement to Statutory Sick Pay.	13.6	14.0	●	●	●	●
Impact Assessment of changes to Regulations 4 and 5 of the Employers' Liability (Compulsory Insurance) Regulations 1998	To remove ineffective regulation and simplify compliance requirements business from compliance with Regulations 4(4) and 5(1) and (2) of in the Employer's Liability (Compulsory Insurance) Regulations 1998.	0	0	●	●	●	●
Impact Assessment of the statutory overrides introduced by The Occupational, Personal and Stakeholder Pensions (Miscellaneous Amendments) Regulations 2009	Introduce a power for scheme rules to be amended by trustees so that scheme rules can be amended following the reduction of the indexation cap.	250	250	●	●	●	●

Impact Assessment Title	Summary	Annual Costs (£m)	Annual Benefits (£m)	Option Development	Option Appraisal	Reliability of Appraisal	Final Rating
Foods Standards Agency							
The Meat Products (England) (Amendment) Regulations 2008	Bring labelling requirements for added starch and protein in certain meat products into line with European labelling requirements.	0.16	0.3	●	●	●	●
The Transmissible Spongiform Encephalopathies (TSE) Regulations 2008	Amend existing controls on Transmissible Spongiform Encephalopathies to be in line with changed EU regulation.	0	2.0	●	●	●	●
HM Treasury							
Impact assessment of amendments relating to Part 7 of the Financial Services and Markets Act 2000 ("FSMA")	Clarify the position under part 7 of the FSMA with respect to insurance business transfer schemes.	0* (£254)	0* (£17k)	●	●	●	●
Home Office							
Tier 5 of the Points Based System for Immigration	Introduction of Tier 5 of the points based system intended to clarify the rules governing the employment of non EU temporary migrants.	51.0	112.0	●	●	●	●
Impact Assessment for Changes to the UK's visa regimes following Stage Three of the Visa Waiver Test; and Jamaica DATV imposition	Introduce new visa regimes on Bolivia, Lesotho, South Africa, Swaziland and Venezuela and a DATV regime on Jamaica, at the same time lift the visa regime on Taiwan.	20.5	20.5	●	●	●	●
Fees for Tier 5 of the Points Based System for Immigration	Sets a fee level for the Tier 5 level (youth mobility and temporary workers) migrants under the points based system for managed migration.	8.1	3.9	●	●	●	●
Impact Assessment of Identity Cards for Foreign Nationals – Student and Marriage Categories	Introduce requirement to apply for a Identity Card for Foreign Nationals allowing them to demonstrate reliably and securely that they are legally in the UK.	3.58	2.98	●	●	●	●
Fees for Tier 2 of the Points Based System	Sets a fee level for the Tier 2 level (skilled workers with a job offer in UK) migrants under the points based system for managed migration.	0.76	0	●	●	●	●
Revised statutory charges for the removal, storage and disposal of vehicles by the police	Setting charges to meet the costs for the police incurred in the removal of vehicles and their subsequent storage or disposal.	Not quantified	Not quantified	●	●	●	●

Appendix Three

Key findings from previous NAO reports

We have published five reports evaluating different aspects of Impact Assessments. These reports all focussed on compliance achieved against a set of criteria we developed for each review, while the current study focussed on compliance with Better Regulation Executive guidance. The table below provides an overview of the scope, methodology and findings from our prior reports.

Study	Scope	Methodology	Findings
Better Regulation – Making Good Use of Regulatory Impact Assessments 2001-02 HC 329	Our report set out to present good practice by departments in producing Regulatory Impact Assessments. We also documented the process used to prepare these assessments.	We reviewed a sample of 23 Impact Assessments from across government, documented how they were prepared and drew out good practice.	Regulatory Impact Assessments that added value tended to be characterised by: <ol style="list-style-type: none"> 1 starting the assessment at a sufficiently early stage; 2 consulting effectively with those affected by the proposal; and 3 analysing appropriately the likely costs and benefits of the proposal.
Evaluation of Regulatory Impact Assessments Compendium Report 2003-04 HC 358	The 2002 PAC report resulted in an invitation from the Cabinet Secretary to undertake a rolling review of the quality of Impact Assessments. For this pilot year we examined the thoroughness and quality of a sample of ten from over 200 Regulatory Impact Assessments approved by the departmental Minister. The sample reflected suggestions in the Better Regulation Task Force's Annual Report.	We assessed a sample of ten Impact Assessments against a set of criteria developed to assess the quality of analysis.	Key areas for improvement identified: <ul style="list-style-type: none"> ● Clearer definition of the objective of the policy allowing a clearer understanding of the rationale to be developed. ● Development of the possible options was limited by poor consideration of the do-nothing option. ● Limited expansion and explanation of the problem which they sought to solve. ● Difficulties in the estimation of benefits as they can be difficult to quantify. ● Limited amount of evaluation of how enforcement would be achieved.

Study	Scope	Methodology	Findings
Evaluation of Regulatory Impact Assessments Compendium Report 2004-05 HC 341	Out of some 175 Regulatory Impact Assessments produced in 2003-2004 we selected a sample of ten. Samples selected with assistance from the Better Regulation Task Force who highlight those from which lessons could be learned.	We assessed the quality of analysis performed using a new set of criteria. Our aim was to assess the level of performance and draw out lessons learned.	<p>Key themes arising were:</p> <ul style="list-style-type: none"> ● continuing issues surrounding defining the policy objective and the issues that the intervention sought to manage; ● limited presentation of alternative options also remained an issue; ● poor quantification of costs and benefits; ● consideration of monitoring compliance post implementation also remained an issue; and ● poor consideration of plans for monitoring and evaluation post implementation.
Evaluation of Regulatory Impact Assessments 2005-06 HC 1305	This Report evaluates the extent to which departments were embedding Impact Assessment into their processes and culture.	We focused our examination on four departments – Culture, Media and Sport; Trade and Industry; Home Office; and Transport. Our methodology included an evaluation of a sample of Regulatory Impact Assessments; identification of the principles needed to achieve culture change, and an assessment of departmental performance against these; and interviews with relevant stakeholders.	<p>Key finding were:</p> <ul style="list-style-type: none"> ● Regulatory Impact Assessments are often not used in the right way. The purpose of Regulatory Impact Assessments is not always understood; there is a lack of clarity in the presentation of the analysis; and persistent weaknesses in the assessments. ● Regulatory Impact Assessments can offer an effective tool for assessing different options and identifying regulatory solutions that do not impose unnecessary costs on those being regulated. ● Regulatory Impact Assessments were not always sufficiently integrated into the decision making process. ● There was room for improvement in considering how to implement, monitor and evaluate the recommended option. ● There was inconsistency between policy officials' understanding of the need for Regulatory Impact Assessments, when they should be started and the level of analysis required.

Study	Scope	Methodology	Findings
Evaluation of Regulatory Impact Assessments 2006-07 HC 606	This report evaluated the quality of Regulatory Impact Assessments produced by the Department of Health and the Department for Communities and Local Government, and considered how these departments were seeking to raise standards and improve their use.	Developed a set of criteria to evaluate performance and highlight the issues where the process could be improved within these departments.	<p>Key finding were:</p> <ul style="list-style-type: none"> ● Regulatory Impact Assessments were not widely used in the Parliamentary process. ● There continued to be an unstructured and ad-hoc approach to post-implementation review across all departments. ● The relationship between the Better Regulation Executive and departments had been strengthened. ● Revisions to the Regulatory Impact Assessment guidance created uncertainty during the period of transition. ● The adequacy of governance arrangements to encourage high quality Regulatory Impact Assessments varied. The departments in our sample are strengthening the scrutiny of Regulatory Impact Assessments.
Delivering High Quality Impact Assessments 2008-09 HC 128	Changes were made to guidance of the process in 2007 and therefore we compared Impact Assessments from the first six months of 2008 against 2006. Our aim was to review the success of these changes at raising the quality of Impact Assessments. We also assessed whether scrutiny processes were more integrated into the process.	Performed a high level review of 309 Impact Assessments from 2006 and 171 from 2008. We did this through 29 high level questions covering the process based on the assessment criteria used in other reports.	<p>In summary our findings were:</p> <ul style="list-style-type: none"> ● The new Impact Assessment process had helped to improve the standard of Impact Assessments. ● As in previous reviews, the standard of Impact Assessments still varied widely. ● There was insufficient analysis of evidence in the weaker Impact Assessments. ● The Better Regulation Executive introduction of a new Impact Assessment process provided a catalyst for change and departments had strengthened scrutiny processes. ● The Better Regulation Executive undertook less real-time external challenge to the development of Impact Assessments than its predecessor body.