Health Professions Council – Wednesday 7 July 2010

Getting more for less from public bodies: 10 lessons from the abolition of the Hearing Aid Council (HAC)

Executive Summary and Recommendations

Introduction
On 1 April 2010, the HPC Register was opened to hearing aid dispensers, transferring the regulation of the profession from the Hearing Aid Council. The report (see appendix) was written and published by the HAC and details how the lessons of the HAC can be applied to other public bodies facing merger or abolition or to other regulatory bodies seeking to increase efficiency and public protection.

Decision
The Council is requested to note the document.

Background information
None

Resource implications
None

Financial implications
None

Appendices
Getting more for less from public bodies: 10 lessons from the abolition of the Hearing Aid Council (HAC).

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Getting more for less from public bodies: 10 lessons from the abolition of the Hearing Aid Council

HAC HEARING AID COUNCIL

Introduction

The Hearing Aid Council (HAC) is an excellent example of how reforming public bodies can simultaneously boost public protection and generate significant cashable savings. The HAC transferred its responsibility for regulating hearing aid dispensers to the Health Professions Council (HPC) on 1 April 2010. The HAC will be dissolved on 31 July 2010. Under the HPC, consumers are better protected and the industry saves over £1 million a year.

There are 766 Non-Departmental Public Bodies (NDPBs) spending £46.5bn a year[1]. In 2005 the Hampton Review[2] proposed merging 31 NDPBs to cut the burden of regulation without reducing public protection. Since then, only one of the statutory NDPB's identified by Hampton has been abolished: the Hearing Aid Council (HAC). The current Government is also committed to reducing the number and scope of public bodies as part of the Budget Deficit Reduction Programme. This report sets out the key lessons for policy makers and public body staff from abolishing the HAC.

The HAC regulated the independent hearing aid sector for 40 years. It kept a register of all the individuals and companies legally entitled to dispense hearing aids in the UK and published standards of conduct and education that registrants had to meet. It investigated complaints from the public and took disciplinary action where registrants breached those standards. Run from a small office in London, the HAC was funded entirely by registration fees. The HAC's public protection legislation dated back to 1968. It was outmoded and ill suited to regulating a modern marketplace. Providing public protection within this framework was challenging and expensive. Registration fees increased over time to £695 per year, compared to the £76 charged by the HPC.

This is a guide to how the lessons of the HAC can be applied to other public bodies facing merger or abolition or to other regulatory bodies seeking to increase efficiency and public protection. The lessons can equally apply to public bodies other than regulatory bodies, where aims might be to improve service quality or scope and reduce organisational costs. The guide highlights the key strategic and operational challenges before suggesting how they can be overcome. It is also a cautionary tale for those who underestimate the volume and complexity of the work involved.

Why the lessons from the abolition of the HAC are relevant to other public bodies facing merger or abolition

Even before the current economic crises, the potential to improve delivery and efficiency amongst public bodies was already an area of interest. In 2005, for example, the then Government accepted the recommendations of the Hampton Review to merge 31 NDPBs. Since then, the economic crisis has made solving the challenge of how to save money from NDPBs without reducing public outcomes even more urgent with the Treasury announcing £600 million will be saved by cutting quangos. Only one statutory NDPB has been abolished under the Hampton Review: the HAC.

The HAC was established in 1968 under primary legislation and was the UK-wide statutory regulator for the independent hearing aid sector until 2010, when this responsibility passed to the HPC. Although a comparatively small organisation with a budget of £1.3M, the functions of the Council mirrored those of most other public bodies. It reported to a sponsor unit in the Department of Business, Innovation and Skills and was externally audited by the National Audit Office. The Council was split into legal, policy, finance and operational departments. It complied with Cabinet Office guidance and was subject to scrutiny from consumer groups, industry, the media and Parliament. Its core business was public protection which it upheld by maintaining statutory registers, holding investigations and tribunals and setting standards.

Other public bodies have been merged or reformed recently, for example Consumer Focus , and clearly each reform has its own distinct challenges.
The widely applicable findings from the HAC's experience are encouraging though as they provide a guide to how public bodies can be reformed to simultaneously improve efficiency and quality of service. But they are also a note of caution to those who underestimate the amount of work involved, the potential for delay and the imperative to maintain support throughout from those affected and all other key stakeholders for proposed reforms.

Lesson 1: Getting reforms right to win stakeholder support stressing quality over efficiency

Savings cannot be realised without protecting quality. A proposed merger between public bodies cannot be considered a success if efficiency savings are made at the expense of quality of service. Not only does this represent a bad deal for the public but, more importantly, the perception that reforms will leave the public worse off is likely to be resisted by the governing body, staff and stakeholders who will be key to realising efficiency savings. It is wrong to say that a body will never support its own abolition. The HAC did just that but only because its reform provided an opportunity to improve quality and efficiency at the same time. However neither improvement would have been realised had Government not revised an original plan to merge the HAC with a body that did not offer the best fit. It is important to get the strategic fit of reforms right first time.

The Hampton Review originally planned to abolish the HAC and move its powers to a new 'super-regulator' called the Consumer and Trading Standards Agency, within the Office of Fair Trading (OFT). Consumer groups, the industry and the HAC all expressed their belief that the Health Professions Council offered the best public protection and the best value. The HPC's up to date, modern regulation would bolster consumer protection, while its economies of scale meant it could charge the industry over £1M a year less in registration fees. The HPC also regulated 13 other similar professions so it was common sense for the HPC to take on hearing aid dispensers too.

The Government responded positively to these concerns. Had it not done so, it would have been almost impossible to secure the buy-in from those groups that made the transfer efficient and successful. Furthermore, it would have made it very hard for the HAC to build support from governing body and staff for abolition on the basis of consumer interest. The governing body and staff play a key role in building support for reforms amongst stakeholders and hold vital knowledge. Without their support, it is impossible for management to understand the operational, reputation or financial implications of strategic plans, such as merging IT systems. Without their support, there is a major risk that neither efficiency savings nor service quality improvements will be realised.

To get support from all those affected, the HAC leadership invested a great deal of time in identifying stakeholders, listening to their concerns, finding common ground and understanding key issues across groups. This built a strong coalition of support for the reforms.

Proposed reforms to public bodies must make their case based on the impact to the quality of service. A corollary of this is that public protection (or the appropriate service quality measure) must not dip during the reform process either. Where quality of service can be protected or enhanced then staff and stakeholders are much more likely to play their role in realising efficiency savings. These factors should underpin decisions over which public bodies can be merged or to where their responsibilities are transferred.

> *If a proposed reform does not win support based on quality of service then it will be difficult to realise subsequent efficiency savings.*

Lesson 2: Understanding what legislation is required. Smaller bodies may be less efficient but harder to abolish

Before announcing reforms, Government should identify as quickly as possible what legislation is required to make it happen, what legislative vehicle can move reforms through, how long it will take and which key stakeholders need to be involved in designing proposals.

In the case of the HAC there was no research in to the legal process of abolition until the Government made its announcement. Initial legal advice suggested that it could be done via a legislative order within 12 months. The HAC acted on this timetable, informed stakeholders and created a sense of momentum for the transfer. The Government's legal advice then changed and it became clear that primary legislation would be needed. Although the HAC was an expensive regulator per capita, the relatively small scope of its operations made it highly unlikely a Government would dedicate Parliamentary time to a dedicated HAC abolition bill. Instead, a late amendment was agreed to the Health and Social Care Bill 2008. Work then began on the legislative order. In all, a legislative process that had been expected to last 12 months took three years.

Frumkin, former Associate Professor of Public Policy at Harvard, stresses the twin importance of communication and momentum in successful public mergers[3]. This legislative delay negatively affected the transfer process through both channels. Communication suffered as the changing Government position undermined the credibility of the HAC's messages to stakeholders, making it harder to build trust and support. Extending the time of the merger by two years made it harder to maintain momentum with partners and staff. Partners put off making key decisions that created bottlenecks in delivery of the transfer plan, for example over who would receive the HAC's data and what format it should be delivered in. Staff faced greater uncertainty about their own futures and about the content of their jobs.

The HAC was able to turn this initial set back in to an opportunity. The years were used, not just to prepare for the technical aspects of the abolition and transfer of responsibilities, but to drive forward a modernisation of how the sector was regulated in preparation for the cultural changes the profession needed to make to function in the post-HAC regulatory framework. For instance, working together with universities, Skills for Health, consumer groups and the regulated profession, the HAC developed a new bespoke foundation degree to bring minimum education standards in line with other HPC professions and the NHS. More importantly for the transfer, it brought together all the key parties and fostered strong working relationships that extended into other areas. Improving quality while preparing for the transfer restored momentum to preparations. It also brought variety and added responsibility to staff who had been concerned about their roles.

While the HAC was able to take advantage of the delay, it would be better to have a clear understanding of the legal processes involved beforehand. The Hampton Review estimated that smaller regulatory bodies were £8,000 more expensive per staff member than larger bodies. This suggests that big savings could come from reforming smaller bodies. However, the HAC found that even though the benefits to the quality of service and the efficiency savings were clear to all parties, the relatively small size of the Council made it difficult to secure the necessary support for legislation to deliver them.

It may be best to pass legislation that reforms many public bodies at the same time. A Bill which enables many bodies to be dealt with at once seems a logical step. It might provide secondary powers to enable bodies to be identified and dealt with by Order rather than dealing with them directly. There is a tension here however with lesson 1, getting reforms right first time. A bill which enables multiple reforms must also make sure the reforms it is proposing will improve or maintain the quality of public services if they are to win the necessary support from staff and stakeholders.

> *A clear understanding beforehand of the legislation required is important for effective communication and maintaining momentum during reform.*

Lesson 3: Supporting Parliament to get legislation right

Working together, organisations facing merger or a transfer of their powers can play an important role in supporting legislation. They have knowledge civil servants need to get the details of legislation right for the public, they have the data Government needs to help build the case for reform and they should be able to co-ordinate support amongst stakeholders.

The bodies involved in a merger should play a role in shaping legislation as they best understand the risks to stakeholders, how these risks may evolve over time and the impact changes in legislation may have, for example what the unintended consequences may be. HAC and HPC chief executives, the HAC Chair, policy staff and lawyers were all part of the working group that spanned the Department for Business, Innovation and Skills (BIS) and the Department of Health (DH) charged with preparing the legislation for the HAC's abolition. The HAC and HPC were also then in a position to fill a communications gap and respond to stakeholders concerns over what the detail of the draft legislation meant. The resulting consultation revealed strong support for the legislation from consumer groups, industry and both regulators.

In making the case for reform, both BIS and DH worked alongside the HAC and HPC. The two regulators detailed the benefits of the proposed reforms, including data on how services would improve and likely efficiency savings. The quality of the subsequent briefing was noted in Parliament and proved important in winning cross party support for the legislation.

The HAC and HPC also played a role co-ordinating stakeholder engagement in this process. This included answering concerns and resolving ambiguities during the consultation phase, as mentioned above, but also working with stakeholders to inform parliamentarians. For example, the Royal National Institute of Deafness invited the HAC and HPC to speak to the All Party Group on Deafness about the benefits of the proposed legislation.

The inclusive approach adopted by Government departments and the resulting proactive involvement of the regulators both eased the passage of the legislation and improved its quality.

> *Involving the bodies that will be reformed in the parliamentary process can improve the quality of legislation and communication, which help build support and understanding.*

Lesson 4: Establishing a strong working relationship between the affected bodies

Where reforms are clearly in the public interest, it is more likely that senior managers will form good working relationships across merging organisations. If a merger is to succeed, it is vital that the organisations facing reform invest a great deal of time upfront to agree the benefits and objectives of the reforms and find a common language they will use to emphasise these benefits to governing bodies, staff and stakeholders. The organisations must also invest in understanding how each other operates, their differences and their respective cultures and in building relations between key personnel. Senior managers should agree in principle early on how they expect to work together and fund joint projects. Reflecting on their merger, Ofcom suggests detailing such agreements in a Memorandum of Understanding signed by all parties[4].

From the outset, it is important that Chief Executives of affected organisations meet and establish a good working relationship with a common language and goals. The Chief Executives of the HAC and HPC invested time early on that set a foundation for their respective teams to get on with the business of making the transfer happen.

Mergers do not just happen at senior level so it is important that operational staff also develop good working relationships across the organisations. Nor is it enough for staff to form relationships with their peer department, say finance to finance, as different organisations will solve the new problems they face during the merger in different ways. For example, trying to solve the problem of how to transfer a database from the HAC to the HPC involved very different departments in both organisations. The HAC had to consult its sponsor department, two IT contractors, the registrations team, finance director and legal director. For the HPC however, receiving the data was a fairly simple job predominantly for their internal IT unit. To complete the database transfer, the HAC and HPC had to work together so took time to build relationships beyond just the IT teams involved, with the HAC co-ordinating the various parties. During the merger, frequent planning meetings were held across HAC and HPC. The HPC also invited the HAC to attend its project team meetings. At a senior level, the HAC's Strategy Executive Committee took a lead role in directing the transfer process.

Governing body members also have an important role to play. Not only can they provide expert scrutiny of proposals but they also help explain the benefits to stakeholders which adds legitimacy.

> *Bodies merging or transferring functions must work together effectively*

Lesson 5: Mergers and abolitions affect all aspects of the organisation – getting culture right and managing major change

There can be no bigger change to an organisation than its merger or abolition. All members of the governing body and staff, all departments and all functions are affected. The kind of work they need to do is different from the work of running and developing an organisation. Getting the right resources in place is the foundation for managing a change process of this scale. Those resources include: the right culture, the right teams, the right people, secure finance and careful planning.

Senior staff must develop a new culture to foster new skills and new teams to solve entirely new sets of problems. Business as usual for public bodies can be a predominantly bureaucratic process. Once a merger or abolition is announced, a public body still has a duty to carry out its business for the public until its final day. However, at the same time, the organisation needs to deliver a huge change process that requires advanced problem solving and constant innovation; the very opposite of business as usual.

Bureaucratic cultures are a frequently cited barrier to innovation. A new culture must encourage problem solving in teams with the power to take decisions, encourage experimentation, and allow staff to evolve beyond rules that may have been sensible before but are not suited to the pressures of a major change process. The culture should also accentuate the benefit of reforms to the public to highlight the value of the changes and maintain support behind them.

Organisations and people need to adapt and new people with different skills may be needed. Careful resource management involves assessing the capabilities of the current workforce against what capabilities are needed in the future before filling these gaps. People who can work together in teams, with different staff from different parts of the organisation and who can see beyond the impact of decisions for their unit to the organisation as a whole are essential. For instance, under business as usual, a decision about what to do with financial records might only involve the finance department and the records department. But during a merger, a decision about financial records might have implications for the work of those project managing data transfer to successor bodies and the IT department who actually carry out the transfer.

The amount of work involved in a merger or abolition and how much it differs from business as usual means it is difficult to predict accurately how much finance it requires. No matter how careful planning is, unforeseen expenses will arise. Organisations should take a risk averse position in financial planning and clearly dedicate resource to the merger process.

The HAC invested heavily in a review of all its operations at the outset of its transfer planning. The transfer brought new risks to governance and so procedures in this area were strengthened. The HAC increased its budget to invest more on communications and legal advice in particular.

A clear plan for the project should set out what needs to be done, concentrating on how core functions will be moved or closed down. These tasks are likely to span more than one department so need input from across the organisation. Frontline and managerial staff can offer different insights to problems and the feasibility of proposed solutions. The plan should also set out the work required for each department and work stream, for example finance and human resources.

The HAC was successful in building a coalition among stakeholders and staff in support of the abolition. Investing time, especially face to face, with those affected to understand concerns and build trust is the key to overcoming conflict. In many cases sufficient common ground can be found to move forward. If there is momentum in the legislative process then this helps focus people on getting the most from the opportunities available. Ultimately though, the most important thing is to design reforms that are clearly in the interest of the public and taxpayers.

> *Mergers and abolitions are wholesale change processes that affect all aspects of organisations and all staff. New cultures, new skills and careful planning are needed to answer new questions.*

Lesson 6: HR, staff retention, support to find employment, redundancy, TUPE

Mergers and abolitions place particular pressures on staff. On one hand, staff may embrace the new challenges and roles this major change brings and be determined to see their jobs through. On the other hand, staff will be anxious about the risk to their continued employment, the pace of change and about the loss of valued working relationships. From a strategic perspective, management must balance the organisation's need to have enough hands on deck and resources to see the job through against minimising closedown costs from redundancy and the responsibility to staff to help them secure new employment.

Communication with staff is vital from day one to explain how the changes will affect them, and the principles which the organisation will stick to in dealing with staff. Staff should be involved in decisions about their futures. Communications must be clear and honest, using language everybody can understand. The HAC held face-to-face meetings with all staff as well as group meetings for all employees. In response to staff concerns, managers and staff together drew up personal development plans to build new skills and opportunities. This helped staff find alternative employment but also helped reassure staff about their ability to find new jobs and created an incentive to stay in post to take advantage of this training. The HAC held training days for the whole organisation to boost morale and share experiences.

The change also represents an opportunity for staff since the type of work they are asked to do during the change process will vary significantly. Staff can develop new skills, for example taking on project management roles, that can help open new doors to their careers. The HAC supported staff with HR support and career advice. This helped staff reflect on the kind of progress they wanted in their careers and how they could take proactive roles in the change process to give them relevant experience.

Management also put in place additional ongoing appraisal and performance reviews to ensure standards did not dip as a result of staff anxiety. Management also need to be aware that as a merger or abolition date approaches, people's emotions tend to rise and surface, and their behaviour may change. It is important to invest extra time in staff at this time listening to their concerns to make sure staff have the support they need and that the organisation can continue to meets it objectives.

Legal guidance on whether the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) apply is often equivocal and Cabinet Office guidelines recommend that organisations should act as though staff are entitled to TUPE protection in any case. This guidance and legal advice is important but redundancy is also a personal issue and, unless the numbers involved make it impractical to do so, organisations should try where possible to provide tailored support to each member of staff.

Finance and audit planning must consider the budget and tax implications of retention and redundancy payments plus whether sponsor body and Treasury approval is needed.

The cost of properly supporting staff and getting the right legal advice can be significant and must be properly budgeted for. The cost of failing to prepare will be higher though if it leads to employment disputes and friction with staff.

> *Staff will be subject to new and changing pressures during reform. If they do not have support and cannot work effectively, quality and efficiency will suffer. Good leadership and resource planning are vital.*

Lesson 7: Data

When a body is to be abolished or transferred a big question is what to do with its data; paper and electronic, current and historic. Who should have it, when should they have it, how should they get it? Legal advice on what data should be moved where, what should be destroyed and how it should be destroyed or moved is important but rarely definitive. Partner organisations may be poorly informed about what data they need and poorly equipped to receive it. While organisations need to work within the legal advice they receive, there are other factors that will shape decisions about data: who has a business need for what data; what needs to be kept as a record of good governance; what should be destroyed and when; and does anyone want the leftovers for historical interest. The organisation transferring should have a record of every transfer, including receipts from each recipient organisation. If the transfer is not taking place by operation of law, some form of data transfer agreement may also be needed. It should also issue exit packs to staff and partners detailing where information is held.

This work should be started as early as possible, especially if there are multiple data recipients, as the process for securing agreement on what goes where and how can be lengthy. Data protection must be forefront at every stage. No matter how strong data planning is, as organisations better understand how the merger affects them and take decisions that affect other departments it is inevitable that their data requirements will evolve over time.

The first step is to complete an audit of all the data held by the organisation. This must include all paper and electronic records held by or on behalf of the organisation, including storage facilities and any information held by staff, board members or contractors off site. It should also record the volume of data.

The next step is to agree with other organisations involved what data they need. For example, the HAC's sponsor department will hold the HAC's financial information for seven years. The HPC had a business need for all data related to the HAC's regulatory work. The organisations then need to agree how data should be transferred and when. Transferring electronic data can be particularly complex, for instance if two databases are incompatible.

Using the data audit, and having taken advice from auditors and legal advice, a body that is being abolished must make sure there is a record of its governance. Some of this information may be of business interest to another organisation and, if so, transferred as above. Other outstanding governance information should be moved to a relevant body. In the case of the HAC, the sponsor unit in BIS took responsibility for knowing where governance information was held and holding the bulk of the information itself.

A significant amount of data may also need to be destroyed. It is important that this is done in line with audit and legal advice and Cabinet Office technical guidance. Again, destroying electronic data can be a particularly complex task. There should be an audit trail detailing what has been destroyed, how and when.

Remaining information may be of historical interest. The National Archives may take this information from public records bodies. Otherwise, the National Archives can help to identify other bodies that might be willing to take the remaining data.

> *Organisations need to understand each other's data holdings and requirements. This will affect policy decisions during reform. Data security will be a significant risk to good governance during reforms.*

Lesson 8: Accounts and audit

Mergers and abolitions are not just a new challenge to the organisation's own staff but also to auditors and Audit Committees. Audit plans must be adapted, new risks recognised and Audit Committee members fully briefed. Governance comes under particular strain during major reforms because of the pace of change. Taking early advice from auditors who will increase scrutiny of governance arrangements is key to understanding and responding to new risks.

A merger or abolition is also a challenge for auditors. As the work and risks faced by the organisation change, auditors must also adapt. The work involved in audit may increase and resource planning should reflect this. The National Audit Office can be a helpful source of advice. It may be helpful then to maintain continuity, involving auditors who have knowledge of the organisation and relationships with staff. It is also helpful to be proactive in seeking advice from internal auditors and building dialogue between internal and external audit.

The transfer and its impact on risk control and governance were a standing item on the HAC Audit Committee agenda. The risk register incorporated risks identified in the transfer plan and was considered at each Committee meeting. It is also advisable to reflect on whether the Committee has the skills it needs during the merger or abolition process. The HAC Audit Committee received additional advice to help prepare for the challenges of the transfer. Bodies could also consider co-opting new members with specific, additional expertise.

> *Mergers and abolitions are a major change for audit and a new challenge to governance. It is important those involved understand what is required and have the skills to deliver.*

Lesson 9: Transferring complaints from the public

Public bodies that deal with complaints, such as regulatory bodies, must move through the merger or abolition process without becoming a 'lame duck' or allowing public protection to diminish.

Where regulatory functions will transfer to another organisation, it is important that their respective case-handling, investigative and legal teams develop a close working relationship. They need to invest time in understanding each other's regulatory processes and powers, particularly the existing regulatory body's standards or codes of practice which the new regulator will have to apply in ongoing cases for which it must assume responsibility following the transfer.

This co-operation is the foundation to drawing up a detailed plan of how cases at each stage of the complaints handling process will be moved from one body to the other. This level of shared understanding and planning is important as complaint handling will be an area of considerable scrutiny from consumer groups and the regulated professions. If there is a perception that the quality of complaint handling might drop, even temporarily, this can undermine support for the transfer, perhaps during key parts of the legislative process. To counteract this risk, organisations should be proactive about communicating their plans for transferring complaints.

> *If public protection dips then so will support for reforms. Legal teams can work together early and explain their co-operation to the public.*

Lesson 10
Assets and Liabilities

All assets and liabilities need to be disposed of or transferred to the successor body or elsewhere within the public sector. The risks during this process are that disposing of assets incurs unforeseen costs, that the organisation does not have the assets over the timeframe that these are required and that controls over asset inventories are weakened.

The Executive team should take the lead in identifying a strategy to handle assets and liabilities. Lines of accountability, levels of authority and the audit trail should all be included in this strategy. The Executive should also consider whether tighter controls are needed in the closure or merger period. If there is a risk that staff turnover will increase as the transfer looms then it may be prudent to tighten controls over inventories, for instance. Similarly, there may be a need to adapt controls, to give staff greater flexibility to renegotiate contracts or dispose of assets.

To deliver the strategy, the organisation needs to maintain a detailed, up to date asset register recording what is owned, where it is held, its value and the projected cost of disposal. Similarly, all contracts need to be reviewed to check they suit the new work the transfer or closure requires and to clarify the exit arrangements. If the abolition or merger date is uncertain, contracts need to have flexible end dates. It is important that these reviews are done before budgets are set as terminating contracts or disposing of assets (particularly it may affect data protection) can be substantial.

The HAC did not transfer any assets. It drew up an asset disposal strategy and presented it to internal and external auditors before the Audit Committee signed it off. Given the uncertainty over when the HAC would be abolished, it sought to minimise the assets it held as early as possible by moving in to serviced offices with rolling contracts and renegotiated with all contractors to make sure it could end contracts at short notice and no cost.

Where liabilities were to be transferred to the sponsor department, the process for doing so was agreed early on with the involvement of the bank and sponsor finance department with greater attention paid to riskier items. After agreeing cut off arrangements to settle invoices and expense claims, the HAC issued timely notice to contractors.

> *There is a governance risk to handling assets, liabilities and contracts and unforeseen costs are likely. Strategies should include lines of accountability and the audit trail that will track how each item is dealt with.*

Cabinet Office (2009): *Public bodies* 2009 (1). Hampton, P (2005): *Reducing administrative burdens: effective inspection and enforcement* (2). Frumkin, P (2003) *Making public sector mergers work: lessons learnt.* IBM Centre for the Business of Government (3). Ofcom (2005): *A case study on public sector mergers and regulatory structures* (4).

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