



SEPARATE 'REGULATION AND CONDUCT' WEBSITE

STATUS

1. The paper is OPEN and can be published subject to the reaction of text highlighted in yellow.

EXECUTIVE SUMMARY

2. The purpose of this paper is to explore the suggestion of a separate regulatory website and to provide implementation options while identifying associated opportunities and threats.
3. The Regulation landing page (icaew.com/regulation) receives between 55,000 and 65,000 unique visits per month. The full Regulation area of the site receives many more. These are largely sourced (65%) from a direct approach – either by going directly to the landing page (likely a previously known and saved link) or via a search engine such as Google. Other visits are largely driven by clicking a link in our communications or from a search (25%) within ICAEW.com.
4. Establishing a new online presence could potentially provide a greater understanding of the independence of regulatory and conduct work. [REDACTED]
5. There are risks with a new website including;
 - Confusion: it is estimated that it will take 3-5 years, among our communities to establish the location of key information, including having two sites to provide a full range of content, resources, and functions.
 - Negative user experience: more clicks to find content as users will need to visit more than one site or use links to find content.
 - Split resources: certain activities, such as payment, may have to remain on ICAEW.com. Users will also lose access to the Technical Advisory Services helpline, help-sheets and chat bot unless we can identify a way to replicate this service for firms.
 - Search engine results may be affected: There is no guarantee that a campaign to promote a new site will successfully ensure that direct visits will shift away from ICAEW.com in a reasonable time frame. ICAEW experience elsewhere with new sites has been that initial results are poor and a long term campaign over many years is required.
6. An initial and exploratory phase, a 10-15 page brochure site, using current naming conventions and branding, could achieve a form of independent online presence and share information about regulation, conduct and the ICAEW Regulatory Board. Such an approach also gives us the opportunity to 'test the theory'.
7. To go beyond a brochure site would be a much more ambitious step. Benefits of such an approach remain unclear. A much larger site, new name and brand, resources and digital functions would require a programme of work and various project streams, new and more dedicated resources, and further budget.

8. As identified by our external brand advisers, we would need to take care that a new site and brand does not suggest to the public and the regulated communities that there is a systemic problem with the current set-up which needs to be addressed in this way.
9. A mid-level or phased approach is not recommended. This approach will lead to an increased negative user experience while there is a period of changeable dual websites. This will not help to build trust, user experience or engagement.

RECOMMENDATION

10. Develop and launch a brochure site during 2023/24 using existing brand and name to make clear the separation from ICAEW membership and representative activities and allow time to explore the impact of a new website.

BACKGROUND

11. Regulation (Appendix 1) appears as a main menu option on ICAEW.com: The regulatory content is clearly separated from membership, students, other representative activities, and communities. It also has its own distinct uniform reference locator (URL) - [icaew.com/regulation](https://www.icaew.com/regulation) – which is used on PSD materials.
12. The Professional Standards' Department (PSD) manages the content and promotion of this Regulation area of the ICAEW website.
13. The regulated community of firm representatives, insolvency practitioners and affiliates also benefit from many of the resources supplied by the representative element of ICAEW e.g., help sheets and webcasts. These resources, some of which are developed by PSD, are stored in the Membership, Resources and Community areas of the website. As applicable, these resources are linked from and to the Regulation web pages and documents.
14. The ICAEW Regulatory Board is referenced on the landing page for Regulation. This reference links to a full web page of information including details of the establishment of the IRB, key topics, terms of reference and board members. This page is also accessible using the quick link URL - [icaew.com/irb](https://www.icaew.com/irb).
15. Our regulatory role and governance structure is also explained on the landing page for Regulation as:
“Our role as an improvement regulator is to strengthen trust in ICAEW Chartered Accountants and firms. We do this by enabling, evaluating and enforcing the highest standards in the profession. ICAEW’s regulatory and conduct roles are separated from ICAEW’s other activities through internal governance so that we can monitor, support or take steps to ensure change if standards are not met. These roles are carried out by the Professional Standards Department (PSD) and overseen by the ICAEW Regulatory Board (IRB).”
16. [icaew.com/regulation](https://www.icaew.com/regulation) has c300 core web pages and further supporting content and report based pages. This does not include the linked resources in the representative area of icaew.com.

A new website

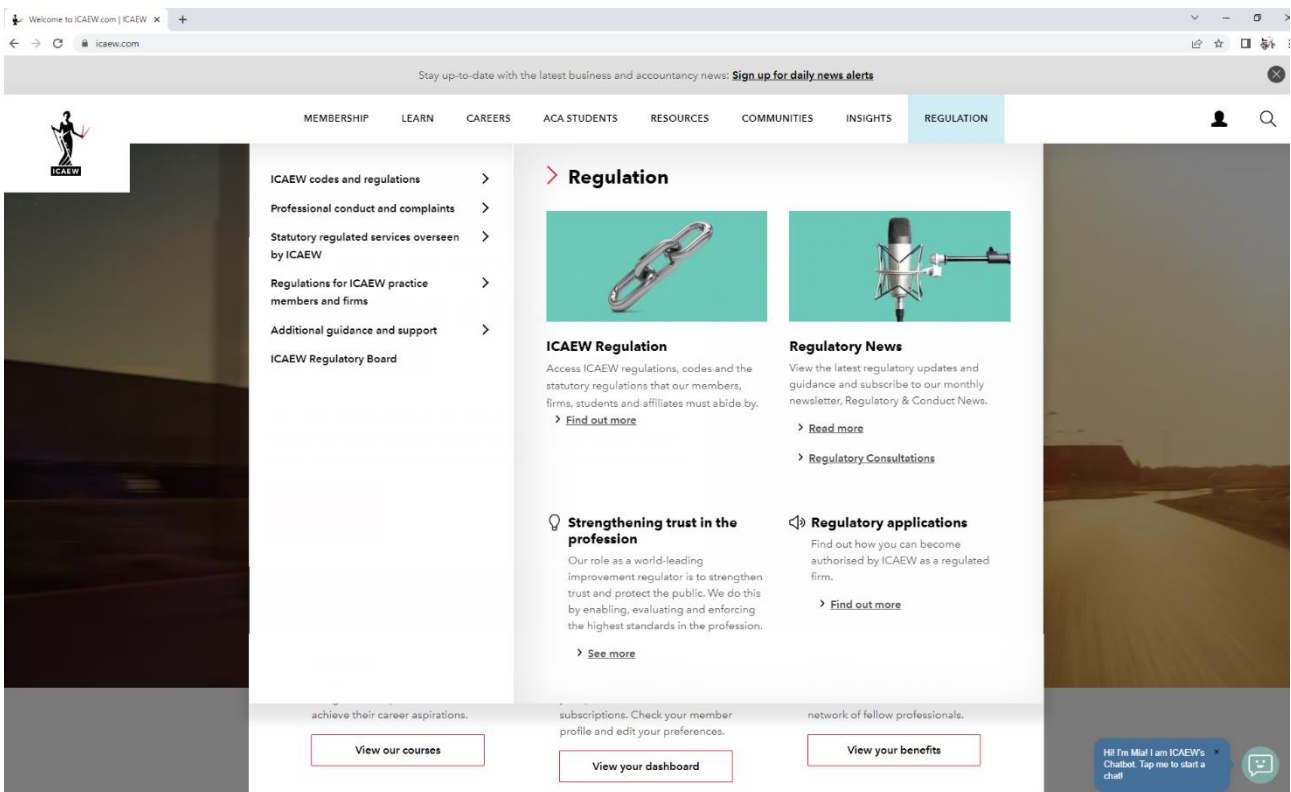
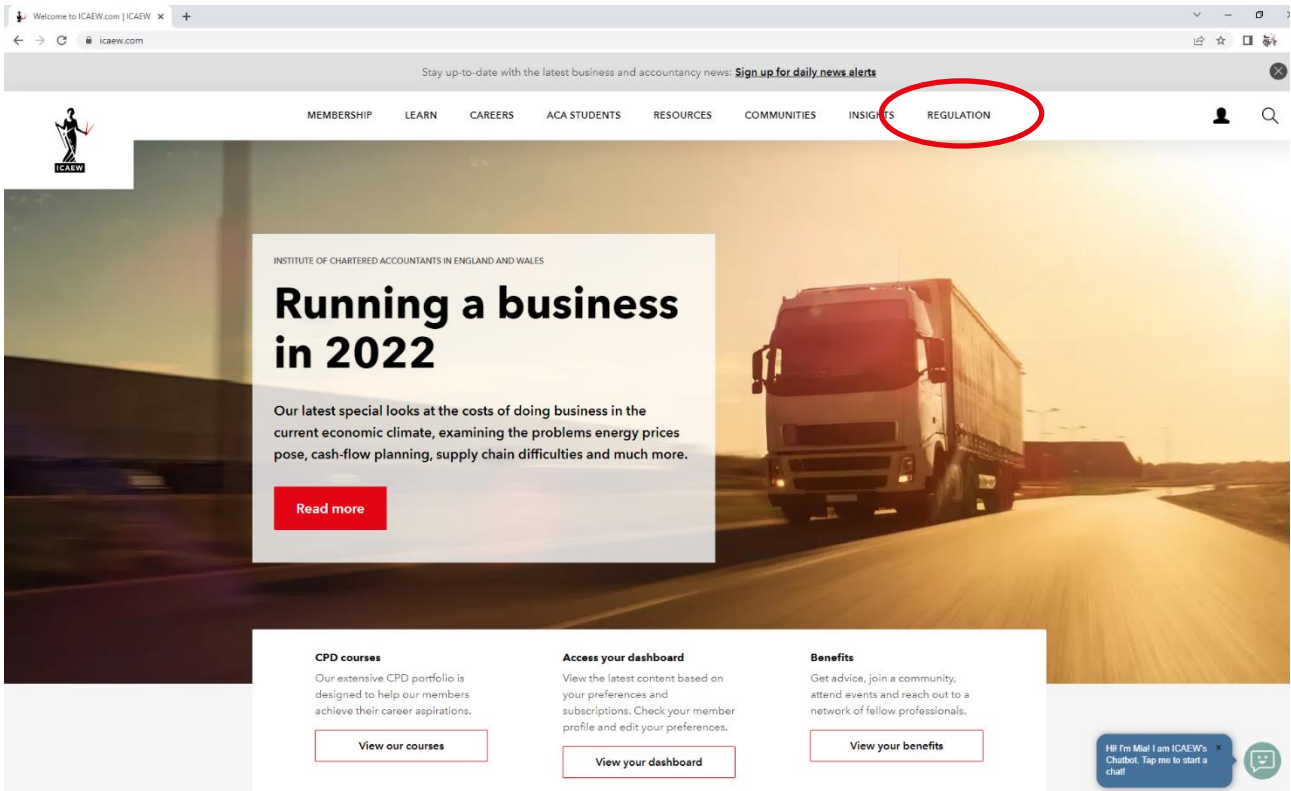
17. The creation of a new and separate website for Regulation would be delivered by way of a structured project including making clear the business objective, goals, targets and what good looks like.
18. A new website can appear in a number of forms (see Appendix 1):
 - Small brochure site.
 - Mid-sized site, with many links back and from ICAEW.com (not recommended).
 - Standalone site, a complete rework of the majority of the content, maintaining much lighter links to ICAEW.com and putting in place its own more sophisticated functions such as databases, complaints process, search and payment functions.

19. A new site provides the potential for clarity; a new name for the regulatory function and a new and distinctive brand, illustrating and demonstrating independence. However, it is judged that a new website also introduces risks and will not in itself be considered by government agencies or oversight bodies as an enhancement of existing governance related to independence.
20. A new website also creates risk, including:
- Transition: The period of change and users becoming accustomed and directed to the new website could be long, potentially 3-5 years. Users of the website often travel to pages via a Google search. Such search results are driven by volume of traffic and there is a high volume history of users accessing ICAEW.com.
 - Staff: Much of any change work will fall to the already stretched PSD communications and projects teams, they have activities planned and therefore little capacity for more in 2023. To recruit new staff and bring them up to speed would take 3-6 months. Further support will be required from technical and digital teams.
 - Competition: Any new site will be in competition with the much larger ICAEW.com.
 - Members: Many ICAEW members, as firm representatives, do not have expertise in distinguishing between representative and regulation functions, often confusing the two. In part this is because of the strength and depth of the focus on membership at ICAEW.com.
 - User experience: Change introduces disruption e.g., is a complaint related to a regulated firm matter or an ICAEW member? Do you on ICAEW.com for the audit and assurance content but ICAEW regulation is on a separate site with its own name.
 - Perception: Is membership of the restructuring and insolvency community a member benefit, as it sits on ICAEW.com, or is it a benefit associated with a regulatory registration? Are ICAEW having to make a radical change because of a problem with regulation?
 - Shared functionality: Does a firm pay its regulatory fees using the new website or ICAEW.com Where is information for a firm about paying in bulk for its member fees, practising certificate / practice assurance fees, and regulatory affiliate fees?
 - Website systems and security: Functionality for searchable databases and payments reside on ICAEW.com, this would drive user traffic away from the new website. Cyber-security is a key consideration, and any new website would need its own and regular security assessments and testing.
 - Reduced benefits/resources for regulated community: The support provided by the Technical Advisory Services team including an online chat bot, helpline and help-sheets, this could be in part lost. New website content would need to sign-post valuable thought leadership content, again taking users back to ICAEW.com
21. Such risks are not insurmountable but potentially complex and expensive to address. Functions and resources may need to be replicated or links between sites maintained. This is a much larger programme of work, and more so if the rebrand exercise is included.
22. The operational priorities and planning for 2023 is largely already in place. CPD, the disciplinary framework, the IRB/PSD annual report etc have all been planned into the first half of the year and around a very busy core set of regular communication and project activities.
23. As a project, almost any goal can be achieved if there is adequate resource, budget and time and, where there is a clash of priorities, a piece of work is moved to the front of the queue.

Costs

24. A high level estimate to establish a 'brochure', small, new website is 5-6 months, £40k external costs and the need for part time support from 5-6 PSD/ICAEW staff.
25. A high level estimate of establishing a standalone website with a range of content similar [icaew.com/regulation](https://www.icaew.com/regulation) including some of the existing functionality e.g., as related to registers, search function etc is 12 – 18 months, £250k - £350k external costs, and the need for considerably more and dedicated time from 6 - 8 ICAEW staff.

Appendix 1



Regulation current content structure – [icaew.com/regulation](https://www.icaew.com/regulation)

Descriptor of role and governance structure

Regulatory and conduct news

Access the latest regulatory and conduct news in the [regulatory and conduct news hub](#) and follow the [Regulation & Conduct LinkedIn page](#).

Read the [ICAEW Regulatory and Conduct Annual Report 2021-2022](#).

Access more information about the [ICAEW Regulatory Board](#).

Regulatory consultations – [have your say or view regulatory consultations](#)

ICAEW Codes and Regulations

Charter and bye-laws

Code of Ethics

Membership requirements

Complaint and disciplinary regulations (shortly to be expanded to explain the new disciplinary framework)

Qualification regulations / Training regulations

Professional conduct

Complaints

Hearings, orders and decisions

Disciplinary records search

Guidance on your duty to report misconduct as an ICAEW member

Complaints process

What to do if you receive a complaint against you/your firm

Your firm's duty to investigate complaints

Statutory regulated services overseen by ICAEW

- Anti-money laundering supervision
- Audit
- Local Public Audit
- Probate and estate administration
- Insolvency
- DPB (Investment Business) licence
- Consumer credit
- Quality assurance monitoring

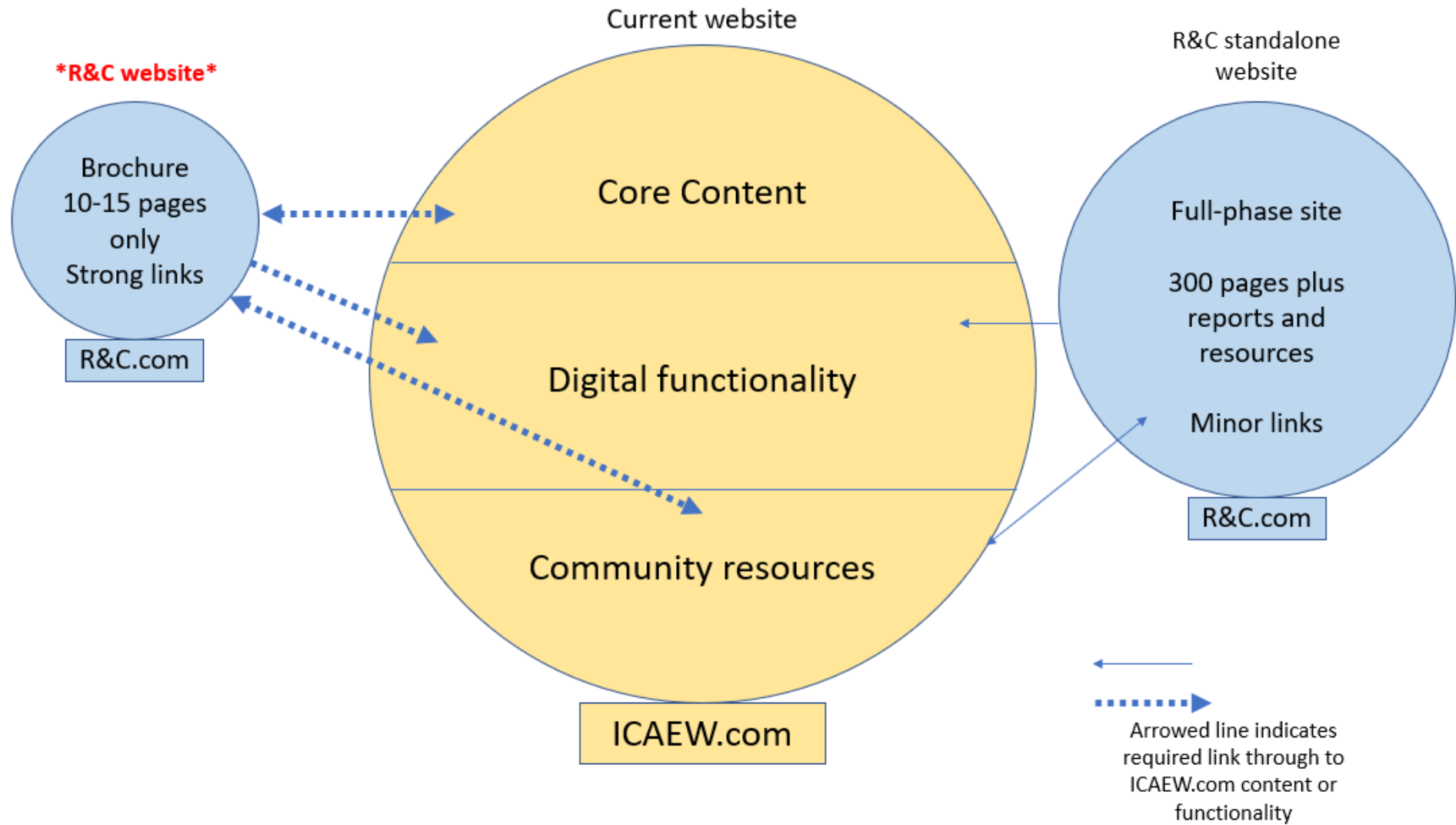
Regulations for ICAEW practice members and firms

- Practice Assurance scheme
- Licensed practices
- Practising certificates
- Professional Indemnity Insurance (PII)
- Clients' Money Regulations
- Taxation (PRCT) Regulations

Additional guidance and support

- Practice management
- Educational films
- Helpline
- Helpsheets
- CABA
- Regulatory applications - information about the application process for regulated areas of work and the application forms.

Appendix 2



Appendix 3 – activities and timetable to implement a new, small ‘brochure’ website

Assuming no new name for the department and no re-branding

5 – 6 months and £40k excluding staff time, contract staff may be required, increasing this budget

HIGH LEVEL ACTIVITIES

An estimated initial list, it's likely that others will be identified as a project is launched

- Identify the objectives, targets and 'what does good look like?'
- Identify domain name for new website
- Hosting and cyber-security of new site
- Plan structure of new site including pages, content and supporting information
- Review and re-plan document, page, and functional links
- User experience review and plan for site
- Amend references to icaew.com
- Amend references to department name on content web pages
- Establish new site using external experts
- Populate site with content
- Adjust ICAEW.com pages and links to new site
- Soft launch of site
- User experience review part 2
- Full launch of site to live
- Promote new site including via Google search

BROAD TIMINGS

Objectives

Domain name

Hosting and security

Plan structure of new site

Plan change to ICAEW.com

UX part 1

Amend ICAEW.com

New site

Populate site

Links

Soft launch

UX part 2

Launch

Promotion

TIMELINE

Total time estimate at 5 to 6 months

Budget £40k excluding any staff costs

Internal staffing requirement 6 as project demands: Project mgr, comms, digital, publishing and content mgt, brand and IT

Appendix 4 – activities and timetable to implement a fully separate ‘standalone’ website

12 – 18 months and £250-350k

HIGH LEVEL ACTIVITIES an estimated initial list, it’s likely that others will be identified as a project is launched

- Identify the objectives, targets and 'what does good look like?'
- Recruit new team members / contractors to deliver project
- Department name and brand
- Brand review for application to systems, web pages, documents – including agency support
- Re-brand outward facing systems and documents (assuming no retrospective approach)
- Re-brand inward facing set-up
- Identify domain name for new website
- Hosting and cyber-security of new site
- Plan structure of new site including pages, content and supporting information
- Review and re-plan document, page, and functional links
- Plan change to functionality and linked systems
- User experience (UX) review and plan for site
- Amend references to icaew.com
- Establish new site using external experts
- Populate site with content
- UX part 2
- New functionality
- Systems integrations i.e., where back office systems support website activities
- Adjust ICAEW.com pages and links to new site
- Web and system links
- Soft launch of site
- User experience review part 2
- Full launch of site to live
- Promote new site to all stakeholders and continue to do so
- Promote new site via paid Google activities to bring to top of the search results

BROAD TIMINGS

Objectives

Recruit new team members

 Name and brand

 Brand review

 Re-brand external

 Re-brand internal

Domain name

 Hosting and security and security

Plan structure of new site and full functionality

 Plan change to ICAEW.com

 Plan change to functionality and linked systems

 UX part 1

 Amend ICAEW.com

 New site

 Populate site

 UX part 2

 New functionality

 Systems integrations

 Content links

 Web and system links

 Soft launch

 UX part 3

 Launch

 Promotion to stakeholders -->

 Paid Google promotion -->

TIMELINE

Total time estimate at 12 to 18 months

Budget £250k-£350k excluding any staff costs

Dedicated and other internal staffing requirement 10 as project demands: Project mgr, comms, digital, publishing and content mgt, brand and IT

Appendix 4 – project justification and considerations pre-build

The ICAEW project toolkit guides:

EXECUTIVE SUMMARY

1. What is the proposed project and what are the main arguments?
2. What are the key points for the [approving body] to consider and what does it need to determine?

BACKGROUND

3. How does the proposal fit with strategy/brand?
4. Was the request included in the sponsoring departments Operational Plan?
5. Are there any earlier decisions/other history of relevance?
6. What are the key points which support the project? What other options are there, if any?
7. What is the timetable? Is the proposal time critical? What are the consequences of delay or not proceeding? Where does the proposal fall within the risk matrix?

FINANCIAL, RESOURCE AND RISK IMPLICATIONS

8. What are the financial costs? Do they fall to the capital or revenue budget? Are they budgeted or supplementary expenditure?
9. What are the financial and non-financial benefits? How are they to be measured?
10. Can the proposal be undertaken within existing staff resources? Are additional permanent or temporary staff required? If so, can they be accommodated within existing office space?
11. What are the associated reputational and/or business risks? How are they to be measured and managed?

CONSULTATION

12. Who has been consulted internally and externally? What was their view? Should/has there be consultation with members or stakeholders?
13. What are the views of the Finance Director and [other relevant directors]?

More specific questions include for example

What is the business objective for this project including both the brand and the website?

What goals does the new website need to achieve, will this affect useability?

What does good look like?

What is the timetable for a new department name and re-branding?

Is there new functionality to be introduced? e.g., news stream, social media stream, pre-populated application forms etc.

Is there enhanced, changed or degradation in useability?

How much existing content will move to the new website?

Some resources that are used by firms sit in membership areas of the website e.g., icaew.com/aml, will these remain or need to be sign-posted or replicated?

Will ICAEW.com link or sign post the new website?

What will continue to reside on ICAEW.com? e.g., databases, search functions, annual return, complaints channels, conference and webinars, event booking and payments functionality?

Third party security and compliance checks required and owned by the regulatory area?

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