



Better Regulation
Victoria

Towards Best Practice – Explanatory Guide

A resource to support the application of
the Towards Best Practice guide for
regulators

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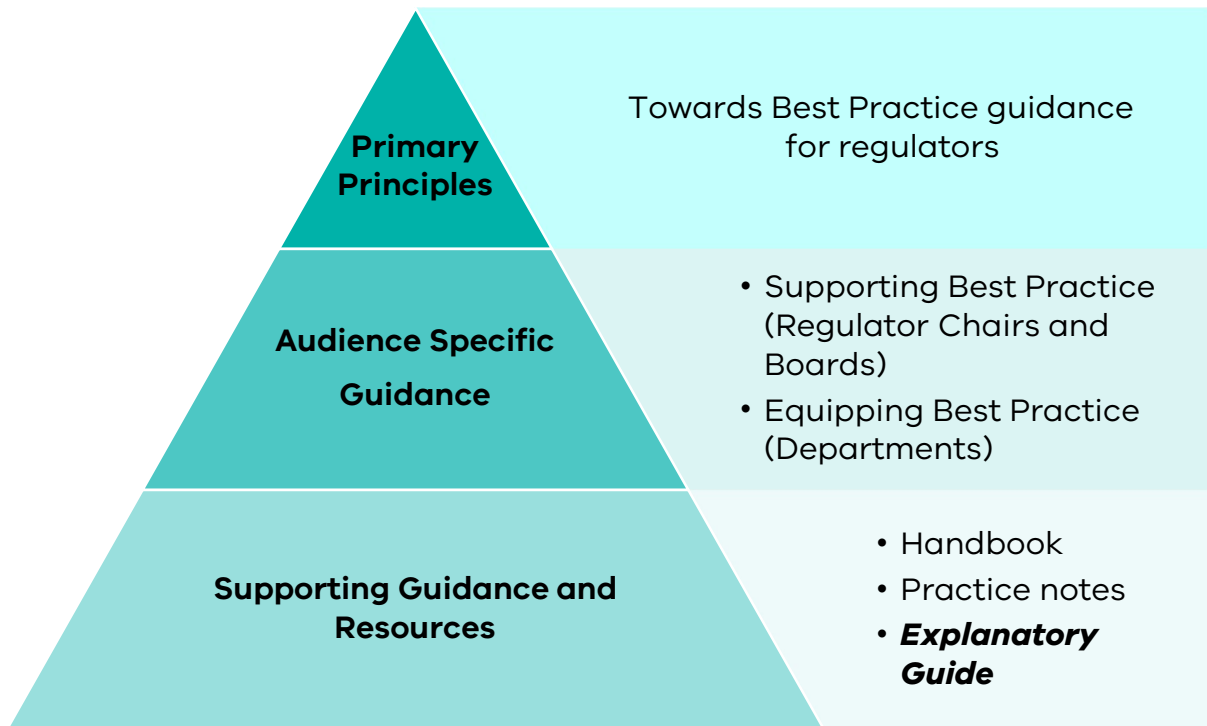
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The role of this explanatory guide

The *Towards Best Practice* guide and its companion papers set out principles and action areas to deliver on regulatory improvement. This guidance was developed by a working group of BRV and Victorian regulators, and feedback from the broader regulatory community.

This explanatory guide has been prepared to help capture the key areas of discussion leading to the finalised principles and is provided to help regulators to best take account of the principles, in a manner consistent with their intent.

Regulator guidance package



Principle 1 Be clear on your regulatory outcome and the harms you are trying to minimise

Sub principle	Intent of the principle
1.1 Understand and describe the causes, characteristics, and impacts of the key harms you seek to minimise	<p>Emphasises the need to understand the causes, characteristics and impacts of harms, as a foundation for designing regulatory responses and the overall operations of the regulator.</p> <p>Asks regulators to look beyond detrimental impact, to understand why harms occur, including the drivers of problem behaviours.</p> <p>The focus on harms, rather than noncompliance, is to ensure that regulator attention is not limited to, or framed in terms of, prescribed requirements and offences.</p> <p>Relates to principle six, and the use of data analytics and other insights, to 'break down' and understand causes, characteristics, and patterns of risk.</p>
1.2 Define the regulatory outcomes you pursue, including the public benefits of harm reduction, increasing community trust, and improving integrity within regulated industries and the regulatory scheme.	<p>Recognises that regulatory outcomes may be broader than harm minimisation, and that it is important to account for all purposes of legislation and the circumstances that led to creation of the regulator. Doing so helps to guide regulatory responses and factors to consider in resource allocation and decision-making.</p> <p>This includes understanding the nature of regulated industries and duty holders, including their capabilities and priorities, and the drivers of behaviours. These regulatory outcomes (such as improving integrity) may directly or indirectly relate to the harms of concern.</p>
1.3 Define your role in addressing these harms and meeting these outcomes, the role or accountability of duty holders, and your relationship to them.	<p>Recognises that the role of the regulator and the relationship to duty holders may differ with legislation and other policy settings.</p> <p>In particular, legislation may define whether regulated entities have explicit or implied duties or obligations, and which functions and responsibilities apply to the regulator.</p> <p>These settings will influence how the regulator engages with duty holders, and the design of regulatory responses and communications that direct or guide duty holder behaviour.</p>

Sub principle

Intent of the principle

1.4 In defining your role, account for the objectives and scope of relevant legislation, broader policy settings, and the role of others. This may include engaging with policy makers, research bodies, peer regulators, government agencies, industry, and the community.

Asks regulators to take a holistic view of their role, recognising that they exist within a broader system, which may be set out under legislation and policy statements (including explanatory memoranda, second reading speeches, government messages and statements of expectations), or may have developed organically as regulatory activities interact with the work of other parties.

Doing so helps the regulator to be more influential and effective.

Principle 2 Establish and refine your approach to minimising harms

Sub principles	Intent of the principle
<p>2.1 Thoroughly understand how your regulatory approaches, powers and tools can be used and coordinated to prevent or respond to harms and achieve your regulatory outcomes in an efficient and effective way.</p>	<p>Encourages regulators to adopt a 'harms' oriented approach to their activities. This means organising operations around their objectives, rather than around regulatory tools. This is important to delivering regulatory outcomes.</p> <p>It emphasises coordination, because often a mixture of integrated approaches (e.g., guidance, monitoring, partnerships, enforcement) is required to achieve objectives.</p> <p>Regulators should recognise the potential for unintended consequences of their actions, and aim to take the minimal regulatory action to achieve their objectives – but there may be important exceptions, such as 'show of force' to make an impact.</p>
<p>2.2 Consider when to apply routine processes and when to develop tailor-made interventions to address harms. Account for and develop the resources and capabilities required to deliver each approach.</p>	<p>States that regulators should consider what general approach to regulation is most suited to given objectives. This is an important strategic consideration in operations design and management.</p> <p>It refers to a 'problem solving' approach.¹ However it does not assume that regulators should adopt a problem-solving approach in all situations, given the diversity of regulators and regulatory frameworks. In some cases, routine processes may be sufficient to achieve outcomes.</p> <p>This sub-element also emphasises the need to build management and staff capabilities, and infrastructure, to deliver each approach.</p>
<p>2.3 When designing your regulatory approaches, account for how duty holder attitude, behaviour, and performance should influence your responses.</p>	<p>Recognises that the regulator's <i>regulatory posture</i>² should in most cases be responsive to duty holder <i>compliance posture</i>.³ Regulators should explain how these factors are considered in their dealings with duty holders. Doing so can help to clarify expectations and proactively influence duty holder behaviour.</p>

¹ A 'problem solving' approach - where regulators develop tailor-made interventions to address a specific issue, rather than relying solely on routine audit programs, permit approvals, or quality reviews.

² Regulatory posture - the stance it adopts towards duty holders.

³ Compliance posture - duty holder's stance, such as engagement, intent, capability and history.

Sub principles

Intent of the principle

<p>2.4 Establish a clear approach to monitoring compliance. For inspection programs, aim to maximise the use of preventative, rather than reactive approaches, accounting for the constraints of relevant legislation and the performance of regulated industries.</p>	<p>Specifically addresses design of compliance monitoring approaches, whether through inspections or other means (where applicable). This is important for establishing compliance monitoring functions, as well as review of existing operations, to challenge assumptions or an 'auto pilot' approach to activities.</p> <p>In general, regulators should understand the current and desired 'mixture' of inspections, whether responsive (e.g., complaint driven), proactive (e.g., audit programs), or strategic (e.g., blitzes or problem solving or education projects or proactive compliance activity for targeted interventions).</p> <p>It encourages inspections to <i>prevent</i> harms, whilst recognising that regulators will usually still have to <i>respond</i> to incidents and complaints about non-compliance.</p> <p>Compliance monitoring programs will usually rely on frameworks and tools to allocate and monitor use of resources according to risk, which is addressed under principle six and seven.</p>
<p>2.5 Develop positions on the use of different enforcement powers within the context of your regulatory approach. Account for legal requirements, risk, proportionality, and effects on broader compliance behaviours. Distinguish how you use remedial tools to change behaviour and secure compliance, from your use of sanctions and penalties.</p>	<p>Relates to communication, recognising that external messages should provide clarity and predictability about the regulator's approach, whilst maintaining scope and discretion about resource allocation and enforcement action.</p> <p>The emphasis on remedial tools highlights that regulators may need to take actions to fix a problem or secure compliance, separate from actions to punish or deter non-compliance, and that regulators need to understand and articulate these different purposes.</p>
<p>2.6 Communicate your overall approach, so it is understood across your organisation, by duty holders, and other stakeholders and the community as relevant. Explain why and how your approaches are intended to work to address harms.</p>	<p>As above</p>

Principle 3 Ensure your regulatory regime is fit for purpose

Sub principle	Intent of the principle
<p>3.1 Monitor the environment you operate in to ensure that your approach is responsive to emerging challenges, changes in harms, and new policy settings, and adapts to changes in technology, industry practices and community expectations.</p>	<p>Set out a range of considerations for regulators to maximise their available tools, powers and resources, whilst influencing change.</p> <p>Approaches may include developing new tools to influence behaviour change, such as information products, advisory letters, communication through partners, and warnings; and use of these measures in combination with tools provided for under legislation.</p> <p>These regulator approaches are complemented by measures set out in the companion paper for departments, <i>Supporting Best Practice</i>.</p>
<p>3.2 Account for the areas where your activities interface with those of peer regulators, policy makers, service delivery and funding bodies, to address inconsistencies in objectives or in delivery of government functions.</p>	<p>Departments can contribute to this principle by being engaged stewards of the regulatory framework, whether in relation to the body of primary legislation, new or revised regulations, relevant policy settings, or related functions of government such as funding or program delivery. These considerations should include the fee and funding arrangements of the regulator.</p>
<p>3.3 Identify where you can innovate or test new approaches to using your tools and powers to achieve your outcomes, including where you should take strategic enforcement action to clarify the limits of your regulatory framework.</p>	<p>Effective and respectful relationships between departments and regulators can assist in ensuring regulatory frameworks are fit for purpose, policies are designed with implementation in mind and regulatory outcomes can be delivered in practice.</p>
<p>3.4 Where your ability to address harms is limited by deficiencies in your regulatory framework, seek to influence and develop other approaches to achieve your goals. This may include collaboration, influence, and explaining your limitations to government peers.</p>	
<p>3.5 Alert relevant Ministers and departments to capability, funding or other resourcing issues, or problems with legislation, that significantly compromise your ability to meet regulatory outcomes. When doing so, advise on the nature of the risks, and proposed or possible mitigating strategies.</p>	

Principle 4 Support duty holders to understand the value of compliance and harm reduction

Sub principle	Intent of the principle
4.1 Communicate the impact of harms and the importance of harm reduction to duty holders, to increase their willingness and motivation to comply.	Principle four is separated from principle five to emphasise the different capabilities, activities and modes of communication that may be involved in raising awareness and attention to compliance and harms. These measures can be an essential part of creating broad-based behaviour change, outside of direct interactions with duty holders.
4.2 Support duty holders and the community to understand how their actions affect harm reduction and broader regulatory outcomes. This may include explaining the benefits of compliance for duty holders, industry, and the broader community.	For instance, approaches might relate to the tone or style of communication in social media, or how regulators use general communications products as a backdrop to specific compliance guidance issued during inspections. To do so, regulators will need to consider the values, motivations and focus of different duty holder groups, and how to effectively engage with these groups – recognising that in some cases, it may not be relevant or effective to motivate compliance in this way.
4.3 Communicate how your compliance and enforcement actions contribute to harm reduction, industry integrity and ultimate social, environmental, and economic outcomes.	

Principle 5 Support duty holders to comply

Sub principle	Intent of the principle
5.1 Reduce barriers to compliance through the design of your regulatory standards and requirements, recognising the differing capabilities and needs of duty holders.	<p>Relates to design of standards, from legislative instruments to processes and forms, which may involve categorising and streamlining requirements according to risk or duty holder cohort.</p> <p>It can involve making compliance 'built in' or automatic for duty holders, e.g., by harnessing existing information to make permit applications or reporting simple.</p> <p>This is important to creating the conditions for increased compliance, and to focus monitoring resources on residual problems.</p>
5.2 Target guidance, information, inspections, and compliance assessments to support or reinforce compliance where it is needed most.	<p>Relates to how the regulator applies discretion in its resource allocations, because this is important to maximising the impact of limited resources and to minimising unnecessary burdens.</p> <p>This might involve spending less time where duty holders are more capable or have a proven track record.</p> <p>Regulators should consider how to best deploy inspection efforts to reinforce voluntary compliance. This includes how inspections are targeted, scoped, and publicised, to reinforce communications and to maximise the effective use of inspection resources.</p> <p>Regulators need to integrate selectivity with the need to maintain a baseline level of monitoring across all relevant risks.</p>
5.3 Consult duty holders on existing and proposed guidance, to ensure that it is relevant and supports them to meet their obligations.	<p>Promotes consultation on guidance, where regulators should seek to understand the impacts and effects of compliance guidance on behaviour and costs to duty holders. In doing so, they should consider the distinction between legal requirements, and what is suggested good or better practice.</p> <p>This is important to increasing 'buy in' to guidance and to ensuring it is useful and relevant.</p>
5.4 Provide guidance in a clear, accessible, and concise format, using communication channels appropriate to the target audience. This may include providing timely, relevant guidance as part of your interactions with duty holders.	<p>Encourages regulators to use all opportunities to provide compliance guidance, whether in general communications, social media, working through peers or industry, or advice in the context of an application, during inspections or in remedial tools. Taking this approach helps to ensure important messages are received and understood.</p>

Sub principle

Intent of the principle

<p>5.5 Ensure that regulatory officers have the necessary knowledge and skills to help duty holders to understand obligations and compliance requirements, in the context of industry operations.</p>	<p>May involve regulators developing a range of tools or initiatives to increase staff understanding of industry. This is important to ensuring compliance requirements and instructions are relevant, proportionate and well understood.</p> <p>Regulators will need to decide what is a proportionate and relevant approach that also protects against regulatory capture.</p>
<p>5.6 Deliver a proportionate, focused response to non-compliances based on the degree of risk presented and your intended effect on duty holder behaviour.</p>	<p>May relate to how regulatory officers communicate observations, prioritise and escalate serious or repeated non-compliances, or provide guidance and supportive responses to early indicators of risk. It involves understanding why they use a remedy or enforcement tool or power, and the intended effects of regulatory tools on securing and maintaining compliance.</p> <p>This is a critical part of both design of regulatory programs, and developing policies, guidelines and training to support staff to be effective and proportionate.</p>
<p>5.7 Where appropriate to the regulatory framework and the risk, take account of stages a duty holder might need to progress through to maintain or improve compliance, and their willingness and ability to do so.</p>	<p>Emphasises that in many cases, regulators should apply suitable frameworks to delineate duty holder compliance posture, and use this to inform their regulatory posture.</p> <p>This is part of taking a 'behaviour change' perspective to compliance, to best deliver results by understanding the willingness and ability of specific duty holders to comply.</p>
<p>5.8 Consider how you can increase voluntary compliance by minimising burdens and costs of compliance, recognising compliance history, and where appropriate, adopting incentives or earned recognition approaches.</p>	<p>Promotes both measures to reduce compliance costs, and approaches to recognise good performance. This might include fee reductions, reduced inspections, different approaches to oversight, and earned autonomy.</p> <p>Provides a starting point for design of measures to incentivise performance, recognising the imperative to minimise unnecessary burdens, alongside the need to understand what motivates compliance, and to not undermine performance.</p> <p>Any approach taken should reflect the legislative constraints, risks, duty holders, options available, and need to maintain integrity and oversight to safeguard against future harms or drops in performance.</p>

Principle 6 Target regulatory effort based on risk of harm

Sub principle	Intent of the principle
<p>6.1 Use data, intelligence and insights from staff and stakeholders to enable you to best understand the causes, characteristics and patterns of risks, to enable you to focus your effort and to design interventions, to make the most significant impact.</p>	<p>Emphasises using risk analysis to understand the causes, characteristics, and patterns of risks, using a range of inputs and forms of insight, including expert judgement.</p> <p>It is important for regulators not to limit risk analysis to rating risk events, so this sub-element encourages the use of risk analysis to deeply understand the patterns and 'makeup' of risks of harm, and use this to distinguish risks and design their interventions.</p> <p>Also emphasises targeting interventions to make the most significant impact, which may not always be for the greatest rated risk.</p>
<p>6.2 In defining your approach, express your attitude to different risks, how you assess risks, and set how you treat risks or provide for contingency plans. Monitor and adjust your risk controls and resource allocation as appropriate.</p>	<p>Summarises the elements of a regulatory risk management process. It accounts for the need to have contingency plans for adverse events, because regulators in most cases will not be able to eliminate risks.</p> <p>This may require building routine response capabilities, and emergency response capabilities, and collaboration capabilities to enable these approaches.</p>
<p>6.3 Establish an approach to risk assessment that integrates staff judgement, protocols, and data in decision-making, which strives to improve use of data and intelligence over time.</p>	<p>Recognises that regulators are unlikely to have perfect data and analytical capabilities to manage risks and need to incorporate available data and intelligence with other forms of judgement.</p> <p>In particular, regulators will usually need to equip and empower their staff to apply discretion within risk guidelines. In addition, regulators should also seek to move towards more mature risk assessment frameworks that enable objective, evidence-based approaches that reduce subjectivity.</p>
<p>6.4 Communicate the key factors of your risk-based frameworks to duty holders and ensure that your internal processes put these frameworks into practice.</p>	<p>Relates to making external commitments, and delivering on these, to increase consistency in risk-based decision-making. This can help improve compliance, avoid duty holder 'guesswork' and over-compliance, and improve the experience of being regulated. Regulators may still need to maintain discretion to take action outside of these frameworks, such as under a compliance program dealing with deliberate non-compliance.</p>

Sub principle	Intent of the principle
<p>6.5 Seek to delegate regulatory decisions to the lowest appropriate level, supported by delegations, training, guidance, assurance and audit frameworks, so staff can consistently assess compliance risks, apply judgement, and determine their response.</p>	<p>Helps to improve efficiency of decisions and minimise bottlenecks. The right level of delegation depends on the nature of the decision and the available capabilities. Regulators may need to review and invest in regulatory officer decision-making capabilities to support delegation settings.</p>
<p>6.6 Where feasible under legislation, target duty holder reporting obligations and requests for information to what is necessary to evaluate risks with reasonable confidence, recognising that perfect information is not always available.</p>	<p>Addresses the potential tensions between gathering information to support risk analysis, and minimising burdens on duty holders. Regulators need to be mindful of additional burden created when asking for information. Seek alternative data sources where feasible, and test whether requested data are necessary and useful.</p>

Principle 7 Evaluate your efforts and communicate their impact on your regulatory outcomes

Sub principle	Intent of the principle
<p>7.1 Appropriately communicate your priorities and focus areas to duty holders, the public and other stakeholders. Use your communications to emphasise the harms and outcomes you pursue, and to promote compliance.</p>	<p>Emphasises the importance of focused communication to influence behaviour change. It asks regulators to communicate priorities, in order to elevate duty holder attention to key compliance issues and increase proactive voluntary compliance, in the expectation of regulator attention and action.</p> <p>This relates to principle four, in that communications may involve both compliance priorities, and the benefits of compliance.</p> <p>Regulators will need to consider the appropriate balance of communication approaches. E.g., emphasising priorities should not infer that other non-compliances are not relevant or important.</p>
<p>7.2 Measure the performance of your regulatory activities including inspections, desktop reviews and audits. Account for the focus and contribution of these to monitoring, detecting and acting on non-compliances and risks of harm.</p>	<p>Relates to the measurement (quality and quantity) of internal processes and the immediate effects of these. This will assist managers to gain insights regarding performance of their processes and make adjustments.</p> <p>A starting point for quality measurement usually involves assessing the 'flow' of activities and how these reflect risk-based decision-making, using percentages of activities 'converted' (e.g., from complaint, to assessment, to inspection, to non-compliance detection, to remedial action) to indicate effectiveness of resource allocation across different functions as a whole system of work.</p> <p>This approach helps to move beyond activity quantity measures to a more holistic understanding of effort and performance.</p>
<p>7.3 Evaluate the effectiveness of your regulatory activities and tailor-made interventions in changing behaviours and reducing harms.</p>	<p>Relates to the effectiveness of regulatory activities in delivering outcomes, which include immediate outcomes (e.g., increased duty holder awareness, attention or action), intermediate outcomes (e.g., increased compliance), or ultimate harm reduction outcomes.</p> <p>It is not likely that individual regulatory activities can 'claim' a change in outcomes, so a regulator will need to account for how combinations of approaches work together to deliver results. This may be through the coordination of core activities, or the outcomes of tailor-made interventions on addressing a specific harm.</p> <p>Different approaches carry different 'performance accounts,' and regulators may need to use a combination of performance measures, social research and case studies about local area initiatives or problem-specific projects, to demonstrate results.</p>

Sub principle**Intent of the principle**

7.4 Regularly publish details of your performance against your commitments, subject to confidentiality and other sensitivities. This may include relevant feedback such as from experience surveys, and summary data of complaints and decision reviews.

Addresses the communication of performance, recognising that regulators should draw attention to their achievements, even where these are subject to caveats.

Principle 8 Work with regulatory peers and partners on shared harms and risks

Sub principle	Intent of the principle
8.1 Understand the limitations of your role, and the complementary roles of other parties including peak bodies, peer regulators, policy makers and service delivery agencies. Actively seek to tackle harms in a coordinated way, by establishing shared agendas and priorities.	Set out various areas where collaboration is important, responding to the needs of regulators to address harms, as well as other expectations on government to be coordinated and minimise overlapping interactions with duty holders. The most effective approach to coordination will depend on the nature of the harms and non-compliances, and which regulator is most proximate to the harm and who has best visibility, tools, relationships and influence over the harm.
8.2 For given harms of shared interest, understand which regulator is best placed to influence that harm, and consider establishing lead, coordination, and support roles.	Regulators may need to start collaboration exercises by defining the harms of concern to each regulator, where these intersect, where there are gaps, and where there is potential conflict in objectives. This can form a foundation for looking at powers and tools in relation to the harms of concern.
8.3 Understand the legal, technological, data, privacy and cultural barriers to information sharing with peers, where these can be navigated, and when it is appropriate to do so.	Other collaboration activities might focus on data and information sharing, which may require departmental support where there are technology or legislative impediments.
8.4 Where appropriate, facilitate and formalise practices for sharing information and insights to help target efforts, minimise duplication and be most effective.	
8.5 Develop your capabilities to utilise and share relevant data, to inform your decision making and regulatory activities and to develop the capability of peer regulators.	
8.6 Work with peers to pursue the goal of 'collect once, use many times' when requesting information from duty holders.	
8.7 Work collaboratively to assist duty holders impacted by multiple regulators, and resolve cases of overlapping, contradictory, or uncoordinated compliance guidance.	

Principle 9 Be transparent and accountable for how you perform your activities

Sub principle	Intent of the principle
<p>9.1 Set out the standard of conduct that duty holders should expect from you, so that you are accountable for how you put your regulatory approach into practice in your interactions and responses to non-compliances.</p>	<p>Sets out key considerations for how to follow administrative law principles, which will be an exercise specific to the regulator’s context and legislation.</p> <p>In general, regulators will need to consider administrative law principles when developing protocols and regulatory tools and training staff, accounting for matters such as understanding the source of regulatory powers, how a person gains authority to make a decision, how to record decisions, how to provide for review of decisions, and reasonableness of decisions (amongst other things).</p> <p>Overall, this is important to increasing accountability, trust and performance.</p>
<p>9.2 Consider the impact on duty holders, stakeholders, and the wider community before changing policies or practices. As appropriate, engage duty holders, stakeholders and the wider community when making decisions or setting policies that impact on them.</p>	
<p>9.3 Support your regulatory officers and other decision makers to understand and consistently apply your regulatory approach, when exercising professional judgement and following protocols.</p>	
<p>9.4 Establish protocols for the consistent exercise of powers, providing guidance, responding to non-compliances, and explaining the reasons for regulatory decisions and the actions required of duty holders to comply. Establish protocols for the consistent exercise of powers, providing guidance, responding to non-compliances, and explaining the reasons for regulatory decisions and the actions required of duty holders to comply.</p>	
<p>9.5 Provide opportunities for duty holders to query required action and/or decisions. Have an impartial, clearly explained, and visible internal review process for relevant decisions.</p>	

Sub principle**Intent of the principle**

9.6 Establish appropriate mechanisms to recognise and acknowledge the experiences of duty holders and the wider community who interact with you. When gathering and reporting feedback, account for the different parties and circumstances of your regulatory interactions.

9.7 Maintain appropriate mechanisms and supports to mitigate risks of undue influence from duty holders and duty holder groups, and to maintain regulatory independence.

Principle 10 Continuously improve your regulatory operations

Sub principle	Intent of the principle
10.1 Establish suitable systems for quality assurance and learning as an organisation, within and across your functions.	Sets out concepts for quality improvement in a regulatory context.
10.2 Consider evolving duty holder and community expectations of regulatory performance, to build trust and confidence in your operations.	Whilst it focuses on quality management systems, it is important for regulators to take a holistic perspective of the capabilities they need to deliver, recognising that not all activities can or should be treated as a routine, repeatable activity.
10.3 Regularly review the effectiveness, efficiency and consistency of your operations and make changes to processes, or invest in management or staff capability, as appropriate.	In many cases, such as for developing problem solving approaches, or improving investigations, the regulator's focus may be on having the right workforce and leadership, a collaborative culture, and the appropriate management practices.
10.4 Set appropriate targets and employ a range of performance indicators, to monitor the effectiveness and consistency of your actions and adjust your various approaches accordingly.	
10.5 Assess and improve your systems to delegate and manage decision-making and regulatory action. Adjust the settings to support delegation and a proportionate level of control.	
10.6 Adopt appropriate change management practices when implementing improvements, to ensure effective delivery and change risk management.	

