

**EXPLANATORY MEMORANDUM TO**  
**THE NATIONAL CARE STANDARDS COMMISSION (COMMISSION FOR SOCIAL**  
**CARE INSPECTION) (FEES AND FREQUENCY OF INSPECTIONS) (ADOPTION**  
**AGENCIES) (AMENDMENT) REGULATIONS 2005**

**2005 No.640**

1. This explanatory memorandum has been prepared by the Department for Education and Skills and is laid before Parliament by Command of Her Majesty.
  - 1.1 This memorandum contains information for the Joint Committee on Statutory Instruments.
2. **Description**
  - 2.1. The National Care Standards Commission (Commission for Social Care Inspection) (Fees and Frequency of Inspections) (Adoption Agencies) (Amendment) Regulations 2005 set out revised fee levels for voluntary adoption agencies that are regulated by the Commission for Social Care Inspection (CSCI).
3. **Matters of special interest to the Joint Committee on Statutory Instruments**
  - 3.1. Section 51(1) of the Care Standards Act 2000 allows the Secretary of State to set the fee in relation to an inspection of a local authority's adoption services. Section 51 of the Care Standards Act 2000 was amended by the Health and Social Care (Community Health and Standards) Act 2003, the amendment being brought into force on 11 March 2004 by SI 2004/759, but its repeal was brought into force on 1 April 2004 by the same instrument. This was an inadvertent repeal which only came to light whilst amending the National Care Standards Commission (Fees and Frequency of Inspections) Regulations 2003. As a result of the repeal there has been no legal authority for CSCI to charge such fees since 1 April 2004, and accordingly, the amounts paid to CSCI by local authority adoption services in respect of annual fees in 2004/05 are in the process of being refunded. The relevant provision in the National Care Standards Commission (Fees and Frequency of Inspections) Regulations 2003 is being revoked.
4. **Legislative Background**
  - 4.1. CSCI is required under the Care Standards Act 2000 to register voluntary adoption agencies and other social care establishments and agencies provided they meet the regulatory requirements. Once the establishment or agency has been registered, CSCI is required to inspect them according to established frequencies. For voluntary adoption agencies this is once every three years. Regulated agencies are required to pay fees for registration, variations of registration, and annual fees

as prescribed by the Secretary of State. These requirements are set out in regulations.

## **5. Extent**

5.1. This instrument applies to England.

## **6. European Convention on Human Rights**

6.1. Not applicable.

## **7. Policy background**

7.1. The policy objective of raising fee income from social care providers is twofold. Firstly, it helps the Commission to be properly funded and able to discharge its responsibilities and statutory obligations effectively. Secondly, the charging of fees is also intended to make the costs of regulation transparent, ensuring that these are borne by those who stand to benefit from the regulatory process.

7.2. The longer-term objective is for improved regulatory effectiveness and efficiency through full cost recovery. The Government's policy is to continue to move towards full cost recovery in stages. Because the amount recovered in fees was originally set at a low level, and is still well short of the full cost, these increases need to be above the rate of inflation. No decision has been taken on the time it should take to achieve full cost recovery, but further annual increases to move in that direction remain the Government's policy.

## **8. Impact**

8.1. A Regulatory Impact Assessment is attached to this memorandum.

8.2. There is no impact on the public sector.

## **9. Contact**

**9.1.** Ruth Wilson at the Department for Education and Skills. Tel: 020 7273 5827 or e-mail: [ruth.wilson@dfes.gsi.gov.uk](mailto:ruth.wilson@dfes.gsi.gov.uk) can answer any queries regarding the instrument.

## **FULL REGULATORY IMPACT ASSESSMENT**

### **Title of regulatory proposal**

**Commission for Social Care Inspection – Fees and Frequencies of Inspection  
2005/6**

### **Issue**

1. This Regulatory Impact Assessment (RIA) covers voluntary adoption agencies (VAAs) only and has been carried out alongside a wider RIA by the Department of Health which has overall policy responsibility for the funding of the Commission for Social Care Inspection (CSCI).
2. The CSCI is required to inspect VAAs and local authorities' adoption services (adoption agencies) in addition to other social care establishments and agencies according to established frequencies. For adoption agencies this is once every three years. From April 2002 until April 2004 this function belonged to the National Care Standards Commission (NCSC). VAAs, like all establishments, agencies and boarding schools within the scope of the Care Standards Act 2000, have been required, where appropriate, to pay fees for registration, variations of registration, and annual fees as prescribed by the Secretary of State. These requirements are set out in secondary legislation<sup>1</sup>, which amends the existing regulations brought into force when the NCSC assumed responsibility for the registration and inspection of VAAs..
3. The content of this RIA deals specifically and explicitly with the annual increase in regulatory fees for 2005/06. Frequencies of inspection are not subject to any change.

### **Objectives**

4. The policy objective of raising fee income from social care providers is twofold. Firstly, it helps the Commission to be properly funded and able to discharge its responsibilities and statutory obligations effectively. Secondly, the charging of fees is also intended to make the costs of regulation transparent, ensuring that these are borne by those who stand to benefit from the regulatory process.
5. The longer-term objective is for improved regulatory effectiveness and efficiency through full cost recovery after five years – in effect making the Commission self-funding through fee income, rather than via central Government subsidy. This

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<sup>1</sup> The National Care Standards Commission (Fees and Frequency of Inspections) (Adoption Agencies) Regulations 2003 cover adoption agencies whereas the Commission for Social Care Inspection (Fees and Frequency of Inspection) Regulations 2004 cover other establishments and agencies.

proposal is both consistent with Treasury guidance on fees and charges<sup>2</sup> and generally supported by care providers. These objectives were the subject of a wide-ranging public consultation in 2001<sup>3</sup> and 2002<sup>4</sup> and remain in place.

## **Background to the Regulatory Fee Arrangements**

6. The former system of registration and inspection differed between establishments and agencies. For VAAs, the system of approval and inspection was carried out centrally in England by the Social Services Inspectorate who advised the Secretary of State for Health on the suitability of a VAA to be approved to operate. VAAs were not subject to any charges and the costs of the Social Services Inspectorate were met centrally. VAAs, and the purchasers of their services (primarily local authorities) were not therefore bearing the true costs associated with the approval and inspection tasks.
7. In the process of establishing the NCSC under the Care Standards Act 2000, the Fees and Frequencies of Inspection Regulations were consulted on in 2001. The preferred option sought to raise standards throughout social care with a nationally applied system of registration and inspection, with standards in care establishments henceforward subject to independent scrutiny. The consultation assumed that some £40m would be raised through fees to assist in this policy intention. In the event, the proposed fee structure was changed to take account of the concerns of small providers, including small VAAs.
8. The final fee structure, introduced in April 2003 for VAAs, reflected concerns about the impact of regulatory fees on small branches of VAAs and small VAAs, by providing fee concessions.
9. The Frequencies of Inspection and Regulatory Fees consultation proposed a five-year period to achieve full cost recovery, with a review of this policy after two years. In this way, the regulatory running costs of the NCSC (and, as now known, its successor organisation, CSCI) were intended to be borne on an incremental basis by the providers and purchasers of care. The issue of full cost recovery is discussed below at paragraphs 15-21.
10. A full regulatory impact assessment for the frequencies of inspection and regulatory fees was published in December 2001. Subsequent RIAs have been published in respect of increases in the levels of regulatory fees which took place in April 2003. These subsequent RIAs effectively update the original RIA of December 2001.

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<sup>2</sup> The Fees and Charges Guide – HM Treasury, 1992

<sup>3</sup> Frequencies of Inspection and Regulatory Fees – *a consultation paper*. DH, 2001

<sup>4</sup> *Adoption: National Minimum Standards and Regulations: Voluntary Adoption Agencies England and Wales*, DH, 2002

11. The expectation was (and continues to be) that providers will pass a large part of any increase on to those paying for the services. This would mean, for example, that local authorities would pay higher amounts and their financial settlements from central government reflect this. Local authority funding therefore allows for this expected increase in their costs.

### **Fee income requirements**

12. Earmarked resource budgets for the NCSC and CSCI have shown, over the three-year period 2003/04 to 2005/06, a steady reduction in the central Government grant, based on an assumption that regulatory fee income would continue to rise. Fee income received by CSCI for 2004/05 is estimated to be about £44.5m.
13. In 2005/06, CSCI will need to raise about £53m in fee income in order to carry out its statutory regulatory functions effectively, taking into account the available central Government grant. This also takes into account efficiencies to be made by CSCI in 2005/06 enabling it to reduce its overall operating budget by some £4m in cash terms.
14. The table below shows the relationship between CSCI's overall budget, grant and fees. The figures for 2005/6 assume a fee increase across-the-board of 20 per cent (the preferred option) and are based on the best available estimates at the time of writing, as the DH grant has not yet been finalised.

	<b>2004/5</b>	<b>2005/6</b>
<b>CSCI budget</b>	147.3m	143.5m
<b>DH grant</b>	102.7m	90.1m
<b>Fee income</b>	44.5m	53.4m

### **Full cost recovery**

15. Regulatory work does not represent the only activity of CSCI (unlike the NCSC). Regulation of social care providers accounts for some 78 per cent of CSCI's overall work. The Commission's remit also includes the performance assessment of local authority social services, ie inspecting the management, provision and quality of social care services, and determining the annual performance ratings for all local councils with social services responsibilities.
16. The level of regulatory fees is still well short of full cost recovery. The table below shows the proportion of the Commission's regulatory activity which is met by fee income, again assuming a fee increase of 20 per cent in 2005/6.

	<b>2004/5</b>	<b>2005/6</b>
<b>Cost of regulatory work</b>	117m	113m
<b>Fee income</b>	44.5m	53.4m
<b>% of full cost of regulation met by fees</b>	38.0	47.3

17. The policy of full cost recovery is firmly Government policy in general and is consistent with Treasury guidance. It is based on the philosophy that it is right that those regulated should pay for their regulation. All providers, private or voluntary, benefit from regulation. Those who pay for the services that are regulated, whether local authorities commissioning services, private individuals funding their own care, or those making charitable donations to voluntary organisations, would expect the organisations concerned to be providing high quality services. Regulation is the way that quality is assured and abuse detected and avoided. So regulatory fees are regarded as a legitimate cost to any regulated organisation.
18. It is the Government's firm policy to move to a position where the recurrent costs of providing regulation are fully recovered from service providers. This was the stated policy at the time the NCSC fee structure was introduced in 2002. At the time, the Government stated that it intended to achieve full cost recovery within five years (i.e. by April 2007) but would review this policy after two years.
19. In the light of this, the Government has decided that it should maintain the policy of moving in the direction of full cost recovery. A fee increase for 2005/06 is part of this process. However, the Government acknowledges that the original proposal to reach full cost recovery within five years is not achievable as it would require annual increases that would be generally regarded as too steep. No decision has been taken on the time it should take to achieve full cost recovery, but further annual increases to move in that direction remain the Government's policy.
20. The regulatory system will be changing, in order to meet the Government's objectives of more proportionate, risk-based, user-focused inspection. As a result of this, and through the modernisation of CSCI's procedures and a Government-led review of the national minimum standards and associated regulations, the process of regulation will become more efficient and its cost reduce.
21. The structure of regulatory fees is broadly – but by no means precisely – related to the workload involved in registration and inspection. The relationship between fees and workload was calculated in the run-up to the creation of the NCSC, but as time passes the link between fee levels and workload becomes more blurred and this blurring can be expected to continue more quickly as CSCI's

methodologies evolve in the move towards a more modern and proportionate inspectorate. In the longer term, therefore, the basis for the fee structure will need to be updated. The Government believes that it will be an appropriate time to reconsider the fee structure when this can be linked to the modernised inspection arrangements that will be in place.

## **Risk Assessment**

22. Through CSCI's effective application of the legislative framework in respect of adoption agencies, the aim is to ensure that the safety and welfare of children affected by adoption is at all times protected. In order to provide this assurance, CSCI needs to be properly funded.
23. However, CSCI cannot function effectively on the level of central Government grant currently available, so some level of fee income is therefore unavoidable, and there must be a basic assumption that at least the current level must remain in place. For 2005/06, as indicated above in paragraph 12, the level of available grant is reducing. Fee income therefore assumes great significance, particularly in the context of the DH review of its arm's-length bodies, which requires major savings in the overall cost of these organisations, and in the level of central grant, over the three years 2005/06 to 2007/08. The achievement of these savings is publicly stated Government policy. CSCI is within the remit of the review and must reach a position by 2008/09 where it is operating under a significantly lower budget than at present.
24. However, this regulatory impact assessment is concerned with fee levels for 2005/06 rather than later years. It is clear that in the context of constraints on available Government grant, the Commission's effectiveness as a regulator will be significantly impaired without an increase in fee income. There is a significant risk that without increased fee income, the Commission would fail in its statutory duties, be unable to protect the interests of service users effectively, and be forced to adopt inconsistent or partial approaches to its regulatory task.
25. A further, related, risk would be that the Government's objectives of moving in the direction of full cost recovery, and of reducing the proportion of Government grant spent on CSCI, would be impaired.

## **Fee Income Options**

26. Five options have been identified:

**Option 1** – Nil increase;

**Option 2** – 10 per cent across the board increase;

**Option 3** – 20 per cent across the board increase;

**Option 4** – 30 per cent across the board increase;

**Option 5** – immediate move to full cost recovery.

## **Benefits**

### **Option 1 - nil increase**

27. Although providers have to some extent become used to annual increases in fees, a nil increase in fees for 2005/06 would obviously be popular with them. However, it is clear that there is insufficient money available for CSCI to undertake its functions if fees remain at their 2004/05 levels. Pressure upon DH budgets is severe and there is no scope to increase the central grant above its 2004/05 level, which would be necessary if fee levels remained unchanged.
28. A nil increase would therefore have major disadvantages. It would result in a gap in the resource budget for 2005/06 that would have to be filled from elsewhere. There has always been a clearly stated intention to gradually increase fees until full cost recovery is achieved, and the Government maintains that this is its objective. This option is therefore not being pursued.

### **Option 2 – 10 per cent across the board increase**

29. A 10 per cent increase would raise additional fee income of some £4.5m. Since there were increases of 20 per cent in April 2003 (and for providers other than adoption agencies in April 2004), this level of increase would probably be lower than what providers expect, and therefore accepted without objection.
30. An increase of this size would be helpful in closing some of CSCI's funding gap but it would still leave a sizeable sum to be found from elsewhere, in a climate in which there are no obvious means of doing so. There would be a major risk of jeopardising the ability of CSCI to achieve longer term efficiency savings, as it would be constrained in its ability to begin implementing organisational changes.
31. It would be a very small, in fact inadequate, step in the direction of properly reflecting the true cost of regulating care services, with only 43 per cent of the full cost of regulation being met by fees in 2005/06. The option is therefore not being pursued.

### **Option 3 – 20 per cent across the board increase**

32. It is clear that a further significant rise in fee income is required for 2005/06 if the Government is to remain on course to reduce the level of central revenue funding to CSCI. A 20 per cent increase would raise about £8.9m of additional revenue. This would take CSCI's fee income up to some £53.4m, or about 47.3 per cent of the cost of CSCI's regulatory activity in 2005/06. Even this level of increase, when taken in the context of the available funds for the central Government grant,



would require CSCI to make efficiencies and to operate with an overall budget of some £4m less in cash terms than in 2004/05.

33. The increase would be on the same level as in the past, and would therefore probably be no surprise to providers. It would represent helpful progress towards properly reflecting the true cost of regulating care services. It represents the option with the best balance between funding CSCI appropriately on the one hand, and minimising financial impact on providers, and is therefore the preferred option.

#### **Option 4 – 30 per cent across the board increase**

34. A 30 per cent increase would bring in an additional £13.4m, taking CSCI's fee income to £57.9m, or just over 50 per cent of the cost of its regulatory work. This would effectively cover the funding gap without requiring CSCI to make efficiencies in 2005/06. Alternatively CSCI could be asked to make efficiencies and the Government would be able to reduce the level of grant below the funds actually already available, thereby using these (some £4m) for other purposes. At the same time CSCI would be able to manage their work programme and begin significant preparation for efficiency measures to come into effect over the coming few years. It would be a significant step in the direction of properly reflecting the true cost of regulating care services.
35. As this would be a higher increase than ever before, providers could be expected to object strongly. However, it is worth noting that whilst in percentage terms the increase looks large, the original fees were set at a very low level in order to help providers adjust to the new regulatory regime. A fee increase of 30 per cent would leave fee levels still at a relatively minor proportion of the budgets of regulated providers. Taking care homes as an example, regulatory fees in 2005-06 would represent about 0.5 per cent of care home total costs. Full cost recovery would represent about 1 per cent of total care home costs. So in cash terms the increase would be minimal. The impact is similar in other regulated sectors.
36. On balance, while this option would satisfactorily meet the Government's objectives, the Government wishes ideally to avoid imposing an increase of this size because it is higher than previous increases.

#### **Option 5 – immediate move to full cost recovery**

37. The 2004/05 fee income for CSCI provides some 38 per cent of the full cost of its regulatory activity. The latter is estimated to be £113m in 2005/06. To achieve full cost recovery an increase in fees over 2004/05 levels amounting to some £68.5m (or 150 per cent) would be needed.
38. Such an increase would release £68.5m of funds to be deployed on other Government priorities. The percentage size of the increase, more than doubling what providers now pay, would to some extent distract attention from reaching a position in care homes, for example, where fees would represent about 1 per

cent of total costs. It would however be expected that many regulated providers, especially smaller ones, would find an increase of this size unpalatable and unmanageable in one step.

### **Quantifying and Valuing the Benefits**

39. Options 1 and 2 would jeopardise Government budgeting for 2005/06 and run counter to financial planning assumptions already made. They would seriously undermine the Commission's ability to carry out its work effectively.
40. Options 3 and 4 offer the best chance of achieving the Government's stated aims of progressing in the direction of full cost recovery (without getting there in one go), and enabling CSCI to function effectively. Between these options, option 3 reflects an outcome which many providers would not find a surprise. It requires a level of increased efficiency from CSCI on the one hand while requiring providers to pay more for regulation on the other, in other words a form of compromise.
41. Option 5 is radical because of the negative impact on providers from having to sustain increases of some 150 per cent in fee levels. It is also not necessary given that available funds are in place to continue to provide a significant Government grant to CSCI in 2005/06.

### Service users

42. The main beneficiaries of the regulatory system are service users. The regulations and national minimum standards on which the system is based provide a consistent framework for assessing the fitness of individuals and organisations who wish to provide social care services for vulnerable children. They also ensure that the premises and facilities for the intended service are fit for purpose from the outset. Service users can therefore feel assured that those providing the services they need are competent to do so and that they employ staff in the services with appropriate experience and qualifications to care for them.
43. In addition, service users benefit from the improved standard of services generated by regulation. The regulatory framework and inspection methodology ensures that all providers of a particular service are subject to the same inspection process. It is essential to maintain these advantages for service users and this can be done only if CSCI is appropriately funded to carry out its functions effectively.

### Service providers

44. Feedback from the majority of providers on the regulations and national minimum standards when they were introduced was largely positive. Providers generally welcomed the opportunity to establish minimum standards of welfare provision. The national minimum standards are designed to be used as a working tool as

well as the criteria for inspection requirements, and so are of use to practitioners and care staff. Unsuitable providers are excluded from the sector, and providers see the new national approach as central to maintaining confidence in and enthusiasm for the care sector.

45. It is therefore to the advantage of providers if CSCI is appropriately funded to undertake its regulatory functions effectively.
46. The expectation has always been that providers pass a large part of any fee increase to those paying for the services. This means that local authorities (and self-funders) have to pay higher amounts. Recent local authority financial settlements have reflected this, although they have not been given specific earmarked compensation for the regulatory fees they directly or indirectly have to pay. But costs passed on to commissioners of services, eg in care homes, are a small proportion of the overall social services budget. In fact full cost recovery would be the equivalent of one per cent of the care home industry turnover. The current fee levels equate to only one third of one per cent. Given this, further increases in fee levels would incur only minimal additional costs.

### **Issues of Equity and Fairness**

47. A key objective of the regulatory system is that it applies consistently to all providers of particular services. CSCI is enabled to undertake its regulatory activities consistently by being funded properly for this. Regulatory fees are therefore a prime factor in ensuring a consistent system. In terms of the fairness of applying fee increases to providers, it is considered that an across-the-board increase has a proportionate impact on all types of regulated provider. Given that the original fee levels were set at a low proportion of the full cost of regulation, and were designed to make allowances for certain types of small regulated provider, across-the-board percentage increases have the fairest impact.

### **Compliance Costs**

48. Under the original NCSC funding model, it was the Government's intention that the NCSC (now CSCI) would ultimately be self-financing through fee income in due course. The level of fees payable to the Commission by providers will clearly have an impact on overall costs for them. The fee costs are not actually compliance costs (which are the costs incurred by providers in adhering to the regulations and national minimum standards that govern how they have to operate to become or remain registered).

### **Impact on Small Businesses**

49. Fee levels are important to agencies and this will be particularly true of small VAAs. However, they will be equally able to pass on these higher costs to clients. The registration of individual agency branches ensures that a disproportionate

- burden does not fall upon small agencies, since a large organisation with many branches pays more in fees than one with only one or two.
50. The impact on small VAAs is not expected to be different from that on other VAAs. VAAs will be able to pass on the increased regulatory costs to commissioners of services and small VAAs will, in addition, continue to enjoy a significant reduction in the "flat rate" or annual fee as well as substantially reduced registration fees in comparison with larger VAAs.
  51. The Small Business Service (SBS) was consulted on the Fees and Frequencies of Inspection Regulations in 2001. It was satisfied that the Department of Health had sought to take on board the views of small businesses in line with the principles of "think small first".

### **Competition Assessment**

52. The proposed fees are relatively low in comparison to other set up costs. The Government's priority is to ensure that users of new services are suitably protected. Nevertheless the fee reductions for "small" providers remain in place, and these mitigate the potentially disproportionate effects of the cost increases on smaller participants in the market. These fee concessions were introduced following the consultation on the original fee structure in 2001 (see paragraphs 7-8) to take account of the concerns of small providers and to give special protection to small care homes, domiciliary care or nurses agencies, and adult placement carers.
53. It is also the case that providers can take the increases into account in negotiating fees with those who commission their services. In view of the above factors the Government considers that the proposals will not affect the current nature of competition within the affected markets.
54. This regulatory impact assessment has been considered during its preparation by the Regulatory Review Team at the Office of Fair Trading, who supports the Department's assessment

### **Consultation**

55. The Frequencies of Inspection and Regulatory Fees were consulted on during the summer of 2001 and again in 2002 (Adoption: National Minimum Standards and Regulations: Voluntary Adoption Agencies England and Wales) specifically for VAAs. The Frequencies of Inspection and Regulatory Fees document set out how the NCSC was to regulate health and social care, the cost of this, its funding and fees. The costs associated with registration and inspection activity and the policy of full cost recovery (and the consequences for later years) were fully set out, as was the need for yearly fee increases.
56. There was extensive consultation with focus groups for service users and carers, with providers, commissioners and regulators in order to seek views on the fee proposals. The general reaction to the consultation proposals was moderate and the number of responses (165) was modest. Most providers were more concerned about the impact of national minimum standards than fees. Some

major organisations welcomed most of the proposals. This is the best the Government could have expected.

57. The new Regulations provide for the yearly increase in respect of the 2005/06 financial year. The Government considers that consultation on the new Regulations is unnecessary since the principles and financial model present within the 2001 consultation are still in place and have been carried forward. Frequencies of inspection also remain unchanged, as do the reductions for small providers.

### Summary and Recommendation

58. The recommended option is option 3, an increase in fees of 20 per cent across the board. This is best in terms of achieving the Government's stated aims of progressing in the direction of full cost recovery, without the need for a fee increase that would be widely regarded as excessive. Whilst providers pay more for regulations CSCI is enabled to function effectively but more efficiently.
59. The Government's policy is a robust system of regulation and inspection aimed at ensuring high standards of care and the protection of vulnerable service users. It is important that the cost of this regulatory system should be transparent and borne jointly by the providers of services and those paying for them. The Government's firm intention remains to move in that direction in stages, whilst ensuring that the overall costs of regulation are gradually reduced.

### Monitoring and Review

60. The Government will keep the policy of moving in the direction of full cost recovery under review. Any changes to the underlying fee structure will be the subject of public consultation.

### Fees for registration and inspection 2005/6 (2004/5 in brackets) - Commission for Social Care Inspection

Service	Provider Registration	Minor Variation	Variation requiring visit
Voluntary adoption agencies principal office and branches	£1,320 (£1,100)	£60 (£50)	£660 (£550)
VAA with small principal office or small branch	£ 360 (£300)	£60 (£50)	£360 (£300)

<b>ANNUAL FEE</b>	
<b>Service</b>	<b>Flat rate</b>
Voluntary adoption agencies	£600 (£500)
VAA branch	£600 (£500)
VAA with small principal office	£300 (£250)
Small VAA branch	£300 (£250)

## **Declaration**

I have read the Regulatory Impact Assessment and I am satisfied that the benefits justify the costs

Signed by the responsible Minister

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Date.....

## **Contact**

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