



Government as a Single Legal Entity

Public Consultation

ISLE OF MAN GOVERNMENT
AN AGENDA FOR
CHANGE



**Isle of Man
Government**

Reiltys Ellan Vannin

June 2015

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Isle of Man Government as a Single Legal Entity
Consultation Document

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Foreword by Chief Minister

Since its inception in the mid-1980s, the present system of Ministerial Government has served the Island well. The idea of the Ministerial system was to clearly identify authority and responsibility, and promote a more joined-up approach by bringing the main components of Government together in one body, namely the Council of Ministers headed by the Chief Minister. However, it is not perfect. In particular the pressures of the fiscal challenge in recent years have exposed outposts of silo thinking within the Departmental structure and a relative weakness in central resources.

I therefore believe it is time to consider a further evolution of our systems of Government. In November 2014 Tynwald debated a report by Sir John Elvidge, KCB which recommended that we should consider the establishment of Government as a Single Legal Entity, and that, to be truly effective and progressive we should examine the options for Government to operate as a single organisation within a clear strategic framework and with clear lines of authority.

At the time of the debate there was some comment about the Ministerial system being undemocratic, about getting rid of the block vote and returning power to Tynwald, which in effect, would mean turning the clock back to the Board system that was abolished in the mid-1980s. People are entitled to their opinions, of course, but a few of us remember what the Board system was like and why it was scrapped to make way for Ministerial Government. The Board system was essentially an attempt to govern the Island through 27 disconnected parliamentary committees. It was incoherent, indecisive and lacking in democratic accountability, as it was impossible for the public to distinguish between the parliament and the executive and to identify who was ultimately responsible for what was happening. It was a recipe for chaos and confusion.

Far from regressing to the 1980s there is a need for the system to continue to evolve so that we can make our services more integrated and efficient. And in considering structures of Government our priority has to be what will produce the best results for the public, as the customer and taxpayer. I firmly believe that the further evolution of Government towards a Single Legal Entity will help deliver better results.

During the debate last year I was asked to ensure that we should consult widely on the proposals and take our time to develop firm recommendations for consideration by Tynwald. Therefore, the next stage of the process is to seek the views of all interested parties on the report by Sir John Elvidge, so that we can identify any concerns that businesses and individuals may have about the ideas and options Sir John has presented. We shall consider all views received with the aim of submitting more specific recommendations to Tynwald by the end of the year.

I would therefore encourage everyone to take an interest in this matter and to provide your comments through this consultation process.

Hon Allan Bell, MHK
Chief Minister

Consultation

This consultation exercise, which is conducted on behalf of the Council of Ministers, is designed to seek comments on the proposals contained within the Report by Sir John Elvidge, KCB to establish Government as a Single Legal Entity.

The Council of Ministers welcomes responses from anyone who may have a view on the proposals in this document.

This document is structured in the same way as the original report, and each section heading refers to the relevant page of the original report, for ease of reference.

How to respond

If you wish to comment on the proposals you can submit your responses online at: <https://www.surveymonkey.com/r/2RSNHXZ>. Alternatively you may send your comments by post or email using the form attached at **Appendix 1**, marked 'Single Legal Entity', to:

Mrs Hilary Leece
Cabinet Office
St Andrew's House
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Douglas
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For additional hard copies of this document please contact the Cabinet Office by telephoning 01624 685272. An electronic copy of this document is available at www.gov.im/Consultations.gov.

The deadline for both physical and electronic submissions is 31st July 2015.

When submitting your views please indicate if you are responding on behalf of an organisation.

A list of consultees can be found at **Appendix 2** of this document. If there is anyone not on the list who you think should be consulted please contact the Officer named above.

To ensure that the process is open and honest and in line with the Government's Code of Practice on Consultation, as attached at **Appendix 3**, responses can only be accepted if you provide your name with your response.

Unless specifically requested otherwise, any responses received may be published either in part or in their entirety. Please mark your response clearly if you wish your response and/or name to be kept confidential. Confidential responses will be included in any statistical summary and numbers of comments received. A summary of the responses received will be published within 3 months of the closing date for this consultation, and will be made available on the Government website, at www.gov.im/Consultations.gov or by contacting the above named Officer.

Introduction

At its sitting in January 2014, Tynwald accepted the proposals contained in a report entitled '*Modernising Ministerial Government*'. Amongst the key recommendations was a proposal that Council of Ministers should consider whether there was merit in creating Isle of Man Government as a Single Legal Entity. As a consequence of this, Sir John Elvidge, KCB was engaged to conduct a review into the matter, and his report was laid before Tynwald in November 2014.

The potential for creating a Single Legal Entity Government on the Island is not a new concept and was first raised in 2006 as part of the '*Review of the Scope and Structure of Government*'. At that time, it was concluded that there was merit in Isle of Man Government being created as a Single Legal Entity for the purposes of external and international relations, but that this should be 'in addition to, and not in place of, the separate legal personality of individual Departments (and Boards)'.

However, the 2014 '*Modernising Ministerial Government*' report identified that the Departmental system in its current form 'works against the achievement of truly joined up Government' and suggested that the basis on which the Departmental system operates should be reconsidered to determine whether it remains the most appropriate structure for the effective delivery of public services or whether an alternative approach was now required.

Sir John's report considers the question of Single Legal Entity status for the Island in the context of a long evolution of the Executive in the Isle of Man, and suggests a suite of options that the Island could now adopt as part of its journey. It was agreed at the November 2014 sitting of Tynwald that it would be premature to commence detailed legal work and other project streams before conducting a full public consultation. Council of Ministers therefore accepts the need to take a more measured approach and set out in greater detail what those options may look like so that an informed and meaningful consultation can take place with the Island's citizens and other interested parties, and has agreed to undertake further work in exploring options before reporting back to Tynwald.

The report by Sir John Elvidge, KCB can be found at the following link:
www.gov.im/Consultations.gov

This consultation invites responses to a series of questions that explore the issues raised in the Report, and consultees are requested to provide replies to the questions posed.

1. Assessing the case for a Single Legal Entity (Chapter 2, Page 5 of SLE report)

The report recommended a single legal identity to replace the separate legal identities of the constituent parts of Government. However a single legal identity is not the same as Government operating as a single organisation. Thus, Single Legal Entity status would not preclude the retention of a Departmental system of Government organisation with responsibility and accountability delegated to Ministers. At present, there is no 'Isle of Man Government' as a defined legal body. Each Government Department exists in its own legal right.

Sir John Elvidge stated that the Island, like most jurisdictions, is facing challenges of an increasingly complex nature against the backdrop of a rapidly changing external environment, and needs to respond effectively to those challenges. As such, the need for 'strategic agility' is greater than ever if the Island is to compete effectively at national and international level. A Single Legal Entity could provide the framework to make the workings of Government more coordinated and flexible, with an emphasis on working across and breaking down internal boundaries. This would bring cultural and behavioural changes within Government by removing inhibitors to joint action by different parts of Government.

It is suggested that a Single Legal Entity would enable:

- Greater flexibility and agility in responding to the Island's external environment;
- More 'integrated' and 'joined-up' systems across Government;
- Policy making and service provision based around the needs of the whole citizen as opposed to 'patients'/'service users' being viewed from a Departmental perspective etc.;
- The ability to make and enter into contracts and agreements as a Government entity, rather than individual Departments, etc., at local and international level;
- More integrated working across Government;
- The removal of existing actual or perceived inhibitors to joint action by different parts of the existing Government structure(s).

From a public point of view, it simplifies accountability because 'Government' as whole becomes accountable rather than a particular part of Government, which is the position with the existing structure. From Government's insurance point of view, it avoids any risk of falling between any gaps in coverage.

The procurement process would be simplified because, for example, the whole of Government could be licensed to use software and other applications in a single operation. And, finally it would remove the vires issue, which often causes difficulties, by enabling the Single Legal Entity to have complete powers, across the piece.

Questions

- 1 Do you agree that there is merit in establishing Government as a Single Legal Entity?
- 2 If yes, do you believe this should be in addition to and not instead of the existing Departmental/Board legal structure?
- 3 Do you believe a Single Legal Entity should replace the existing legal identities which currently exist?

- 4 If yes, would you envisage the retention of a Department structure, with responsibility and accountability delegated to Ministers?
- 5 Alternatively, do you agree with the removal of the Departmental system, and the introduction of a management system based on accountability and responsibility based on portfolios, operating within a single organisation?

2. The boundaries of a Single Legal Entity (Chapter 2, Page 9 of the SLE report)

The report makes a distinction between Government as a Single Legal Entity and Government as a single organisation, but emphasises that there is no 'one size fits all' model that can be adopted.

The report provides a menu of measures that could be adopted in whole or in part. In deciding whether to become a single entity and/or single organisation, a decision would need to be taken as to which elements were inside or outside of the Single Legal Entity structure. Isle of Man Government is a diverse organisation, providing a wide range of services. It also raises revenue and has a number of regulatory functions. At present, it is able to fulfil its quite disparate statutory and legal functions by virtue of its structure and underpinning legislative framework. Whether it is to become a Single Legal Entity and/or single organisation, decisions will need to be made about where the boundaries of the entity and organisation lie.

Issues to be considered include:

- The services provided by Isle of Man Government are diverse;
- Government provides some services and activities that are 'regulated' by itself;
- Regulatory bodies may take action, including prosecution, when services that are regulated fall short of required standards or where there is evidence of malpractice or breach of the law;
- Separation of the regulatory functions of Government from its other functions would mean that it is not in the position of suing itself, and is objectively able to be held to account.

Questions

- 6 Please specify whether the following "regulatory" bodies, which currently sit outside the Departmental structure, should be included within from the Single Legal Entity:

Financial Supervision Commission
Insurance and Pensions Authority
Communications Commission
Gambling Supervision Commission
Office of Fair Trading
Public Sector Pensions Authority

- 7 Please specify whether the following "commercial" or "semi commercial" bodies, which currently sit outside the Departmental structure, should be included within from the Single Legal Entity:

Isle of Man Post Office
Manx Utilities Authority
Manx National Heritage

- 8 Please specify whether those following regulatory functions, which currently sit within the Departmental structure, should be included within from the Single Legal Entity:

Planning and Building Control
Registration of Nursing/Residential Care Homes
Health and Safety at Work
Food Safety and Environmental Health
Fire Safety
Work Permits

- 9 Please specify whether the following "commercial" or "semi commercial" activities, which currently sit within the Departmental structure, should be included within from the Single Legal Entity:

Bus Services
Heritage Railways
Villa Marina/Gaiety Theatre
National Sports Centre

3. Government as a Single Organisation (Chapter 3, page 11 of SLE report)

4.1 Single Strategic Framework for Government (Chapter 3, page 12 of SLE report)

The report considers what a single strategic framework for Government might mean in terms of outcomes, rather than a traditional model of inputs and outputs. As Sir John indicates in his report 'the key point of focusing Government on outcomes...is driven by a concern about the effectiveness of Government and its agencies'. Strategic frameworks vary within Governments, but with a diverse organisation the shared purpose and values need to be more coherent as they represent a wide range of interests.

The potential advantages of a single strategic framework for Government could be:

- There is a shared common purpose that transcends political or individual Department, Board or Office agendas;
- Portfolios based on outcomes, including budget allocation;
- Effectiveness of outcomes can be more easily measured;
- A greater ability to benchmark overall performance against strategic objectives;

Questions

- 10 Do you agree there is merit in developing a single strategic framework focusing on the outcomes Government wishes to achieve rather than inputs or outputs?
- 11 Do you agree that a single strategic framework should be given statutory force with supporting legislation?

4.2 Integrated performance management framework (Chapter 3, page 12 of SLE report)

Sir John's report stated that it is a well-established feature of performance management that organisations focus on delivering the things which are measured. Separate performance management systems for different organisations will tend to produce a focus on the objectives which are specific to that organisation, rather than common to the Government as whole.

It follows that if there is an integrated strategic framework based on outcomes, there needs to be an integrated performance management framework. Sir John's report cites the Scottish model where the national outcomes framework is 'elaborated' into 50 national performance indicators, which are tracked through data as close to real time as possible and published online. This is a more effective and responsive means of performance management than traditional systems, which are based on historical data, as the direction of travel may need to shift more quickly than traditional systems allow.

The potential advantages of an integrated performance management framework are:

- A more nuanced and holistic approach to performance management
- The opportunity to measure more tangible and meaningful outcomes rather than outputs, thereby achieving greater efficiencies
- A tighter fit between strategy and the performance of teams and individuals in achieving outcomes

Questions

- 12 Do you agree that there is merit in introducing an integrated performance management framework?

4.3 Collective approach to political decision-making (Chapter 3, page 13 of SLE report)

All Governments with Cabinet-based models of Ministerial political decision making, as distinct from presidential systems, have some degree of collective approach to political decision making. On the Isle of Man, the collective approach is vested in the power of the Council of Ministers, although there remains considerable responsibility for decision making at Departmental and Board level.

Sir John suggests that a collective approach to political decision making under a Single Legal Entity would likely see a greater shift on the continuum towards collective decision making as the strategy setting would be focused on decisions that span the traditional boundaries that currently exist.

The potential advantages of a collective approach to political decision-making would be:

- Improved resolutions and outcomes across conflicting policy areas
- The promotion of open and constructive dialogue between officers and politicians
- A more objective decision-making process
- A reduction in the risk of potential information suppression.

Questions

- 13 Do you agree that a greater number of policy decisions which currently sit within Departments should be agreed collectively by Council of Ministers?
- 14 If not, who should be responsible for determining Government policy on the Isle of Man?
- 15 Do you agree that there should be more cross cooperation between Departments and functions of Government when developing policy?
- 16 If so, do you believe this would be assisted by Government functioning as a Single Legal Entity?
- 17 Should the section of the Government Code which describes collective responsibility be modified?
- 18 If so, how should the rules on collective responsibility be changed?

3.4 Common systems within central Government (Chapter 3, page 13 of SLE report)

Sir John's report discusses the systems that would enable greater integration within Government and in particular, financial and Human Resources systems that would facilitate greater flexibility of staff and finance. The report also highlights the difficulties of integrated performance management if the data has to be drawn from separate and incompatible systems.

The advantages of common systems within central Government are as follows:

- Swifter access to performance data
- Greater consistency of information and data
- Greater internal flexibility to manage staff and resources without the need to 'restructure'
- Single points of access for public services

Isle of Man Government has already made significant progress in developing common systems including areas such finance, payroll, information technology, HR and accounting systems. As part of the current digital strategy review it is anticipated that this will be improved further.

A specific question which is often raised in the context of common services was whether the move to a single legal entity might have negative consequences for data protection. The report concluded, on the advice of the Data Protection Supervisor, that if the Isle of Man Government were to become a single entity this would not in itself permit personal data to be processed where no statutory power to do so existed, nor would it affect how personal data would be shared. This is because the existing legal position provides for data sharing where it meets specific purposes, not whether it conforms with particular organisational structures.

Questions

- 19 Do you agree that common systems under a Single Legal Entity would result in more integrated working across Government?
- 20 Do you agree that central Government should adopt more common systems?
- 21 If so, which areas should be subject to common systems?
- 22 Do you accept the view that establishing IOM Government as a single entity will not affect how personal data is processed or shared.

3.5 Integrated financial planning and budget management (Chapter 3, page 14 of SLE report)

Sir John's report said that in most jurisdictions, there is some form of Finance Ministry/Department (in the case of the Isle of Man, this is the Treasury) responsible to a Finance (Treasury) Minister which exercises overall control of public spending. Often the mechanism for this control is a series of spending controls/budget limits on individual Departments or public bodies.

The disbenefit of this arrangement tends to be creation of unintended incentives for Departments to place a high priority on the protection of their relative share of overall resources, rather than collaboration to achieve common outcomes. This current approach can also drive Departments to adopt policies designed to reduce their relative spending needs without considering the impact on other parts of Government. It also generally means a lack of flexibility in the allocation of resources to match innovation in ways of delivering Government's agenda.

Potential advantages of integrated financial planning and budget management include:

- Removal of internal barriers to financial planning and budget management
- Removal of the internal market in which Department's cross-charge each other (e.g. invoicing each other for services)
- Greater incentive towards toward shared responsibility and innovative approaches for the allocation of resources
- Outcome based budgeting

Questions

- 23 Do you agree that Government should adopt an integrated approach to financial planning and budget management?
- 24 Do you agree that integrated finance and budgeting would give greater flexibility of resource allocation?
- 25 Do you agree that Government should be held to account by Tynwald on its performance against its aggregate budget, rather than the individual performance of Departments and Boards?

3.6 Integrated civil service structure, with a clear single point of authority (Chapter 3, page 14 of SLE report)

Sir John's report discusses the question of an integrated civil service structure with a clear, single point of authority. It suggests that an absence of common citizenship prevents or inhibits movement of staff between Departments or bodies. Career development tends therefore to be confined to each Department or body and is reinforced by a high value on subject expertise, rather than on a broader understanding of economic and social issues and of the operation of Government.

Reference is also made the role of the more senior posts within Government and the opportunity to redefine responsibilities to contribute to a wider set of objectives, rather than Departmental portfolios.

Advantages of an integrated civil service structure could include:

- A more integrated career structure with greater emphasis on developing broader transferable skills that can be pooled and shared across Government as needed
- Greater sense of citizenship that transcends the boundaries of individual Departmental structures
- An opportunity to streamline structures and realign senior leadership with Government

Questions

- 26 Do you agree that an integrated civil service structure with a clear point of authority via the Chief Secretary would be a positive move?
- 27 Do you agree that a single organisational model would support the delivery of clear corporate leadership and intent?

3.7 Basis for aligning arm's length bodies with the single strategic framework (Chapter 3, page 15 of SLE report)

Sir John Elvidge argues that there is a strong risk within any system of Government which makes extensive use of arm's length bodies that the bodies will develop mutually inconsistent strategic approaches. The use of Ministerial powers of strategic direction through the Council of Ministers is the conventional counterweight to this but different sets of Ministerial direction also carry the risk of lack of coherence. Sir John provides examples of approaches in different countries.

In Sweden, the mechanism for seeking greater coherence is to make all public bodies accountable effectively to the Cabinet rather than to the Departmental Minister whose portfolio is primarily relevant to their activities. In Scotland, the approach has been to substitute the National Performance Framework for separate Ministerial strategic direction to individual bodies.

Executive Agencies within central Government and Non-Departmental Public Bodies at arm's length from Government are also subject to performance management frameworks which link to this strategic framework and are expected to align their internal performance management frameworks accordingly.

Advantages of aligning arm's length bodies with the single strategic framework include:

- Development of closer working between regulators
- Greater clarity about regulation versus delivery in some areas
- Opportunity to develop regulation where none currently exists

Questions

28 Do you agree arm's length bodies should be aligned with the single strategic framework?

29 Do you support separation of regulatory and enforcement functions?

3.8 Basis for aligning local Government with the strategic framework (Chapter 3, page 16 of SLE report)

In jurisdictions where there is a central Government financial contribution to the funding of individual local authorities, a common alternative means of achieving central Government influence is the ring-fencing of some or all of that financial contribution to specific uses, often with restrictive conditions further limiting use. Sir John's report gives the approach used by the Scottish Government as an example of how strategic alignment has been achieved.

Advantages of aligning municipal/local Government with the strategic framework:

- The opportunity to give local authorities greater responsibility, but with a commitment to supporting national strategic outcomes
- The opportunity to link a local funding model to support strategic outcomes
- Coherence around shared purpose

Questions

30 Do you support the principle of aligning local Government with the central Government strategic framework?

Appendix 1: Response to Consultation Form

Submissions can be completed online at: <https://www.surveymonkey.com/r/2RSNHXZ> or in writing using this form. Written submissions can be sent by post or email, marked 'Single Legal Entity', to:

Mrs Hilary Leece
Cabinet Office
St Andrew's House
Finch Road
Douglas
Isle of Man
IM1 2PX
Tel. (01624) 648062 e-mail: Hilary.Leece@gov.im

The deadline for both physical and electronic submissions is 31st July 2015

Your details:

Name: _____

Address: _____

Email: _____ Phone no: _____

Representing Self Representing Organisation

Name of organisation: _____

Do you want us to keep any of your submission confidential: Yes / No

If yes, please detail the elements you wish to be kept confidential: _____

Confidential Responses Only: If you want part of your response, your name or your organisation to be confidential, can we publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)? Yes / No

Declaration: I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full unless otherwise specified on this cover sheet, and I authorise the Civil Service Commission to make use of the information in this response.

I confirm that I have read the declaration.

Single Legal Entity Consultation – Response Form

Response to Consultation Questions

Question	YES/NO
Assessing the case for a Single Legal Entity (Chapter 2, Page 5 of SLE report)	
1 Do you agree that there is merit in establishing Government as a Single Legal Entity?	
2 If yes, do you believe this should be in addition to and not instead of the existing Departmental/Board legal structure?	
3 Do you believe a Single Legal Entity should replace the existing legal identities which currently exist?	
4 If yes, would you envisage the retention of a Department structure, with responsibility and accountability delegated to Ministers?	
5 Alternatively, do you agree with the removal of the Departmental system, and the introduction of a management system based on accountability and responsibility based on portfolios, operating within a single organisation?	

Additional Comments

Question	YES
<p>The boundaries of a Single Legal Entity (Chapter 2, Page 9 of the SLE report)</p> <p>6 Please specify whether the following “regulatory” bodies, which currently sit outside the Departmental structure, should be included within the Single Legal Entity:</p> <p style="padding-left: 40px;">Financial Supervision Commission Insurance and Pensions Authority Communications Commission Gambling Supervision Commission Office of Fair Trading Public Sector Pensions Authority</p> <p>7 Please specify whether the following “commercial” or “semi commercial” bodies, which currently sit outside the Departmental structure, should be included within the Single Legal Entity:</p> <p style="padding-left: 40px;">Isle of Man Post Office Manx Utilities Authority Manx National Heritage</p> <p>8 Please specify whether those following regulatory functions, which currently sit within the Departmental structure, should be included within the Single Legal Entity:</p> <p style="padding-left: 40px;">Planning and Building Control Registration of Nursing/Residential Care Homes Health and Safety at Work Food Safety and Environmental Health Fire Safety Work Permits</p> <p>9 Please specify whether the following “commercial” or “semi commercial” activities, which currently sit within the Departmental structure, should be included within the Single Legal Entity:</p> <p style="padding-left: 40px;">Bus Services Heritage Railways Villa Marina/Gaiety Theatre National Sports Centre</p>	

Additional Comments

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Question	YES/NO
<p data-bbox="188 280 1018 353">Government as a Single Organisation (Chapter 3, page 11 of SLE report)</p> <p data-bbox="236 387 970 533">10 Do you agree there is merit in developing a single strategic framework focusing on the outcomes Government wishes to achieve rather than inputs or outputs?</p> <p data-bbox="236 562 997 636">11 Do you agree that a single strategic framework should be given statutory force with supporting legislation?</p>	

Additional Comments

Question	YES/NO
Integrated performance management framework (Chapter 3, page 12 of SLE report) 12 Do you agree that there is merit in introducing an integrated performance management framework?	

Additional Comments

Question	YES/NO
<p>Collective approach to political decision-making (Chapter 3, page 13 of SLE report)</p> <p>13 Do you agree that a greater number of policy decisions which currently sit within Departments should be agreed collectively by Council of Ministers?</p> <p>14 If not, who should be responsible for determining Government policy on the Isle of Man?</p> <p>15 Do you agree that there should be more cross cooperation between Departments and functions of Government when developing policy?</p> <p>16 If so, do you believe this would be assisted by Government functioning as a Single Legal Entity?</p> <p>17 Should the section of the Government Code which describes collective responsibility be modified?</p> <p>18 If so, how should the rules on collective responsibility be changed?</p>	

Additional Comments

Question	YES/NO
<p>Common systems within central Government (Chapter 3, page 13 of SLE report)</p> <p>19 Do you agree that common systems under a Single Legal Entity would result in more integrated working across Government?</p> <p>20 Do you agree that central Government should adopt more common systems?</p> <p>21 If so, which areas should be subject to common systems?</p> <p>22 Do you accept the view that establishing IOM Government as a single entity will not affect how personal data is processed or shared?</p>	

Additional Comments

Question	YES/NO
<p>Integrated financial planning and budget management (Chapter 3, page 14 of SLE report)</p> <p>23 Do you agree that Government should adopt an integrated approach to financial planning and budget management?</p> <p>24 Do you agree that integrated finance and budgeting would give greater flexibility of resource allocation?</p> <p>25 Do you agree that Government should be held to account by Tynwald on its performance against its aggregate budget, rather than the individual performance of Departments and Boards?</p>	

Additional Comments

Question	YES/NO
<p>Integrated civil service structure, with a clear single point of authority (Chapter 3, page 14 of SLE report)</p> <p>26 Do you agree that an integrated civil service structure with a clear point of authority via the Chief Secretary would be a positive move?</p> <p>27 Do you agree that a single organisational model would support the delivery of clear corporate leadership and intent?</p>	

Additional Comments

Question	YES/NO
<p data-bbox="188 280 981 353">Basis for aligning arm's length bodies with the single strategic framework (Chapter 3, page 15 of SLE report)</p> <p data-bbox="236 385 986 459">28 Do you agree arm's length bodies should be aligned with the single strategic framework?</p> <p data-bbox="236 492 890 566">29 Do you support separation of regulatory and enforcement functions?</p>	

Additional Comments

Question	YES/NO
<p data-bbox="188 280 997 353">Basis for aligning local Government with the strategic framework (Chapter 3, page 16 of SLE report)</p> <p data-bbox="228 421 973 526">30 Do you support the principle of aligning local Government with the central Government strategic framework?</p>	

Additional Comments

Appendix 2: List of Direct Consultees

- Members of Tynwald
- Chief Officers of Government Departments, Boards and Offices
- Members of the Judiciary
- Local Authorities
- Municipal Association
- IOM Trades Union Council
- Chamber of Commerce

Appendix 3: Code of Practice on Consultation

Consultation Code of Practice

This consultation follows the Code of Practice on Consultation the criteria for which are set below.

The Six Consultation Criteria

1. Consult widely throughout the process, allowing a minimum of 6 weeks for a minimum of one written consultation at least once during the development of the legislation or policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your Department's effectiveness at consultation.
6. Ensure your consultation follows best practice, including carrying out an Impact Assessment if appropriate.

The full Code of Practice is available at www.gov.im/consultations.gov