



Economic Development,
Jobs, Transport
and Resources

Veterinary Practitioners Registration Board of Victoria

Statement of Expectations January
2018 – June 2019

Evaluation report, December 2018

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1 Report purpose and evaluation objectives

The primary purpose of this report is to provide the results of an evaluation of the Veterinary Practitioners Registration Board of Victoria's (Vet Board) Statement of Expectations (SoE) January 2018 to June 2019. The evaluation covered an assessment of the Vet Board's performance progress against the SoE targets, and an assessment of the process that was used to develop the SoE and response.

The objectives of the evaluation were derived from Department of Treasury and Finance (DTF) SoE evaluation guidelines and DTF guidance material about the intentions of the SoE Framework¹. The objectives of the evaluation were to:

- identify actions that could improve the development and design of the Vet Board's next SoE
- determine how well the Vet Board's SoE and response support the Vet Board's contribution to public policy outcomes
- in line with DTF's stated intentions for SoE evaluations, note any observations for consideration by DTF about the operation of the revised SoE framework².

2 Background

Preparation of this report

The Vet Board's SoE and response is managed through the Agriculture Regulatory Policy branch of Agriculture Victoria, within the Department of Economic Development, Jobs, Transport and Resources (DEDJTR). To provide arm's length review, the evaluation was conducted by the Biosecurity and Agriculture Services branch, Agriculture Victoria. This enabled the evaluation process to be independent of the parties involved in developing and executing the SoE and response.

Key roles and participants in the evaluation process were:

- Conduct of evaluation and preparation of report: Biosecurity and Agriculture Services – Agriculture Victoria
- Department liaison and advice: Animal Welfare Victoria and Agriculture Regulatory Policy – Agriculture Victoria
- Consultation with regulator: Veterinary Practitioners Registration Board of Victoria

Vet Board context

The Vet Board is a small regulatory entity consisting of approximately five full-time equivalent staff providing administrative support to a board of nine members, with operations funded almost entirely through registration fees paid by practitioners. It has a tightly defined remit to protect the public by ensuring veterinary practitioners are registered and properly qualified. It has a responsibility to investigate the professional conduct and fitness to practise of registered practitioners, including in response to complaints from the public. While annual resource demands associated with registration processes are relatively stable and predictable, demands arising from complaint investigations can be highly variable, depending on the number, nature and complexity of issues raised.

Vet Board alignment to public policy outcomes

The veterinary profession plays an important role in protecting both public and animal health and ensuring good welfare outcomes for Victorian animals. It plays a crucial role in detecting and managing critical animal diseases, research and teaching, and services the animal health and welfare needs of pet and recreational animal owners. It provides an important contribution to Victoria's reputation for clean and safe agricultural produce, good standards of animal welfare and maintaining the integrity of Victoria's biosecurity and food security arrangements.

¹ <https://www.dtf.vic.gov.au/reducing-regulatory-burden/statement-expectations-regulators>

² See: page 5, *Guidelines for Evaluation of Statements of Expectations for Regulators*

These can be influential factors in trade and tourism and are vital to maintaining access to domestic and international markets for Victorian produce, which are significant elements of Victoria's economy.

In view of this public good, the Vet Board needs to be effective in its role of ensuring practitioners are registered, appropriately qualified and well informed, so the profession has the capability to play its part in contributing to a Victorian economy that is prosperous, competitive and globally connected. A key question during the evaluation was the extent to which the Vet Board's SoE and response support these public outcomes.

3 Evaluation methodology

The evaluation methodology draws on a simple analysis broken into two parts:

- a comparison of actions taken and results achieved by the Vet Board, as at November 2018, against the expectations and targets of the SoE and response (the **performance evaluation**), and
- a comparison of the content, process and effect of the Vet Board's SoE and response against the stated requirements and intentions of the SoE framework (the **process evaluation**).

For the performance evaluation, the analysis considers what would constitute success in terms of meeting the SoE targets and establishes a set of questions that form the criteria for assessment. The same approach is used to assess how well the process of developing the Vet Board's SoE was aligned to the SoE framework.

Appendix A contains additional information about how the assessment criteria for the evaluation were derived.

The analysis was based on information gathered from the Vet Board's Annual Report 2017-18, the Vet Board's public website, the joint DEDJTR–Vet Board annual governance health check (managed by Agriculture Victoria), and discussions with Vet Board officers and Agriculture Victoria staff.

While the SoE is currently set to run until June 2019, the DTF guidance recommended that this evaluation be completed by the end of December 2018. In practice, this means the performance evaluation needed to be based on information available up until early November 2018. In view of this, the performance evaluation was made from the perspective of a progress update, as distinct from a full and final evaluation. It is a requirement under the SOE Framework for evaluation reports to be published.

4 Evaluation conclusions

Performance evaluation conclusions

The Vet Board has made a number of improvements in line with its SoE and response, and has initiatives under way that will bring further enhancements to its operations and stakeholder interactions. There are some aspects that have not yet been addressed, or where some further action could be taken. For example, while there is evidence the Vet Board is applying a risk-based approach to regulation and compliance, it has not succinctly articulated a risk-based regulatory strategy (it has stated risk-based approaches for operations, finance and security).

However, in tackling the SoE targets the Vet Board has given priority to actions that either give the most significant or direct benefit to stakeholders, or will establish the infrastructure and systems the Vet Board needs to enable future improvements. To this extent, while the Vet Board has not met all aspects of the SoE to the letter, (as at November 2018), it is meeting them in intent, noting the SoE is still expected to run until June 2019 and some targets have timelines beyond the publish-date of this evaluation report.

Process evaluation conclusions

Broadly speaking, the process for developing the Vet Board's SoE and response met the required standards of the SoE framework. The department undertook a consultation process with the Vet Board in developing the SoE and response, as required under the framework. For future SoEs, the Vet Board would prefer a more iterative process, with additional consultation opportunities, and a more selective approach to developing the elements and targets of the SoE and response.

Given the Vet Board's small size and tightly defined remit, the SoE is comparatively detailed and extensive. It may have been more effective for the SoE to focus on a smaller number of high-value actions that create the

greatest benefit to practitioners and the community, and that most support the Vet Board in delivering its unique public value (i.e. protection of the public by ensuring veterinary practitioners are registered and properly qualified for practise). However, the department's flexibility in steering the development of the SoE and response was constrained to some extent by the framework, which provides only limited reference to considerations of proportionality.

5 Recommendations

The following recommendations are based on the objectives of this evaluation, which were to identify potential improvements to the SoE development process, evaluate whether the SoE and response support achievement of public policy outcomes, and note observations for consideration by DTF about the operation of the SoE Framework:

- For future Vet Board SoEs and responses a more iterative development process could be applied, with earlier engagement between the department and the Vet Board, and additional consultation opportunities.
- Given the Vet Board's comparatively limited resources and narrowly defined remit, proportionality should be a consideration in developing future SoEs and responses. Future Vet Board SoEs could focus on a smaller number of high-value actions that yield benefit to veterinary practitioners and the community without undue burden placed on the Vet Board.
- Future Vet Board SoEs and responses could benefit from a clearer articulation of risk from a regulatory perspective. The Vet Board could outline how it develops strategies to mitigate potential harm from regulatory risks it has identified through observations of complaint trends or other factors affecting the veterinary sector.
- Positive feedback the Vet Board has received from stakeholders indicates its efforts to reduce regulatory burden are having a beneficial effect. The SoE framework should continue to promote efficiency in regulatory practice through improved design and administration of regulation.
- To ensure regulatory purpose and public value is maintained, the SoE framework could also include guidance on clearly aligning better regulatory design and administration to achievement of the unique public value regulators are intended to create.
- To provide more flexibility to departments and regulators in the development of SoEs and responses, the guidance materials for the SoE Framework could include additional advice on proportionality to ensure the framework is workable for smaller entities.

6 Detailed performance evaluation

The performance evaluation was based on a comparison of the actions taken and results achieved by the Vet Board, as at November 2018, against the targets set out under each of the elements in the SoE.

6.1 Timeliness

Statement of Expectation: *The Board must ensure it avoids unnecessary delays for regulated parties. I expect the Board to clearly communicate timeframes associated with applications, registration and decision-making processes to applicants. I also expect the Board will make most decisions within these timeframes (after applicants provide all required information) and provide reasons where it does not.*

I expect the Board to measure the time taken by regulated parties and the community during applications, and to implement methods to reduce this time through revisions to forms and improvements in its capability and capacity to interact with stakeholders electronically.

The Vet Board has taken steps to enable greater responsiveness of administrative processes and better capacity to measure processing times and track efficiency. The Vet Board has made some improvements to its information technology (IT) infrastructure and a further upgrade, anticipated to take effect from November 2018, will increase its capacity for electronic processing and stakeholder interaction, including further automation. The upgrade will allow implementation of web-based forms and information transfer, electronic payments, automated communications and accurate reporting of administrative processes.

In the meantime, the Vet Board has made improvements to its website and transitioned forms relating to its most frequently used processes to fillable PDF format (i.e., complaints and practitioner registrations, accounting for 33 per cent of forms). The Vet Board has also put steps in place to more reliably advise or remind practitioners about regulatory requirements and associated timeframes and deadlines. It has publicly committed to a new Service Charter, that addresses the key elements and intent of the SoE, and includes a set of responsiveness standards for the Vet Board's regulatory processes.

Case study, communicating administrative timeframes: *To improve its communications for 2018 registration renewals, the Vet Board used an expanded range of methods to remind registrants of renewals due and direct them to renewal options and the availability of the Vet Board's online portal. This included use of a third-party bulk email service, emails direct from the Vet Board, mobile phone SMS and hard-copy posted letters. The Vet Board observed that contact via mobile SMS appeared to be a very successful communication mechanism. Observations by Vet Board staff indicated many practitioners seemed to renew their registration and update their contact information online after receiving an SMS. In all, just under 96 per cent of practitioners used the online portal for registration renewal.*

The Vet Board has had limited capacity to systematically capture quantitative data about administrative burden. While it could have manually estimated some quantitative data about baseline burden, and this would have enabled more effective measurement of improvements, this would have been a disproportionately onerous task given the Vet Board's relatively limited resources. Introduction of new software for managing investigations and an upgrade of existing registration software is expected to automate this additional level of data capture, which could inform inputs to future Statements of Expectation. In the meantime, the Vet Board has started seeking qualitative feedback from veterinary practitioners and the public about ease of use of Vet Board forms. It has received positive feedback from users about its new fillable PDF complaint form and new graduate registration form, with both rated as easy to complete. While qualitative in nature, this feedback is indicative of some reduction of administrative burden.

6.2 Risk-based strategies

Statement of Expectation: *I expect the Board to establish a clear approach to risk-assessment and risk-based regulation, and to publish these objectives to ensure they are available to all regulated parties. I also expect the Board to review current practices [as at 2017] and develop risk-based compliance strategies where appropriate.*

The Vet Board has taken steps to revise its practices and adopt risk-based approaches to its operations, including by generally raising the profile of risk analysis in its standard procedures and templates. It has revised its mission, strategic goals and intended strategies for delivery. These measures address operational, security and financial risks, but don't include a clear description of regulatory risks. The Vet Board could more clearly set out the regulatory risks it has identified, how its strategies will control the associated harms, and how its compliance effort has been calibrated to the level of risk.

Having said this, from information presented in its Annual Report and newsletters, the Vet Board appears to be doing the kinds of information gathering and analysis consistent with risk-based compliance strategies. The Vet Board's approach to complaint investigation, which escalates through higher levels of intervention according to the severity of the issue and conduct of the respondent, is also consistent with a risk-based compliance approach.

In view of this, the Vet Board could more clearly articulate how it uses its observations of trends in the sector to make an analysis of regulatory issues that then inform a set of risk-based strategies for compliance management, and regulatory practice generally. These risk-based objectives could then be published through its website or newsletters, to educate practitioners about the Vet Board's priority areas.

Case study, risk-based regulation: *The Vet Board's revised approach to applications for registration provides a good case study of applying a risk-based approach to regulatory practice. To assure authenticity, the registration process previously required applicants to lodge hard-copy documents, to prevent potential fraud associated with electronic documents. The Vet Board re-assessed the value of this procedure in light of new technology, including new techniques for detecting fraud in electronic documents and access to highly reliable university records of graduates awarded veterinary qualifications and/or letters of professional standing issued directly to the Vet Board by registration authorities in other jurisdictions. On this basis, the Vet Board assessed the risk of fraudulent application for registration is very low, and the additional burden associated with lodgement of hard-copy documentation was disproportionate to the risk. While applicants are still required to provide authenticated documentation, the ability to use electronic lodgement significantly reduces the time and cost burden connected with the application process.*

6.3 Compliance related assistance and advice

Statement of Expectation: *I expect the Board to improve the clarity and currency of advice provided to regulated parties to ensure it is both comprehensive and easy to understand. The Board must ensure 100% of advice provided to its members and the community is reviewed and updated at an appropriate frequency to ensure currency and relevance. Advice must be clear, concise and written in plain English.*

In dealing with stakeholders, I expect all of your regulatory staff to be helpful, respectful, impartial, proportionate, predictable, transparent. I also expect that the Board will engage with stakeholders to seek feedback on your progression against these principles and report this to me as part of your annual reporting arrangements.

The Vet Board has established work programs for reviewing its advice and guidance materials, including the veterinary *Professional Conduct Guidelines*. Updates have been made to its guidelines for *Supply and use of drugs, scheduled drugs and other medications in veterinary practice*, and *Veterinary medical records*. Feedback on these initial updates has been sought from practitioners and this will be used to develop a model for revision of remaining guidelines, expected to occur over the first half of 2019. Additional stakeholder consultation has been built into the process for these further revisions. To provide systematic assurance of guidance materials and other advice, the Vet Board's Professional Standards Committee has responsibility for ongoing review of the Vet Board's website and documents, with reports to be made to the Vet Board annually.

Recent changes to the Vet Board's website improve its ease of use through the addition of navigation menus to assist information discovery and the inclusion of news updates on the homepage, enabling timely information to be made available to practitioners about current issues affecting the profession. This supplements updates provided through the Vet Board's quarterly newsletter. To address plain English expression, the Vet Board has commenced a comprehensive review of its communications and engagement with stakeholders, with the aim of establishing a communications protocol covering all aspects of interactions with its stakeholders. The Vet Board's Service Charter includes an overall commitment to provide straightforward advice and to adapt its communication to the specific needs of stakeholders as much as possible.

The Vet Board receives only a small number of requests for hard copy materials. Hard copy materials are used primarily upon initial registration of graduating practitioners, with guidance and other support documents accompanying registration certificates (around 300 per year). The Vet Board manages printing of hard copy materials in-house, giving it full control over the currency of content and an ability to print documents only as required. The Vet Board is planning to redesign its range of support materials in line with its broader branding refresh, including HTML versions of documents and printable versions that can be downloaded by stakeholders who prefer hard copies.

The Vet Board's new Service Charter includes a commitment to standards of behaviour aligning to those detailed in the SoE, promising the Vet Board will be *Fair* (impartial, proportionate); *Open* (transparent); *Attentive* (helpful); *Respectful* and *Consistent* (predictable) in dealing with practitioners and the community. The Vet Board is working to model these standards of conduct through its updated forms and processes, and through information it communicates on its website and its public documents. For future SoEs, consideration could potentially be given to measuring performance against these standards of conduct.

6.4 Accountability and transparency

Statement of Expectation: *I expect the Board to be transparent in its operation with all stakeholders and regulated parties, by clearly documenting the rationale for its statutory decision making and communicating these regularly and effectively to affected parties. I expect the Board will provide information to stakeholders about trends and topical issues affecting the industry within appropriate timeframes.*

I expect a summary of the findings and recommendations [of the report of the 2017 external audit of the Vet Board] to be made publicly available on the Board's website. I also expect the Board to report its responses to these recommendations, release a plan to address them and report progress against these recommendations on the Board's website and as part of its annual reporting arrangements. In developing actions to achieve these recommendations, the Board is expected to consult with the Red Tape Commissioner [now Office of the Commissioner for Better Regulation], veterinary practitioners, industry stakeholders and the broader community as appropriate.

The Vet Board uses several ways to provide information to its regulated community and the public about its expectations of practitioners and its rationale for decision making. Through its website and Annual Report, the Vet Board informs the profession of qualifications required to meet registration standards. Case studies in its newsletters illustrate the Vet Board's rationale in specific circumstances and draw links to implications for better practice. The Vet Board's website homepage includes information on important developments (such as the

announcement of Victorian Government's Animal Welfare Strategy) and its Annual Report covers trends in complaint issues observed over the year.

The Vet Board started publishing summaries of Vet Board meetings in January 2018, as committed to in its SoE response, but ceased after April 2018. Although the Vet Board had committed to this target, the summaries in their current form are unlikely to provide much additional regulatory guidance, as the information tends to be procedural in nature and doesn't convey a strong sense of the Vet Board's regulatory priorities. An alternative approach could be to provide summaries of the Vet Board's discussions or decisions about regulatory issues significant to practitioners or the community.

Case study, transparency of decision-making: A case study provided in the Vet Board's September 2018 newsletter provides a good example of transparency of decision-making rationale in practice. In the newsletter, the Vet Board provides a detailed case study comparing two instances of complaint relating to allegations of negligence involving the management of multiple births (domestic pets). In the first instance, an Informal Hearing Panel found there had been unprofessional conduct and counselled the practitioner. In the second instance, a Panel found there had been no unprofessional conduct by the practitioner. The case studies give a detailed but anonymised description of the circumstances, including the criteria that underpinned the Vet Board's reasoning in each instance, and a summarised reflection on the implications for veterinary practice with respect to managing multiple births in domestic pets.

The information published in the Vet Board's Annual Report 2017-18, demonstrates an external audit was conducted, a report with recommendations was received, and plans and actions taken in response. However, the Vet Board has not published the summary of findings from the external audit or its response to the audit and its corresponding plan. Publishing the summary of findings together with the Vet Board's high-level response could be a relatively uncomplicated way of providing additional transparency and accountability to the Vet Board's practitioners and wider community.

The Vet Board's Annual Report covered its progress against the majority of the targets set out in the SoE and response, but there are some elements that were not addressed. In some cases, this was due to a misalignment of the periods covered by the Annual Report versus the SoE, (noting some targets also have timelines beyond the publish date of this evaluation report). However, there were some targets where progress or comment could have been provided, and a small amount of additional information or explanation would have provided a more comprehensive progress update (such as the summary of audit findings noted above).

Overall, the Vet Board has made significant progress towards meeting this expectation but has omitted some central actions. To some extent, the targets in the SoE response for this element also limit the Vet Board's opportunity to demonstrate performance. For example, a strict assessment of the identified targets as stated in the response would not have captured the Vet Board's role in providing topical information to practitioners and in helping the veterinary community understand the Vet Board's rationale for regulatory decisions. However, these issues are reflected in the expectation and there is good evidence that the Vet Board is fulfilling these roles. This could be taken into consideration in the drafting of future SoEs and responses.

6.5 Evaluation processes

Statement of Expectation: I expect the Board will evaluate the performance improvements contained in this SoE during the period of its validity to ensure progress is made against these expectations.

The Vet Board's Annual Report covered its progress against the majority of the targets set out in the SoE and response, but there were some elements that were not addressed. In some cases, this was due to a misalignment of the periods covered by the Annual Report versus the SoE, (noting some targets have timelines beyond the publish date of this evaluation report). In other cases, there are targets where progress or comment could have been provided, and a small amount of additional information or explanation would have provided a more comprehensive progress update. This would include a published summary and response of the Vet Board's external audit, and some additional information about the Vet Board's strategies for managing risk from a regulatory perspective. However, the Vet Board anticipates adopting a more detailed, comprehensive approach for its 2018-19 Annual Report.

6.6 Reporting processes

Statement of Expectation: As part of annual reporting, regulators are expected to report on:

- Current baseline levels of performance targets set in this SoE; and

- *Activities to be undertaken to reach the performance targets and improvements set out in this SoE.*

I also expect these SoE performance targets will be incorporated into the Board's Corporate Plan and that this SoE should be published on the Board's website upon receipt. I expect that by 31 December 2017, the Board will respond to this SoE, outlining how it intends to achieve the performance improvements and targets set out in this SoE. This response should include details of the specific activities that will be undertaken by the Board.

The Vet Board met the requirements to respond to the SoE by 31 December 2017 and to publish key SoE documents. It is taking action to address the targets, with some elements requiring further action as noted through this evaluation. As noted above, the Vet Board's Annual Report covered its progress against the majority of the targets set out in the SoE and response. In terms of a Corporate Plan or equivalent, while the Vet Board has published its revised Vet Board Strategy, and there are some parallels that can be drawn between the SoE and Vet Board's strategies, the SoE targets could be more clearly integrated. Some additional information would need to be included for the Vet Board Strategy to serve as an equivalent to a high-level Corporate Plan.

The Vet Board could also consider other channels, such as its quarterly newsletter or website homepage, to communicate performance achievements or progress updates, especially where these relate to matters directly affecting practitioner registration or handling of professional conduct complaints. For example, when announcing a given action or improvement that benefits practitioners, the Vet Board could note the action also fulfils an obligation agreed to under its SoE.

7 Detailed process evaluation

The analysis for the process evaluation is based on a comparison of the content, process and effect of the Vet Board's SoE and response against the stated requirements and intention of the SoE framework:

- Content - whether the Vet Board's SoE contains the necessary elements under the SoE Framework
- Process - how well the process for developing the Vet Board's SoE and response aligned to the process set out in the SoE Framework
- Effect - whether the Vet Board's SoE and response support improved regulatory outcomes and facilitate reduction of regulatory costs on veterinary practitioners and the community.

7.1 Content

The Vet Board's SoE and response for January 2018 - June 2019 covers the necessary minimum elements under the SoE framework. Targets and actions are covered under the mandatory elements of Timeliness, Risk-based strategies and Compliance related advice and assistance. It covers further targets and actions under the element of Accountability and transparency, and additional expectations under Evaluation and Reporting. Within each expectation, the statement and response are detailed and extensive, and somewhat comparable to statements of expectation issued to larger regulatory entities with wider remits and greater resources in proportion to the Vet Board. For smaller entities like Vet Board, an SoE and response focusing on a lower number of high-value targets may deliver greater overall benefit to both the regulator and regulated community.

7.2 Process

Administrative requirements under the SoE framework were met and there are processes in place for the Vet Board that satisfy the intent of the SoE framework. For example, the department undertakes an annual governance health check for all its regulators and statutory bodies. The Vet Board is covered by this annual governance health check and is able to provide comment on the department's findings. This process requires the Vet Board to come to a view about its own performance and consider how it will respond to any identified improvements, broadly serving the intent of a self-assessment and good regulatory practice plan. However, while this process can inform development of the SoE and response, it cannot fully meet the consultation requirements under the SoE framework. To meet these requirements, the department undertook a consultation with the Vet Board specifically on the development of the SoE and response. For future SoEs, the Vet Board would prefer a more iterative process with additional consultation opportunities, and considers this would foster greater alignment with the Vet Board's regulatory purpose and a greater sense of ownership of the targets and actions. In view of this, the development of the Vet Board's SoE and response could benefit from a more extended engagement and consultation process between the Vet Board and the department. This consideration should inform future Vet Board SoE processes.

7.3 Effect (supporting outcomes)

The Vet Board's SoE and response are well aligned to the SoE Framework's central goal of reducing regulatory burden through better design and stewardship of regulation together with better administration of regulatory processes. The Vet Board has found the targets in the SoE and response useful for identifying key focus areas for action, and generally has found the revised SoE framework to be a more workable and tangible structure than previous SoE approaches.

An additional consideration could be to frame these over-arching objectives of red-tape reduction with reference to the unique public value regulators create through their regulatory purpose. The Vet Board's unique public value is protection of the public by ensuring veterinary practitioners are registered and properly qualified, and by conducting investigations into the professional conduct and fitness to practise of veterinary practitioners. By extension, the objective of improved regulatory design and administration, in Vet Board's case, is to achieve this goal of public protection. Clearly aligning reduction of regulatory burden to achievement of unique public value in this way may better ensure that focus on regulatory purpose is maintained and corresponding public value is created. The SoE framework could more explicitly articulate this aspect of better regulatory design and administration.

Given the Vet Board's limited resources and relatively small remit, the comprehensive and detailed nature of the SoE and response risks being unintentionally onerous. While the Vet Board's SoE and response provide a thorough execution of the framework, an alternative approach could be to focus on a lower number of high-value actions under each element of expectation. This would direct attention towards those actions yielding the highest return on stakeholder benefit for the effort expended, while maintaining proportionality. This should continue to be a factor in developing future SoEs. The SoE framework makes only a limited reference to proportionality in developing SoE letters and responses. It may be of value to give greater prominence to this consideration in the guidance material, to provide departments with greater flexibility in developing SoEs, and to ensure smaller entities are not unduly burdened.

8 Appendix A – Assessment criteria

The development of assessment criteria was based on the objectives of this evaluation, which were derived from the stated requirements and intention of the SoE framework, and were as follows:

- identify actions that could improve the development and design of the Vet Board's next SoE,
- determine how well Vet Board's SoE and response support the Vet Board 's contribution to public policy outcomes, and
- note any observations for consideration by DTF about the operation of the revised SoE framework.

The evaluation made an analysis of the information needed to achieve these objectives, and the questions that would need to be answered to serve those information needs. The analysis considered what would constitute success in terms of the Vet Board meeting its SoE targets, and in terms of the SoE framework achieving its intended outcomes. On this basis the following set of questions was established, which formed the assessment criteria used for the evaluation.

Performance evaluation criteria

TIMELINESS
<ul style="list-style-type: none"> • What changes has the Vet Board made to its communication processes about timeframes? • Has the Vet Board established accountable standard timeframes for addressing enquiries, applications, and complaints? Are the timeframes being met? • Is the Vet Board's Service Charter published? Does it address the key elements of the SoE and encourage stakeholder feedback? • How is the Vet Board measuring its adherence to the Service Charter, or how does it intend to? • How have the Vet Board's websites assets, forms and guidance notes been reviewed to ensure clarity of information on timeframes associated with administrative process and decisions making? • What mechanism is the Vet Board using to ensure parties are updated with outcomes or progress updates of regulatory processes? • Have stakeholders provided any comment or feedback to the Vet Board regarding clarity of decision-making timeframes and the Vet Board's adherence to its Service Charter? • What steps has the Vet Board taken towards implementing its digital innovation plan and other improvements? • Did the Vet Board benchmark existing processing times and to establish a baseline? Has it made an analysis of what parts of its processes tend to cause delays? • What data collection is the Vet Board doing (or planning) to track processing times? • What actions did (or will) Vet Board take to put a data collection system in place to measure time-based burden to stakeholders of completing Vet Board processes? • Has the Vet Board undertaken the review of its public website and forms? What are the outcomes or further actions from the review? • Which application forms that have been transitioned to electronically fillable? Has the 50 per cent target been reached? • Has the Vet Board completed the review of its information management system? What is the outcome or further action from the review? • Has the web-based case management system and portal been implemented? Are there further actions to be taken on implementing the web portal? • Are stakeholders using the web portal for registration and other regulatory processes? Has there been any stakeholder feedback?
RISK-BASED STRATEGIES
<ul style="list-style-type: none"> • Has the Vet Board reviewed its current practices? • What methodology has the Vet Board put in place to identify and assess regulatory risk? • What key priorities has the Vet Board identified based on assessment of regulatory risk? • What risk-based compliance strategies has the Vet Board put in place to address its key priorities? • What are the Vet Board's compliance objectives and principles? • Are the Vet Board's compliance objectives and principles published and readily accessible?

COMPLIANCE RELATED ASSISTANCE AND ADVICE

- Does the Vet Board have a plan in place for reviewing its regulatory process advice?
- Has the initial review of regulatory process advice taken place? What were the findings of the review?
- What is the status of the review of website content?
- What is the status of the review of hard-copy materials? Have any updates been made (or planned) as a result of the review?
- What is the status of the Vet Board's review of existing advice on Professional Conduct?
- Have any focus areas for revision been identified?
- What stakeholder consultation is the Vet Board doing (or planning) as part of its review strategy?
- What methodology does the Vet Board intend to use for its review of current advice material? How will 'appropriate frequency' be determined?
- How does the Vet Board address the issue of ensuring its information, advice and communication is comprehensible to a wide audience?
- How has the Vet Board applied the standards of conduct to its operations?
- What guidance does the Vet Board provide to Members and staff about interpreting and demonstrating alignment with its principles of conduct?
- How does (or will) the Vet Board measure stakeholder feedback against the principles of conduct.

ACCOUNTABILITY & TRANSPARENCY

- Are Vet Board's Board Meeting summaries published?
- How does the Vet Board ensure advice or information is distributed to stakeholders at a time when it will be useful?
- Are the DEDJTR Antimicrobial resistance (AMR) resources available from the Vet Board's website?
- Does the Vet Board's newsletter include content on industry trends and issues, and information on AMR? What additional channels (if any) does the Vet Board have for communicating significant industry developments or issues to stakeholders?
- How does the Vet Board communicate its expectations to its regulated community?
- How does the Vet Board communicate its rationale for statutory decision-making?
- Has the Vet Board made a summary of the findings of the external audit publicly available?
- Has the Vet Board formulated its response to the external audit? Has it published the response on its website?
- Has the Vet Board developed a plan for addressing the findings of the external audit? Has it published the plan on its website?
- What actions did (or will) the Vet Board take to implement the identified improvements?
- Does the Vet Board's Annual Report include results or a progress update against the targets in the SoE?
- Does the Vet Board's Annual Report outline the findings of the external audit and what actions it is (or will be) taking in response?
- When addressing the audit recommendations, what consultation process did the Vet Board use to engage with Red Tape Commissioner [now Office of the Commissioner for Better Regulation], veterinary practitioners, industry stakeholders and the broader community?

EVALUATION

- Does the Vet Board's 2017-18 Annual Report include an update of performance against the SoE targets?

REPORTING

- Does the Vet Board's 2017-18 Annual Report include an update of performance against the SoE targets? Did this include benchmarking of current levels of performance?
- Does the Vet Board have a Corporate Plan (or equivalent)? Are the commitments against the SoE clearly reflected in the Corporate Plan (or equivalent)?
- Has the SoE and response been published on the Vet Board's public website? Does the Vet Board's SoE response outline specific steps to be taken in fulfilment of the SoE?
- Does the Vet Board provide public information on its performance against SoE targets through any other channels?

Process evaluation criteria

CONTENT
<ul style="list-style-type: none"> • Does the Vet Board's SoE and response address the mandatory good practice elements prescribed by the SoE framework? • Does the Vet Board's SoE include elements addressing recommended or suggested good regulatory practice in accordance with the SoE framework?
PROCESS
<ul style="list-style-type: none"> • Did the Vet Board undertake a self-assessment process (or equivalent) as recommended by the SoE framework? • Were the elements of the Vet Board's SoE informed by a good regulatory practice plan or equivalent? • How were the actions in the Vet Board's SoE response determined? • What consultation process was used to develop the SoE and response, including with the Vet Board's regulated community and the Office of the Commissioner for Better Regulation ('Red Tape Commissioner')? • Has the Vet Board reported publicly on its progress against the expectations and targets in its SoE? • Was the SoE issued to the Vet Board in accordance with the SoE framework? • Have the Vet Board's SoE and response both been published on Vet Board's website in accordance with the SoE framework?
EFFECT (SUPPORTING OUTCOMES)
<ul style="list-style-type: none"> • Does the Vet Board's SoE and response articulate the public outcomes it is seeking to support and how this aligns to broader DEDJTR and/or Government objectives? • Does the Vet Board's SoE and response demonstrate a rationale for reduction of regulatory burden and achievement of regulatory outcomes? • Does the Vet Board's SoE and response foster regulatory stewardship? • Is the Vet Board's SoE and response proportionate to the scope of the Vet Board's remit and the scale of its resources? • Does the Vet Board's SoE and response facilitate recognition of the public value created through Vet Board's regulatory activities?



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