



Independent Autism Reviewer
for Northern Ireland

Independent Statutory Monitoring Methodology

September 2026

Purpose of this Methodology

Section 3D(a) of the Autism Act (Northern Ireland) 2011 ('the Act') requires the Independent Autism Reviewer for Northern Ireland ('the Autism Reviewer') to monitor the implementation and effectiveness of the Autism Strategy ('the Strategy').

For the purposes of this publication, the statutory function of monitoring the implementation and effectiveness of the Strategy under section 3D(a) is referred to as 'independent monitoring'.

This Methodology explains the principles that will ordinarily guide the exercise of that function. It makes the Autism Reviewer's approach visible before substantive findings are reached and supports independent monitoring that is proportionate, consistent and evidence based.

It is an adaptable framework. The scale, sequence and methods used may vary according to the nature and significance of the matter being examined, the evidence reasonably available, competing statutory priorities and the capacity and resources available to the Office of the Independent Autism Reviewer for Northern Ireland ('the Office').

The Methodology is informed by the Autism Reviewer's statutory functions, applicable public-law principles and recognised approaches to proportionate monitoring and evaluation.

It sits within the Autism Reviewer's wider Oversight and Scrutiny Framework, as described in the Independent Autism Reviewer for Northern Ireland's Annual Report, April 2026.

Related explanatory publication

The separate publication, *[From Public Problem to Public Benefit](#)*, provides wider explanatory context. It does not form part of, add to, alter or prescribe the application of this Methodology.

1. Statutory basis, responsibilities and boundaries

1.1 Status of this Methodology

This Methodology provides a structured but adaptable approach. It is not an exhaustive procedural code, does not create additional legal duties or determine legal rights or liabilities, and does not require every methodological element to be applied in every independent monitoring exercise.

It does not itself prescribe how Ministers, departments or public bodies must organise or deliver implementation. The adequacy, coherence and operation of those arrangements may nevertheless be relevant where they bear upon the implementation or effectiveness of the Strategy.

The Strategy has a statutory basis, but not every statement within it will constitute a freestanding statutory duty. Where relevant to the matter being examined, the Autism Reviewer may distinguish between statutory requirements, strategic commitments, delivery arrangements, administrative practice, measurable targets and other evidential indicators.

This Methodology relates specifically to the independent monitoring function under section 3D(a). Evidence or analysis arising from independent monitoring may also be relevant to the Autism Reviewer's other statutory functions, including the assessment of funding arrangements, review of the adequacy and effectiveness of law, practice and services, commissioning independent research and advising the Northern Ireland Assembly ('the Assembly'). That does not require this Methodology to be applied to the exercise of those other functions.

For clarity, this Methodology does not prescribe the procedure for the Autism Reviewer's wider engagement, correspondence, public commentary or exercise of the functions under section 3D(b)-(g), although evidence or findings arising from independent monitoring may inform that wider work.

1.2 Statutory framework and governmental responsibilities

The Act establishes connected but distinct responsibilities concerning the Strategy.

Under section 2, the Department of Health ('the Department') is responsible for preparing and keeping the Strategy under review. Northern Ireland departments must cooperate with the Department in relation to its preparation, review

and implementation. Each department must implement the part of the Strategy falling within its responsibilities, and the Department must monitor implementation by Northern Ireland departments.

The Department must also prepare reports on implementation at the statutory intervals, and the Minister must lay those reports before the Assembly.

Sections 3 and 3A establish substantive requirements concerning the content and methodology of the Strategy. Among other matters, the Strategy is required to take account of best international practice and individualised needs, adopt a multidisciplinary and cross-departmental approach, set out how consistency of practice is to be achieved across Health and Social Care trusts and educational services, and set measurable targets against which its effectiveness may be assessed.

Those statutory requirements may themselves provide relevant benchmarks for independent monitoring of implementation and effectiveness.

The Act does not prescribe a particular model for how the Department is to carry out its monitoring duty. Subject to the Act and applicable public-law obligations, the administrative arrangements by which that duty is discharged are matters for the Department. Monitoring by the Department and statutory reporting upon implementation are related but distinct responsibilities.

1.3 Responsibilities and independence of the Autism Reviewer

Section 3C provides that the Autism Reviewer is not subject to the direction or control of the Department or the Northern Ireland departments.

Section 3D(a) requires the Autism Reviewer to independently monitor the implementation and effectiveness of the Strategy.

The Department's monitoring function and the Autism Reviewer's independent monitoring function are therefore separate and concurrent. The appointment of the Autism Reviewer did not transfer, suspend or replace the Department's responsibility, and the Autism Reviewer's function is not dependent upon the Department first completing its own monitoring or reporting.

Information may be relevant to both functions. Sharing or reuse of evidence may reduce unnecessary duplication but does not merge the functions or transfer responsibility for either of them.

Evidence gathered by the Office for independent monitoring does not, by itself, constitute or discharge the Department's monitoring responsibility. Equally, information supplied to the Autism Reviewer does not, by that fact alone, demonstrate how the Department has discharged its own function.

The scope, sequencing, priority and depth of independent monitoring are matters for the Autism Reviewer's independent judgement within the statutory remit.

Engagement by the Autism Reviewer with Ministers, departments, public bodies, delivery partners or other stakeholders does not transfer responsibility for implementation, signify approval or endorsement of a delivery approach, or constitute independent assurance of its adequacy or effectiveness. Such engagement does not prevent the Autism Reviewer subsequently examining or publicly reporting independently upon the matter.

1.4 Independent monitoring function boundaries

In exercising the independent monitoring function, the Autism Reviewer may examine evidence, undertake proportionate inquiry, make observations, reach findings, and where appropriate, make recommendations arising from independent findings or advise the Assembly. Observations, findings and recommendations will be publicly reported where appropriate.

Responsibility for implementation, governance, risk management, evaluation, corrective action and improvement remains with the relevant Ministers, departments, public bodies and delivery partners. The retention of those responsibilities does not place them outside independent monitoring. Where relevant to implementation or effectiveness, the Autism Reviewer may examine whether the arrangements established to discharge them are adequate, coherent and operating effectively.

The Autism Reviewer does not assume responsibility for creating or reconstructing system-level information, evidence or evaluation arrangements that responsible bodies should reasonably maintain in the discharge of their own implementation, governance, monitoring or evaluation responsibilities. Where information that ought reasonably to exist is absent, incomplete or inadequate, that may itself be relevant to independent monitoring.

The independent monitoring function does not involve determining individual complaints, resolving personal cases or substituting the Autism Reviewer's judgement for decisions lawfully entrusted to another decision-maker. Individual

experiences may nevertheless provide evidence of wider patterns, risks or implementation issues capable of informing system-level independent monitoring.

Observations, findings and recommendations arising from independent monitoring do not themselves impose a legally binding requirement on a Minister, department or public body or constitute a binding determination of legal rights, lawfulness, fault or liability. This does not prevent the Autism Reviewer from identifying and publicly reporting a statutory concern where evidence reasonably warrants it.

2. Principles and application of independent monitoring

2.1 Core principles

Independent monitoring supports accountability by examining whether requirements and commitments arising from law, strategy and delivery arrangements can be demonstrated in practice and are contributing to their intended outcomes. Independent monitoring will ordinarily be guided by the following principles.

Independence

The Autism Reviewer will assess the evidence independently and will not treat a governmental account, assessment or rating as determinative. Observations, findings and recommendations will reflect that independent assessment.

Statutory line of sight

Independent monitoring will seek to maintain a clear connection between the applicable statutory or strategic benchmark, responsibility for implementation, the arrangements selected for delivery, the material evidence and the finding reached.

Proportionality

The scale and depth of independent monitoring should be proportionate to the significance, risk and complexity of the matter and the value reasonably obtainable from further inquiry.

Evidence and reasoned judgement

Findings should be supported by evidence of sufficient relevance, quality and weight for the finding being reached. Volume of information is not a substitute for evidential quality.

Outcomes and experience

Evidence of activity or action completion will not, by itself, be treated as evidence that implementation has changed routine practice or achieved its intended result.

Implementation realism

Independent monitoring may consider whether the conditions necessary for successful implementation are present in practice, including leadership, capability, capacity, resources, governance, cooperation and other material enabling factors.

Equity and consistency

Where relevant, independent monitoring may consider who has benefited from implementation, who has not, and whether there is material variation between populations, places, organisations or services.

Transparency about uncertainty

Material gaps, limitations, conflicting evidence and uncertainty should be made visible where they affect a finding.

Learning and follow-through

Independent monitoring may examine not only whether action occurred, but whether evidence was used to identify problems, learn, adapt, correct course and sustain improvement.

2.2 Prioritisation

The Autism Reviewer's statutory remit is broad, and the capacity of the Office is finite. Independent monitoring activity may therefore be prioritised having regard to considerations including:

- the significance and likely impact of the matter;
- known or emerging risk;
- the relationship to statutory requirements or major strategic commitments;
- the scale of the population or interests potentially affected;
- evidence of inequality, inconsistency or persistent difficulty;
- the quality or absence of existing evidence;
- the likely value of independent scrutiny;
- previous findings or unresolved concerns;
- competing statutory priorities; and

- the proportionality of the work required.

These considerations are not exhaustive, and no single factor will automatically determine priority.

2.3 Graduated independent monitoring

Independent monitoring may range from routine information gathering and engagement, through focused examination of a defined matter, to a more detailed thematic or system-level review.

The level and form may change as evidence develops. A matter initially examined through routine independent monitoring may warrant more detailed scrutiny where significant risk, inconsistency, evidential weakness or a potentially material implementation problem emerges.

3. Scope, evidence and inquiry

3.1 Scope

Independent monitoring may examine any matter relevant to the implementation or effectiveness of the Autism Strategy. It is therefore not confined to actions included in a particular Delivery Plan.

Depending on the exercise, the Autism Reviewer may examine some or all of the following insofar as it is relevant to implementation or effectiveness of the Strategy:

- a statutory requirement, Strategy commitment, Delivery Plan action, measurable target, milestone or indicator;
- the relationship between the Act, the Strategy and the arrangements selected for delivery;
- the intended route through which an intervention or action is expected to contribute to a strategic outcome;
- responsibility, cooperation, leadership, governance, accountability, risk and dependency;
- resources, capability or capacity where material to implementation;
- a service, pathway, policy, programme, operational practice or cross-cutting issue;
- access, quality, consistency, equity, regional or population variation;
- outputs, outcomes and the experience of autistic people, families and carers;
- funding visibility, data, monitoring, evaluation; and
- evidence of learning, adaptation or corrective action.

Relevant guidance, research, audit findings, evaluation evidence or comparative practice may inform the analysis where appropriate.

The scope of an exercise need not extend to every related issue, body, evidence source or potentially relevant line of inquiry.

3.2 Understanding the intended route to change

Where relevant to implementation or effectiveness, independent monitoring may examine how the relevant action, intervention or delivery arrangement was expected to contribute to the intended strategic result.

This may include consideration of:

- the problem or need being addressed;
- the intended output or outcome;
- the people or populations expected to benefit;
- the actions or interventions selected;
- the principal assumptions upon which delivery depends;
- responsibilities and dependencies between organisations;
- resources, capability and enabling conditions;
- material risks or barriers; and
- the evidence supporting the expected connection between action and outcome.

The purpose is to permit independent examination of whether there is a sufficiently coherent and evidence-based route between what government has undertaken to do and the result the Strategy is intended to achieve.

Where that route is not explicit, the Autism Reviewer may, where reasonably practicable, identify the apparent route to change from the available statutory, strategic, policy and delivery material.

Any such identification is undertaken solely for the purposes of independent analysis. It does not remediate, replace, or compensate for any failure by the responsible bodies themselves to articulate, evidence, govern or evaluate the intended route.

3.3 Evidence

The Autism Reviewer may consider evidence provided by departments, public bodies, delivery partners, community, voluntary and social enterprise organisations, autistic people, families, carers and other relevant stakeholders, together with material within the public domain, and evidence gathered directly by the Office.

Depending upon the matter, this may include:

- information-request responses and supporting material;
- legislation, strategies, delivery plans, delivery plan monitoring and reporting, policies and guidance;
- business cases, implementation plans, governance papers, risk information and decision records;
- measurable targets, baselines, milestones and performance indicators;
- statistics, administrative data, and operational information;
- monitoring, evaluation and research reports;
- financial and funding information where relevant;
- audit, inspection, regulatory and review evidence;
- complaints, concerns and other information capable of assisting with understanding how arrangements operate in practice;
- evidence from autistic people, families, carers, professionals, organisations and other stakeholders;
- surveys, interviews, focus groups, workshops, roundtables, conferences, visits and other relevant proportionate forms of engagement or evidence gathering; and
- targeted evidence requests or other proportionate forms of inquiry.

No single source will automatically determine a finding. Where proportionate and reasonably practicable, material evidence may be corroborated or triangulated across different sources and evidence types.

Governmental accounts will be considered fairly but will not be treated as determinative of the finding reached.

Equally, an individual experience will not automatically be presented as representative of every autistic person, family, service or circumstance.

3.4 Participation and lived experience

A central question in assessing the effectiveness of a strategy is whether intended change is occurring for the people and populations it is intended to benefit.

Evidence from autistic people, families and carers forms a substantive part of the evidential base for independent monitoring. It will not be treated as secondary to governmental, professional, administrative or documentary evidence merely because it derives from lived experience. Where the matter concerns accessibility, implementation in practice, outcomes or experience, autistic people, families and carers may be uniquely or particularly well placed to provide relevant evidence about how arrangements operate and their effects.

Where accessibility, implementation in practice, outcomes or experience are materially in issue, independent monitoring will ordinarily seek appropriate evidence concerning the experience of autistic people, families and carers. This may be obtained directly or through sufficiently relevant and reliable existing evidence, according to the nature and scale of the exercise.

Where direct engagement forms part of an exercise, reasonable and proportionate steps will ordinarily be taken to support accessible participation.

The weight attached to lived experience evidence will be assessed according to its relevance, quality, context, coverage and other applicable evidential considerations. No category of evidence will be preferred solely because it is official, professional, administrative or documentary in origin.

Where lived experience evidence differs materially from an organisational account or documentary record, that difference may itself warrant examination, having regard to the purpose and limitations of the evidence and any relevant communication barriers, power imbalance or other contextual factors.

Individual experiences will not automatically be presented as representative of every autistic person, family, service or circumstance. Individually or cumulatively, they may nevertheless identify risks, implementation gaps or matters warranting wider inquiry.

The Autism Reviewer may examine such material insofar as it is relevant to independent monitoring, but does not determine individual cases or provide medical, clinical, social care, legal or other case-specific assessment or representation. Responsibility for individual decisions and remedies remains with the relevant organisations and established processes.

3.5 Evidence quality and reasonable inquiry

The quality and weight of evidence may be assessed by reference to factors relevant to the exercise, including:

- source and provenance;
- reliability and methodological quality;
- relevance to the question being examined;
- sufficiency and timeliness;
- coverage and representativeness;
- consistency and corroboration;
- independence;
- material assumptions; and
- known limitations or uncertainty.

Evidence that an action was completed does not by itself establish that it changed routine practice, reached the intended population, operated consistently or equitably, produced the intended outcome or was effective.

The completion of activities, milestones, deliverables or programme actions will not, without supporting evidence, be treated as demonstrating improvement in outcomes.

The Autism Reviewer may take reasonable and proportionate steps to obtain sufficient information to support a properly informed finding.

Capacity and resources may affect the prioritisation, sequencing, scope and depth of an exercise. They do not alter the requirement that any substantive finding reached through independent monitoring must have an adequate evidential basis.

Independent monitoring is not required to eliminate every uncertainty, obtain every potentially relevant item of evidence or pursue every possible line of inquiry. An exercise may conclude when reasonable and proportionate inquiry has been undertaken and any material limitations can be appropriately identified.

3.6 Information not provided or not available

Where material evidence is requested but not provided, or is otherwise unavailable, the Autism Reviewer may identify and, where appropriate, report publicly:

- the information sought;
- its relevance to the independent monitoring question;
- whether the information was not provided, was not held, did not exist or was otherwise unavailable;
- any explanation provided for its absence;
- the resulting evidential limitation;
- any reasonable inference arising from the absence, non-provision or unavailability of the information; and
- the effect upon the finding or level of evidential confidence.

The Autism Reviewer may draw such reasonable inferences from the absence, non-provision or unavailability of evidence as the circumstances and the evidence reasonably support. In determining whether an inference is justified, regard may be had to the nature and significance of the information, whether it ought reasonably to exist or be held, responsibility for producing or maintaining it, the opportunity afforded to provide it, any explanation for its absence or non-provision, and any other relevant evidence.

Any inference drawn will be no broader than the evidence reasonably supports and, where a proposed inference would materially contribute to a proposed adverse finding, the requirements of section 5 will apply.

No adverse inference will be drawn automatically from the absence or non-provision of evidence. The Autism Reviewer will not infer that an action did not occur merely because evidence of it is absent where the evidence as a whole does not reasonably support that finding.

Equally, an absence of sufficient evidence will not be treated as demonstrating that implementation or effectiveness has been established.

Where information that would reasonably be expected to exist or be available, having regard to the nature of the responsibility and any applicable statutory, strategic, governance or monitoring requirements, is materially absent or inadequate, that absence or inadequacy, and any reasonable inference arising from it, may itself form part of the independent monitoring finding.

4. Assessment, observations and findings

4.1 Core Assessment Questions

Independent monitoring may be informed by the following questions insofar as they are relevant to the particular exercise.

1. Benchmark

What did the law require, or what did government commit itself to achieve?

2. Measures and expected progress

What measurable target, outcome, baseline, indicator, milestone or timeframe applies, and what progress would reasonably have been expected by the point being examined?

3. Delivery logic and responsibility

How was the intended change expected to occur, who was responsible, and what resources, dependencies, risks and governance arrangements were material to delivery?

4. Implementation in practice

What was actually done, to what extent was it implemented as intended, and what changed in routine practice?

5. Reach, consistency and equity

Who was reached, who was not, and was implementation accessible, consistent and equitable across relevant populations, places, organisations or services?

6. Outcomes and experience

What do operational evidence and people's experience show about intended and unintended outcomes, including any differential or unequal effects, and what other material factors may have contributed to the observed position?

7. Prospects of achievement

What does the evidence indicate about the pace of progress and the prospects of achieving the relevant statutory requirement, strategic objective, target or commitment?

8. Evidence, learning and next steps

How robust is the evidence, what remains uncertain, what has been learned, and what requires correction, adaptation, further examination or follow-up?

Not every question will require a separate finding in every exercise. Together they provide a framework for maintaining a clear line of sight from statutory and strategic intention to implementation, outcome and future delivery.

4.2 Implementation, effectiveness, prospects of achievement and evidential confidence

Where relevant to the purpose and maturity of the matter being examined, analysis may distinguish between four related but separate judgements.

Implementation

What the evidence establishes about whether and to what extent the relevant action, commitment or arrangement has been implemented in practice.

Effectiveness

What the evidence supports regarding whether implementation is contributing materially to the intended outcomes, including any material unintended or unequal effects.

Prospects

What the available evidence indicates about whether the relevant objective, target or commitment is likely to be achieved, having regard to current position, pace, dependencies, risks and planned action.

Evidential confidence

The degree of confidence that can reasonably be placed in any assessment of implementation, effectiveness or prospects of achievement, having regard to the quality and sufficiency of the evidential basis and any material gaps, limitations, conflicting evidence or uncertainty.

These are distinct analytical questions. Strong evidence may support a finding of poor progress just as weak evidence may limit confidence in an apparently positive position.

Observations and findings will ordinarily be expressed in clear narrative terms and supported by concise reasons. Where standard descriptors or ratings are used, their intended meaning and evidential basis should be made clear.

4.3 Missing or conflicting evidence

The analysis may distinguish between:

- something that did not occur;
- something that occurred only in part;
- something that may have occurred but has not been adequately evidenced;
- something whose effect cannot yet reasonably be established; and
- something that cannot reliably be determined on the evidence available.

Missing, incomplete or conflicting evidence may:

- prevent or narrow a finding;
- reduce evidential confidence;
- affect any assessment of prospects;
- indicate weakness in governmental monitoring or evaluation arrangements;
- constitute a relevant governance or accountability finding; or
- warrant further proportionate inquiry.

Uncertainty will not automatically be converted into a neutral or positive assessment.

5. Fairness, reporting and follow-up

5.1 Procedural fairness

Where, in the course of an independent monitoring exercise under this Methodology, a proposed observation or finding is **materially adverse to, or involves significant criticism of**, an identifiable department, public body, organisation or person, a fair and proportionate process will be adopted.

What fairness requires will depend upon the nature and significance of the proposed observation, finding or criticism, the evidential basis upon which it rests, any material factual dispute, its likely consequences and any relevant confidentiality, safeguarding, urgency or other practical consideration.

Not every observation, finding, recommendation, evidential limitation or emerging concern will require a formal representations process under section 5.2.

5.2 The representations process

Where fairness requires, a reasonable opportunity will be provided to respond to the substance of the proposed observation, finding or criticism and the material basis upon which it is proposed to be made. Any response received will be considered with an open mind before the relevant observation or finding is finalised.

Representations are intended to assist in testing the factual accuracy, evidential completeness and fairness of the proposed observation or finding. They are not a process for agreeing, approving or clearing the Autism Reviewer's observations, findings or recommendations.

The form, scope and timing of representations may vary according to the circumstances.

Ordinarily, one substantive opportunity to make representations will be sufficient. A further opportunity may be afforded where reasonably necessary in the interests of fairness.

The Office may set reasonable requirements concerning the timing, length, format and supporting evidence for representations.

Subject to the requirements of fairness, the Autism Reviewer may decline to delay an exercise, extend a process or consider material that is immaterial, repetitive, disproportionate or submitted late without reasonable explanation.

5.3 Confidential evidence

Information supplied in confidence will be treated sensitively and handled in accordance with applicable legal and information-governance requirements. Confidentiality cannot, however, be guaranteed in all circumstances.

Information may need to be disclosed, its substance shared or action taken because of legal obligations, safeguarding concerns, or the requirements of procedural fairness.

Where confidential evidence is materially relied upon in support of an adverse observation or finding and cannot be disclosed in full, consideration may be given to whether its substance can fairly be summarised, anonymised, corroborated or relied upon for a narrower purpose.

Where the evidence cannot be used consistently with fairness, it may be insufficient to support the proposed finding.

5.4 Additional advice and review

The Autism Reviewer may seek additional methodological, analytical, legal or subject-matter advice or review, where the significance, complexity or technical nature of the exercise warrants it. Responsibility for the final observations, findings or recommendations remains with the Autism Reviewer.

5.5 Statutory concerns

Where evidence raises a material question as to whether a statutory requirement relevant to implementation or effectiveness has been met, the Autism Reviewer may publicly report that concern following reasonable and proportionate inquiry and fair process and, after taking legal advice where appropriate.

Where any such concern is publicly reported, the analysis should ordinarily identify:

- the relevant statutory requirement;
- the material evidence giving rise to the concern;
- any material contrary evidence or explanation;
- any relevant evidential limitation; and
- the basis for the finding reached.

A finding expressed through this Methodology is an independent monitoring finding. It does not constitute a binding judicial determination of unlawfulness, fault or legal liability.

5.6 Observations, findings and recommendations

The Autism Reviewer may make observations, reach findings and, where appropriate, make recommendations arising from independent monitoring.

For the purposes of this Methodology:

- an **observation** identifies a matter, pattern, feature, concern or evidential issue brought into view through independent monitoring;
- a **finding** is a reasoned conclusion reached on the evidence available; and
- a **recommendation** is a proposed action, change or matter for consideration arising from an observation or finding.

These may be publicly reported where appropriate.

An observation, finding or recommendation does not itself impose a legally binding requirement on a Minister, department or public body. Responsibility for determining the appropriate response and for implementation remains with the relevant body, subject to its applicable statutory and public-law obligations.

Where useful and proportionate, an observation, finding or recommendation may identify, as applicable:

- the body or bodies capable of acting;
- the problem or risk requiring attention;
- the change or result sought;
- why that change is justified;
- how progress or completion could be demonstrated; and
- an appropriate timeframe or point for review.

Observations, findings and recommendations may be included in the Autism Reviewer's annual report or an additional report under section 3C(5), or communicated through correspondence, non-statutory public reports or briefings, advice to the Assembly, oral evidence or another appropriate form of communication. References in this Methodology to advice provided to the Assembly include, where appropriate, advice, evidence, briefings and other communications provided to Assembly Committees in connection with the Autism Reviewer's statutory functions.

The nature of the output will depend upon the significance and purpose of the independent monitoring undertaken.

5.7 Follow-up

Independent monitoring does not necessarily end when an observation, finding or recommendation is published.

Where appropriate, subsequent independent monitoring may revisit a previous observation, finding or recommendation or matter requiring attention.

Follow-up may consider:

- any governmental or organisational response;
- whether a recommendation was accepted, rejected or accepted in part and the reasons given;

- action committed to or subsequently taken;
- whether expected milestones or timescales were met;
- evidence of resulting change;
- whether risks or evidential gaps remain; and
- whether the matter requires further independent monitoring, escalation or no further action at that time.

A previous observation, finding or recommendation may be revised where subsequent evidence reasonably warrants a different assessment. The basis for any material change in assessment should be made clear.

6. Review, records and commencement

6.1 Records

The Office will maintain proportionate records sufficient to support and explain substantive observations, findings and recommendations arising from independent monitoring.

The level of record-keeping should be proportionate to the significance and complexity of the exercise and should support transparency, consistency, continuity and accountability.

6.2 Review of this Methodology

This Methodology may be reviewed and revised where experience or a material legal, strategic, operational or methodological development indicates that refinement would be appropriate.

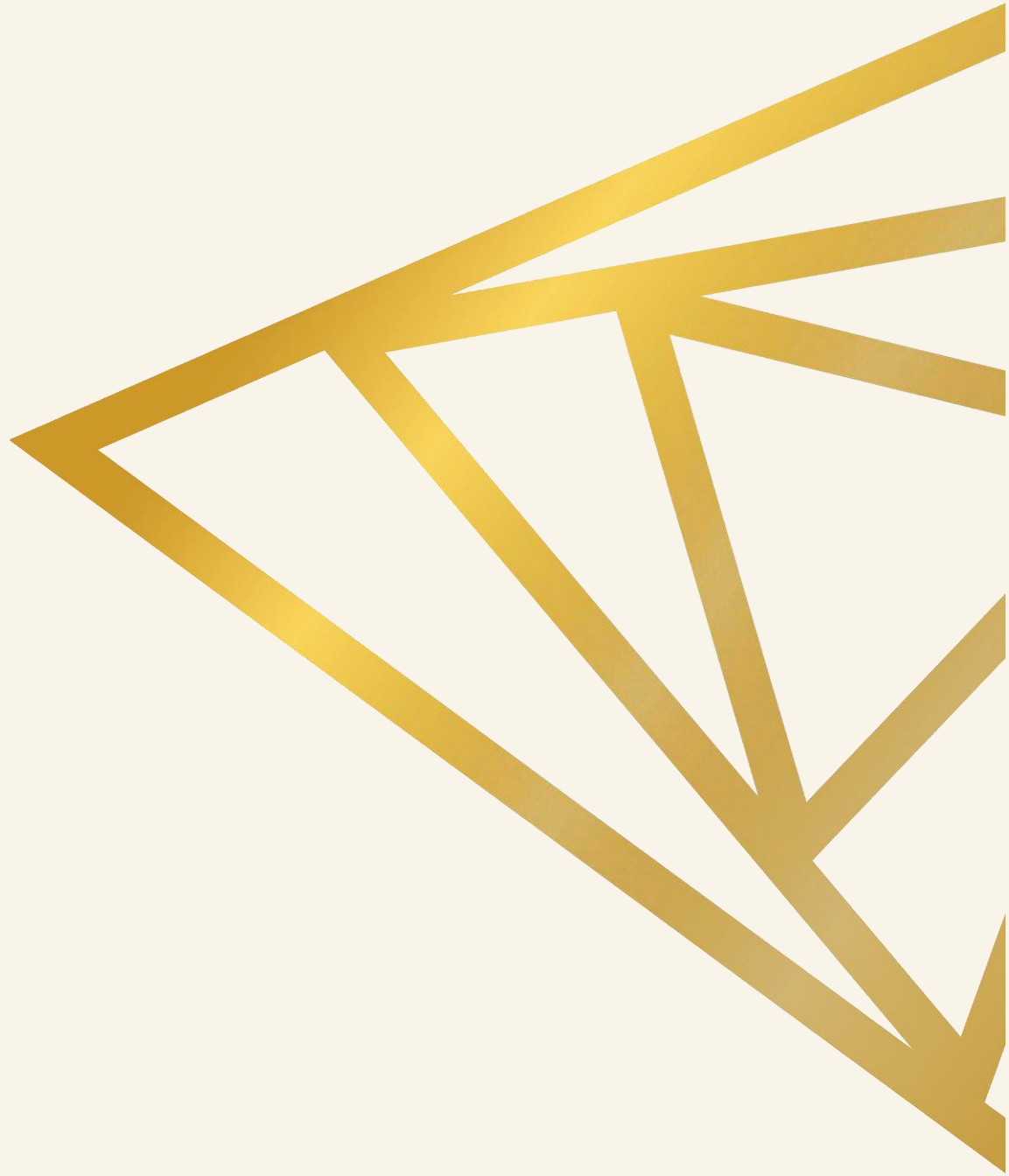
Material revisions will ordinarily be identified prospectively and the revised Methodology dated or otherwise version controlled.

A subsequent methodological refinement will not retrospectively alter the stated basis upon which a published observation, finding or recommendation was made. Where an earlier matter is reconsidered under a revised Methodology, that should be made clear.

6.3 Commencement and transition

This Methodology takes effect 22 September 2026 and applies to monitoring activity commenced on or after that date.

For independent monitoring activity already underway at that date, some or all of this Methodology may be applied where reasonably practicable, proportionate and fair, having regard to the stage and circumstances of the exercise.

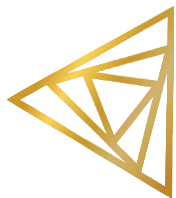


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