

The Online Safety Bill

Lead department	Department for Digital, Culture, Media and Sport (with the Home Office)
Summary of proposal	Introduces a new regulatory framework establishing a duty of care on companies to improve the safety of their users online, overseen and enforced by Ofcom.
Submission type	Impact assessment (IA) – 31 January 2022
Legislation type	Primary legislation
Implementation date	2024
Policy stage	Final
RPC reference	RPC-DCMS-4347(4)
Opinion type	Formal
Date of issue	18 February 2022

RPC opinion

Rating¹	RPC opinion
Fit for purpose	The IA fully assesses direct impacts on business, in line with RPC guidance on primary legislation IAs. It would benefit from focussing more on the impacts of regulating ‘legal but harmful’ content and activity in relation to adult users, and from including a stronger assessment of risks to freedom of speech and privacy.

Business impact target assessment

	Department assessment	RPC validated
Classification	Qualifying regulatory provision (IN)	Qualifying regulatory provision (IN)
Equivalent annual net direct cost to business (EANDCB)	Not quantified	Further IAs to be submitted at secondary legislation and/or regulator stages for validation of an EANDCB figure
Business impact target (BIT) score	Not quantified	See above
Business net present value	Not quantified	
Overall net present value	Not quantified	

¹ The RPC opinion rating is based only on the robustness of the EANDCB and quality of the SaMBA, as set out in the [Better Regulation Framework](#). The RPC rating is fit for purpose or not fit for purpose.

RPC summary

Category	Quality	RPC comments
EANDCB	Green	The Department's approach to estimating and accounting for impacts on business is in line with RPC guidance for primary legislation IAs. The IA presents an indicative EANDCB, explaining that the final figure will depend on policy detail to be determined at secondary legislation stage and/or by Ofcom. The RPC expects to see the further IAs produced for those measures in order to validate an overall EANDCB figure for this measure for BIT purposes.
Small and micro business assessment (SaMBA)	Green	The IA includes a strong SaMBA, which breaks down indicative costs per business by cost type and firm size, and estimates the share of aggregate cost by business size. It explains why exempting small and micro businesses (SMBs) would compromise the policy objectives and considers mitigation measures.
Rationale and options	Good	The IA provides evidence of existing harm and discusses market failure rationales for intervention. It would benefit from providing further evidence relating to content and activity that is 'legal but harmful' to adult users, to support the rationale for intervention. The IA only analyses the preferred option, but describes other options considered at pre-consultation stage. It would benefit from further discussion of why the chosen option is preferred.
Cost-benefit analysis	Satisfactory	The IA makes good use of data sources and evidence to provide illustrative cost estimates, including a break-even analysis. It would benefit from focussing more on the costs and benefits of extending the scope to cover content that is 'legal but harmful' to adults. The break-even analysis would be improved by focusing less on reduced detriment relating to existing criminal offences. The IA would also benefit from strengthening its assessment of risks to freedom of speech and privacy.
Wider impacts	Good	The IA provides a good assessment of a range of indirect and wider impacts and a particularly strong analysis of competition and trade impacts. It would benefit from further analysis of public sector impacts and impacts on civil society organisations (CSOs).
Monitoring and evaluation plan	Good	The IA sets out governance plans and high-level objectives for a post-implementation review (PIR). The Department has strengthened the monitoring and evaluation (M&E) plan by including key metrics, specific research questions and data collection for the PIR.

Background

The RPC reviewed an earlier version of this IA dated 8 November 2021² (the original IA) relating to the Online Safety Bill (the Bill) and issued a ‘fit for purpose’ opinion on the original IA on 15 December 2021 (the December 2021 Opinion).³ Subsequently, the Government accepted a number of recommendations resulting from pre-legislative scrutiny, and has revised the draft Bill. The main changes were the addition of:

- a provision on pornographic provider content to prevent children from accessing non-user generated pornographic content;
- a duty on Category 1 and 2A platforms to implement systems and processes to minimise the publication and/or hosting of fraudulent advertisements (the fraudulent advertising duty); and
- a duty on Category 1 platforms to offer optional user verification and provide user empowerment tools.

This opinion updates and supersedes our December 2021 Opinion to take account of the Department’s assessment of these further policy changes as reflected in the revised IA. This opinion also takes into account other revisions to the original IA made in response to RPC comments in the December 2021 Opinion.

The revised IA was submitted to the RPC for review on 31 January 2022. On 4 February 2022, the Government announced further revisions to the Bill, including designating additional priority illegal offences.⁴ However, the Department has indicated that the business impact of the most recent changes to the Bill will depend on matters that will be detailed in secondary legislation and Ofcom’s code of practice, and will be subject to consultation and further IAs. Therefore, the Department has stated that the estimates in the revised IA remain its best estimate of the potential scale of impacts at this primary legislation stage. The RPC expects the Department to submit the further IAs to it for review in due course.

Summary of proposal

The proposal would create a new regulatory framework establishing a duty of care on companies to improve the safety of their users online, which will be overseen and enforced by Ofcom. The new regulatory framework will apply to any service:

- which hosts user generated content (UGC) which can be accessed by users in the UK; and/or
- facilitates private or public interaction between service users, one or more of whom is in the UK;
- search engines; and

² IA not published.

³ RPC-DCMS-4347(3) Online Safety Bill, 15 December 2021.

⁴ <https://www.gov.uk/government/news/online-safety-law-to-be-strengthened-to-stamp-out-illegal-content>

- any service which publishes pornographic content which can be accessed by users in the UK (para. 67).

Each provider in scope will have a core duty of care to prevent UGC or activity on their services which causes 'significant physical or psychological harm' to individuals. Providers will be required to complete risk assessments of their services and take reasonable steps to reduce the risks identified. The Government intends to set out priority categories of 'legal but harmful' content and activity in secondary legislation and identify priority categories of offences. Providers will also have to provide mechanisms to allow users to report harmful content or activity and to appeal removal of their content.

The IA estimates 25,100 platforms will be in scope of the new regulations, down from an estimated 180,000 in the pre-consultation stage IA (reduced by exemptions introduced for specific services, including 'low risk functionality' and internal business services).

The IA anticipates between 30-40 platforms that pose the highest risk will be subject to additional regulation by Ofcom. The IA describes (para. 73) that the proposal would also create three categories of regulated services:

- Category 1 - likely to be the highest risk and 'highest reach user to user' platforms, e.g. the largest social media sites and pornography sites, which will have additional duties with regard to content that is harmful to adults;
- Category 2A - the highest risk and highest reach search services, e.g. the largest online search engines; and
- Category 2B - high-risk, high-reach platforms that may not necessarily meet the Category 1 threshold.

Thresholds for these categories will be set out in secondary legislation. Service providers in those categories will have additional duties imposed upon them, including submitting annual transparency reports to Ofcom.

As noted above, the Bill now includes a specific provision covering pornography publishers that do not host USG or enable peer to peer interaction. This is in addition to companies' new core safety duties set out in the Bill. The Department estimates that a further 11 UK-based businesses (pornography publishers) will be in scope. They will be required to verify the age of their users to ensure that children are not able to access this type of content. Category 1 and 2A platforms will also have the fraudulent advertising duty, including carrying out customer due diligence on their advertisers. Category 1 platforms will be required to offer optional user verification and user empowerment tools to allow users to verify their identity and the ability to filter the type of content they see on those platforms.

The IA only offers an indicative scale of impacts at this stage, because the policy details will be decided in secondary legislation and the Ofcom code of practice. It suggests an illustrative cost of £2.5 billion over ten years in present value terms, including:

- transition costs of £65 million for familiarisation, implementing a user reporting mechanism and updating terms of service;
- recurring costs of £290 million per year, amounting to around £2.5 billion over ten years in present value terms. The largest costs are in respect of:
 - additional content moderation (£1.9 billion);
 - a fee paid by industry to cover Ofcom's operating costs (£313 million);
 - fraudulent advertising duty, including conducting customer due diligence (£142 million);
 - employing age assurance technology (£36 million); and
 - producing risk assessments (£33 million).

The Department has not attempted to monetise benefits at this stage. However, the IA estimates the aggregate current detriment from certain types of online harm and uses it to carry out a 'break-even analysis', indicating that the measure would have a positive net present value if it eliminated approximately 2.1 per cent of the online harms included in the calculation (such as child sexual abuse, cyberstalking and fraud).

EANDCB

The Department's approach to estimating and accounting for impacts on business fulfils the requirements of 'scenario 2' in the RPC guidance for primary legislation IAs.⁵

The IA estimates an illustrative EANDCB figure of £251.2 million (2019 prices; 2020 present value base year), based upon anticipated requirements from the Ofcom code of practice, qualitative information from business and an assumed set of plausible actions providers may need to take. However, it states that it is not possible to calculate a robust EANDCB figure at this stage due to uncertainties about final policy details.

The EANDCB has increased by around 8 per cent since the original IA, largely due to costs relating to carrying out customer due diligence on advertisers in respect of the fraudulent advertising duty. The Department has also now partially monetised the cost to platforms of employing age assurance technologies, although this is not presently included in the EANDCB (para.191). The IA also notes that this cost may be incurred by platforms in respect of their core duties as well as the provision on published pornography (the 'pornography provision'). The Department has estimated an indicative cost for user verification (£16.8 million) but explains that it has been unable to monetise the impacts of the user empowerment tools requirement (para. 227).

The Department states that further IAs will be produced to support secondary legislation and the Ofcom code of practice. The EANDCB calculation in further IA produced at the secondary legislation stage will need to include direct impacts to business in respect of the new policy elements or explain why it would not be

⁵ <https://www.gov.uk/government/publications/rpc-case-histories-primary-legislation-ias-august-2019>.

proportionate to do so. The RPC expects to see any further IA and/or BIT assessments relating to this measure in due course, in order to validate an overall EANDCB figure for this measure for BIT purposes.

Direct/indirect

Albeit indicative at this stage, the IA correctly identifies direct impacts on business.

Counterfactual/baseline

The IA provides a good discussion of the counterfactual (the do-nothing option). Following RPC comments, the IA now includes a useful discussion of the 'Voluntary Principles to Counter Online Child Sexual Exploitation and Abuse' (para. 98) adopted in 2020 by the UK and other countries. The IA would be further improved by extending discussion of this framework's potential impact on the counterfactual.

Comparison against pre-consultation stage IA estimates

The estimated number of providers in scope has reduced significantly since pre-consultation stage, however the overall estimated costs have increased significantly, which implies a very large increase in estimated costs per business. Following RPC comments in our December 2021 Opinion, the IA now includes a comparison against pre-consultation estimates (para. 353). The IA would be further improved by comparing costs per business, given the estimated number of platforms affected has reduced markedly since the consultation stage (paras. 70 and 111).

See also comments under 'Cost-benefit analysis' below.

SaMBA

The IA includes a strong SaMBA, which analyses possible disproportionate impacts on SMBs, explains why exempting them would compromise the policy objectives and considers mitigations. It sets out indicative costs per business by cost type and firm size, and estimates the share of aggregate cost by business size (table 39). The breakdowns indicate large and medium businesses are expected to bear around 96 per cent of costs. The SaMBA considers mitigation measures in detail (see para. 370 and table 41). It also describes engagement with SMB representative organisations. The SaMBA would benefit from additional discussion in some areas, e.g. the impact of SMBs having relatively limited compliance resources. The IA would also benefit from discussing improved compliance incentives for 'small' platforms, to address the risk that 'problematic' content will migrate to under-resourced or non-compliant platforms.

The IA updates the SaMBA to take account of the new provisions in the Bill; it usefully includes an assessment of the impact of the fraudulent advertising duty on SMBs that advertise on in-scope platforms (paras. 365-366). The 11 businesses estimated to be affected by the 'pornography provision' are all expected to be SMBs.

The IA notes that Ofcom, through its development of codes and regulator guidance, will further consider potential impacts on these businesses (para. 364).

Rationale and options

The IA provides a range of evidence indicating societal harm and concern around online activity, focusing mostly on illegal activities. It describes a theoretical basis for government intervention, in terms of negative externalities and information asymmetries. It also explains in detail the current legal and regulatory context and how the preferred option fits in with other measures. In general, research commissioned by the Department found that mitigations which organisations already had in place were proportionate to the risk of potential online harm and that most platforms were already investing in protecting users in the absence of regulation (see paras. 90-92). Given that, the IA would benefit from providing greater evidence to support the rationale for intervention, particularly relating to ‘legal but harmful’ content for adult users.

This IA considers only the preferred option and the counterfactual. However, it briefly describes the three policy options considered in the pre-consultation stage IA, setting out their overall costs and net present values (paras. 40-43 and table 1). The IA would be significantly improved by providing a stronger justification for selecting the ‘full risk-based scope’ as the preferred option over the “limited risk-based scope” option considered at pre-consultation stage. It would also be improved by fully describing the relative costs, benefits and risks of the two ‘risk-based’ options and providing better evidence and analysis to justify the preferred option (see also comments under ‘Cost benefit analysis’ below).

The IA would benefit from discussing the likely effectiveness of codes of practice in this area, including addressing any risk that they may decrease legal certainty and increase regulatory ‘churn’, and may be more difficult to enforce than rule-based regulation.

The IA explains that the Department considered non-regulatory options as part of the long-list policy development process, including self-regulation and voluntary approaches to tackle harm. It describes several innovative non-regulatory online safety measures which the Government proposes to undertake that are complementary to this measure (see paras. 46-48). However, the IA would benefit from a more detailed explanation of why the Government believes non-regulatory options would not achieve the policy objectives given the efforts businesses and CSOs are already taking to prevent online harm, particularly in relation to legal but harmful content for adult users. The IA could discuss, in particular, a ‘private right of action’ co-regulatory option (enabling injured parties to sue service providers, based on legally-defined categories of harmful content or harmful services in respect of UGC).

The IA would benefit from explaining further whether and, if so, how the UK (e.g. through Ofcom) will seek to enforce the regulations for online providers which have no legal presence in the UK or are hosted from other countries.

The IA includes some useful discussion of the rationale for the newly added policy measures. On the ‘pornography provision’, the IA cites British Board of Film Classification research which found that the adult industry has not adopted age assurance technologies due to concerns about competition and the potential commercial impact if the requirement was not mandatory for all services (para. 178). On fraudulent advertising, the IA discusses the voluntary activity that platforms are currently undertaking but notes that fraudulent adverts are still widespread online (para. 203). The IA would benefit from further discussion of why the advertising industry is unlikely to address the problem absent regulation. More generally, the IA would benefit from discussing alternative options relating to the new policy provisions, including non-regulatory options.

Cost-benefit analysis

Including content ‘legal but harmful’ to adults

The IA would be significantly improved by providing a clearer and more detailed analysis of the impact of the policy proposal including content and activity which is ‘legal but harmful’ to adults. That would enable a clearer comparison of the relative costs, benefits and risks of the preferred option and the ‘limited risk-based scope’ option considered at pre-consultation stage (as this element is the key difference between them).

The IA helpfully sets out the estimated costs of the options from the pre-consultation stage IA. The ‘limited risk-based scope’ option had an indicatively monetised societal cost around 20 per cent lower than the preferred option and an indicative EANDCB around 25 per cent lower. As noted above, the preferred option’s scope is wider and, therefore, it offers greater potential benefit. However, the estimated costs of the existing harm in relation to the two ‘legal but harmful’ content categories (cyberbullying and intimidation of public figures) appear to account for only around 0.5 per cent of the total monetised potential benefit figure (table 27). Regulating ‘legal but harmful’ content in relation to adults would also appear to carry the most significant risks of unintended consequences, in particular restrictions on freedom of speech and privacy (see comments below). Although the IA now includes discussion of the difficulty of quantifying ‘legal harm’ in the baseline (para. 44), the IA should address more fully the costs, benefits and risks associated with including ‘legal but harmful’ content for adults in the scope and provide sufficient evidence and analysis to support the ‘full risk-based scope’ option.

Risk of restrictions on freedom of speech

The IA acknowledges the subjective nature of ‘harmful’ content, which the proposal defines as a foreseeable risk of “*a significant adverse physical or psychological impact on [an adult] of ordinary sensibilities*”. This approach will therefore involve judgement. It provides a useful discussion of risks to freedom of speech (paras. 336-342). It also acknowledges that major technology companies already exercise significant power over what lawful speech is available online and helpfully lists some concerns raised by some stakeholders. Nevertheless, individuals or groups could seek to shut down legitimate debate or criticism by influencing decisions of online

media companies and Ofcom through mis-use of user reporting functionality. They could also seek to disable the mechanism or to impose costs on service providers by spurious or excessive requests. The IA would benefit from discussing these risks, perhaps by considering situations where platforms have removed (and in some cases subsequently reinstated) online content. It could also usefully consider any analogies to or learning from experience with the broadcasting code and press complaints mechanisms. The IA would also be improved by discussing risks of individual over self-censorship, the costs of appealing against content removal and the limited value of content re-instatement after a debate has moved on. Also, the IA refers to protections in relation to “journalistic content” and “content of democratic importance” but would benefit from discussing how these protections would operate in practice. The IA would benefit from referring to the work of the House of Lords Democracy and Digital Technologies Committee.

The preferred option seeks to improve awareness of and reduce the occurrence and spread of misinformation and disinformation online. The IA helpfully now defines these terms (para. 311) but would benefit from discussing the difficulties and risks providers face in tackling these issues. The IA would also benefit from considering ‘mal-information’ and its relevance to the proposal. More generally, the IA would benefit from discussing the subjective nature of some key terms used in the proposal, the consequent difficulties in defining them and how this would affect the assessment of costs and benefits.

Evidence and data

The IA makes good use of data sources and evidence obtained through consultation and other engagement. It provides a clear assessment of the likely number of businesses/platforms directly affected and includes useful sensitivity analyses in the ‘risks’ section (para. 355 and table 33). It also estimates the number of CSOs likely to be affected by the measure (paras. 102-105) and discusses the direct impact on CSOs that operate platforms.

As noted above, cost estimates have been revised significantly since pre-consultation stage (for example, transition cost assumptions have been revised upward substantially – see paras. 141 and 148).

The assessment of familiarisation costs appears thorough, taking account of the costs of dissemination and obtaining legal advice (para. 124). The IA would benefit from providing further information on the sources for some of the illustrative figures (e.g. para. 139).

The IA usefully reviews the limited international evidence available. Most of those measures are not yet in force, but the Department has considered the German Act to Improve Enforcement of the Law in Social Networks (‘NetzDG’) in more detail. However, the IA would benefit from discussing the relative value of this evidence, as the German act appears to apply only to “manifestly unlawful” content.

The IA draws on various data sources, in particular a survey of SMEs conducted by the Interactive Advertising Bureau, to provide an indicative cost of £142.4 million (over ten years in present value terms) for customer due diligence in respect of the

new fraudulent advertising duty. Estimates of set-up costs and unit costs of conducting customer due diligence on an advertiser make use of assumptions in anti-money laundering IAs. These appear to be reasonable proxies at this stage, but the Department should seek to obtain evidence from stakeholders for the further IA at secondary legislation stage and consider any PIRs or other evaluation evidence from the anti-money laundering legislation and related IAs.

The IA would also benefit from addressing some additional issues to demonstrate the robustness of its cost estimates for customer due diligence, for example:

- how fraudulent advertising is defined and differentiated from advertising for fraud-enhancing products or services;
- clarification of what customer due diligence is likely to entail and how (in relation to e.g. non-compliant products) it relates to existing market surveillance arrangements; and
- whether the cost estimates take sufficient account of the openness of the large platforms and the small, quasi-anonymous, often very short-lived nature of online retailers using them.

These issues will need to be addressed in the further IAs relating to secondary legislation and/or Ofcom code of practice.

As noted above, the IA now partially monetises costs to platforms of employing age assurance technologies, based upon data from a survey of age verification providers in January 2022. This data has enabled the Department to produce illustrative costs for different platform scenarios, usefully strengthening the analysis. The IA would benefit from a clearer presentation of the calculations leading to the aggregate indicative estimate of £35.8 million (the central estimate). As noted above, the RPC would expect to see a cost for this requirement included in the EANDCB in further IA at secondary legislation stage.

Assumptions, risks and uncertainty

The IA's section on risks and assumptions contains a useful sensitivity analysis, including on the number of businesses/platforms affected. Given the very high uncertainties around impacts, the IA would benefit from:

- varying assumptions for the percentage of in-scope platforms requiring extra expenditure on content moderation (para. 165);
- providing sensitivity analysis around the assumed prevalence and incidence of harmful content;
- discussing the wide variety of estimates provided by certain platforms and providing detail on the £1.9 billion calculation at table 12;
- discussing the risks associated with the complementary non-regulatory measures which are asserted to be "vital to the success of the framework" (para. 47); and
- the extent to which 'user empowerment tools', which will enable users to filter 'legal but harmful' content and determine who they interact with online, could have negative effects through reducing users' exposure to different ideas or viewpoints.

The IA would be improved by expanding the discussion around displacement of 'problematic' content to under-resourced or non-compliant platforms. For example, it could address users gradually accessing content through internet intermediaries (and through free Virtual Private Networks), potentially to platforms that host even more harmful content.

Modelling, benefits and break-even analysis

The Department's decision to include a break-even analysis for the measure seems to be reasonable, given the difficulties of monetising benefits. However, the benefits figure calculated for the break-even analysis is comprised largely of expected reductions in types of harm which already constitute criminal offences. Given that, the IA would benefit from better explaining why the existing criminal offences and current enforcement measures are not sufficiently effective in addressing online harms and how Ofcom will work in tandem with law enforcement to achieve the policy objectives. The analysis would also benefit from more clearly differentiating between harm to children and adults.

The IA acknowledges that there is little evidence as to the likelihood of benefits occurring at the level necessary to offset costs. It would benefit from discussing business views on the likely effectiveness of the proposed measures, perhaps drawing upon their experience of carrying out existing activities such as risk assessments.

The IA's methodological approach remains largely the same as at pre-consultation stage IA. However, it includes one additional quantified harm: fraud. In the previous final stage IA this was limited to fraud facilitated through UGC; this has since been expanded to allow for the policy inclusion of fraudulent advertising. The proportion of fraud costs estimated to be in scope of the policy has increased from 33% to 45% (table 24). The IA also significantly updates some other estimates of existing harm. The IA would benefit from explaining the changes, in particular the very large increase relating to cyberstalking (table 23). It would also benefit from setting out the respective roles of various government agencies in combatting fraud (such as Ofcom, the Information Commissioner's Office, the Financial Conduct Authority, the Serious Fraud Office, the Advertising Standards Agency, etc), identifying any areas of co-operation between regulators and/or overlapping regulator responsibility, and discussing in more detail the impact of the Bill on all relevant regulators.

The Department has developed the modelling further since the previous final stage IA, particularly in response to the policy additions. The estimated cost of employing age assurance technologies combines individual platform costs based on two separate approaches, an industry pricing survey and top-down user-modelling scenarios. The IA also sets out in detail its top-down modelling approach to estimate four main costs associated with the new advertising fraud duty (paras. 206-215).

The IA usefully includes a new section on the indirect costs of the fraudulent advertising duty and the risk of fraudulent advertising being displaced to smaller less well-resourced platforms (paras. 216-217).

Wider impacts

The IA provides detailed assessments of trade and competition impacts. The assessments would benefit from further discussion of level playing fields between the UK and other countries and whether this measure may create potential barriers to entry, including whether compliance costs could deter start-ups in the UK.

The IA includes a useful section discussing impacts on innovation (paras. 396-404). The IA acknowledges that the proposal will have disproportionate impacts companies in highly innovative sectors (para. 401). However, it sets out how these impacts could be mitigated, e.g. through Ofcom potentially adopting a principles-based approach allowing flexible solutions, a proportionate focus on higher risk activities and the use of exemptions. The IA would benefit from clarifying what is meant by a 'principles-based' framework (para. 403) in this context, e.g. whether the compliance and enforcement efforts will focus on prevention of harm to users, expected regulatory outcomes, etc. The IA could also usefully consider further how the proposal might affect growth in the affected sectors.

The IA would benefit from considering the impacts on CSOs in more detail, e.g. implications for organisations such as Victim Support (with raised awareness perhaps leading to increased referrals). It could also usefully discuss the requirements CSOs will face and how Ofcom expects to interact with CSOs. The IA could also discuss potential displacement of activity away from CSOs which are currently focussed on addressing these types of harms.

The IA would benefit from greater monetisation of public sector costs. For example, the IA could present indicative estimates of Ofcom's costs (including inspection and enforcement) and of establishing the body that will be responsible for receiving and processing online child sex abuse reports (para. 83). It monetises some costs relating to criminal justice but would benefit from discussing potential implications for use of law enforcement resources.

Monitoring and evaluation plan

The IA describes the M&E plan for the measure (paras. 418-428), including plans for governance, high-level objectives, sources of evidence and the phases for the PIR. The Department has significantly strengthened the M&E plan in response to RPC comments in the December 2021 Opinion, and the IA now identifies key metrics, specific research questions and data that will need to be collected.

Regulatory Policy Committee

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Committee member Daniel Dalton did not participate in the scrutiny of this case to avoid a potential conflict of interest.