



## **Children's social care market study**



**Suffolk County Council response to  
[children@cma.gov.uk](mailto:children@cma.gov.uk)**

**14 April 2021**

## Consultation questions and next steps

The CMA welcomes comments on any of the issues raised in this Invitation to Comment and the accompanying Market Study Notice from care and accommodation suppliers, local authorities, looked-after and care-experienced children and their advocates, and other interested parties. We particularly welcome responses on the following key questions.

### **Box 1: Our themes and key questions**

#### *Theme one: Nature of supply*

1. How has the provision of children's homes, unregulated accommodation and foster care for looked after children developed over time, what has driven this development and how will the wider environment shape it in the future?

We consider these to be drivers that have affected the market:

- Regulatory compliance
- Increasing levels of needs of YP, e.g, Gangs and County Lines, reduction in Youth Services and increase in the need for mental health services.
- Legislation - unregulated sector
- Media interest and scrutiny
- Matching / placing alongside difficulties.
- Reduction in public sector budgets
- Capacity / lack of capacity
- Ability to recruit staff, foster carers etc

Children's Homes - There has been a slow growth in the number of children's homes in Suffolk. Growth has (appropriately) been in smaller provision (1/2 bed) and not larger homes. Availability of local placement capacity is insufficient to meet the spectrum of needs. We value the diversity of supply from a wide range of suppliers in Suffolk, who can provide an offer to children which we wish to maintain, to achieve a differentiated offer. We value the local supplier market and would wish to grow this expertise. The ability to meet more complex needs of a small number of children is more mixed.

Unregulated Accommodation - In Suffolk we have been able to meet the need for our limited use of good quality unregulated provision. One barrier has been the availability of suitable housing stock in the east of England. We have minimum standards and high levels of contract management

oversight which have led to good outcomes for children.

Fostering – We have seen a slow growth in in-house foster carers, however we have an ageing foster care population; foster care recruitment has not yielded large enough net gains to meet sufficiency needs, therefore there is still a level of reliance on agency foster care. Mostly, this is 2-3 large IFA providers. Despite a fostering fee structure that is linked to needs and skills, we are limited in our ability to compete with IFAs because of the inability to fund fostering increases for all carers to maintain equity. (raising fees for all our several hundred in-house carers to a level that is competitive with agency foster carer recruitment in order to gain a marginal number of new carers would be extremely costly)

2. Are there significant differences in how providers operate, depending for example on the type of provider they are, their size or the geographic region in which they are operating?

Pay levels for foster carers – IFAs can pay more (per Q1 above), but when all overheads and staff teams are considered costs are similar.

Our experience of locally commissioned services for unregulated is that we have similar levels of quality, service and cost irrespective of provider type.

Residential – we work with local/smaller providers more effectively to meet needs, who are more focused on meeting local needs and establishing good long-term working relationships. In the main national/larger suppliers, are less willing to listen and work with us to meet local need, have a higher turnover of staff and Business Development Managers with large geographical areas to cover, which impacts on consistency of approach, offers less flexibility to respond to local need and the driver is commonly profit at any cost rather than cost effectively meeting local market. Consistency of staff and time to develop relationships is key. One IFA who we had a significant number of placements with and who would work with us to recruit to meet our needs, closed their local office which had a direct impact reducing their sufficiency and weakened the relationship with the IFA and LA placement teams to match need with referrals.

In our experience we are more likely to have price increases imposed on us by national/larger providers, against which we have little leverage

when there is a lack of capacity in the market. Some national providers have also openly refused to engage in region or local frameworks/DPSs.

3. To what extent is a lack of availability of suitable residential and fostering placements driving undesirable outcomes for local authorities and children?

This is a particular challenge for a smaller number of children with complex or multiple needs. The ability to commission appropriate placements for this group is limited, both because of the unique needs children present, and the challenge of placing the child with a challenging set of needs satisfactorily alongside other children. This means bespoke or very short-term provision is needed. This can also result in difficulty accessing appropriate education and mental health services. This group can lead to increased placement breakdown. There is an imperative to find the right placement at the right time and with a rupture and repair approach / offer.

LAs individually face greater financial risks in our ability to hold 'spare' residential and fostering capacity to meet 'matching' and fluctuating needs. IFAs and private residential providers provide a useful function in this respect as they can more flexibly use their provision to meet demand to place children from multiple authorities. However, the private market are incentivised to 'cherry pick' children with lower levels of needs as this gives them a consistent revenue stream without risking their registration rating.

Our experience is that we have recently had unawarded tenders - some national providers have not been interested in tendering and are only agreeing to spot purchase where advantageous to them. In spot purchasing placements we have little leverage to maintain consistent terms and conditions and increase service quality in our specifications.

There is a disproportionate amount of budget spent on children with complex needs when the market is limited, and the development of the market is proving difficult.

Children may be placed out of county if availability is limited, and this is not a desirable outcome for those children. This would be a last resort.

There is a lack of foster carers who can care for children with highly complex needs, reducing the opportunity to step down from residential care.

4. How have the following four types of children's care home and fostering agency provision developed over the last decade:

a	Local authority	Growth in fostering has been with IFAs rather than LA – small net gains in Suffolk.
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		We fully support an increase to inhouse provision. This should be on a continued and rolling basis, notwithstanding the barriers already mentioned.
b	Private – private-equity owned	Increase in mergers – 2/3 large providers limiting choice and local offer – leading to less competition in market. Companies in Groups not acting independently.
c	Private – non-private-equity owned	Knowledge and experience of IFA's has increased. Maintained competitive pricing. Struggled with tier 5, mother and baby, siblings and transition to foster placements.
d	Third sector private.	Knowledge and experience of IFA's has increased. Maintained competitive pricing. Struggled with tier 5, mother and baby, siblings and transition to foster placements.

5. Does the *status* of the provider (ie Local authority, private equity, non-private equity or third sector) significantly impact on the nature of the homes and fostering arrangements they put in place, in terms of: the number of placements (eg do they have incentives to invest in new capacity), price, value for money, location and quality of placements?

Fostering – where our choice is limited for internal placements, IFAs can charge more for this opportunity. Private equity groups have visibility of pricing, referral volumes and tender outcomes for the companies across their group structure, enabling them to influence the market and will price individually for referrals as they have a better understanding of the needs of the market.

For Suffolk, we have a clear career structure so carers can increase their skills to take more complex placements and be paid a higher fee level. The status of LA provision is such we can offer almost guaranteed placements (matching permitted), good placement stability, excellent career and training opportunities, Mockingbird support, a consistent local offer with support from a Suffolk Fostering Association. The inhouse service is consistently more cost effective and represents good value for money to the public purse.

IFAs can operate across other LA areas and go to where they get the best financial return, whereas the LA is restricted.

Our ability to invest as a LA is limited and we cannot compete commercially with the care market.

In the foster and residential care markets there are few not for profit providers (Note Mencap as a specialist provider withdrew from the market a few years ago).

6. With regards to private equity ownership of children's care homes and fostering agencies:

- a. What features of children's care homes and fostering agencies attract PE investors? Are these the same compared to non-PE investors?

In regard to Private Equity Ownership the LA knowledge is limited, however we would comment as follows:

Profit is a driver for PE investors.

PE investors use geographical location to maximise potential sales to largest numbers of LA's, such as the M25 corridor or the A12. Therefore, in a rural county like Suffolk there will be less investment in specialist services.

PE investors may be attracted by highly leveraged debt financing possible from relatively secure cash flows.

- b. To what extent are property prices a driver of PE incentives to invest?

A Children's Home property may provide an asset that provides security for debt and the opportunity (risk) of property price changes. However, for Children's Homes the element of property cost is likely to be a modest proportion of the total cost of operating in the medium to long term

- c. Do PE investors in the sector have a shorter-term investment horizon than other types of providers, and if so, what effect does this have on the service they provide and investment in future capacity?

PE investors may seek to maximise profit / cash-flows in the short term to sell on the business.

Where a LA creates a partnership and relationship with one provider, one management team, this shifts entirely upon sale.

Block contracts are seen by some as a secure revenue stream, although we are seeing a move towards pay as you go (spot purchase) , which allows the provider greater flexibility in terms of the placements they take and the amount they charge. LA's are not in this position.

- d. Do PE-owned children's homes or fostering agencies carry a higher financial risk profile or leverage than the other types of providers, and if so what effect does this have on the service they provide and investment in future capacity?

There are economies of scale and spread of risk across a portfolio in being a larger children's care home operator which may create a barrier to market entry / sustainability for smaller operators.

Sudden financial, regulatory or other, failure of a large children's home operator or fostering agency, resulting for example from high levels of debt finance, may create significant difficulties for Local Authorities with multiple children placed there.

PE may be less constrained by political or public accountability.

- e. What are the implications for the number of placements, price, value for money, location and quality of placements if group companies

providing essential services such as children's social care are registered offshore?

We feel we cannot comment on offshore registration.

## *Theme two: Commissioning*

1. How has the way in which local authorities commission places in children's homes, unregulated accommodation and foster care developed over time, what factors have driven this, and how is it likely to develop in the future?

In addition to comments already made in question 1.

We feel a wider strategic approach is needed for sufficiency planning, and we would like to see LGA support with National and Regional sufficiency (e.g. for secure and other more specialist needs). We envisage working more closely with our regional LA's.

Whilst we can plan regarding our numbers of CiC, and levels of needs, some circumstances evolve during the lifetime of a Sufficiency Strategy such as Gangs and County Lines, and / or the fallout of a National pandemic. We must operate within the LA financial envelope but are optimistic the new procurement regulations will give us some opportunities, including working with Eastern Region neighbours, and improving our local market.

Unregulated provision in Suffolk has been very successful due to rigorous contract management. We support the implementation of national standards to improve the sector. These services are important for enable our young people to gain independence and reduce the cliff edge that is Leaving Care.

We have had the opportunity of testing and developing Staying Close, and we support the mainstreaming of the service. This plays a crucial role in development of move on / transition planning, including the resilience of young people. This has improved the quality-of-service delivery in the residential sector as well as the unregulated sector and has fostered partnership working across the pathway. This has improved outcomes for the Care Leaving service and outcomes for young people supported by them, such as the levels of those in suitable accommodation, currently 95%.

Strategic needs led planning for children, so that they are provided with timely therapeutic interventions to prevent placement breakdown and highly specialist care in the future. We have found that a Trauma Informed approach is a necessity, not a luxury.

Future commissioning must focus on early intervention and family support,



reunification, step-down and preventative solutions. Critically this must be informed by the voice of the child and their experiences.

2. How able are local authorities to secure appropriate placements to meet the varying needs of children in their care, for a reasonable cost?

The monetisation of care / money leaking from the social care system to 'for profit' providers is a barrier to securing a cost-effective sufficiency of appropriate placements and we believe that unless there is a system in place where profit is reinvested in children, we will continue to see high costs in placements.

Constrained Local Authority financial resources are being disproportionately used for a relatively small number of children in high-cost care. If invested in earlier intervention services, this could reduce the need for some high cost placements.

The system focus should be on the needs of children. A whole system, Corporate Parenting approach, with real investment from health, education, housing, criminal justice and the voluntary and community sector, is required. The voice of the child needs to have a greater weight through the system, treating them truly as experts by experience, giving them a greater voice.

We recognise the most appropriate place for children is in a family environment. Where this is not possible, trauma supported services with links to family networks and reunification is needed. However, we recognise the following can be barriers to LA procurement.

- Innovating or moving at pace are likely to lead to increase costs.
- LA's cannot spread the risk in the same way, such as secure.
- Lack of capacity enables the market to be confident to sell their services without the bureaucracy of undertaking tenders from the public sector. Dictating their own terms and conditions and service delivery models.

3. To what extent do features of the market limit the ability of local authorities to secure appropriate placements at reasonable cost, including:

a	levels and uncertainty of future demand;	Medium
b	nature of demand, e.g. age profile of looked-after children or prevalence of	High

	complex needs;	
c	levels of uncertainty of future funding;	Inhouse – High Purchased - Medium.
d	level of access to information on providers and individual placement options;	Low
e	any other factors?	Cost of maintaining 'spare' capacity to meet fluctuating levels of need/complexity Effective information sharing, good quality referrals. Investment in professional relationships, market events and forums. Contract management and QA with named and consistent individuals. Sharing of commissioning intentions / needs assessments and an ongoing dialogue. Partnership working and shared risks. Not over specifying, concentrating on outcomes.

4. To what extent does the capacity, capability and practice of local authorities limit their ability to secure appropriate placements at reasonable cost, including:

a	the relative use of frameworks, block contracts or cost and volume contracts, as against spot purchasing;	The sector wants a commitment but not the restrictions of which placements they are obliged to take – traditional block. Traditional contract/ procurement, even using the flexibility of the Light Touch Regime has limited impact where there is a lack of competition in the market. As previously commented, this is currently a sellers' market. See above re mergers.
b	the extent to which local authorities proactively forecast demand and seek to attract providers into their area;	Strong market engagement is key to attracting and maintaining new providers. Suppliers need this to evidence their service development.
c	levels of collaboration between local authorities in planning and	Innovative example of collaboration including planning support and offers of property.

	purchasing;	
d	ability to recruit and retain appropriate staff to carry out their planning and procurement functions;	Experienced public sector procurement staff with experience of the care sector are more common than they were 5 years ago, however it is still difficult to recruit experienced procurement staff, without paying a premium and losing existing staff as a result. Changes of staff can result in significant delays to the commissioning/ procurement process.
e	other factors?	Lack of investment in contract management to have oversight and understand the complexities of the markets.

5. Are there examples of good practice within or among local authorities that have been effective in overcoming any of these potential difficulties?

We have developed good relationships, including consistency of staff, transparency, and responsiveness to the market. Building trust is paramount.

We have reviewed our commissioning team to implement a commissioning and contract management function, giving us increased oversight of our high value contracts, and dedicated market contact, building trust and relationships with the market.

We have commissioned two residential children's homes to accommodate young people with complex needs that provide a supportive, intensive offer to young people in provision, where there is no more than 2 beds.

The residential review in Suffolk has resulted in an increase of pay for residential staff, a review of the sector and introduction of trauma informed practice. Full details in link:

<https://www.local.gov.uk/sites/default/files/documents/Childrens%20Homes%20Research%20-%20Newgate.pdf>

*Theme three: Regulatory system –*

1. Please briefly describe the regulatory system and your assessment of its effectiveness in supporting good outcomes in children's social care. In particular, we welcome comments on:

a	The interplay between regulators and government, local authorities and providers.	Whilst the role of the regulator is critical in holding out for standards of care, there are times where the regulator applies these in a way that adversely impacts on some children (ie when inspectors influence providers not to accept a placement)
b	The range of the regulators' functions and whether they ought to be reduced or expanded in any way?	<p>Standards for children in public care are essential but the application of these could be more realistic in some circumstances. In other words – it may be better in the operational environment to see more collaboration between the LA and the regulator rather than the present approach.</p> <p>Regulatory bodies should consider the level of supplier profit, to ensure that children have a good and appropriate level of care directed at them, in balance with profit levels.</p>
c	The operational effectiveness of regulators and whether this could be strengthened by reform of their remit and objectives, resources and skills-sets and/or powers.	<p>See above – the development of a more well-informed critical friend role would be helpful and could develop a better / more realistic appreciation of the operating environment.</p> <p>A system based on enforcement only is not right for children or providers. A solutions-based approach, which allows for flexibility and innovations with the right motivations should be endorsed.</p>

2. Are there particular problems in the way placements are supplied and commissioned that the current regulatory system is not well-equipped to address?

The regulatory system is not set up to support providers in supporting young people in emergency circumstances and in a period of crisis. Differentiating between complex children and inadequacies in service delivery is vital to giving the sector confidence and ceasing 'cherry picking'.

3. Does any aspect of regulation create any perverse incentives on local authorities, providers or other actors, which are driving sub-optimal outcomes?

4.

As above, endorses high levels of provider caution due to the potential impact on their Ofsted rating.

5. Where local authorities use unregulated placements, how do they ensure that these are appropriate in the absence of regulatory oversight? In England, how might this change as a result of the government's recent announcements?

We endorse the proposed national minimum standards to the unregulated sector. Our current three service providers operate at a standard which we anticipate will meet these requirements. These services are all subject to a full competitive tender process and ongoing contract management and quality assurance processes. We collect live feedback from young people continuously, which goes direct to the contract manager, detailing their experiences. The semi-independent sector is an important stepping-stone and pathway for some of our young people, who do not require care, and is in line with their pathway planning and their individual wishes. Family type placements are also offered under the unregulated category via supported lodgings. A diverse choice of placements is required to cater for the individual needs and wishes of our young people.

The cost of regulation will again drive the market forces to the largest providers and may see a loss of provision and expertise delivered by smaller local providers.

A cohort which particularly thrives in an independent living situation is our UASC. We have a successful model in supporting this group with an individualised service specification tailored to their needs.

*Theme four: Pressures on investment*

1. What are the main drivers of, and barriers to, decisions to invest in new children's homes capacity by local authorities, private sector and third sector providers? Please consider:

a	Levels, nature and certainty of future funding;	It doesn't impact adversely in-house, but it does limit our investment opportunities for growth which would be our choice.
b	Levels, nature and certainty of future demand;	Our ability to meet current demands on sufficiency impacts our ability to look in a meaningful and sophisticated way at the future demands.  Note – future demand will significantly be impacted by Covid and this is an unknown currently.
c	Expectations of the level of prices in the future;	We anticipate an increase due to the National Living Wage, covid, workforce pressures etc. Inconsistency regarding the National Living Wage increases driving providers to cost additional risk of increases into their prices.
d	Regulatory and policy frameworks;	Balance in growing incrementally and maintaining standards of delivery.  Provider who are new to regulatory frameworks may not have the infrastructure to support growth into this area.
e	Barriers to the acquisition of appropriate property;	Limited C2 resources, providers and LA's all competing for the same stock.  Severe barrier in South East for affordable housing. North South divide for property prices limits the residential market in the South East. Conversely, there is more sufficiency in the North and we do not want to place our children out of the County. More Investment in social housing for RSL's / LA's for them to meet their Corporate Parenting duties. This could take the form of a dedicated capital settlement in addition to revenue.  We are concerned that covid has exacerbated this situation and impacted growth. We are seeing large-sized residential accommodation being bought by people moving out of the capital, which is distorting

		the local housing market – this is an issue for rural areas close to the capital.
f	Barriers to the recruitment and retention of appropriate staff;	<p>Impacts of long covid on staffing groups. Staffing groups shifting sectors minus the appropriate qualifications and the ability to meet the minimum levels needed of qualified and internal staff.</p> <p>Whilst we have invested in in-house residential care in Suffolk, the sector itself is seen as a poor relation to social care and undervalued. This view has to change.</p>
g	Any other factors you think are significant drivers or barriers.	<p>We are seeing provider caution, as they do not want the regulatory and reputational risk in taking the most complex children, whose placement may breakdown.</p> <p>There is a significant deficit in experienced DCYP residential providers.</p>

2. What are the main drivers of, and barriers to, decisions by local authorities to expand their use of in-house foster carers, and to new independent fostering agencies entering the market or expanding their operation? Please consider:

a	Levels, nature and certainty of future funding;	Limited staffing resources to be able to recruit and assess the required numbers of foster carers to replace carers who leave and to achieve a net gain.
b	Levels, nature and certainty of future demand;	Maximum activity in the recruitment team does not yield the numbers we need to meet sufficiency needs and competition with IFA's in the area who pay their carers higher fees than the LA.
c	Expectations of the level of prices in the future;	Limited ability to increase foster carer pay for inhouse carers, value and costs of inhouse care as well as outcomes for children are good.
d	Regulatory and policy frameworks;	No concerns, we think this is right for fostering
e	Barriers to attracting and retaining appropriate foster carers;	Low pay and recognition as a professional and the risk of allegations are factors that are barriers. Retention is impacted by carers leaving to get other jobs that pay more or leaving to go to an IFA that pays more.
f	Any other factors you think are significant drivers or	Higher caseload levels in inhouse fostering

	barriers.	services than in an IFA, so IFA's advertise that they are able to provide more 1 to 1 enhanced support.
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3. Within the private sector, does the ownership model, particularly whether or not a firm is private equity-owned, affect the appetite of a provider to invest in providing new placements?

As above

4. Are there actions that government, regulators, local authorities (acting independently or collaboratively) or other actors could take to support more investment in capacity where it is required?

Managing risk appropriately.

A voice from central government and/or the regulatory body at times of media interest and scrutiny, would foster a positive collaborative approach with these sectors.

Flexibility around local authority finance, and settlements to enable capital investment.

Strengthening of corporate parenting responsibilities to enable District and Boroughs, and registered social landlords to ringfence property for CiC and Care Leavers.

The regulatory body to proactively share and promote good practice.  
The regulatory body to also consider social value and the investment in the local community where our children and young people live.

More funding opportunities for innovation.

Expansion of the Staying Close project.

Appropriate funding to support Trauma and Psychologically informed practice.

Early intervention. Community capacity building to support families meaningfully.



Fundamental change to reinvestment of profits from PE.

Support from the LGA to embed a strong social value approach with the market.

Clarity regarding profits in industry, particularly from the biggest players in the market. LGA Strategic Supplier Management work to include a live map of the group structures available via KHUB or the LGA email updates.

Ceiling on profit, via guidance and transparency or regulation for regulated care services. Consideration could be given for the not-for-profit part of the market to be pump primed?

Maps of Regional Sufficiency to identify areas of need, to support LA joint commissioning to meet sufficiency.

Cabinet Office/ LGA to support open book practice when contracting with the care market (or any market predominantly reliant on the public sector as their customer). For example, regarding National Living Wage cost increases, which have been inconsistent and caused additional costs to be built into pricing.



Responding to this invitation to comment and market study notice

88. Please email written submissions on the market study to [children@cma.gov.uk](mailto:children@cma.gov.uk) by 14 April 2021.
89. Please ensure that all personal information, other than your contact details, is redacted or excised from your response and any documents you submit to us.<sup>26</sup>
90. Due to the ongoing Coronavirus (COVID-19) pandemic, we are not able to process any documents or correspondence by post or courier to our offices.
91. We intend to publish responses to this Invitation to Comment, therefore:
- Please supply a brief summary of the interests or organisations you represent, where appropriate.
  - Please consider whether you are providing any material that you believe to be confidential, and explain why this is the case. Please provide both a confidential and non-confidential version of your response where applicable.
92. If you are responding as an individual (i.e. you are not representing a business or other organisation), please indicate whether you wish your response to be attributed to you by name or published anonymously.
93. An explanation of how we will use the information provided to us can be found in the Annex. The Annex sets out how the CMA may use information provided to it during the course of this market study, including where we may need to refer to information in order to pursue enforcement action against a business in this sector.

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<sup>26</sup> Personal information is defined in the General Data Protection Regulation PR (Article 4(1)) as ‘any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person’.

## **Annex – use of information provided to the CMA**

1. This Annex sets out how the CMA may use information provided to it during the course of this market study.

### ***Why is the CMA asking for information?***

2. The information you provide will help us to understand how to improve outcomes in the provision of accommodation and associated care and support for looked-after children, and fostering services for looked-after children and identify ways to help local authorities secure better value for money in their procurement in this sector (for further details of the issues considered see paragraphs 82 to 85).

### ***What will the CMA do with the information I provide?***

3. Your information will inform our market study report. The report will set out our findings and any proposed remedies to any existing or potential issues we find.
4. Where appropriate, we may also use information you provide to take enforcement action, using our competition or consumer powers, against businesses providing care and accommodation for looked-after children or may share your information with another enforcement authority or with another regulator for them to consider whether any action is necessary.
5. We may only publish or share information in specific circumstances set out in legislation (principally Part 9 of the Enterprise Act 2002). In particular, prior to publication or any such disclosure, we must have regard to (among other considerations) the need for excluding, so far as is practicable: (a) any information relating to the private affairs of an individual which might, significantly harm the individual's interests; or (b) any business of an undertaking which, if published or shared, might significantly harm the legitimate business interests of that business.
6. We will redact, summarise or aggregate information in published reports where this is appropriate to ensure transparency whilst protecting legitimate consumer or business interests.
7. If you wish to submit information either in writing or verbally that you consider confidential and therefore do not wish us to publish or share, please let us know when you contact us with your reasons.
8. Any personal data you provide to us will be handled in accordance with our obligations under the General Data Protection Regulation, the Data Protection

Act 2018 and any other applicable data protection legislation. Any personal data provided to us will be processed for the purposes of this market study under Part 4 of the Enterprise Act 2002. For more information about how the CMA processes personal data, your rights in relation to that personal data (including how to complain), how to contact us, details of the CMA's Data Protection Officer, and how long we retain personal data, see our Privacy Notice.

9. Further details of the CMA's approach can be found in Transparency and Disclosure: Statement of the CMA's Policy and Approach (CMA6).