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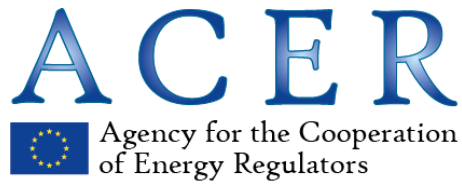
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**EU AGENCY FOR THE COOPERATION OF ENERGY
REGULATORS (ACER)**

*Towards an Internal Energy Market for the benefit of all EU
consumers*

COMMUNICATION STRATEGY 2014-2015

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1. INTRODUCTION

This is the first communication strategy of the EU Agency for the Cooperation of Energy Regulators (ACER). This document aims at assisting ACER in fulfilling its overall mission and main goals through effective communication.

The overall mission of ACER, as stated in its founding Regulation¹, is to work towards the completion of the EU internal energy market for electricity and natural gas by complementing and coordinating the work of national energy regulators at EU level. To this purpose, the external communication of the Agency takes two main forms: involving NRAs and stakeholders in ACER's work; communicating with the general public directly and through the media.

Among its specific tasks, ACER plays a central role in the development of EU-wide network and market rules with a view to creating a well-functioning internal energy market, thus enhancing competition and providing greater choice and better prices to consumers. It coordinates regional and cross-regional initiatives which promote market integration. It also monitors the work of European networks of transmission system operators (ENTSOs), notably their EU-wide ten-year network development plans (TYNDP), and contribute to the process for the identification of Projects of Common Interest (PCIs). Finally, it monitors the functioning of gas and electricity markets in general, and of wholesale energy trading in particular in order to detect and deter market abuse, to notify any instance of suspected market manipulation and insider

¹ ACER's missions and tasks are defined by the Directives and Regulations of the [Third Energy Package](#), especially [Regulation \(EC\) 713/2009](#) establishing the Agency: The Agency should ensure that regulatory functions performed by the national regulatory authorities in accordance with Directive 2009/72/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in electricity [7] and Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas [8] are properly coordinated and, where necessary, completed at the Community level. To that end, it is necessary to guarantee the independence of the Agency from electricity and gas producers, transmission and distribution system operators, whether public or private, and consumers and to ensure the conformity of its actions with Community law, its technical and regulatory capacities and its transparency, amenability to democratic control and efficiency.

In 2011, ACER received additional tasks under Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency ([REMIT](#)) and in 2013 under Regulation (EU) No 347/2013 on guidelines for trans-European energy infrastructure.



trading to NRAs, which are responsible for investigation and enforcement, and, in general, to promote the integrity and transparency of these markets.

The communication strategy focuses on the tools and channels to communicate to ACER's main audiences the Agency's contribution towards achieving a single energy market in the EU and ensuring the integrity and transparency of this market for the benefit of European consumers.

The foreseen communication activities contribute to increase the transparency of ACER's activities, and thus its visibility, impact and influence. They also should reflect that the Agency is an independent, credible, transparent, service-oriented and efficient expert EU body in energy regulation.

One of the fundamental elements to implement a successful external communication strategy is to ensure effective internal communication. A well-functioning internal flow of information allows staff to increase their awareness of the broad scope of the Agency's activities that are not strictly related to their own portfolios. This will contribute to maintain the high standard of the Agency's deliverables and thereby reinforce a positive perception of the Agency. A high level of engagement and job satisfaction of regularly informed and consulted staff members is key for success.

This strategy paper is intended as an evolving document. It takes account of best practices from other EU bodies and is in accordance with Internal Audit Services' and European Court of Auditors' standards. Smart qualitative key performance indicators should allow for the evaluation of the effectiveness and quality of the Agency's communication activities and deliverables and thereby enhance its accountability.

2. EXTERNAL COMMUNICATION

2.1 Objectives

The main objective of ACER's communication strategy is to increase the transparency of the Agency's activities. The visibility of the Agency vis-à-vis all target audiences should be enhanced, while feedback received should ensure a two-way communication. As mentioned in the introduction of this document, the external communication of the Agency takes two main forms: involving NRAs and stakeholders in ACER's work; communicating with the general public directly and through the media.

It should present the Agency as an independent, credible, transparent, service-oriented and efficient expert EU body in energy regulation. Independence from any public or private interests is critical in achieving the Agency's goals, maintaining its reputation and gaining trust. However, independence should be reconciled with a strong degree of accountability. In fact, while ACER is independent when taking its decisions, it is also fully accountable as a public institution, financed from the EU budget and implementing goals set at the EU level.

The accountability of ACER is guaranteed via:

- ex-ante instruments: through its founding regulation, which includes its specific mandate, powers and tasks.
- ex-post instruments: Discharge of the Agency's budget by the European Parliament, financial accountability to the Court of Auditors, hearings of ACER Director and ACER Chairman of the Board of Regulators in the European Parliament, the supervision of the European Ombudsman, the annual activity reports, the independent evaluation reports, etc.

2.2 Messages

2.2.1 ACER's general communication messages

SHORT

ACER is the EU Agency that promotes cooperation among national energy regulators to achieve a competitive, secure and sustainable internal market for electricity and natural gas that brings more choice and better prices for European energy consumers.

EXTENDED

ACER is the EU Agency that promotes cooperation among national energy regulators to deliver a robust EU-wide regulatory framework:

- *To support the creation of a more competitive, integrated market which offers consumers more choice and better prices;*
- *To promote the efficient development of energy infrastructure to enhance security of supply and accommodate new energy sources (including renewable energy);*
- *To foster integrity and transparency in energy markets, to ensure that all market participants trade on the basis of the same information, to prevent market manipulation and to ensure that market prices reflect the interplay of demand and supply and are not distorted by abusive practices.*

2.2.2 ACER communication messages vs. work programme themes

The 2014 Market Integration Target

The Agency plays a key role in the process for the development of European network and market rules through Framework Guidelines/Network Codes. The European Union is committed to the creation of an open, integrated and competitive single market for energy which promotes the security of energy supplies and sustainability, to the benefit of consumers in terms of more choice and better prices. The Agency activities in this area include the definition of the principles for common rules for the internal energy market, the contribution to European network planning and the monitoring of the electricity and gas internal energy markets.

Moreover, by supporting and coordinating regional and cross-regional initiatives, ACER promotes market integration through the early implementation of the network codes and the removal of barriers to cross-border energy exchange.



Wholesale Energy Market Integrity and Transparency (REMIT)

By monitoring wholesale energy trading in gas and electricity markets, ACER plays a central role in safeguarding market integrity and transparency. By detecting and deterring market abuses, ACER promotes confidence among energy consumers that electricity and gas prices reflect market fundamentals and are not distorted by abusive practices.

The Infrastructure Challenge

The Trans-European Energy Infrastructure (TEN-E) Regulation entered into force in May 2013 and the first EU list of Projects of Common Interest was adopted in October 2013. The Agency plays a role in identifying Projects of Common Interest (PCIs), the development of the Cost-Benefit Analysis (CBA) methodology, the exchange of best practices on incentives, and the handling of cross-border cost allocation requests when the concerned NRAs are unable to reach an agreement or when they jointly refer the request to the Agency. It also monitors progress on the implementation of the projects of common interest.

By overseeing the work of transmission system operators (ENTSOs) and notably their network development plans, ACER ensures that electricity and gas grids in the EU are developed efficiently to support market integration, sustainability and security of supply for the benefit of all European citizens.

Future Challenges, including Renewable Energy Sources Integration

In 2014 ACER is performing an assessment of whether and how the electricity and gas “target models” - a shared vision for the future of the wholesale market in these sectors - would need to be enhanced to address the future challenges. The Agency is also developing an effective wide-ranging vision for 2025 on wholesale market arrangements.

2.3 Attributes of ACER Communication

Clear

ACER should communicate with clarity on what the Agency is and does. A clear message is critical for effectiveness.

Consistent

ACER should convey a series of key overall and thematic messages to be used consistently and regularly when communicating externally. These messages should be ACER branded and known at all relevant levels of the organisation so that they can be reiterated to maximise their effect.

Connected

ACER key communication messages must be well-timed and connected with the European agenda and thus include, if within its remit, wallet issues, the economy, crucial aspects for business and citizens (for example cost benefit analyses performed by the Agency).

Defined

*ACER is an independent EU Agency that works in accordance with EU governance standards. **TRANSPARENT***

*ACER works for the European public interest towards a single energy market which delivers tangible benefits to energy consumers: citizens and companies. **SERVICE-ORIENTED***

*ACER has contributed and will continue to contribute to the internal energy market: by November 2013 the Agency delivered the framework guidelines in all the eight priority areas for the completion of the internal energy market by 2014. **EFFECTIVE***

Planned

Each year, as part of the planning process, and taking into account the work programme of the Agency, the Press and Communication Officer will develop a communications calendar for the forthcoming year, together with the Director and the Heads of Department, including the level of communication needed for each deliverable or event produced or organised by ACER. Whenever possible, ACER's communication should be linked with the European agenda. The Heads of Department will also alert the Press and Communications Officer of hot topics in the energy field being discussed in the EU public sphere for which ACER may be approached, in order to have readily available answers for journalists and stakeholders.

ACER will strive to ensure a systematic and predictable information flow from operational staff and Heads of Department to the Director's Office Press and Communication Section

and vice-versa. When communicating with an external audience, messages are to be validated by Heads of Department within their field of competence and level of responsibility. Answers to questions which go beyond (and, for example, commit the Agency on regulatory or policy matters) should be agreed with the Director. Messages should focus on profiling the Agency as an independent, transparent, service-oriented and efficient organisation.

2.4 Target Audiences

ACER's main audiences are the following:

European citizens

As a publicly-funded body, ACER must ensure that clear and transparent information is readily available to the general public on its mission and activities. Firstly, ACER should make sure the public can easily access the relevant information on how ACER is carrying out its activities with due regard for taxpayers' money.

Secondly, despite the very specialised work of the Agency, within its communication actions ACER should always strive to show the implication of its work for energy consumers. A user-friendly website and other means already in use, such as citizens' summaries, will facilitate the understanding of the Agency's work by consumers. In addition, in the short to medium-term, the goal is also to continue enhancing contacts with the specialised media outlets, as well as further developing relations with national media.

Decision-makers

ACER is accountable to the budgetary authorities: the European Parliament and the Council. These Institutions are interested in how ACER functions, its performance and added-value which it brings to the European economies. Transparency and clarity are crucial elements for decision-makers.

Senior Management of ACER is the main interlocutor of this target audience. Regular meetings between the Director and EU decision-makers, as well as proactive newsfeeds are important. Participation in relevant international forums, high-level meetings and events is also a way of engaging with this audience. Key decision-makers include:

- European Parliament
- EU Council
- European Commission
- Member States

In dealing with this audience, ACER should stress its role as an EU Agency, dealing with important matters related to the EU agenda. It should show that it delivers value and, therefore, is worth supporting and investing in.

National Energy Regulators

National regulators are both ACER's constituency – since ACER has been established to support them - and part of ACER - through the Board of Regulators and the Agency's Working Groups and Task Forces. Therefore, besides the regular two-way communication, which stems from the nature of the Agency's mandate, NRAs are also a target audience in terms of external communication as concerns the provision of information/training/networking opportunities beyond their direct involvement. NRAs can also act as information multipliers.

ACER's communication activities should contribute to national regulators being sufficiently informed about the activities of ACER and can present them to interested stakeholders in their own jurisdictions. ACER should be able to support national regulators in this effort.

Stakeholders

The European Network Transmission Operators for gas and electricity (ENTSOs), European industry federations, European associations of consumers and other interested parties are considered as ACER's stakeholders and a prime target audience. ACER focuses on making communication with this target group as user-friendly, timely and transparent as possible.

ACER engages with stakeholders through its website, public consultations, public events, permanent and ad hoc experts groups. The Agency has a clear and transparent policy for stakeholders' involvement, which aims at reinforcing the message that the Agency is an independent body which takes account of stakeholders' views. A transparent and articulate stakeholders' relations policy is vital for the Agency to meet its objectives.

ACER's communications activities should contribute to stakeholders feeling sufficiently informed, consulted and engaged in all ACER regulatory activities.

Other relevant authorities

Under REMIT, ACER also collaborates with the European Securities and Markets Authority (ESMA), national financial authorities, national competition authorities, the Federal Energy Regulatory Commission (FERC) of the United States and other international regulators.

2.5 Channels

2.5.1 Digital communication

This is ACER's main communication channel.

The focus is on securing regular improvements and updates of the available means: ACER's website and e-alerts. ACER is also developing new channels, such as the citizens' summaries (putting ACER's activities in a wider context using language that is comprehensible also to non-experts) and ACER debriefings for stakeholders. ACER will also strive to develop e-surveys and webinars and will explore the possibility of being present on social media.

Web

This is ACER's first point of contact. The Agency's goal is to further improve its website in terms of usability, features and functionalities, so that it evolves from a document storage facility to a website which is easy to navigate and regularly updated so as to encourage returning visits. In principle ACER's website should be relatively low cost to manage and easy to use; with short lead times in making information publicly available.

Public Consultations

While preparing the Framework Guidelines, the Agency is required formally to consult the European Networks of Transport System Operators for Electricity and Gas (ENTSO-E and ENTSOG) as well as the other relevant stakeholders, during a period of no less than two months, in an open and transparent manner.



However, ACER involves stakeholders in public consultations on most documents, therefore much beyond the legal requirement. Additionally, ACER also carries out public consultations in the framework of REMIT, the Regional Initiatives and also when developing a strategic vision for future challenges of the single European Energy market. Public consultations are carried out online. When a public consultation is launched stakeholders receive an email alert via the ACER infoflashes.

All supporting documents and questionnaires are published online together with the invitation to participate in the consultation. The Agency also creates dedicated email addresses to facilitate stakeholders' participation in the consultation. Responses to consultations are also published on the Agency's website.

ACER's public consultation policy is further described in its [Guidance Note on Consultations](#).

Infoflashes

ACER publishes e-alerts (infoflashes) to more than 2,500 contacts (a number in constant growth), including stakeholders, national regulators, academics, media, think tanks, as well as other interested citizens. Subscription to ACER alerts is available within seconds when visiting the ACER's website homepage.

This is one of the Agency's key communication channels and an excellent means of keeping a large number of interested people regularly informed. Infoflashes provide fresh information on newly published official documents (such as framework guidelines, opinions, recommendations), on the launch of public consultations, as well as on upcoming ACER conferences, workshops and other events. Infoflashes can also be used for providing information on ACER public briefings.

E-surveys

ACER has identified the software needed for giving stakeholders the possibility of providing feedback on the quality of ACER documents. Once the e-surveys are in place ACER will have the tools to measure the satisfaction of stakeholders with its work, including in terms of quality. Questionnaires should in principle be short, simple and easy to fill in. Closed questions, with multiple answers, are preferable, to ensure consistency of feedback and to facilitate its analysis. They should provide respondents with a sufficient range of answers to be meaningful.

E-surveys will in some cases also be used as performance indicators to measure the progress achieved towards the attainment of the Agency's annual and multi-annual goals.

Social media

ACER has not yet invested in social media. Developing this means of communication should be envisaged in the future as an additional channel to communicate the Agency's messages. Social media are widely used by EU institutions and ACER stakeholders.

The use of social media requires some unique adaptations, but it could also provide the Agency with a new way to communicate. Audiences can be targeted relatively quickly and hundreds or thousands of people reached with a single post.

Through social media an organisation can communicate and interact with the general social media population (or subsets of that population which may be more interested in the specialised work of the Agency). Various social media platforms could be used, such as Twitter or LinkedIn.

2.5.2 Public Events

ACER public events are generally well attended and are the second main means of engaging with policy makers and stakeholders, as well as the media. Public events serve the purpose of allowing stakeholders to contribute to ACER deliverables, inform about the Agency's latest documents, as well as brief on future developments.

As highly targeted deliverables, public events offer the potential to develop strong relationships and networking opportunities. This communication tool offers the opportunity to further develop ACER messages to an already engaged audience.

2.5.3 Media relations

In view of the overall communication objective of increasing the visibility and raising the profile of the Agency, a more pro-active approach to media relations is more effective. ACER aims to further engage with specialised media, national experts and the general public.

Press releases

In addition to infoflashes, press releases can encourage journalists to develop articles and news items on ACER's work. This can be done only if the news release is relevant, targeted and newsworthy. It can be effective in transmitting ACER messages to a wider audience.

Untargeted non-newsworthy press releases would make it harder to attract attention to ACER's news; therefore press releases are only launched on very specific topics which may have an impact for the general public. When more technical deliverables are produced, an infoflash, which may be accompanied by a web piece of news, is launched. For example, press releases have been produced on the following topics:

- The Administrative Board's major decisions;
- ACER's annual conference;
- The presentation of ACER's Market Monitoring Report.

Press briefings

Press briefings generally coincide with the launch of press releases, which means that they also focus on major events or deliverables (annual conferences, presentation of ACER Market Monitoring Report, etc.). They are usually held where the event takes place in the form of a press conference or before the event under embargo conditions in order to acquaint journalists with specialised issues. The briefings are led by the Director, either on his own or together with the Chairman of the ACER Board of Regulators.

2.5.4 Publications

Publications remain an effective way of promoting the Agency's activities. ACER reports should strive to provide user-friendly executive summaries, including all the relevant key messages. Most of the Agency's publications are produced in digital form only. Print is strictly limited, in line with the Agency's environmental commitments. ACER issues four large-scale reports annually which undergo professional graphic design:

- ACER Annual Activity Report: The Agency reports yearly on its activities and achievements in relation to the tasks assigned to it in a specific year.
- ACER Annual Report on the results of monitoring the internal electricity and natural gas markets (Market Monitoring Report): The Agency provides as

complete an assessment as possible of the progress made towards the implementation of the Third Energy Legislative Package ('the 3rd Package') and the completion of the internal energy market. This report is mostly prepared by ACER and, so far has been co-branded with the Council of European Energy Regulators (CEER).

- ACER Annual Report on its activities under REMIT: The Agency reports on its activities under the Regulation on wholesale energy market integrity and transparency (REMIT).
- ACER Status Review Report for the Electricity and Gas Regional Initiatives: The Agency reports yearly (also quarterly per sector) on the progress of the regional initiatives in an effort to promote the early implementation of some of the most critical rules for the integration of the electricity and gas markets.

ACER also publishes many other sectorial reports on specific issues related to gas and electricity.

2.5.5 Participation to External Events

Attending external events is an essential tool in raising awareness of the Agency's work towards its stakeholders. ACER receives a substantial number of invitations to attend and speak at external events. This is a sign of ACER regulatory achievements and its growing responsibilities and visibility; however, as a public institution run with taxpayers' money and limited resources, the Agency has to evaluate carefully every proposal before making a decision.

ACER prioritises events on the basis of two main considerations: whether they are in conformity with the objectives of the ACER Work Programme and the extent to which they benefit EU citizens. Therefore, events organised by EU institutions, ENTSOs and organisations representing significant ACER stakeholder's constituencies at European level, as well as events organised by Member States and NRAs are assigned priority.

3. INTERNAL COMMUNICATIONS

3.1 Objectives

Internal communication should enable both management and staff to fulfil their responsibilities effectively and efficiently. The overall objective of having an internal communication strategy is to increase the level of awareness, across the whole Agency, of ACER's work and recent developments of the Agency in order to contribute to the staff's engagement and job satisfaction, which will contribute to the positive reputation of the Agency. It is also important that staff members are regularly informed of policy decisions taken by the Boards and the Director, enabling them to better understand their role and to have a broader knowledge of the Agency's activities. This should ultimately also improve external communication.

Effective communication from ACER management and Human Resources should provide staff with the tools to speak positively and consistently about ACER. An effective internal communication strategy will ensure that ACER staff is engaged with the organisation's goals and fully conscious of its role in achieving these goals. To this purpose ACER staff members are, besides being informed of relevant decisions, also consulted and able to pro-actively signal solutions to issues that affect them, so their feedback can be effectively taken on board at an early stage.

3.2 Key Messages

ACER is a professional employer which invests in its people, offers career and training opportunities and ensures equal treatment of staff.

3.3 Target Audience

ACER staff; seconded national experts; locally contracted employees; and trainees.

3.4 Channels and products

3.4.1 Digital communication

The main channel for internal communication is the intranet, where staff can find relevant information on ACER's activities and also HR-related information. The Communication team works closely with the ACER IT team in order to improve the features and accessibility of the intranet according to the needs of staff. The experience acquired with social media, for example, should allow the ACER Communication and IT teams to develop a more user-friendly tool for cooperative work, information gathering and social interaction.

A monthly staff newsletter with the latest news related to the Agency is circulated in order to provide updated and reliable information to staff. It also includes opportunities for feedback and suggestions.

The topics that are usually covered by the internal newsletter:

- Newcomers
- Vacancy notices at ACER
- Director's decisions
- Management meetings' minutes
- Upcoming events (workshops, trainings, lunch-time conferences)
- Other news (ACER away days, practical information on ACER's premises, etc.)

3.4.2 Events

Monthly Lunch-time Conferences serve to encourage knowledge sharing among staff, as they are typically dedicated to specialist topics with which the Agency deals and presented by ACER staff members. Involving ACER employees in events organised by the Agency is also a way of keeping them engaged. In-house training also allows for exchanges among staff. Organising horizontal team meetings or task forces is also an element of knowledge sharing (working groups on web improvements, reports etc.).

3.4.3 Surveys

The organisation of yearly staff surveys also involves staff in finding solutions to existing or potential problems and is a good way for the management to get feedback from staff.

It is also important that a list of actions is drawn up on the basis of the surveys and followed up on by the Management.

3.4.4 Management meetings with staff

Frequent meetings of management with staff at departmental level, as well as at least quarterly general assemblies with the Director, should be organised to allow two-way communication on issues affecting employees. This could also provide a platform for feedback from staff on upcoming decisions.

4. KEY PERFORMANCE INDICATORS

In order to measure the success of ACER's communication activities a series of key performance indicators have been established.

4.1 Surveys

Electronic surveys will be included within ACER documents in order to measure the satisfaction of ACER's audiences with the Agency's publications and digital communications. Follow-up on the shortcomings should ensure a continuous improvement of the Agency's deliverables.

ACER will continue developing on the spot paper surveys for its main events, such as the Annual Conference, so that the feedback of the Agency's audiences can be appropriately addressed and taken into account in organising future events.

Surveys are also run internally to gauge the level of satisfaction and engagement of ACER staff and their suggestions for improvements. Annual surveys will be more comprehensive while the staff newsletter will allow space for suggestions on a monthly basis.



4.2 Quantitative analysis

Apart from qualitative feedback received from the different ACER audiences, the Agency communication activities are also internally measured by quantifying the visits to key publications and website contents.

Furthermore, the increase in the number of subscribers to the Agency's news, as well as the quantity of infoflashes produced, is a good indicator to measure the flow of ACER communication to the external world.

ANNEX 1: Communication Activities Plan 2014-2015 by objective

Facilitate and increase stakeholders involvement			
Objective:	Activity/Deliverables:	Timing for next one:	Priority:
Facilitate interaction with stakeholders, make the information on ACER's activities more accessible, increase engagement	Organise regular workshops with feedback surveys and regular evaluation	Continuous	High
	ACER's Annual Conference	Q2 2014	
	ACER e-surveys deliverables	Q3 2014	
	Extranet new platform	Full migration achieved	
	Further promotion of infoflashes	Continuous	
	Organise webinars	Q2 2014	
	Explore social media possibilities for ACER	Q4 2014	

Increase visibility of the Agency			
Objective: Increase the visibility and raise the profile of the Agency's work and activities; highlight the added value it brings to EU citizens and businesses	Corporate brochure translated in 24 EU languages	Available	Priority: Medium
	Website improvements	<ul style="list-style-type: none"> • New features for more user-friendliness in place • Internal Guidelines for regular updates in place • Full screening of contents by the end of Q2 	Top
	Explore interaction with NRA's press officers as relays (cross-referencing activities on their websites, organising joint events, preparing articles for national media)	Q4 2014	Medium



	Regular meetings between Director and EU decision makers	Continuous	
	Publications	Q1 2014 Regional Initiatives Status Review in place Q2 2014 REMIT Report Q3 2014 Annual Activity Report Q4 2014 Market Monitoring Report	
	Maintaining a proactive media strategy/ regular e-alerts; press releases (when a wider interest is identified), increase the number of interviews with the Director, and exploit further the specific knowledge of Heads of Department for interviews.	Ongoing	

Establish internal communication processes			
Objective: To improve internal communication and ensure a consistent level of quality for ACER communications projects	Activity/Deliverables: Develop a policy and processes for key communications deliverables (time needed to complete tasks, templates, communication training for staff)	Timing: Ongoing	Priority: High
Develop internal communication			
Objective: To improve internal communication and ensure a consistent level of quality for ACER communication projects; increase involvement of staff and job satisfaction	Monthly internal newsletter for staff	Continuous	Priority: Medium
	Organise one staff survey per year	Continuous	



	Organise a monthly lunch-time conference to share knowledge	Continuous	
	Develop cross-departmental focus groups	Continuous	



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