Possible Key Performance Indicators (KPIs)

Activity	Measure	Target/direction of trend
Quantitative measures:		
Quality of assessment	Number of reports 'sent back' by the Authority	[0%] / Downwards
	Number of final decisions in line with panel recommendations	Upwards
Effective communication	Glossary and plain English summary to be provided with reports	[100%] - Stable
	Number of respondents to consultation	Upwards
	Percentage of 'bounced' or unsuccessful emails	5% / Downward
Efficient administration	Papers to be published within [x] days of the meeting	[x%] / Upwards
	Numbers of reports submitted to the authority in line with original timetable	[X%] / Upwards
	Number of extensions to timetable requested	Downwards
	Average lead time between decision and implementation	Downwards
Implementation costs	Implementation cost estimates to be produced and consulted upon prior to a proposal being recommended for approval	100% [subject to panel agreement not to request such an estimate]
	Accuracy of estimates to actual implementation costs: % difference from estimate.	[5%] / Downwards.
Qualitative measures:		
Critical Friend	Number of survey respondents who stated they were 'satisfied' or better with the assistance offered by the CA	[75%] / Upward

Notes:

We have sought to demonstrate how the KPIs could be a mix of qualitative and quantitative measures. For instance, we consider that the role of the **critical friend** should be measured not by how often their assistance was called upon, but how helpful they were in that instance. The CAs should have discretion not to be unduly concerned with statistics, but to take opportunities to add value on a case by case basis, i.e. where assistance would be of benefit. We also recognise that as parties become used to the critical friend concept, expectations may rise.

In our Final Proposal for the Code Governance Review we have set out a range of other measures, such as the power to **send back** any reports which we consider are in some way deficient. It is recognised that this should be a rarity if a transparent and participative process is followed. However, if a report is sent back it may suggest that underlying problems in the code arrangements remain, albeit not necessarily where those problems lie.

We consider that it will be useful to measure the instances where the Authority decisions accords or, perhaps more pertinently, does not accord with the **panel recommendation**. Again, the quantitative measure alone would not necessarily indicate that a problem, as there will be instances where the panel and Authority come up with perfectly valid yet opposing views, particularly given the wider set of duties to which the Authority must have regard. However, the aim of the proposer and to an extent the CA and panel should be to ensure that any proposal that has gone full term has the best possible chance of being accepted, i.e. if the panels assessment is thorough, impartial and well presented it should be more likely that the Authority will come to the same conclusions.

We note that Principle 2 of the Code of Practice is that documentation will be in **clear English**, with a glossary provided where appropriate. We therefore consider that the target for this KPI should be 100%, with a null return for instances where the panel have determined that a glossary is not required, i.e. the report is sufficiently clear without a further glossary.

We are aware that there are a number of factors which influence the number of **responses to a consultation**, not all of which are within the CA or panel's control. For instance they may make every effort to contact interested parties, but the issue is not of sufficient importance or appears to be so clear cut that a response does not seem necessary. However, there may be more practical reasons, such as interested parties not being aware or having sufficient understanding of the proposal (the latter of which will be negated by use of plain English etc). The CoP sets out an expectation that the CA will contact interested parties proactively. For instance, rather than simply posting a consultation on its website, the CA could issue an accompanying email. While this is already common practice, it may be appropriate to gauge its ongoing effectiveness. KPIs associated with 'bounced' or otherwise unsuccessful emails could be used by CAs to ensure that industry contacts remain relevant. It should also be recognised that the interested parties themselves have a role to play in this and should be reasonably expected to keep the CA informed of changes in contact details.

KPIs on administrative functions may already be commonplace where a CA is operating to a service level agreement. It may aid transparency and give assurance to all stakeholders if these existing measures are reported openly and not just to the contracting parties. However, consideration of **efficient administration** may appropriately extend beyond the secretariat functions, potentially to the modification arrangements as a whole. We have suggested additional measures around timetables, recognising that while the CA may not be responsible for the deliverable, they are well placed to report on progress towards it. For instance, we would expect that an extension to a timetable would be at the behest of the working group, while subsequent implementation may be dependent on a licensee or IT service provider.

Finally, in keeping with Principle 8 of the CoP, we consider that there should be greater prominence given to projected and actual **implementation costs** of modifications. These costs should appropriately be a fundamental part of any modification decision, yet there is often insufficient visibility, even retrospectively, of what these costs are. Irrespective of any post-implementation reviews that may take place, we consider it important that stakeholders have access to, and confidence in, any cost information against which the benefits of proposals will be weighed and views formed.

We recognise that in some respects the CAs of the UNC, BSC and CUSC may be starting from differing positions, and have not in the past had their performance directly compared in this way. For some measures it may therefore be appropriate not to set an initial target. As mentioned in the consultation letter, we welcome your thoughts on these KPIs individually and whether they should, as a whole, be embedded within the Code of Practice.