Reforming the Framework for Better Regulation

Submission by Sir Mark Boleat

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Introduction

1. On 22 July 2021, the Department for Business, Energy and Industrial Strategy (BEIS) published a consultation document Reforming the Framework for Better Regulation. Comments are sought by 1 October 2021.

2. My qualifications for commenting on this issue include having chaired regulatory bodies, established a regulatory regime (for claims management companies), chaired regulated companies, membership of the Regulatory Policy Committee and author of an influential paper on regulation – An Agenda for better Regulation. I also made a submission to the Taskforce on Innovation, Growth and Regulatory Reform (TIGGR), much of which is relevant to this consultation. The TIGGR published its report on 16 June 2021.

Summary

3. The key issues are –

- The consultation is based on the false premise that much regulation comes from Government departments. In practice, only a small proportion does; regulators are responsible for most regulation, and in practice much of the regulatory burden now stems from informal regulation such as the issuing of guidance or expectations, information requests and enforcement policy and practice.
- The impact assessment process is not fit for purpose as it bears no relation to the way that policy is made.
- A "common law" approach to regulation may sound attractive in theory but it would mark a very significant change from the current prescriptive approach, giving more power to regulators. The concept needs further detailed consideration, including examples of how it would work in practice, before there is wholesale scrapping of existing regulations.
- The consultation document emphasises the importance of the proportionality principle and the role of regulators in promoting innovation and growth. It is impossible to argue with these concepts – but the reality is that the incentive structure for regulators does not support this approach.
- Post implementation reviews are sensible but at present the incentive structure means they are not done or are done badly. Regulators should publish their policy on post-implementation reviews and compliance with that policy, and this should be subject to external scrutiny.
- One-in, x-out simply does not work in practice, as it is easily circumvented by regulators and government departments.
- In practice regulators are subject to very limited accountable. Accountability should include –
  - A requirement on regulators to commission and publish external reviews of their effectiveness at least every five years.
  - A requirement on regulators to bring forward each year meaningful proposals to reduce the cost of regulation, including complying with guidance and information requests, and to report each year of their performance and also compliance with policy on post-implementation reviews and in promoting competition and innovation.
  - A properly resourced agency should be charged with reviewing the performance of

regulators and government departments in their capacity as regulators. Such an agency should have powers to -

- Select a few regulators every year for detailed review, with or without the help of external consultants, and separate, although drawing on, the five yearly reviews.
- Require a regulator to explain why it has taken certain actions where there is a widespread concern about the actions.
- Require regulators to commission the external reviews in a specified time frame and to oversee those reviews.
- Scrutinise the various reports that regulators are required to produce under the second bullet point above.

- The structure should be based on the current Public Accounts Committee (PAC)/National Audit Office (NAO) model. A unit should be established within the NAO dealing specifically with regulation. Political oversight is essential. The PAC already has a heavy workload and there would seem merit is establishing a specialist Regulatory Effectiveness Committee, which would work with the NAO unit in the same way that the PAC does.

The consultation

4. The consultation is seeking views of five key issues raised the TIGGR report –

- A "common law" approach to regulation
- Revising the process and requirements of better regulation
- Scrutiny of regulatory proposals
- Measuring the impact of regulation: reviewing the Business Impact Target
- Regulatory offsetting: one-in, x-out.

Key point 1 – source of regulation

5. The consultation is based on the premise that much regulation comes from Government departments. Paragraph 2.1 of the consultation document illustrates this point –

> The Better Regulation Framework is designed to ensure that government regulation is proportionate and is only used where alternative non-regulatory approaches would not achieve the desired policy outcomes. The framework enables ministerial decisions to be based on robust analysis of the costs and benefits of different options.

Similarly 3.1.1. refers to the TIGGR recommendation that "the Government would focus on regulating in a proportionate way". In practice only a small proportion of regulation comes from Government departments. Regulators, independent of Government, are responsible for most regulation.

6. It is also the case that much of the burden of regulation by regulators is not through formal regulatory measures but through a variety of informal forms of regulation, not subject to any political oversight. These include guidance, which is often interpreted as being mandatory, information requests and policies and practices on inspection and enforcement activity, particularly for those businesses subject to a specific regulatory regime and regulator.

7. The statutory provisions governing the Financial Conduct Authority usefully illustrate these points. Under Section 137A of the Financial Services and Markets Act 2002 the FCA has power to make rules governing the conduct of regulated businesses. These rules are onerous and wide-ranging and are not subject to any Parliamentary scrutiny, but there is a requirement under Section 138I(2)(A) for the FCA to consult and to publish a cost-benefit analysis of the rules. Section 139a of the Act provides for the FCA to give guidance and section 165 gives it unlimited power to require information. There

is a requirement for consultation and impact assessments for guidance, not common with other regulators, but not for information requests. Increasingly, the FCA issues its "expectations". While neither expectations nor guidance are legal requirements in practice they are treated as such by regulated institutions. None of this is to say that the FCA is acting improperly or unreasonably, but rather that the focus on formal regulation by ministers does not address the problem.

8. A good example of guidance becoming regulation relates to the right to work in the UK. Section 15 of the Immigration, Asylum and Nationality Act 2006 provides that an employer may be liable to a civil penalty if they employ someone who does not have the right to work in the UK. However, if they are discovered to have employed someone not entitled to work in the UK, employers have an "excuse" if they conduct appropriate checks. But the Home Office Guidance effectively requires such checks. The 55 page Employer's Guide to right to work checks includes the following statements: "You should conduct a right to work check **before** you employ a person" and "You must obtain **original** documents" and "You must keep a record of every document you have checked". There is a general belief that such checks are a legal requirement and employers may face an inspection of such documents – much easier than inspecting whether illegal workers are being employed. Just a few examples from websites –

- UK Research and Innovation: "The Immigration Act 2014 requires employers to check documents to establish a person's eligibility to work in the UK and comply with any restrictions."
- UCL: "It is a Home Office and statutory requirement that employers, including UCL, undertake RTW checks to prevent illegal working."
- SOAS**: "**Under the Immigration, Asylum and Nationality Act 2006 the School has a duty to prevent illegal working by carrying out document checks to confirm if a person has the right to work in the UK**."**
- ACAS: "When you offer someone a job, you must ask for proof that they have the right to work in the UK. You could be fined up to £20,000 if you do not check this."

9. The point can be further illustrated by looking at individual regulators. The security Industry Authority, to take one at random, has a Code of Conduct, which it did consult on and may well be reasonable. However, there was no impact assessment and such codes do not count in measures of the burden of regulation. The first paragraph of the Code makes it clear that in practice it is equivalent to a requirement laid down in law: "SIA licence holders, and applicants for SIA licences, must act in line with this Code of Conduct". Taking another example, the Care Quality Commission provides that care providers "must comply with guidance from the Department of Health about the prevention and control of infections". This may well be reasonable but is a clear example of a regulator turning Government guidance into a legal requirement.

10. A related point is that regulators have to decide what to do and how to do it. It is sadly the case that many regulators – and police forces – are tempted to go after easy targets rather than real problems. A good example of this is the way that HMRC enforces minimum wage legislation. There is an annual ritual, in the slow news month of August, of big companies being named and shamed for non-compliance, generally on technicalities. In 2021 the target was John Lewis. The issue was four years old and resulted from John Lewis smoothing pay so that workers received the same each month. Average pay was never below minimum wage but in some weeks it was. John Lewis had to pay an average of £48 compensation per worker for what was a purely technical offence that did not disadvantage workers. But "John Lewis named and shamed for underpaying workers" was meat and drink to ministers and spin doctors looking for a good headline. Big companies are easy targets for HMRC because the minimum wage regulations are very complex and difficult to comply with, and big companies have immaculate records that can be inspected. By contrast, businesses that completely flout the regulations and have minimal records are generally left alone. The treatment of John Lewis

can be contrasted with the revelation that the DWP underpaid pensions to 134,000 women. DWP was not "named and shamed" but rather the NAO press release said that: "The errors occurred because State Pension rules are complex, IT systems are outdated and unautomated, and the administration of claims requires a high degree of manual review and understanding by case workers" - all matters for which DWP was responsible.

11. Another example of regulators going for easy targets relates to sectors where there is substantial malpractice, such as estate agency and car servicing, but which are not politically sensitive and not easy to tackle. Regulators, the Competition and Markets Authority in particular, and policymakers shy away from such sectors, instead preferring to concentrate on easier issues such as bank accounts.

12. Within regulatory bodies the chief executive has huge power in deciding policy and practice. It is quite common for a change at the top of a regulatory body to be accompanied by significant changes, which can have a material effect on individual businesses and whole sectors. There is little effective accountability and often no meaningful checks and balances within regulators. Boards of regulatory bodies often do not have the right balance of experience and expertise, partly because of political interference and bureaucratic delays (as with the Financial Reporting Council currently) in the appointments process and partly because there is a poor reward/risk balance for those willing to put their names forward.

Key point 2 – impact assessments

13. The consultation document proposes a streamlined approach to impact assessments. This is fully supported. The current impact assessment regime is not remotely fit for purpose as it bears no relation to the way that regulation is actually made. It is based on the assumption that for each regulation there is a limited number of options including those which are manifestly disproportionate and the do-nothing option. An impact assessment accompanying a draft law is generally fairly meaningless given that the law will simply provide for huge numbers of regulations to be made which may not be subject to any impact assessment.

14. In theory, the impact assessment regime should be part of the policy-making process, but it has to be done in a prescriptive way which does not correspond with how regulation is actually made. The making of a new rule does not simply begin with a limited number of options but rather an assessment of the nature of the problem followed by a broad-brush assessment of options, the working up of detail on one or more options with appropriate analysis at every stage, the refinement of options, regular consultation and then finally the publication of proposals. Typically, impact assessments are written after all this has been done as part of the compliance process. This is pretty soul-destroying work for highly qualified economists who would be better employed playing their part in the development of policy.

15. The proposal in the consultation document is an improvement but does not go far enough. What is required is a change of culture so that the impact of any proposed measure is automatically considered, albeit not with detailed economic analysis in every case but with a view to minimising the regulatory burden for the desired outcome. When a draft law or regulation is finalised then an impact assessment should be published stating what is being proposed, what the expected benefit and costs are, and noting, not in huge detail, options that were considered and discarded. In brief, policy makers should have much more freedom to explain how they have come to a decision, but in exchange must provide more honest assessments. If they are forced to do it in a particular way, then it becomes a compliance exercise.

16. The consultation document covers the requirement on Government to publish annual reports on progress made in respect of business impact targets – which cover only regulations with a cost above £5 million. The various reports cover different periods and have different scope and there are legitimate areas for discussion on the validity of the targets. However, a few points are worth noting –

- The Home Office reports no measures with an impact above £5 million, which at first sight seems implausible given the cost of complying with changing right to work regulations.
- In 2019 the annual cost of business was £6,894 million and in 2020 £5,739 million, huge figures by any standards.
- In 2019 regulators accounted for £5,593 million of the total of £5,739 million, again confirming that regulators account for most regulation

17. It can reasonably be assumed that regulators "game" the target, most obviously by having a number of regulations with an impact of under £5 million rather than a single regulation which would be caught by the £5 million threshold.

Key point 3 - A "common law approach" to regulation

18. The TIGGR report proposed "a new regulatory vision for the UK is the introduction of a form of common law approach to regulation, which would allow regulations to be made in a more agile and proportionate way". More power would be delegated to regulators and the regulatory regime would be shaped by case law. While the EU has been partly responsible for the current detailed and inflexible regulation, much of it is home grown. This applies to much of the FCA rule book and to all the regulation made by regulators that are unaffected by EU law. A "common law" approach to regulation may sound attractive in theory but it would mark a very significant change from the current prescriptive approach and would give even more power to regulators than they have already. There seems little enthusiasm for this approach from businesses, particularly given the starting point and a wish for clarity. The concept needs further detailed consideration, with examples of how it would work in practice, before there is wholesale scrapping of existing regulations.

Key point 4 – incentives on regulators

19. The consultation document emphasises the importance of the proportionality principle and the role of regulators in promoting innovation and growth. It is impossible to argue with these concepts – but the reality is that the incentive structure for regulators does not support this approach. Regulators get blamed when there is a problem – so they concentrate on ensuring that the scope for problems is minimised, at the expense of proportionality and promoting innovation and growth. Unless the incentive structure is changed, in particular by changing the "blame culture", then regulators will continue to be risk averse, concentrating on minimising the scope for problems at the expense of promoting innovation and growth. The proposals to strengthen the accountability of regulators, set out in paragraph 22, would contribute to changing the incentive structure.

Key point 5 – post implementation reviews

20. At first sight the concept of a post implementation review for any rule is a sensible one and indeed there are requirements for such reviews. It is good practice for any organisation to conduct post-implementation reviews, and this is part of business-as-usual in the best-run organisations. However, in respect of both government and regulators such reviews are either not done or done in a very bland way. The difference of approach is explained by the incentive structure. In the private sector such reviews are essential in order to maximise profits. By contrast, neither Government nor regulators bear the cost of bad decisions – rather these are met by regulated businesses or society at large. Ministers do not want to hear that their pet policy has not worked as planned. And it is not career-enhancing for a civil servant to suggest that a fairly recently introduced policy produced by the department somehow has not worked as planned. It is not helpful to be prescriptive on how post-

implementation reviews are carried out because what is appropriate depends largely on the nature of the policy. In some cases an in-depth external review after one year is appropriate while in other cases a quick internal desk exercise after five years is all that is needed. It is suggested that each Government department and regulator should be required to publish its policy on post-implementation reviews and to publish annually its compliance with its policy and the results of its reviews, this all being overseen by the organisation charged with "regulating regulators".

Key point 6 - one-in, X-out

21. The initial concept of one-in, one-out was always doomed to failure as there are huge numbers of regulations that have no impact whatever because they are out of date, and which can easily be discarded in exchange for new regulations which in turn can be merged into a single regulation. The concept has been developed such that the costs and benefits of regulations are what matter rather than the number, but even this is flawed. In practice removing a regulation seldom leads to significant cost savings simply because much of the costs are sunk, which incidentally is why there is no huge enthusiasm for deregulation on the part of businesses. The reality is that regulators and officials are expert at circumventing regulations in the same way that businesses are. It is also relevant to note that regulators, as opposed to government departments, are less subject to the regime. Officials can get round one-in, one-out is by outsourcing new regulatory requirements to regulators or by using one of the various informal methods of regulation.

Key point 7 - Accountability of regulators

22. The consultation document suggests that regulators are accountable to Parliament directly or indirectly. In reality they are not. With the exception of the Treasury Committee, the select committees rarely cause the head of any regulator to worry when they are summoned to appear. There is a huge mismatch of knowledge between a specialist regulator and a group of MPs with limited technical support. But it is vital that regulators are accountable. What is required is a meaningful system of holding regulators to account, which requires support at a level comparable with that of the NAO. The accountability should include –

- A requirement on regulators to commission and publish external reviews of their effectiveness at least every five years, such reviews including independently conducted surveys of the business they regulate.
- A requirement on regulators to bring forward each year meaningful proposals to reduce the cost of regulation, including complying with guidance and information requests, and to report each year of their performance and also compliance with policy on post-implementation reviews and in promoting competition and innovation.
- A properly resourced agency should be charged with reviewing the performance of regulators and government departments in their capacity as regulators. The Regulatory Policy Committee is not equipped to do this. Such an agency should have powers to -
    - Select a few regulators every year for detailed review, with or without the help of external consultants, and separate, although drawing on, the five yearly reviews.
    - Require a regulator to explain why it has taken certain actions where there is a widespread concern about the actions.
    - Require regulators to commission the external reviews in a specified time frame and to oversee those reviews.
    - Scrutinise the various reports that regulators are required to produce under the second bullet point above.

23. It is suggested that the appropriate structure should be based on the current Public Accounts Committee (PAC)/National Audit Office (NAO) model. The NAO describes its function as "We support Parliament in holding government to account and we help improve public services through our high-quality audits." Wikipedia helpfully describes the relationship as follows –

- The NAO performs financial and VFM audits and makes its reports public.
- The PAC has hearings based on NAO reports wherein failures in meeting regularity or propriety requirements are apparent.
- The PAC provides a report with recommendations based on PAC hearings.
- The Government responds to the PAC report in a Treasury Minute.
- The NAO publishes a reply to the minute and there may be an NAO/PAC follow-up study.

24. The NAO has 800 staff, and its skillset is well suited to undertaking the work described in paragraph 21. It undertakes about 60 value for money studies each year. A unit could be established within the NAO dealing specifically with regulation. Political oversight is essential. The PAC already has a heavy workload and there would seem merit is establishing a specialist House of Commons Regulatory Effectiveness Committee, which would work with the NAO unit in the same way that the PAC does. This administrative arrangement would be simple to implement, building on existing structures and ensuring essential political oversight.

Responses to selected questions

Question 1: What areas of law (particularly retained EU law) would benefit from reform to adopt a less codified, more common law-focused approach?

There is scope for a common law approach to be more widely used but the concept needs much greater analysis than is in the consultation paper.

Question 3: Are there any areas of law where the Government should be cautious about adopting this approach?

The concept should be considered with great caution in all areas because of the much greater scope it gives to regulators

Question 5: Should a proportionality principle be mandated at the heart of all UK regulation?

Yes, but in itself this will achieve nothing unless incentives are aligned with such a requirement and regulators are held firmly to account in meeting the proportionality principle.

Question 6: Should a proportionality principle be designed to 1) ensure that regulations are proportionate with the level of risk being addressed and 2) focus on reaching the right outcome?

Yes, but the question is framed in such a way that it is impossible to answer no. The key point is not how the principle is designed but how it is enforced.

Question 8: Should competition be embedded into existing guidance for regulators or embedded into regulators' statutory objectives?

a. Embedded into existing guidance
b. Embedded into statutory objectives
c. Creating reporting requirements for regulators
d. Other (please explain)

Yes to all of the above but with the proviso the regulators need to take into account competition rather than having an explicit objective of promoting competition as generally this is something that regulators are ill-equipped to do. Creating reporting requirements is essential but even more important is that regulators should face meaningful scrutiny of their achievements in respect of a competition objective.

Question 9: Should innovation be embedded into existing guidance for regulators orembedded into regulators' statutory objectives?

a. Embedded into existing guidance
b. Embedded into statutory objective
c. Creating reporting requirements for regulators
d. Other (please explain)

Yes to all of the above but with the proviso the regulators need to take into account innovation rather than having an explicit objective of promoting innovation as generally this is something that regulators are ill-equipped to do. Creating reporting requirements is essential but even more important is that regulators should face meaningful scrutiny of their achievements in respect of an innovation objective.

Question 11: Should the Government delegate greater flexibility to regulators to put the principles of agile regulation into practice, allowing more to be done through decisions, guidance and rules

rather than legislation?

Not unless guidance and rules are subject to consultation, impact analysis and detailed scrutiny requirements.

Question 14: If greater flexibility is delegated to regulators, do you agree that they should be more directly accountable to Government and Parliament?

Yes to Parliament, but with the support of a unit in the NAO.

Question 15: If you agree, what is the best way to achieve this accountability? If you disagree please explain why?

The consultation document suggests that regulators are accountable to Parliament directly or indirectly. In reality they are not. With the exception of the Treasury Committee the select committees rarely cause the head of any regulator to worry when they are summoned to appear. There is simply because there is a huge mismatch of knowledge between a specialist regulator and a group of MPs with limited technical support. But it is vital that regulators are accountable. What is required is a meaningful system of holding regulators to account, which requires support at a level comparable with that of the NAO. The accountability should include –

- *A requirement on regulators to commission and publish external reviews of their effectiveness at least every five years, such reviews including independently conducted surveys of the business they regulate.*
- *A requirement on regulators to bring forward each year meaningful proposals to reduce the cost of regulation, including complying with guidance and information requests, and to report each year of their performance and also compliance with policy on post-implementation reviews and in promoting competition and innovation.*
- *A properly resourced agency should be charged with reviewing the performance of regulators and government departments in their capacity as regulators. The Regulatory Policy Committee is not equipped to do this. Such an agency should have powers to -*
    - *Select a few regulators every year for detailed review, drawing on the external reviews.*
    - *Ask a regulator to explain why it has taken certain actions where there is a widespread concern among businesses about the actions.*
    - *Require regulators to commission the external reviews in a specified time frame and to oversee those reviews.*
    - *Scrutinise the various reports that regulators are required to produce under the second bullet point above.*

It is suggested that the appropriate structure should be based on the current Public Accounts Committee (PAC)/National Audit Office(NAO) model. The NAO describes its function as "We support Parliament in holding government to account and we help improve public services through our high-quality audits." Wikipedia helpfully describes the relationship as follows –

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The NAO has 800 staff and its skillset is well suited to undertaking the work described in paragraph 19. It undertakes about 60 value for money studies each year. A unit could be established within the NAO dealing specifically with regulation. Political oversight is essential. The PAC already has a heavy workload and there would seem merit is establishing a specialist House of Commons Regulatory Effectiveness Committee, which would work with the NAO unit in the same way that the PAC does. This administrative arrangement would be simple to implement, building on existing structures and ensuring essential political oversight.

Question 16: Should regulators be invited to survey those they regulate regarding options for regulatory reform and changes to the regulator's approach?

This should be a requirement not an invitation.

Question 17: Should there be independent deep dives of individual regulators to understand where change could be introduced to improve processes for the regulatedbusinesses?

Yes, see answer to question 15.

Question 18: Do you think that the early scrutiny of policy proposals will encourage alternatives to regulation to be considered?

This should happen now. But the pressure, including by MPs, is always for more regulation

Question 21: Do you think that a new streamlined process for assessing regulatory impact would ensure that enough information on impacts is captured?

The consultation document proposes a streamlined approach to impact assessments. This is fully supported. The current impact assessment regime is not remotely fit for purpose as it bears no relation to the way that regulation is actually made. It is based on the assumption that for each regulation there is a limited number of options including those which are manifestly disproportionate and the do-nothing option. An impact assessment accompanying a draft law is generally fairly meaningless given that the law will simply provide for huge numbers of regulations to be made which may not be subject to any impact assessment.

In theory, the impact assessment regime should be part of the policy-making process, but it has to be done in such a prescriptive way which does not correspond with how regulation is actually made. The making of a new rule does not simply begin with a limited number of options but rather an assessment of the nature of the problem followed by a broad-brush assessment of options, the working up of detail on one or more options with appropriate analysis at every stage, the refinement of options, regular consultation and then finally the publication of proposals. Typically, impact assessments are written after all this has been done as part of the compliance process. This is pretty soul-destroying work for highly qualified economists who would be better employed playing their part in the development of policy.

The proposal in the consultation document is an improvement but does not go far enough. What is required is a change of culture so that the impact of any proposed measure is automatically considered albeit not with detailed economic analysis in every case but with a view to minimising the regulatory burden for the desired outcome. When a law or regulation

is finalised then an impact assessment should be published stating what has been decided, what the expected benefit and costs are and noting, not in huge detail, options that were considered and discarded. In brief, policy makers should have much more freedom to explain how they have come to a decision. If they are forced to do it in a particular way, then it becomes a compliance exercise.

Question 26: The current system requires a mandatory PIR to be completed after 5 years. Do you think an earlier mandated review point, after 2 years, would encouragemore effective review practices?

No.

Question 27: If no, what would you suggest instead?

At first sight the concept of a post implementation review for any rule is a sensible one and indeed there are requirements for such reviews. It is good practice for any organisation to conduct post-implementation reviews, and this is part of business-as-usual in the best run organisations. However, in respect of both government and regulators such reviews are either simply not done or done in a very bland way. The difference is simply explained by the incentive structure. In the private sector such reviews are essential in order to maximise profits. By contrast neither Government nor regulators bear the cost of bad decisions – rather these are met by regulated businesses or society at large. Ministers do not want to hear that their pet policy has not worked as planned. And it is not career-enhancing for a civil servant to suggest that a fairly recently introduced policy produced by the department somehow has not worked as planned. It is not helpful to be prescriptive on how post-implementation reviews are carried out because what is appropriate depends largely on the nature of the policy. In some cases and in-depth external review after one year is appropriate while in other cases a quick internal desk exercise after five years is all that is needed. It is suggested that each Government department and regulator should be required to publish its policy on post-implementation reviews and to publish annually its compliance with its policy and the results of its reviews, this all being overseen by the organisation charged with "regulating regulators".

Question 28: Which of the options described in paragraph 3.4.10 would ensure arobust and effective framework for scrutinising regulatory proposals?

a. Option 1
b. Option 2
c. Option 3
d. Other (please explain)

Option 2(An independent body could continue to provide a scrutiny function which would operate independently from the Government. They could provide scrutiny of regulatory proposals and their impacts to government departments directly) but with Parliamentary oversight rather than reporting to Government.

Question 29: Which of the four options presented under paragraph 3.5.4 would bebetter to achieve the objective of striking a balance between economic growth and public protections?

- Adjust

- Change
- Replace
- Remove
- Other (please explain)

d-remove

Question 30: Should the One-in, X-out approach be reintroduced in the UK?

No

Question 32: What do you think are the disadvantages of this approach?

It can easily be circumvented.

Question 33: How important do you think it is to baseline regulatory burdens in the UK?

a. Very important
b. Somewhat important
c. Somewhat unimportant
d. Not very important

C – somewhat unimportant

Question 34: How best can One-in, X-out be delivered

It can't.