



Report: Occupational regulation of teachers – case for reform and functional analysis

To:	Hon Erica Stanford, Minister of Education		
Date:	12/03/2025	Deadline:	21/03/2025
Security Level:	In-Confidence	Priority:	High
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Drafter:	Ruth Cameron	METIS No:	1344037

Why are we sending this to you?

- You have asked for further advice on occupational regulation of the teaching profession and an analysis of functions in the system.

What action do we need, by when?

- This paper seeks your direction on options for grouping occupational regulatory functions to enable us to progress more detailed advice on the form of the entity or entities in which those functions should sit. Please return the signed paper by 21 March.

Key facts, issues and questions

- There is a strong case to reconsider the model of occupational regulation of teachers in New Zealand including who undertakes what functions with what level of independence from government.
- We are seeking your direction on options that group key occupational regulatory functions. This will inform subsequent advice on entity form, including for a possible separate ITE qualification regulator.
- All options have trade-offs. 9(2)(f)(iv)
[Redacted]
[Redacted]
[Redacted]
- Subsequent advice will outline entity form options that could deliver your preferred option(s) in a way that supports your objectives 9(2)(f)(iv) [Redacted]
- We are keen to discuss consultation options and your approach to engaging your Cabinet colleagues with you further 9(2)(f)(iv) [Redacted].

You are seeking to reform occupational regulation to support student achievement

1. Quality and consistency in teacher and leader performance is the key to lifting student achievement.
2. The purpose of regulating the teaching profession is to protect students from the harm caused by incompetence, recklessness or dishonesty. It ensures the workforce has the attributes, skills and knowledge required to deliver the best outcomes for students.
3. We understand your objectives for occupational regulation of teachers are:
 - **increasing teacher quality and competence** to raise student achievement, protect students from harm and maintain public trust and confidence in the teaching profession.
 - **improving quality and consistency in Initial Teacher Education (ITE)** to ensure all teachers are adequately prepared to teach the curriculum in the relevant school or early childhood education setting.
 - **improving the quality and structure of in-service training, development and promotion pathways** to support quality teaching and teacher retention.
 - **supporting alignment** between teaching standards and broader government education policies and priorities, particularly curriculum goals and workforce requirements to support quality teaching.
4. Occupational regulation needs to balance these objectives against the impact regulatory barriers can have on teaching supply.
5. We have recently outlined New Zealand's occupational regulatory system for teachers in comparison to other jurisdictions (METIS#1342713 refers). 9(2)(f)(iv)
[REDACTED]
6. This paper outlines:
 - the problem definition
 - options for regulatory reform, and
 - next steps, timelines and engagement.

There is a strong case to reconsider the regulatory model

7. As previously outlined, (METIS1342713 refers) New Zealand's occupational regulatory model is more profession-led with greater independence from government than many other jurisdictions.
8. New Zealand's regulation of teachers has shifted between government-led to independent and profession-led over the last several decades, yet some of the critical challenges that have driven these shifts remain today. It is timely to reassess, alongside your wider system reforms, whether current settings are fit for purpose and if they are achieving your objectives.
9. As previously outlined, the design (form and functions) of the occupational regulatory system will not solve all the workforce and student achievement challenges facing the system. However, it can support them alongside broader operational changes and help to remove some of the system-level barriers that currently exist to achieving your objectives.

Our system leaves too much to chance in relation to quality teaching

10. New Zealand's devolved education system means that Boards and early childhood education services have significant workforce responsibilities, notably in hiring, performance reviews and dismissals, yet we know they have highly variable human resource capability and limited accountability for teachers' and leaders' performance once in their roles.
11. This accountability sits within the profession-led regulatory model, which operates on the underlying assumption that teachers can set appropriate standards and hold themselves to account for quality. This assumes the profession is sufficiently esteemed to recruit the highest achievers (including through levels of remuneration and working conditions), demonstrates universally high levels of teaching and leadership capability and excellent student outcomes, and is fully committed to exiting non-performers. We do not have all of these conditions and we leave too much chance in relation to teacher quality.

Independence is not achieving its intent to lift buy-in and teaching practice

12. Previous reviews have suggested that teaching practice and status in New Zealand would benefit from teachers' participation in an organisation that is the voice and face of the profession with independence from government. However, creating the space for an independent professional body requires a change in culture in the education sector¹.
13. Despite changes to increase independence, we have not seen an increased culture shift, high buy-in from the teaching profession or a noticeable lift in teaching practice. The Teaching Council does not appear to be a sought out, reliable source of information for public commentary on professional teaching issues and teachers continue to lack engagement with their own Council (voter rates were 8% in 2022 and 9% in 2025 and resistance to paying fees is a continuing theme of objection from teachers themselves).
14. In response to sector demand, Government will continue and expand previous funding for teacher fees and levies in the 2025 Budget. However, without change to the regulatory model, Government will bear a significant proportion of the regulator's cost without the commensurate level of oversight or control.

The Council's functional scope is broad and not well aligned to system priorities

15. The Teaching Council has the broadest scope of functions compared to teacher professional bodies in other jurisdictions. Stakeholders such as the PPTA have long held the view that the Teaching Council should have a narrow set of functions focused on registering and de-registering teachers and investigating misconduct². Its broad scope also raises other issues:
 - **Separation between standard setting functions:** There is limited alignment to broader education priorities and policies which largely sit with the Ministry for Education. Current legislative powers limit the Minister's ability to require this alignment.
 - **Duplication of functions:** Professional leadership, including education research, developing best practice and general advocacy for the profession has been identified in reviews as a crowded field and one where too few opportunities are taken for collective effort³. It is also the area where the Teaching Council has historically been criticised for not having a distinctive brand or effective public voice.

Initial Teacher Education regulation is not meeting sector expectations and needs

16. ITE outcomes have been a long-standing area of concern with stakeholders. As we have briefed you on previously, many new teachers enter the workforce underprepared and

¹Winter, Baker, Aitken and Morris (2012). *Review of the New Zealand Teachers Council. A Teaching profession for the 21st Century*.

² [No Frills Teaching Council Needed](#) – PPTA. 6 March 2025.

³ Winter et al (2012). *Review of the New Zealand Teachers Council. A Teaching profession for the 21st Century*
The NZ Initiative (2023). [Who Teaches the Teachers?](#)

lacking confidence in critical areas⁴. We consider that an effective ITE system should set clear and specific standards and have a robust system of programme approval and monitoring, including of graduate outcomes. This could more effectively promote alignment at a national level between training, curriculum and workforce requirements, which is one of your key reform objectives.

17. We see two main challenges in relation to ITE quality assurance:

- **High-level and unaligned standard setting:** ITE standards, and the professional standards that underpin them, are comparatively less clear than other jurisdictions about the appropriate skills, knowledge, and attributes required of teachers and do not describe specific acts of teaching that can be directly observed⁵. We consider standards need to be more closely linked to expectations of teachers in the workplace, including employers' needs, and to government priorities, particularly in curriculum and assessment. Further, assessment against these standards should be consistently and appropriately applied.
- **Quality assurance regulatory powers lack teeth:** Quality assurance tools available to the Teaching Council to address issues in ITE provision are limited. For example, they do not have an explicit power permitting them to require information or undertake site visits to perform the on-the-ground monitoring of ITE programmes in the way as NZQA has powers to do for tertiary provision. Locating standard setting, programme approval and some quality assurance functions together with one entity also may not take advantage of possible healthy regulatory tensions.

18. NZQA and the Vice Chancellors Committee/CUAP (for university programmes) have an important role in ensuring national tertiary qualification consistency in addition to the ITE-specific role of the Teaching Council. However, given the number and diversity of ITE programme offerings, and the multiple oversight agencies involved, there is a risk that these programmes are not analysed with appropriate rigour. It has been noted that a smaller number of providers being monitored through a clearer system of accountability would be more effective, as well as a more consistent and meaningful approach to measuring graduate outcomes⁶. Having multiple agencies involved means information flows, coordination of processes and reporting, and clarity of roles and functions is critical.

We are seeking your direction on regulatory reform options

19. We have developed three options that build on the functional groupings map (see Annex 1). All options present a significant change from the status quo where all functions sit with the Teaching Council as a profession-led regulator established in legislation. They are:
- **Option 1 - Split model:** functions split between MoE and a new highly streamlined occupational regulator with a closer relationship to government e.g. Crown Agent or Crown Entity. This is not a profession-led regulator.
 - **Option 2 - Centralised model:** all regulatory functions held by MoE.

⁴ Winter et al (2012). *Review of the New Zealand Teachers Council. A Teaching profession for the 21st Century*
The NZ Initiative (2023). [Who Teaches the Teachers?](#)
Post Primary Teachers Association (2022). *Initial Teacher Education: Is it fit for Purpose?* AC paper - NCEA
Change Package update
NZEI, [Initial Teacher Education 2040](#) (2022).
Ready, set, teach: How prepared and supported are new teachers? Education Review Office (2024).
Teaching and Learning International Survey of New Zealand, Ministry of Education (2018)
Fit for purpose: Teachers' own learning experiences and lessons about standardisation from the health sector.
NZIER (2024)
Royal Society, Pāngarau Mathematics and Tauanga Statistics in Aotearoa New Zealand (2021) - Drawing on
TIMSS data from 2019

⁵ The NZ Initiative (2023). [Who Teaches the Teachers?](#)

⁶ Timperley, H, Mayo, S (2016). [Think Piece on Education Accountability](#), commissioned by the NZ Treasury

- **Option 3 – New occupational regulator model:** New streamlined regulator located closer to government with a closer relationship to government e.g. Crown Agent or Crown Entity. This is not a profession-led regulator.
20. All options separate what we previously classified as optional functions (i.e. professional advocacy, best practice research and professional leadership) from core regulation functions. Further advice will be provided on how these needs can be met across the system. Some are likely to already be occurring elsewhere (e.g. advocacy for the profession), others will need more consideration (e.g. disseminating best practice and research).
 21. Any future system design will need to include strong feedback loops and information sharing between entities, which are more important in models where related functions are split between entities but arguably require significant work.
 22. All options have trade-offs. Our initial assessment against the criteria points towards progressing option one and/or three to the next stage of analysis on entity form:
 - Option one gives you the greatest ability to prioritise integrating standard setting functions across the education system, with appropriate government oversight, and achieving alignment with likely schooling and ECE directions, with some tension between standard setting and assurance functions introduced.
 - However, if you wish to retain a single occupational regulator, in-line with most other jurisdictions and not split functions (with the associated efficiency and effectiveness gains) then you would likely choose option three, with work needed on an appropriate entity form e.g a Crown Agent or Crown Entity, not a profession-led regulator.
 - Option two wouldn't be aligned with likely broader system reform to move assurance functions out of the Ministry and risks losing the priority and focus occupational regulation needs to achieve its objectives.

There is an additional option to carve-out a separate ITE qualifications regulator

23. We have clustered the functions of approval of programmes and ongoing monitoring and quality assurance of programmes together as 'qualifications regulation', and identified that under any of the functional splits, there is an option to have an entity separate (from either the Ministry or the overall occupational regulator) responsible for these activities. The rationale for a potential split for these functions is two-fold:
 - To potentially introduce additional rigour into the system by splitting out standard-setting functions from assurance against those standards.
 - To potentially benefit from a narrower focus and deeper expertise by strictly directing a quality assurance entity to focus on the provision of ITE against independent standards.
24. However, depending on decisions as to how functions should be distributed, this could lead to more complexity and potential duplication of work for providers, with associated pushback from the sector. There is also a risk the standard-setter loses touch with realities of delivery and feedback loops will be critical to making this work.
25. We are seeking your direction on whether you would like advice on a separate qualifications regulator, and the levers and powers it requires to be effective, noting that:
 - Further work is required on if the return justifies the cost and efficiency trade-off under Option 1 given it will result in three entities involved in occupational regulation.
 - Given the primary benefit of option two is cohesion, you would likely not progress a separate qualifications regulator under this option.
 - A separate qualifications regulator could introduce healthy tension and further shift option three from the status quo.

Next steps, timelines and engagement

26. Reform to the occupational regulatory system for teachers is a significant work programme 9(2)(f)(iv)

27. The next stage of advice on occupational regulation will cover entity form and functions together i.e., how best to design the form of entities to deliver the functions assigned to them, including for a qualifications regulator if requested. As per this paper, this will sit alongside advice on broader regulatory system reform so that you can consider changes to the form and functions of entities across the entire system.

28. We will also provide you with advice on how to improve the operation of functions within the system to ensure we are meeting your objectives i.e. do you have the right tools and levers. We consider the challenges with the regulatory system will not all be resolved by simply lifting and shifting existing functions to another entity. This work to review functions is also necessary regardless of the form of the future regulatory entities. Some of the changes that will be required will be operational and funding, but others might require an enabling regulatory framework e.g. ITE quality assurance powers.

29. 9(2)(f)(iv)

Consultation should be prioritised, if feasible within your proposed timelines

30. 9(2)(f)(iv)

, we recommend consultation is undertaken.

31. The challenge with full public consultation is timing. For an Education System Reform Bill (ESRE) to be introduced to Parliament in December 2025, substantive Cabinet policy decisions are required by the end of July 2025 to allow time for drafting, as this will be a highly complex bill. Targeted sector consultation will be more manageable but will likely attract criticism, especially given it will likely be undertaken late in the policy process. We consider consultation would assist in improving the feasibility of any policy proposals; in particular identifying key risks and potential mitigations, implementation considerations, and ensuring the overall design is fit for purpose.

32. Alternatively, you may wish to progress work without any consultation; this would leave the Select Committee process as the main avenue for the public and education sector to express their views. This would mean a full Select Committee process of six months may be more important. This option would likely be subject to significant criticism from the sector, however, it would enable you to prioritise developing your detailed proposals over the next three months, while still taking into account previous feedback the public and sector have provided to the Ministry over other consultation exercises. 9(2)(g)(i)

33. In our indicative timelines below we have assumed a period of highly targeted engagement with key stakeholders on detailed policy proposals. 9(2)(f)(iv)

What – key themes of advice/analysis	Indicative timeline
Possible STR discussion – option 1	1 April
Entity form analysis for chosen option	Early April
ITE QA future functions framework	Early April

What – key themes of advice/analysis	Indicative timeline
In-service training and oversight future functions framework	Mid – late April
Professional leadership, advocacy and research functional advice	Early May
Possible STR discussion – option 2	13 May
Overall MOG and Fiscal impacts reports	Early May
SOU ahead of consultation	21 May <i>TBC if required and interplay with STR discussion</i>
Cabinet ahead of consultation	28 May
Targeted consultation	9 – 27 June (~3 weeks)
Brief on final policy decisions	17 – 11 July
Final policy decisions SOU	23 July
Final policy decisions Cabinet	28 July

Risks

34. Although there are risks to proceeding with this proposal, there are significant opportunity costs from not proceeding, including the ongoing impact on student learning from inconsistency in teaching and leadership practice. We consider that these risks can be balanced against the benefits from proceeding:

- Stakeholder push-back: Stakeholders are likely to be strongly opposed to any option that shifts control away from the profession and places responsibilities for occupational regulatory functions within government. This was the strong view in our previous consultation on the 'lift and shift' and is noted in previous work on this topic.
- Effectiveness: As noted above, we do not consider that lifting and shifting existing functions between entities will be effective at meeting your objectives. Subsequent advice will consider broader changes, both regulatory and operational, that will be required to support more effective operation of the regulatory system.
- Capability and capacity: Any options that move functions away from the Teaching Council into other entities (whether newly established or existing) will require significant capability and capacity building in areas that will most likely be completely new for these entities. We note that organisational performance, and its leadership, has as much impact on the operation of the regulatory system as where the functions sit or how strong the regulatory framework is.
- Fiscal: There will be financial implications associated with machinery of government changes and advancing this proposal without budget funding is a risk. Future advice will consider financial implications and outline likely budget implications 9(2)(f)(iv) [redacted]. Early engagement with Treasury will also be important.

Next Steps

35. We intend to discuss this report with you at the next available opportunity 9(2)(f)(iv) [redacted]. We ask that you return the paper as soon as possible ahead of any meeting.

Annexes

The following are annexed to this paper:

Annex 1: Occupational regulation 9(2)(f)(iv) Functional coherence analysis

Recommended Actions

The Ministry of Education recommends you:

- a. **agree** the policy problem and objectives for occupational regulation reform for teachers 9(2)(f)(iv) as outlined in this brief, which will shape future advice.

excellent paper

Agree / Disagree

- b. **indicate** which option or options you wish to receive further advice on in Annex 1.

Agree / Disagree

- c. **note** subject to your direction, the next brief will provide advice on the form of the entity or entities in which those functions should sit, including a possible qualifications regulator.

I want to consider if regulator could sit within FRO. sep entity is costly + timely.

OPTION 1

Noted

- d. 9(2)(f)(iv)

Noted

Proactive Release:

- e. **agree** that the Ministry of Education release this paper once Government has made final decisions on reform to teacher occupational regulatory settings, with any information needing to be withheld done so in line with the provisions of the Official Information Act 1982.

Agree / Disagree

Jennifer Fraser
Jennifer Fraser

General Manager

Te Pou Kaupapahere

___/___/___

Erica Stanford
Hon Erica Stanford

Minister of Education

28/3/2025
___/___/___

Occupational regulation 9(2)(f)(iv): Application of functional groupings to options

	Option 1 – Split model; functions held by MoE and a new occupational regulator			Option 2 – Centralised model; functions held by MoE			Option 3 – New occupational regulator model; streamlined and closer to government		
	MoE	Occ reg	Quals reg	MoE	Occ reg	Quals reg	MoE	Occ reg	Quals reg
Setting standards for the profession (including professional development requirements)	✓	✗		✓	✗		✗	✓	
Setting standards for qualifications (ITE standards)	✓	✗		✓	✗		✗	✓	
Setting conduct and competence requirements (i.e. code of conduct or professional responsibility)	✓	✗		✓	✗		✗	✓	
Approval of ITE qualifications	✗	✓	?	✓	✗	?	✗	✓	?
Quality assurance and ongoing monitoring of ITE	✗	✓	?	✓	✗	?	✗	✓	?
Registration and certification (keep the records and assure standards have been met)	✗	✓		✓	✗		✗	✓	
Discipline, compliance and competence	✗	✓		✓	✗		✗	✓	
Professional leadership, professional advocacy, developing best practice and research*	?	✗		?	✗		?	✗	
Supporting development of education leaders	✓	✗		✓	✗		✓	✗	
	Most like England (if you include a carveout for ITE QA)			Most like Singapore (excluding a carveout for QA)			Most like NSW or Ontario depending on entity form		

*There are several related functions grouped together here which would likely be split in a reformed model – subsequent advice will break these down and provide options for where they sit across the broader system.

Occupational regulator

- Under options one and three the occupational regulator is not a profession-led regulator like the Teaching Council is now. It will be closer to government e.g. a Crown Agent or Crown Entity.

Qualifications regulator

- All options include a possible carve-out for a separate qualifications regulator.
- This could bring additional healthy tension between standard-setting and assurance but has efficiency and effectiveness considerations.
- Further advice will be provided on this option in the next stage if requested, alongside entity form analysis.

Occupational regulation across schooling and ECE: Options assessment and recommendations

Option 1 – Split model; functions held between MoE and a new occupational regulator	Option 2 – Centralised model; functions held by MoE	Option 3 – New Occupational regulator model, a streamlined regulator located closer to government
<p>The new highly streamlined occupational regulator with a different (closer) relationship to government e.g. Crown Entity or Agent.</p> <p>Impacts of an optional separate ITE qualifications regulator noted but not included in ratings</p>	<p>Separation will be built in for quasi-judicial functions e.g. independent panels and tribunals.</p> <p>Impacts of an optional separate ITE qualifications regulator noted but not included in ratings.</p>	<p>The new streamlined occupational regulator with a different (closer) relationship to government e.g. Crown Entity or Agent.</p> <p>Impacts of an optional separate ITE qualifications regulator noted but not included in ratings.</p>
<p>✓✓</p> <ul style="list-style-type: none"> Increases role clarity for Ministry and regulator. Improves ability to meet government's expectations through direct ownership of standard-setting 9(2)(f)(iv) 	<p>○</p> <ul style="list-style-type: none"> Decreases role clarity for the Ministry as adds significant new functions into a large agency, including regulatory assurance functions 9(2)(f)(iv) However, improves ability to meet government's expectations through direct ownership of standard-setting. 	<p>✓</p> <ul style="list-style-type: none"> Increases role clarity through streamlining functions of the occupational regulator and establishing a new structure with a coherent and consistent relationship to government Improves ability to meet government's expectations but not as directly as direct ownership of standard setting.
<p>✓</p> <ul style="list-style-type: none"> Integrates standard setting across system 9(2)(f)(iv) Splitting functions across two (or potentially three) agencies reduces cohesion across the occupational regulatory system. 	<p>✓✓</p> <ul style="list-style-type: none"> Integrates standard setting across system 9(2)(f)(iv) Retains a single body responsible for all occupational regulation functions, comparable to most jurisdictions. 	<p>✓</p> <ul style="list-style-type: none"> Retains a single body responsible for all occupational regulation functions, comparable to most jurisdictions. Will not integrate standard setting across system 9(2)(f)(iv) but can align it through entity design and implementation.
<p>✓</p> <ul style="list-style-type: none"> Introduces tension between standard-setting and assessment against standards. Further tension if a separate qualifications regulator is established. 	<p>○</p> <ul style="list-style-type: none"> Doesn't introduce tension any more than status quo unless a separate qualifications regulator is established. 	<p>○</p> <ul style="list-style-type: none"> Doesn't introduce tension any more than status quo unless a separate qualifications regulator is established.
<p>✓✓</p> <ul style="list-style-type: none"> Greater oversight of standards and the ability to set the appropriate oversight of approvals and assurance functions separately to standard setting functions. 	<p>■</p> <ul style="list-style-type: none"> Greater oversight of standards. However, assurance functions could lose important separation and reduced focus. 9(2)(f)(iv) 	<p>✓✓</p> <ul style="list-style-type: none"> New regulator would be designed to provide greater oversight of standards though not directly. 9(2)(f)(iv)
<p>■</p> <ul style="list-style-type: none"> Splitting functions is more costly and complex operationally requires significantly improved information sharing and collaboration to work effectively. Requires significant capability build in the Ministry, and risk of losing focus within a larger entity, which could impact effectiveness. More complex if you bring in a qualifications regulator; reduces efficiency. 	<p>■</p> <ul style="list-style-type: none"> Requires more significant capability building in the Ministry and may risk diluting the focus on occupational regulation, as it will compete for resource and priority with all other Ministry functions. However, less complex and reduces inefficiency risks from splitting functions. More complex if you bring in a qualifications regulator; reduces efficiency. 	<p>○</p> <ul style="list-style-type: none"> Some implementation cost but less significant capability build assuming builds on the status quo and once completed more operationally efficient. More complex if you bring in a qualifications regulator; reduces efficiency.
<p>This option prioritises standard setting functions across the system, with appropriate government oversight, and alignment with 9(2)(f)(iv)</p> <p>Under this option, further work is needed on if the return from a qualifications regulator warrants the cost and efficiency and effectiveness risks given it would create three entities.</p>	<p>We do not recommend this option as it 9(2)(f)(iv) risks losing the priority and focus occupational regulation needs to achieve its objectives.</p> <p>The primary benefit of this option is cohesion and therefore you would likely not introduce a separate qualifications regulator.</p>	<p>If you want to retain a single streamlined occupational regulator in-line with most other jurisdictions and not split functions (with the associated efficiency and effectiveness gains) then you would choose this option.</p> <p>Under this option a separate ITE qualifications regulator could introduce healthy tension that further shift this from the status quo.</p>
<p>Progress:</p> <p>Yes / No</p> <p>If Yes then provide advice on an ITE qualifications regulator option:</p> <p>Yes / No</p>	<p>Progress:</p> <p>Yes / No</p> <p>If Yes then provide advice on an ITE qualifications regulator option:</p> <p>Yes / No</p>	<p>Progress:</p> <p>Yes / No</p> <p>If Yes then provide advice on an ITE qualifications regulator option:</p> <p>Yes / No</p>



Assumptions



Reflects regulatory best practice - includes entity role clarity



Integrates similar functions to support system coherence



Creates healthy tension between functions



Supports appropriate oversight



Is operationally practical, cost effective and efficient



Assessment

Previously provided slide on functional groupings

[IN-CONFIDENCE - INTERNAL ONLY]

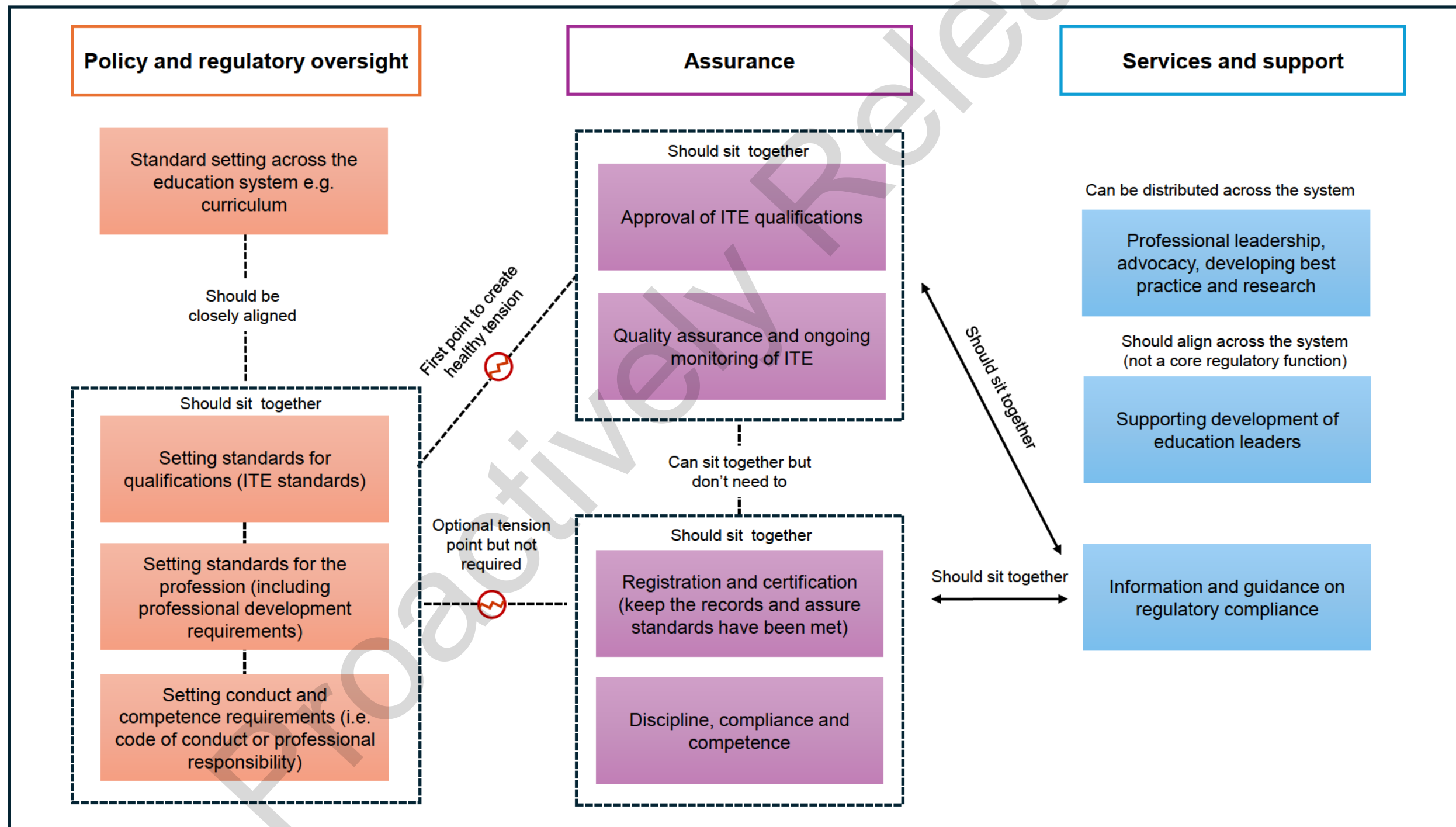
DRAFT NOT GOVERNMENT POLICY

We have developed criteria to inform which functions should be kept together, and which should be kept apart, but some criteria conflict and judgement calls need to be made



Key choices

- There are two points where you could choose to create tension, but these need to be weighed up against the cost effectiveness and efficiency of splitting functions across multiple entities and the need to ensure appropriate oversight.
- There are three standard setting functions that should sit together to create cohesion and system coherence, how close these sit to broader standard setting functions across requires weighing up against appropriate oversight and regulatory best practice criteria.



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