

Regulators' Pioneer Fund (RPF3) Evaluation

Long-term project case studies

RPF evaluation aims

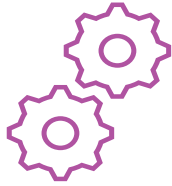
To assess RPF3's success in supporting regulators and local authorities to adopt novel and experimental regulatory approaches, which can facilitate innovation.

This included understanding:

- Whether RPF3 has delivered against its intended goals, exploring the range of outcomes and impacts, for whom and why.
- Programme delivery lessons, with a view to disseminating these insights across government and all stakeholders.



The evaluation approach



Methodology

— The evaluation used Contribution Analysis (Mayne, 2011)¹ to understand the extent to which the outcomes achieved by the funded projects could be attributed to the RPF.

— Contribution Analysis develops a causal narrative about how and why project activities lead to change, which is presented as a series of ‘contribution statements’ derived from the programme Theory of Change (see slide four).

— The contribution statements presented here are the final statements which were revised throughout the evaluation and following the findings from the final report.



Evidencing

— The evaluation refined the causal narrative by testing the contribution statements against the evidence collected from interviews with project staff and beneficiaries, as well as other supporting documentation.

— Applying concepts from Process Tracing (Befani, 2020)², these tests considered whether the observation of evidence presented is *sufficient* or *necessary* to infer outcomes:

- Sufficient – providing compelling evidence that confirms the outcome.
- Necessary – a required step for the outcome, adding some confidence it will occur.

— For anticipated future outcomes, the case studies set out the extent to which these can be currently evidenced.



Reporting

— The case studies presented here are published by the Regulatory Innovation Office (RIO), part of the Department for Science, Innovation and Technology (DSIT), the government body running the RPF programme, alongside the RPF3 final evaluation report.

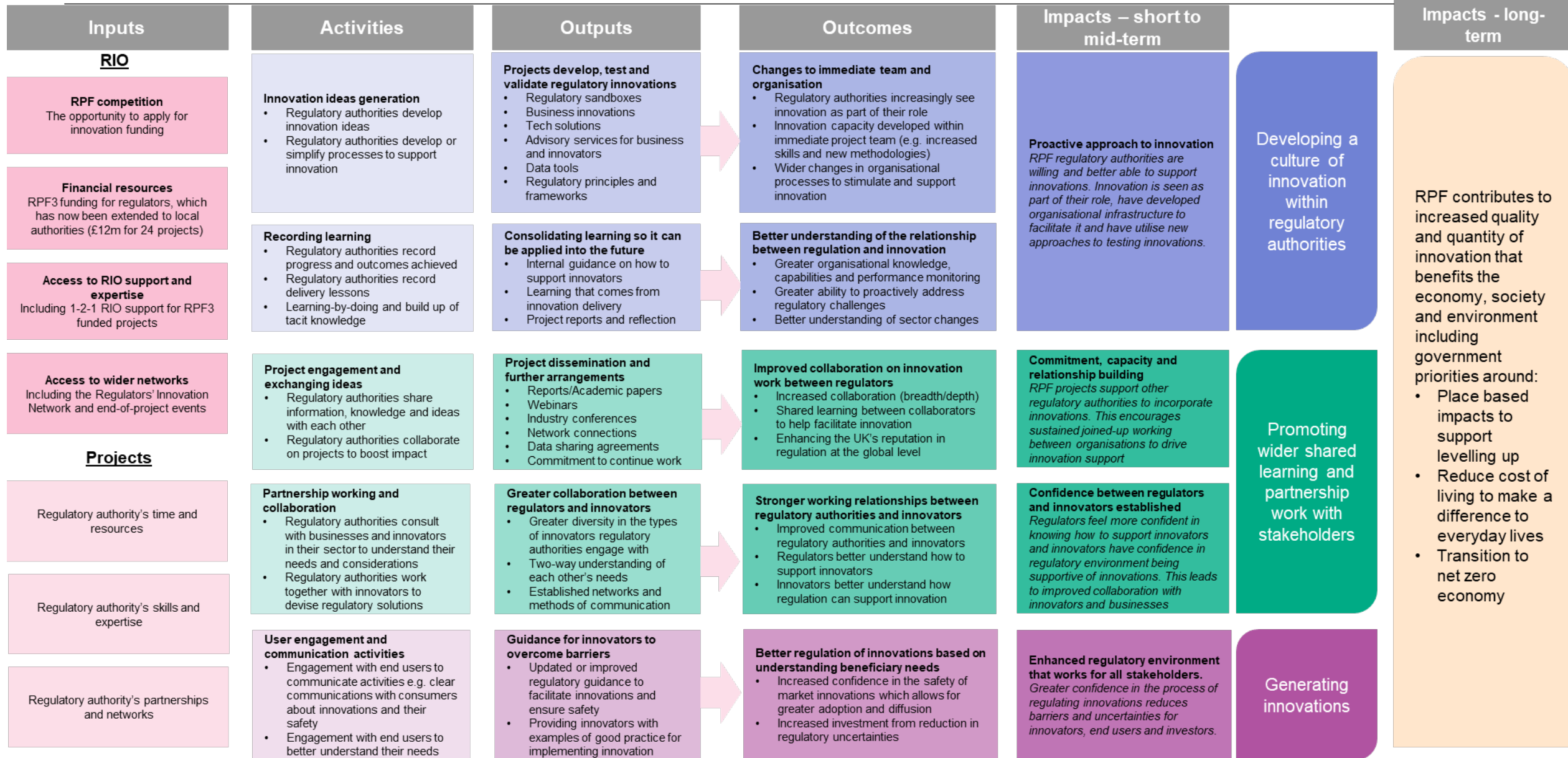
— The case studies complement the final evaluation report, which is published separately. Their insights are organised using the evaluation framework outlined in the report.

— Case studies provide a closer look at individual projects and their results, showing how they connect to the RPF programme’s goals. The final evaluation report focuses on the overall programme.

Mayne, J., 2011. Contribution analysis: Addressing cause and effect. *Evaluating the complex*, pp.53-96.

Befani, B., 2020. Quality of quality: A diagnostic approach to qualitative evaluation. *Evaluation*, 26(3), pp.333-349.

RPF programme Theory of Change (ToC)



There were six contribution statements developed from the ToC

- 1. Creating a culture of innovation.** RPF creates a culture of enabling innovation within regulatory authorities, who following the programme see innovation as part of their role.
- 2. Increased capability to enable innovation and support compliance.** RPF increases the capability of regulatory authorities to enable innovation and support compliance.
- 3a. Collaboration between regulatory authorities.** Regulatory authorities establish processes of working together and collaborating during project delivery which leads to greater capacity to tackle regulatory issues into the future.
- 3b. Influencing other regulatory authorities.** RPF projects produce innovative regulatory solutions that influence other regulatory authorities to explore new approaches to regulation.
- 4. Engagement with industry.** RPF encourages greater engagement between regulatory authorities and innovators through the project activities and the regulatory solutions they create. This allows for a better understanding of the relationship between regulation and innovation by both regulatory authorities and industry.
- 5. Creating an enabling regulatory environment.** The RPF creates an improved regulatory environment that fosters innovation and supports compliance. Regulatory authorities support innovators with the development of their ideas, increasing confidence for investors who have greater incentive to invest in the UK and reducing risks for consumers who are more likely to adopt innovations.

The case studies

- Eight case studies were selected to reflect the diversity of RPF projects in terms of project focus (advice provision, proof of concept development, as well as curating and disseminating good practice), project progress, sector(s) and type of regulatory authority (local authorities and national regulators). The eight case study projects were delivered by the regulatory authorities listed and summarised in the next slide.



- The case studies help illustrate how the RPF programme ToC and contribution statements work at a project level.
- For each case study, this report identifies key activities and learning across the different project phases. The learning relates to project set-up and delivery, internal and external stakeholder engagement, and whether the project enabled innovation through regulation:

Project delivery

Stakeholder engagement

Enabling innovation

- In exploring whether projects enabled innovation, the report identifies key outcome pathways for each project and the evidence that supports these.

Overview of the case studies

Argyll and Bute Council

Undertaking trials for integration of drones within manned and unmanned airspace

Business Compliance Support
(Tameside and Greater Manchester Local Authorities)

Delivering a free regulatory and compliance signposting advice service for businesses

Civil Aviation Authority
Regulatory framework for use of hydrogen as an aviation fuel

Finance Reporting Council

Developing regulatory toolkit for structured organisational and corporate data

Plymouth City Council

Developing a regulatory framework for innovative maritime prototype testing

POWYS County Council

Developing regional plans for LAs to deliver targeted, intelligent led enforcement and business support

SEPA

Testing of outcome based regulatory approaches in Grangemouth Industrial cluster

Solicitors Regulation Agency

Investigating alternative methods for dispute resolution

Case study approach

- **The case studies were conducted between June and December 2025.** They involved fourteen in-depth qualitative interviews in total. These were conducted with project leads and beneficiaries for each project:
 - **Project leads** — 8 x 70 to 80-minute single or paired interviews with key strategic project staff who had oversight of the project.
 - **Beneficiaries** — 6 x 30-minute single or paired interviews with key stakeholders who were either involved in the project or benefitted from it. In addition, one additional stakeholder provided documentary evidence on how they benefitted from one of the projects.
- The topics explored with participants are outlined below, with the project team using enabling materials in the interview to bring together previous project learning:

| Project leads | Beneficiaries |
|--|--|
| <ul style="list-style-type: none">• Revisiting project rationale and vision• Exploring project delivery activities and issues• Understanding project outcomes achieved and how these can lead to longer-term impacts — including evidencing these• Factors that affected project outcomes | <ul style="list-style-type: none">• Exploring beneficiaries' organisational context and relationship to project• For innovators that were involved in the project, their experience of working on the project• Project outcomes experienced for their organisation and the wider sector, and any evidence pointing to these outcomes |

- **The research team also drew on previous end of project materials** — these included NatCen's endline interviews with project leads and the reports that projects produced to share key achievements and learning after project completion.
- **Analysis** — all interviews were transcribed, and the data was summarised using NatCen's qualitative Framework approach. This involved organising and analysing the interview data by project (and type of beneficiary) and themes (e.g. views on the stages of the project) across each project within an overall matrix. This allowed for a detailed understanding of each project, as well as comparison of insights across projects.



Learning across the case studies

Headline learning across the case studies — motivations to apply and factors affecting project delivery

| | | |
|------------------------------------|--|--|
| Motivations for applying | Motivations for applying to RPF funding included the uniqueness of the funding opportunity, alignment with regulatory goals, supporting government priorities and reducing business barriers. | The RPF was a unique funding source for regulators — project leads noted that there was no comparable source of funding which encourages authorities to experiment with regulatory innovations. |
| | | Meeting wider regulatory authority goals — regulatory authorities were motivated to apply for RPF funding when they saw their projects aligning with organisational strategic priorities and existing programmes to improve regulatory outcomes. |
| | | Meeting wider governmental goals — regulators also supported broader government priorities—particularly aligning their projects with the government’s net zero goal. |
| | | Reducing barriers for businesses — regulators were motivated by wanting to reduce the time and costs associated with regulatory compliance for businesses in their sectors. |
| Project delivery enablers | A combination of factors supported project delivery. These related to the programme support and project practices. | Programme support — RPF support was critical for delivering projects on time and within scope for three main reasons. Firstly, monthly catch-ups with RPF staff helped keep project progress on track by identifying and resolving challenges early. Secondly, the programme’s flexibility—such as adapting to shifts in project spend profiles—helped projects agilely navigate delivery changes. Thirdly, the programme support accelerated project learning by connecting teams with other RPF projects and government experts. |
| | | Strong project coordination — effective project management was essential for timely delivery. Smaller projects needed to remain agile to manage their workloads, while larger projects had to develop strong collaborative approaches with partners (explored further below). Given that some projects spanned more than 12-18 months, maintaining continuity of vision was also important—particularly where there was project staff turnover. This was best supported through clear and consistent project documentation. |
| Project delivery challenges | Project delivery challenges related to financial support needed to begin set-up activities early and partnership work with other regulatory authorities. | Pre-project support is important for effective set-up — although the 12–18-month projects had a longer lead-in time than the shorter 8-month projects, they needed early financial support—such as pre-project funding—to use that time effectively for setup activities. In addition, the extended lead-in time sometimes caused a loss of project momentum—for example, due to staff turnover or disengagement from partners during that period. |
| | | Partnership work — the success of larger projects often depended on other regulatory authorities to provide expertise and delivery capacity. Partnership work was challenging when partners’ priorities shifted due to restructuring and staff turnover. Contrasting working styles and different perceptions of regulatory risk also reduced engagement. However, effective collaboration was supported by regular communication, senior leadership engagement, and managing diverse working styles. A dedicated project manager helped coordinate partners and handle administration efficiently. |

Headline learning across the case studies — project outcomes

| | | |
|---|---|--|
| <p>Immediate outcomes achieved</p> | <p>All projects achieved some level of successful outcome for their projects.</p> | <p>These outcomes were aligned to RPF’s key aims of encouraging regulatory authorities to develop novel approaches to regulation that enables innovation, as identified by the six contribution statements mentioned earlier.</p> <p>Even when projects did not fully achieve their intended goals, project leads felt they laid the groundwork for future regulatory work by advancing thinking, identifying challenges and shaping dialogue.</p> <p>In meeting these immediate project outcomes, project leads also reported three additional benefits for them and their organisation. Project delivery helped to:</p> <ul style="list-style-type: none"> • Develop the capacity of their organisation and other regulatory authorities to understand and oversee emerging technologies — for example, by upskilling staff and sharing insights with other authorities through project activities. • Raised their profile as key partners in enabling innovation safely — through engagement with innovators and industry, and recognition from domestic and international regulatory authorities. • Developed and strengthened relationships — creating new connections and deepening existing ones with innovators, industry, other regulators and academic institutions. |
| <p>Taking forward regulatory innovations</p> | <p>Some of the projects were also seeking to continue their regulatory innovations post-RPF3 funding.</p> | <p>Depending on the project goals and their immediate outcomes, continuation of regulatory innovations involved:</p> <ul style="list-style-type: none"> • Further development and testing of regulatory innovations — such as refining regulatory frameworks and guidance or expanding the use cases for emerging technologies like drones. • Supporting implementation of regulatory innovations — for example, by encouraging regulatory authorities and stakeholders to adopt tools and guidance developed by the project. <p>Project leads reported that both financial and wider contextual factors influenced whether they could advance their regulatory innovations.</p> <ul style="list-style-type: none"> • A key financial consideration was access to future funding — having access to other funding sources after RPF3 was significant in helping projects realise their longer-term outcomes. Project leads mentioned the importance of securing continued funding either from their own regulatory authority or elsewhere (e.g. from RPF4 or other government funding). • Wider contextual factors included: (1) continued demand for the regulatory innovation from industry and government; (2) ongoing internal senior leadership support and the regulatory authority’s financial capacity to prioritise the innovation; (3) sustained engagement from key stakeholders and businesses, including whether larger regulatory authorities responsible for implementing or advancing guidance have the capacity to remain involved. |



Case study 1: West Coast of Scotland Trial for Integration of Crewed and Uncrewed Air Space

Project at a glance – Drone demonstrations



Regulation role

Located on the West Coast of Scotland, Argyll and Bute is one of 32 unitary council regions in Scotland. It covers the second largest geographical area of any Scottish local authority, delivering statutory and non-statutory services to an area that covers 690,946 hectares, and over 4,500km of coastline and over 40 lochs.

The local authority plays a regulatory role in several key local activities, including environmental health, animal health and welfare, and licensing standards.

Project context



Project vision

Context: The local authority's geographical coverage is varied, ranging from urban areas of Helensburgh and Dunoon along the Clyde, Loch Lomond to the East, the Mull of Kintyre to the south, Atlantic Islands to the west, and the Sound of Mull and Appin to the north. This makes its service delivery unique, prompting the authority to focus on innovative and transformative approaches.

Rationale: As part of its innovative approach, the local authority wanted to understand how the use of uncrewed air vehicles (drones) could assist service delivery. Although the authority has previously tested drones with contractors, these trials were restricted to airspace corridors away from crewed aircraft.

Project: This project aimed to work with the Civil Aviation Authority (CAA) to explore new beyond visual line of sight drone regulations and the feasibility of integrating drones with general aviation on Scotland's west coast.



Project detail

Project activities

The project delivered three core phases of activity to meet its goals:

- **Regulatory Pioneering:** The lead contractors worked with the CAA to review guidelines for drones operating beyond visual line of sight in rural airspace, including participating in CAA sandbox activities.
- **Delivery operation trials:** Drones were trailed for logistics and goods transfer purposes. This included the delivery of school meals, mail, and hospital drugs/equipment with Royal Mail and NHS Highlands.
- **Survey demonstration trials:** Drones were trialled for surveying (1) vegetation along a local river; (2) electric powerlines with Scottish and Southern Electric Networks (SSEN); and (3) rails for Network Rail.

However, as discussed in the next slide, the trials could not take place in integrated airspaces as intended, but in 'sterile corridors' where other crewed aircraft did not operate.



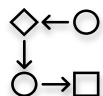
Projects outcomes

- **Regulatory innovation:** contributed to CAA's work on integrating drones into shared airspaces.
- **Strong drone use case demonstrated:** for delivering goods and performing inspections.
- **Stakeholder relationships:** the project helped the local authority to build lasting partnerships with SSEN and others.



...in relation to RPF

- **Promoting engagement with industry to drive innovation –** Argyll and Bute will continue to work with industry experts to develop the use case for drones.
- **Creating an enabling regulatory environment –** as noted, the Regulatory Pioneering phase supported CAAs thinking on how to regulate the use of drones in integrated airspaces.



Set-up and delivery experiences

The project was able to test drone delivery use cases in sterile corridors but was unable to carry out its original plan of testing them in integrated airspace.

Enablers to project delivery

- **Environmental and wider factors** – the project was driven by a local appetite for drones because of two contextual factors. Firstly, climate change has meant that the delivery of goods, such as medicines, has become difficult during frequent bouts of inclement weather. Secondly, the recent Covid pandemic demonstrated the effectiveness of drones in supporting local rural communities that would otherwise have been isolated.
- **The project relied on RPF funding**– as local authorities often have to focus on essential services due to budgetary constraints.
- **RPF support helped project delivery**– RPF staff were engaged and supportive. They were flexible with project deadlines when delivery activities required more time and were open to connecting the project to external expertise if needed.

Challenges faced during to project delivery

- **RPF financial administrative process was onerous** – the project found the monthly financial reporting requirement, such as progress reports and financial claims, to be time consuming. They would have preferred annual financial reporting, as it took time to complete the financial information and to get internal sign-off from senior staff.
- **The wider local authority departments were keen to be involved but sometimes lacked the capacity to engage with the project** – for example, although the project asked departments to identify service use cases for drone use, departments did not have the time beyond delivering their core activities to do so.
- **The challenges working with the CAA limited the scope of the project**– the CAA was a key stakeholder, which meant that two challenges in working with them significantly affected the project's original scope. First, while their guidance was helpful, it was limited as they were still developing expertise in drone technology. Second, they could not process the project's request to test drones in shared airspace in time, as they were understandably cautious and faced resource constraints. As a result, the project was only able to trial drones in sterile corridors, which restricted the geographical scope of testing.



Learning

- **The project team suggested that the RPF relax its spending scrutiny processes.** This would free up administrative time and help projects focus on delivery.

[RPF staff support] was excellent, and engaging from the start of the project, and [they were] up to speed with everything that we were doing. [RPF staff] would offer us extensions if we couldn't make. (Project lead reflecting on the importance of RPF support)

We did a huge consultation exercise internally with [local authority] departments, basically saying, 'Think about your service delivery. How could we assist developing a proof of concept?' and I have to admit, everyone...was super excited [and] wanted to take part, but then... but nobody had the time. (Project lead reflecting on engaging their local authority departments)



External stakeholders

- **Contractor**– Skyports Drone Services (Skyports) and Air Navigation Solutions Limited (ASNL)



Nature of engagement

Contractors

The project drew on the technical expertise of Skyports to deliver the programme. Skyports sub-contracted ASNL to bring in their expertise on providing air traffic control solutions.

...we certainly, as a local authority, don't have the technical capability [that Skyports have] to engage with the CAA or really, to know what types of UAVs [uncrewed aerial vehicles] would be required for each of the test scenarios. (Project lead reflecting on the importance of the contractor's expertise)



Learning

The project benefited from Skyports expertise. The contractor was instrumental to the project in two ways:

- Bringing with them the necessary expertise to help inform how drones could be used in different use cases and hold technical conversations with the CAA.
- Connecting the project to industry stakeholders, such as SSEN and Network Rail, who would also be potentially interested in drone technology. The project was then able to share project insights.



Immediate positive outcomes after project completion

As noted, the project was unable to test drones in integrated airspaces as originally planned. However, it successfully achieved the following milestones, laying the groundwork for future drone trials in integrated airspaces:

- **Demonstrate a strong use case for drones.** This included delivering goods such as mail and medical supplies and performing drone inspections on the environment and key infrastructure, such as powerlines.
- **Stakeholder relationships developed or deepened.** These included with established partners such as Royal Mail and NHS, as well as newer collaborators like SSEN. These partners advocate for drone integration into shared airspace and supported the local authority's application for the next round of RPF funding —covered in the next slide

Whilst the project faced hurdles and was ultimately unsuccessful in creating an area of integrated airspace, great progress was made with the CAA to further the way that SMEs addressed the challenge of integrated airspace operations. (Project team reflecting on the importance of laying the foundation for future work in their end of project report)



Beneficiaries of the project



The Local authority – use case trials demonstrated how drones can be used to cost-effectively deliver services to their dispersed rural community.



Industry – wider industry partners, like SSEN, who can draw on the project's insights to develop their own drone use cases.



Wider government– extending the use of drones to integrated airspace will support the government's net zero ambitions.



Longer term outcomes

Ultimately, the project aims to enable drone operations in integrated airspace to support service delivery in remote rural communities, in a way that is both cost-effective and carbon-efficient. The project team outlined three steps needed to accomplish this long-term goal, presented below alongside the evidence to support this.

In terms of next steps, the local authority have already secured funding from the fourth round of the Regulators' Pioneer Fund (RPF4) to continue to work on introducing the drone service. This will include working with the CAA to shape regulations to support the use of drones in integrated airspace, expanding the testing of drones to other service use cases and to train local authority staff in piloting drones.

Evidence: Sufficient evidence observed for outcome

In the medium term, the council hopes the project will support the CAA to develop clear regulatory guidance on the use of drones in integrated airspace. This will enable the introduction of drones by establishing clear regulatory requirements for compliance.

Evidence: Too early to observe project outcome

In the long term, the team are hoping that the use of drones in integrated airspace in the West Coast of Scotland becomes business as usual. As noted, this will require CAA to provide clear regulatory guidance to support compliance. In addition, three further conditions will also need to be met: (1) the project must clearly define the service cases where drones can be effectively deployed; (2) local authority staff should be trained as drone pilots to enable cost-effective deployment and enhance the authorities' operational resilience; (3) the local authority, in collaboration with other stakeholders, must engage with local communities to build acceptance of drone use.

Evidence: Too early to observe project outcome

I think it's really probably the end goal is the regulations to come out from the CAA to say, 'Right...if you're going to be doing these UAVs over your area, this is how you have to comply with our regulations', etc., and stuff like that. (Project lead on the importance of regulatory certainty)



Outcome enablers and barriers

The project team mentioned organisational and wider factors that could affect whether the project achieves its intended medium and long-term outcomes:

- **Funding.** The local authority relies on external funding to continue its drone work. Support from RPF3 and RPF4 has been vital, but ongoing progress will depend on securing further funding.
- **Legislative changes.** Drone use in shared airspace depends on the CAA giving clear compliance guidance, so the local authority feels confident to move forward with this technology.
- **Public acceptance of drones.** Successful use of drones also depends on local communities accepting the technology, which requires local authorities and other stakeholders to actively promote its benefits.



The project outcomes in relation to the RPF contribution statements

Statement 3a: Collaboration between regulatory authorities

Input: The RPF funding provided financial resources, which helped Argyll and Bute release staff time to work on the project and bring in a contractor with industry expertise.

Process: The funding created an opportunity for the contractor to collaborate with the local authority, the CAA, and wider industry—both to explore drone use cases for service delivery and to help shape emerging regulatory guidance for operations in integrated airspace. For example, during the project's Regulatory Pioneering phase, the contractor regularly met with the CAA to exchange ideas on future drone guidance.

Outcome: With RPF4 funding, the local authority will continue working with industry to develop drone use cases and inform CAA 's emerging regulations for their safe integration into shared airspace.

Statement 5: Creating an enabling regulatory environment

Input: The RPF funding provided financial resources, which helped Argyll bring in a contractor with industry expertise.

Process: The contractor worked with CAA, including participating in CAA's beyond visual line of sight sandboxes, to inform their emerging thinking on drone regulations in integrated airspaces.

Outcome: With RPF4 funding, the local authority will continue working with industry to develop drone use cases and inform CAA 's emerging regulations for their safe integration into shared airspace.



**BUSINESS
COMPLIANCE
SUPPORT**

Case study 2: Greater Manchester Business Compliance Service

Project at a glance — Greater Manchester Business Compliance Service

Project context



Public protection fulfil a range of statutory duties in several core areas in local authorities, including consumer protection, product safety, health and safety, licensing, and food safety. Greater Manchester's Public Protection Partnership (PPP) — made up of heads of service from each of the ten Greater Manchester (GM) local authorities' regulatory teams and the Greater Manchester Fire & Rescue Service (GMFRS) — developed the Greater Manchester Regulatory Centre of Excellence (GMRCE).

The GMRCE focuses on promoting the national Better Business for All and primary authority programmes, previously overseen by the Department for Business, Energy & Industrial Strategy (BEIS).

The 10 local authorities in Greater Manchester include Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan.



Project vision

Context and rationale:

The Business Perception Survey conducted by BEIS in 2020 indicated that over a third of businesses view regulation as a barrier to success. Businesses were concerned that regulators could adversely affect their approaches to innovation by imposing rules that reduce flexibility and create uncertainty around new ideas. This leads to businesses being more cautious and less likely to invest in new products or services. In response, GMRCE set up several primary authority partnerships with large businesses, creating long-term arrangements with local authorities or fire services to provide compliance advice and support.

Project:

Business Compliance Support was borne out of the PPP's aim to expand their existing offer to include small and medium sized businesses that may not be eligible for a primary authority partnership. The project aimed to deliver a Greater Manchester Business Compliance Service and help overcome three challenges:

- Lack of consistent and readily available regulatory guidance and support for small and medium businesses (SMEs);
- Ongoing staff recruitment and retention issues, particularly prevalent in environmental health and trading standards roles; and
- Lack of affordable and readily available cost-recovery compliance support service for small and medium businesses.

The project developed a one-stop-shop for business compliance advice and support, including dedicated business compliance officers and a new website. The support is targeted for businesses in environmental health, trading services and licensing.

Project detail



Project activities

The project involved creating compliance resources for new and existing businesses, and training apprentices and environmental health graduates. There were four main stages of the project:

- **Pre-launch and planning** — consulting with key stakeholders, employing 10 apprentices and graduates, devising a communication strategy, setting up a business compliance enquiry route and website development.
- **Service launch and awareness raising** — launching the website, proactively contacting new and existing businesses and creating new resources.
- **Showcase initial projects** — creating and delivering local projects, online and in-person self help tools.
- **Transition to chargeable model** — planning for the next phase of chargeable services to businesses, surveying businesses to understand what they are prepared to pay for and starting to deliver cost-recovery services. Due to subsidy control issues, discussed later, this phase of the project was not completed in the lifecycle of the RPF3 project.



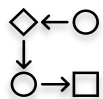
Projects outcomes

- **Improved compliance for new and existing businesses** — through a website that signposted free regulatory advice and guides and a business compliance support team.
- **Changed perception of regulators** — testimonials indicate that businesses now see regulators as an aid rather than a barrier for new innovative products, processes and services.
- **Trained officers across Greater Manchester** — with all apprentices/graduates now in permanent posts as compliance officers or environmental health practitioners.



...in relation to RPF

- **Enhanced regulatory environment that works for all stakeholders** — the online website and engagement has helped SMEs access consistent and readily available regulatory advice and support.
- **Collaboration with industry and regulatory authorities** — businesses communicating with a regulatory compliance team to access compliance advice and support.



Set-up and delivery experiences

The project achieved its goal of providing free service signposting advice and support to businesses via direct proactive telephone and in-person interactions, a website and new compliance officers.

Enablers to project delivery

- **Long lead in time between project award and start date** — Business Compliance Support received pre-project funding, which allowed them to complete governance processes across local authorities and recruit apprentices and graduates before the project began in October.
- **RPF support** — RPF staff were engaged and responsive to questions throughout the project. The RPF team were also flexible, allowing the project to start in October rather than September.
- **Good collaborative ways of working — due to:**
 - **Relationships in place before the project** — the service managers could collaborate effectively because they had long-standing relationships.
 - **Face-to-face meetings in a co-location** — working together two days a week at Manchester Town hall helped build team cohesion and collaboration.
- **Project support officer** — the project reallocated some of the budget from under-recruiting apprentices and graduates to hire a project support officer. The project support officer was crucial for the project as they dedicated time to manage service delivery and the communications and marketing.

Challenges faced during project delivery

- **Subsidy control issues** — subsidy control issues arise when government funding creates an unfair advantage to public sector organisations. RIO and the legal team flagged that chargeable services could raise these issues, where potentially some businesses would have greater positive impacts than others. These issues have now been resolved, and Business Compliance Support will be working towards offering some chargeable services in the next phase of the project, funded by the Greater Manchester Combined Authority.
- **Lack of resources in local authorities** — which led to the following challenges:
 - **Limited publicity about the service to businesses** — GM local authority comms teams had to manage conflicting other priorities, so Business Compliance Support was not a focus. As a result, the project struggled to get enough visibility to promote the service either internally or to an external audience.
 - **Lack of shadowing opportunities for officers** — a key part of the apprentices and graduates learning was shadowing other compliance officers. Due to resourcing challenges, some apprentices and graduates had to seek out shadowing opportunities in local authorities other than their own.
- **Wage structures in local authorities** — although the intention was that the apprentices/graduates would be paid the same as each, this was not possible due to the differences in job evaluation and wage structures across different local authorities. Where salaries were lower than expected, this sometimes led to challenges recruiting apprentices and graduates.



Learning

- **Expected project costs had changed since the application process** — the total costs of the project were unclear at the application stage, so costs were estimated based on similar projects. The project budget needed to be revised during delivery due to inflation and rising costs, so some local authorities hired apprentices instead of an environmental health graduate.
- **Financial monthly returns were a useful tool** — to keep on top of project activities, spending and progress. The programme manager will continue using similar forms in future projects.

...the actual project didn't start until October 2023...that's probably the biggest factor in it being the success...because it allowed us time to get through the governance process at local authority levels across ten local authorities, which, notoriously...takes an awful lot of time...the long lead-in time also allowed us to put recruitment out at the same time, do the interviews, and get people in to start the project. (Project lead reflecting on the long lead in time)



External stakeholders

- **10 Local authorities:** Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford, and Wigan.

- **Greater Manchester Growth Hub, Greater Manchester Build a Business and the Greater Manchester Fire and Rescue Service (GMFRS).**



Nature of engagement

External stakeholders

10 local authorities: four local authorities recruited an environmental health graduate, and the others recruited an apprentice. Two local authorities were unable to recruit due to wage structure constraints or because they joined the project at a later stage, leaving insufficient time for recruitment.

Greater Manchester Growth Hub, Greater Manchester Build a Business and GMFRS: regularly referred businesses requiring compliance support, and Business Compliance Support reciprocated by referring into these organisations. Business Compliance Support also collaborated with partner organisations by delivering and supporting workshops and networking events.



Learning

- **Collaboration with other organisations boosted awareness** — working with the Greater Manchester Fire and Rescue Service early on gave credibility to Business Compliance Support and provided a ready-made business audience to deliver its support.

 **GM Business
Growth Hub**

**Build A Business
in GM Libraries**



**GREATER
MANCHESTER
FIRE AND RESCUE SERVICE**



Immediate positive outcomes after project completion

The project successfully improved compliance for new and existing businesses by providing the following resources:

- A free website available to businesses offering self-help guides (such as licensing application guidance and new food business checklist), contact details for the Greater Manchester Business Compliance Support, and business testimonials. This website will continue to be updated after the project has concluded.
- Engagement was achieved with 4374 businesses including 666 in-person visits, 1374 telephone calls and 2805 emails/letters providing guidance and support. Nationally, 85% of business have a food hygiene rating of three or above which compares with 94% of those provided with in-person guidance from BCS, and 93% of businesses that were provided guidance over the phone.

There has been a positive shift in how businesses perceive regulators during the project, with businesses beginning to view them as an aid to growth rather than a barrier. This change is highlighted by 24 testimonials from businesses, which are featured on the website.

The project also **trained and developed apprentices and graduates** to receive their compliance officer apprenticeships or become an environmental health practitioner. Local authorities recruited 8 out of 10 apprentices and graduates, and within two years of the project's start, all had secured permanent positions in Greater Manchester local authorities.

As discussed, while the initial plan for Business Compliance Support included some chargeable services, concerns from both RIO and Tameside's legal team about subsidy control issues led to these services not being delivered during the funded period. However, it is anticipated that some chargeable service will feature during the next phase of the project which is funded by the Greater Manchester Combined Authority.



Beneficiaries of the project



Local authorities: Increased resource and capacity due to 1) having a larger workforce with graduates or apprentices now in full time positions; 2) businesses being able to use the new compliance service rather than asking local authorities directly, saving them time to focus on high-risk businesses; and 3) early compliance advice to businesses helping local authorities save time during inspections and reducing the need for enforcement action, as business start off compliant.



SMEs: Providing accessible regulatory guidance and support helps small and medium businesses be more compliant, saving them time and resources.



Apprentices and graduates: The project provided them with a placement in a GM authority, with the opportunity then to move into a full-time position.

...there's a running theme around businesses previously being worried that their LA regulator is coming to shut them down, or cost them money, but actually... speaking to an officer from Business Compliance Support has reassured the business that regulators are there to help and support the businesses. (Project lead reflecting on a change in the perception of regulators)

Specific beneficiary feedback



Manchester City Council

Manchester City Council is the largest council in Greater Manchester. Participation in the project freed up their resources and increased their capacity in two ways: businesses being able to use the new compliance service rather than asking them directly and having an apprentice increased their workforce.

All local authorities are experiencing an increase in workloads alongside an increase in demand from government in new regulations. The project has saved local authority staff time because businesses can now easily access compliance advice and support online and through a compliance support team. This has also enabled local authorities to focus their attentions to high-risk businesses.

In addition to this, the council benefited from hiring an apprentice within the RPF project because they added young people to an ageing workforce. In Manchester city council and across most local authorities, they went through five or six years in 2010 where they had no recruitment at all. Within the project, apprentices and graduates were given the opportunity to receive a professional registration and membership with the Chartered Institute of Environmental Health, providing the council with a larger and younger workforce. With the new funding provided from GMCA, the council will also hire two new environmental health graduates which will expand their workforce even further.

some of the work they're doing will improve businesses and it will mean we don't have to do as much enforcement or we don't have to do as much interaction or we don't have to tell them, sorry we haven't got resource to do that. So, that's one aspect. The other aspect of it is that in using the funding to bring in resource, which was either environmental health graduates or apprentices — so two different levels — that brought new resource into each council [representative at Manchester City Council]



The Hideout

The Hideout Café and Bar sits within the Hideout Arena in Farnworth. Originally it was opened as a café but is now open for large events including weddings and different sport competitions.

The Hideout sought regulatory and compliance advice from the Business Compliance Support service when they first set up the café. The support mainly included in-person visits and included food safety, paperwork, and what they must do to make their customers safe and protected. As a new business, they would have not been able to afford external support and would have had to guess what to do. The support meant that they could get the advice they needed without worrying about the cost.

Yeah, a massive difference that, you know, aside from obviously the financial burden that would have been placed on us if we'd have to go externally for that type of advice...we did initially start looking externally and you know the prices that people were telling us were crazy so we probably as a new business, we wouldn't have took that up.

Going forwards, they will use the support service again if any new legislations emerge and further advice is needed.



Longer term outcomes

The project's ultimate goal was to support support and educate businesses to get compliance right first time, thereby protecting the public and helping local authorities and businesses save time, money and resources.

In terms of next steps, Business Compliance Support will begin offering a range of chargeable services for businesses. Tameside Council has received funding from the Greater Manchester Combined Authority to continue the project because of its success. This funding will be used to offer chargeable services and to recruit more apprentices and graduates within the local authorities in Greater Manchester. 454 businesses have already indicated their interest in chargeable services if they become available in the future.

Evidence: Indicated by project lead.

In the medium term, local authorities outside of Greater Manchester may start prioritising business compliance and introduce similar approaches. Business Compliance Support has provided a model for delivering statutory services in a more efficient, cost-effective way that benefits both businesses and local authorities. This model has generated significant interest from local authorities across the country. As a result, the programme manager was asked to speak and present to other regulatory teams who were interested in replicating the services' success, including West Northamptonshire Council, Hertfordshire Council, South Cambridgeshire Council and Norfolk County Council. Whilst there have been no concrete plans from the local authorities to replicate the compliance service, the presentations encouraged discussions on how best local authorities can 'grow their own' regulatory team while providing compliance support for businesses.

Evidence: Evidence that is necessary for this outcome to occur has not been observed.

In the long term, the intention is to support and educate businesses to get compliance right the first time, saving them and local authorities time, money and resources. Evidence suggests that compliance has improved for some businesses, effectively saving them and local authorities time and money. As discussed to the right, the continuation of funding will ensure to support and educate businesses going forwards.

Evidence: Too early to observe project outcome.



Outcome enablers and barriers

Long-term funding stream: To ensure the project's sustainability, securing long-term funding is essential. The current continuation phase provides only 12 months of funding, limiting Councils' ability to plan effectively. Longer-term funding—ideally two to three years—would offer the stability needed for local authorities to commit to supporting compliance officers. Achieving this may require senior buy-in and Spending Reviews from the Government to address budget uncertainties faced by local authorities.

...realistically, we're not going to become sustainable just from chargeable services in the short term, or even medium term, the aim for us is doing a good job for this 12 months, and then securing future funding to carry on—because we think it's a really crucial service for businesses and local authorities in Greater Manchester. (Project lead reflecting on the importance of a long-term funding stream)



The project outcomes in relation to the RPF contribution statements

Statement 4: Engagement with industry

Input: The RPF program has fostered an environment where regulatory authorities and innovators can collaborate to develop regulatory solutions that are more outcome focused.

Process: Innovators have gained more frequent and in-depth access to regulatory authorities through dedicated business compliance officers and a website, leading to increased exposure and a more balanced, collaborative relationship. This improved dynamic has promoted open communication, helping both sides better understand each other's needs and responsibilities, providing small and medium sized businesses with more timely and targeted compliance support and authorities with more information on how to update their guidance.

Outcomes: The project has produced greater engagement between regulatory authorities and SMEs through the different forms of regulatory advice and support. This has allowed for a better understanding of the relationship between regulation and innovation by both regulatory authorities and industry.

Statement 5: Creating an enabling regulatory environment

Input: The RPF funding provided financial resources for Business Compliance Support to provide consistent and readily available regulatory advice and support.

Process: By focusing on outcomes rather than prescriptive processes, regulatory authorities have developed compliance frameworks with built-in flexibility. This adaptability ensures the frameworks remain relevant and effective over time, even as sector needs evolve. Businesses have greater access to regulatory authorities which means that regulation guidelines are clear. Together, this creates more timely responses to queries and fewer barriers to developing and commercialising innovations.

Outcome: The RPF has created an improved regulatory environment that fosters innovation. Businesses feel like regulatory authorities support the development of their ideas and UK markets offer a greater number of safe products and services.



Case study 3: Hydrogen Challenge

Project at a glance — Hydrogen Challenge



Regulation role

Project context



Project vision

The CAA (Civil Aviation Authority) is the UK's aviation regulator, responsible for ensuring aviation safety and security, protecting consumers, and managing the environmental impact of aviation. In doing so, it works to ensure:

- the aviation industry meets the highest safety standards.
- consumers have choice, are protected and treated fairly when they fly.
- working with the industry to improve its environmental performance across the aviation and aerospace system.
- the aviation industry manages security risks effectively.

Established as a public corporation in 1972, it operates under a UK government requirement that all costs are recovered through charges to those it serves or regulates, including airlines.

Context: To achieve Net Zero air travel by 2050, the aviation industry is investing in hydrogen propulsion solutions that could enable zero carbon emission flights.

Rationale: However, hydrogen as an aviation fuel is still at an early developmental stage. The industry does not yet fully understand the risks to aviation safety or the pathway towards certification that verifies the safe use of hydrogen technology. This hinders the deployment of hydrogen at scale within the aviation system and the government's ambition to create new regulatory frameworks for new zero-carbon emission aircrafts to be introduced by 2035.

Project: In response, the project aimed to create a CAA-led Regulatory Challenge on the use of Hydrogen as aviation fuel. This Challenge sought to promote collaboration among the CAA, the aviation industry, and academia to further the understanding of hydrogen-related safety risks, identify gaps in CAA policies, and propose recommendations for developing new net-zero policies.



Project detail

Project activities

The project delivered four workstreams to achieve its aim:

- **Workstream 1:** Desk-based research to identify gaps in the current aviation regulations and Certification Specifications.
- **Workstream 2:** Three sandbox projects with industry to test hydrogen technology in aviation: a fuel cell powertrain, a Hydrogen Fuel Cell Electric Propulsion System, and hydrogen-fuelled Ground Service Equipment for airports.
- **Workstream 3:** Academic research on hydrogen in aviation, including guidelines for safe use in gas turbine engines and the impact on materials and design.
- **Workstream 4:** Stakeholder engagement, including setting up three Hydrogen Stakeholder Working Groups (HSGW) with industry, academia, and national regulators to focus on hydrogen technology.



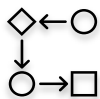
Projects outcomes

- **Regulatory landscape review** — providing a baseline understanding of the UK's regulatory environment for hydrogen powered flights.
- **Hydrogen sandboxes** — enabling further hydrogen testing on aircrafts and at airports.
- **Working Groups setup** — enhancing engagement between CAA and key stakeholders.



...in relation to RPF

- **Promoting engagement with industry to drive innovation** – the CAA is continuing work with industry and academics to advance the safe use of hydrogen in aviation.
- **Creating an enabling regulatory environment** — initial qualitative evidence suggests that the Hydrogen Challenge is making progress towards the safe adoption of hydrogen through considered reflections on current regulations. This regulatory refinement is being achieved gradually through ongoing trials and stakeholder involvement.



Set-up and delivery experiences

The project team were successful in delivering all four workstream activities in the funding period.

Enablers to project delivery

- **RPF funding helped the project realise its goals** — it enabled the CAA to have a dedicated team focusing specifically on hydrogen as an aviation fuel, which helped to accelerate work in this area.
- **RPF support was reassuring** — RPF staff were engaged, and the monthly meetings reassured the project team that they were meeting programme requirements.

Challenges faced during to project delivery

- **National elections affected partnerships** — the national elections resulted in a shift in government priorities in the areas some of areas the projects were operating, which in turn impacted funding for project partners. This led to some workstream activities not being delivered by partner organisations.
- **RPF financial administrative process was onerous** — the project found it time-consuming to submit detailed financial evidence, which took up to a day to prepare and submit. They encouraged RPF to ease its expenditure oversight requirements, particularly if projects were progressing towards their outcomes.
- **There were procurement delays** — there were delays in appointing academic posts because the CAA had a small internal procurement team that was affected by staff absences and delivering other procurement activities. This issue was further exacerbated by the fact that it was the first time the Hydrogen Challenge had done a formal procurement process for academic research.



Learning

- **The project team suggested the RPF simplify/relax their spend scrutiny** — for example, by just asking for a financial summary rather than receipts to evidence every spend. They felt this would free up additional administrative time for project delivery.

It was good to have those regular catch-ups [with RPF team] to make sure they were happy with what we were reporting on. (Project lead reflecting on RPF support)

[Procurement delays because of...] A small [internal] team with lots of other procurement activity going on. They can only do so much and then obviously there's [staff] leave. (Project lead reflecting on procurement challenges)



External stakeholders

- **Academic partners** — Swansea University and University College London.
- **Industry partners** — Cranfield Aerospace Solutions, ZeroAvia and a consortium comprising Exeter Airport, Regional & City Airports (RCA), TUI Airways Ltd, Cranfield University and ULEMCo Ltd.



Nature of engagement

Contractors

The project brought together academic and industry expertise to deliver the different project workstreams. These included:

- **Academic partners** — delivered on the academic research on hydrogen and aviation for workstream 3.
- **Industry partners** — delivered on the three sandbox projects for workstream 2.

Yes, so some academia [academic organisations] just didn't apply because it wasn't enough money or enough timeframe, but thankfully, I think some of the ones that were awarded [selected by project] that [RPF funding] helped them because they had already started [working on Hydrogen]. (Project lead reflecting on what is needed to engage academic organisations)



Learning

- **The project was able to engage a wide range of partners** — while the CAA has a strong history of working with industry, the project funding also allowed collaboration with academic innovation partners.
- **Adapting to academic collaborations** — the project learned that academics often work on longer-term projects (three to five years) and need a higher project budget (around £180,000 or more) to justify their involvement. In the future, the project team plans to allocate more time and budget to better suit academic work styles. Despite this, the project received six applications from academic organisations involved in hydrogen research seeking additional funding.
- **Industry partners had their own challenges** — some were reluctant to share sensitive information without a non-disclosure agreement, causing delays. Additionally, smaller industry partners sometimes lacked internal capacity and expertise so needed extra project support, which also led to delays. For example, the project had to support a partner with their sandbox work as they lacked the staff to do this, delaying the start of the trial.



Immediate positive outcomes after project completion

As noted, the project team worked successfully with industry and academia to meet its objectives to better understanding hydrogen-related aviation risks and identify gaps in CAA policies. The project delivered all intended activities across the four workstreams, which helped the CAA to:

- **Understand how regulations can support hydrogen powered flight** — through the desk-based research in workstream 1.
- **Prepare for the future testing of hydrogen on aircrafts and airports** — through the successful completion of the three sandboxes in workstream 2. The sandboxes also provided the opportunity to collaborate with industry to further CAA's understanding of the important innovation developments in the area.
- **Understand how to qualify new materials for safe hydrogen aviation** — through the work done by academic partners in workstream 3.
- **Engage internal and external stakeholders in the Hydrogen Challenge** — by setting up three HSWG working groups in workstream 4, involving industry, academia and other national regulators. The working groups focused on Hydrogen Propulsion Systems, Hydrogen Aircraft Safety and Certification and on Hydrogen Aerodromes and Airports.

Other immediate outcomes included the project team helping to upskill the wider CAA on hydrogen technology and participating in national and international discussions by attending conferences and joining the Hydrogen Technologies International Working Group.



Beneficiaries of the project



CAA — has benefited from its staff being upskilled by the project team and further developing its relationships with academic institutions, as well as industry. Working with industry has introduced the CAA to new hydrogen developments in the sector.



Industry — industry partners on the project have benefited from the CAA's regulatory knowledge, using it to guide their hydrogen innovations.



Wider government — the safe development of hydrogen for aviation will enable zero-emission flights in the future, supporting government ambitions for Net Zero aviation by 2050.

Specific beneficiary feedback



Industry innovator

A leading aerospace technology firm was involved in delivering a sandbox for workstream three of the Hydrogen Challenge project.

Reflecting on their experience, they felt it was a valuable learning opportunity for both the CAA and industry experts. The CAA learned about new hydrogen developments from innovators, while firms gained insights into regulatory expectations, boosting their confidence to invest in hydrogen fuel development.

I think it was really refreshing, because you normally don't have that opportunity [to interact with regulators]... From the regulator's point of view, they see what the industry is up to and know what they need to focus on. [From the innovation firm's perspective] The most expensive in any aerospace development programme is showing compliance...to the regulation. With no regulation being there, you don't actually know what type of testing and evidence you need to provide... the regulations are still not written down, but at least you get a feel for what it's going to be and what ballpark we're talking about. At least you get the confidence the order of magnitude is right rather than being completely off. (Representative from one of the innovation firms)



Longer term outcomes

Ultimately, the project aims to support the safe adoption of hydrogen fuel in aviation. It will do so by ensuring that hydrogen fuel is rigorously tested before adoption and the learning from these trials informs Secondary legislation and the Certification pathway. The project team outlined three steps needed to accomplish this long-term goal, presented below alongside the evidence to support this.

In terms of next steps, CAA has already secured funding from the Department for Transport (DfT) to conduct a second round of the Hydrogen Challenge Sandboxes. There will be thirteen trials delivered for up to three years, focusing on developments ranging from new designs of cutting-edge aircraft that use hydrogen fuel cell power systems to changes in airport infrastructure to allow for safe hydrogen storage and refuelling. In the meantime, the HSWG working groups will continue to meet to foster collaboration between CAA, industry, academia and other stakeholders.

Evidence: Sufficient evidence observed for outcome.

In the medium term, the hydrogen testing will move up to higher levels of sandbox testing. This may include trials for live aircraft using hydrogen fuel and the continued trials for the use of hydrogen in airport ground equipment. This will inform CAA thinking on regulatory amendments.

Evidence: Too early to observe project outcome.

In the long term, the team are hoping that the use of hydrogen fuel in aviation becomes business as usual. This will require CAA to amend its regulatory guidance to reflect learning from the trials and re-train its inspection staff on these regulatory changes. The CAA and industry will raise public awareness about the use and safety of hydrogen fuel. The Scheme of Charges for the airline industry, which financially covers CAA's regulatory services, will be amended. This change will shift funding for hydrogen fuel regulation from government to industry.

Evidence: Too early to observe project outcome.



Outcome enablers and barriers

The project team mentioned both organisational and wider factors that could affect whether Hydrogen Challenge achieves its intended medium and long-term outcomes:

- **Funding.** Hydrogen fuel is currently at its developmental stage and so the CAA relies on government and other funding to support its projects. Whilst it has been successful in receiving RPF and DfT money, it will need to continue to win funding to ensure further testing.
- **Legislative changes.** Relating to the above, the project team noted that current government environmental priorities align well with the use of Hydrogen fuel for aviation. However, a change of government or shift in environmental priorities could affect funding for CAA's hydrogen development activities.



The project outcomes in relation to the RPF contribution statements

Statement 4: Engagement with industry

Input: The RPF funding provided financial resources, which helped CAA establish a team focused specifically on the use of hydrogen in aviation. This dedicated team had time and resources to set up collaborations with innovators and academia.

Process: The funding allowed the dedicated project team to create opportunities to support more frequent and collaborative interactions with both industry and academia. This included the HSWG working groups and the opportunity to collaborate in an outcome focused way during the three sandbox trials.

Outcome: CAA continues to collaborate closely with industry and academia through the continuation of its HSWG working groups and the new wave of DfT funded sandboxes.

Statement 5: Creating an enabling regulatory environment

Input: The RPF funding provided financial resources, which helped CAA establish a team focused specifically on the use of hydrogen in aviation. This dedicated team had time and resources to set up collaborations with innovators and academia.

Process: CAA, academia and industry worked collaborative, learning from one another to think through the safe adaption of Hydrogen in aviation and how this can inform the CAA regulatory approach.

Outcome: The CAA continues to collaborate closely with industry and academia as they gradually progress towards an outcomes-based regulatory approach that support the safe adoption of hydrogen.

Case study 4: Company and Organisational Data Explorer (CODEx)

Project at a glance — Company and Organisational Data Explorer (CODEx)

Project context



Regulation role

The project was led by the Financial Reporting Council (FRC), an independent regulator in the UK. It oversees auditors, accountants and actuaries, and sets the UK's corporate governance, stewardship codes, accounting standards and digital taxonomies.

The FRC seeks to serve the public interest and support UK growth by upholding high standards of corporate governance, reporting, audit and actuarial work. The FRC has set out four key objectives to support this purpose:

- Supporting UK growth and investment by setting clear standards and expectations to improve governance, reporting, and investor trust.
- Regulate proportionately and fairly, encouraging high quality auditing, assurance and actuarial work, and intervening fairly and effectively in cases where there are significant shortcomings.
- To build on their already extensive knowledge of corporate reporting and the audit and actuarial markets. Through this and agile thinking, to identify and prepare for future challenges and opportunities.
- Be a modern, inclusive organisation that is continuously learning and improving — and is trusted as an effective regulator and a great place to work.



Project vision

Context: The UK is committed to driving economic growth, encouraging long-term investment, and strengthening its capital markets. A key enabler for these goals is a data environment that delivers insightful analysis to a wide audience at minimal cost.

Rationale: The UK is a leader in collecting company and organisational data in a digital format called iXBRL (Inline eXtensible Business Reporting Language). Indeed, over 80% of the accounts published annually by the Companies House are available in this format. However, accessing and using this data is difficult because it sits in regulatory silos and is in a format that is not easy to view or analyse. This limits its value to the public, investors, regulators, and government agencies.

Project: The Company & Organisational Data Explorer (CODEx) project was funded by RPF3 to accelerate the use of structured financial data in iXBRL format. It aimed to do this through developing a publicly available iXBRL viewer and a sandbox toolkit for regulators and agencies. These outputs were designed to support:

- Investors access to information about UK companies to support investment decisions.
- Businesses make more informed decisions about their suppliers and creditors.
- Regulators and government agencies to use existing data more effectively and efficiently.

Project detail



Project activities

FRC worked with regulators and other stakeholders to create the iXBRL viewer and toolkit across four phases:

Pre-discovery

Engaging with other regulators prior to RPF funding to understand how structured reporting data could be used and improved. This led to the Viewer and the Toolkit being chosen as the project's focus.

Main phases

Discovery

User research to understand the needs of regulators, investors and the public.

Alpha

Prototypes developed and test — focusing on the user journey. Torchbox, a digital specialist, helped to build the technical architecture and a user interface that met government accessibility and usability standards.

Beta

Split into Private and Public phases. Viewer functionality informed and strengthened by user feedback. Viewer launched — providing access to 30, million reports in iXBRL.

Viewer

Toolkit

Toolkit blueprint developed.

Proof of concept developed — for parsing iXBRL data, using commercial and open-source tools. Commercial tool selected for practical and budgetary reasons.

A simple usable version of the Toolkit developed, capturing data from various sources and transforming it into a data model. Workshops ran to test and improve Toolkit.



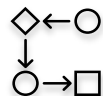
Projects outcomes

- **iXBRL viewer** — a web enabled tool that allows users to search and display 30 million individual iXBRL tagged annual company reports.
- **Regulatory toolkit** — data platform which brings together company data from public sources and processes it into a series of data visualisations. It essentially provides a production-ready XBRL analysis blueprint and comprehensive data model.



...in relation to RPF

- **Promoting partnerships with other regulators** — helped to further strengthen working relationships between the four regulators.
- **Development of innovative processes and products** — the project Viewer and Toolkit helped to provide a set of tools to support better business and regulatory decisions.



Set-up and delivery experiences

The project achieved what it set out to by launching the free and publicly available iXBRL Viewer and the regulatory Toolkit to support the use of structured, machine-readable iXBRL data.

Enablers to project delivery

- **Funding conditions** — RPF funding focused project delivery by providing clear expectations on the agreed budget, the project timeline and the anticipated outcomes. For example, the 18-month delivery period ensured the project focused on the key goals and helped to sharpen project and partnership processes.
- **RPF support** — RPF staff were engaged and responsive to project needs. The monthly catch-ups were particularly helpful in identifying and tackling challenges. For example, RPF staff quickly approved rescheduling some of the project's spending due to delays in procurement communications caused by the national election period.
- **Pre-engagement work** — the two-month RPF application window could have been challenging without the prior groundwork that the project had done with regulators and users a few years before submitting the application. This included identifying digital reporting as the project focus and setting up a regulatory forum, which established cross-regulatory communication and expectations for collective engagement on digital reporting. This was later complemented by the pre-discovery project phase, which identified the Viewer and Toolkit as the project focus through discussions with regulators and the public.
- **Drawing on existing, cross-regulatory forums to support the project** — FRC were able to engage XBRL experts in their existing Technical and Governance committees to feed into the project, which had three advantages.
 - Brought in the right expertise to support the development of the outputs.
 - Involved other regulators in shaping the Viewer and Toolkit so it met their needs too.
 - Ensured the project was compliant with internal governance processes.
- **Having a dedicated project manager**— given the project's complexity, a dedicated contracted manager was appointed to coordinate activities. Based onsite but external to the project team, they had the time and independence to coordinate, manage project administration and chase for approvals and sign-offs that internal staff may have struggled to prioritise.

Challenges faced during project delivery

- **Central Digital and Data Office (CDDO) approval** — the FRC were required to secure CDDO approval for the Viewer strand of work as part of a technology and digital spend control process. Although this process provided helpful accessibility guidance to strengthen the Viewer, the approval timelines were challenging
- **The 10-month gap between funding being awarded and the project starting** — whilst this did not lead to issues, it could have risked losing senior regulator staff buy-in if key individuals had moved on before the project began. Although the RPF remained in contact with the immediate project team, project staff felt that more could have been done to engage directly with their senior leadership to help sustain their buy-in to the project. For example, the RPF could have communicated the importance of the project's involvement in the programme and provided senior leaders with updates on RPF progress, such as sharing the RPF's Theory of Change.
- **Partnerships** — staff changes and shifting organisational priorities meant that delivery input varied across the partners during the life of the project, with FRC playing a key role in maintaining project momentum.



Learning

- **Pre-engagement with regulators and users work was important** — this helped to shape the project focus, secure partner buy-in and led to a smoother application process and more effective delivery.
- **Drawing on cross-regulatory expertise important** — as will be discussed in the next slide.
- **An external, dedicated project manager was instrumental to project delivery** — by ensuring that project activities were coordinated the project was generally kept on track.

I would certainly say that being able to bring in a specialist project manager...Just someone to be slightly removed from the detail, just to be able to drive the project along, supporting on our engagement with procurement...funding and the budgeting and all that sort of thing. I think that was quite key to the success of the project. (A project lead reflecting on importance of having an independent project manager)

...both those committees [Technical and Governance] have [staff] from all the other regulators that we were working with on this project...which was obviously, important, because this was a product that wasn't just for the FRC; it was for and on behalf of the other regulators. So, it was quite useful using those pre-existing committees, which already had that cross-regulatory representation on them. (Project lead on the importance of cross-regulatory forums)



Internal stakeholders

- Partnership with five key regulators



Nature of engagement

The FRC worked with four regulators:

- Companies House
- The Charity Commission for England and Wales
- Financial Conduct Authority
- HMRC



Learning

- **The project benefited from multi-regulator involvement** — as noted in the previous slide, involving multiple regulators helped to bring in expertise and ensured the Viewer and the Toolkit met the needs of different organisations.
- **Involving regulatory partners throughout the project is important** — as with any multi-regulatory work, there were challenges coordinating timelines and maintaining the project priority across the regulators. This was because the project was delivered over 12-18 months and personnel and priorities changed in organisations during that time. In response, the project team:
 - Involved partners from the outset — including early workshops conducting the pre-discovery phase and during the discovery phase.
 - Continued engagement throughout the project — e.g. involving the partnerships in key decisions and engaging them at key moments, such as in data sprint sessions.



External stakeholders

- **Project management specialist**
- **Digital expertise**



Nature of engagement

Contractors

- **Dedicated project manager** — as noted, this was an external person with a fixed term contract who was based on the project premises.
- **Digital expertise** — the team worked with a number of providers with digital expertise to explore how the Viewer and toolbox could be structured and how best to deliver the functionalities required.



Learning

- **Importance of an external project manager** — discussed earlier.
- **Procuring the right contractor** — external expertise played a key role in understanding what was required for the Viewer and toolkit. Key learning included:
 - The importance of mapping required skills at each project phase and assessing internal capabilities to decide if external expertise was needed.
 - The project would have benefited from more time to explore options beyond existing procurement frameworks to secure contractors with the most relevant expertise.
 - The importance of exploring and experimenting with different approaches to deliver the solutions.



Immediate positive outcomes after project completion

As mentioned previously, the project achieved its stated outcomes:

- **A digital iXBRL Viewer was launched for wider public use** — giving access to 30 million reports in iXBRL format for both UK listed and non-listed companies, the first of its kind worldwide in terms of scope and coverage. It is also important to note that the code for the Viewer is opensource, encouraging users to draw on the Viewer to innovate.
- **The sandbox Toolkit was produced for regulators** — the Toolkit is a data platform which brings together company data from public sources (Companies House and the FCA), processes the data into a database, adds reference data and presents this to users via a series of data visualisations. It essentially provides an XBRL analysis blueprint to allow other regulators to build their own dashboards and replicate the toolkits capabilities. The visualisations are designed to support regulators in answering questions, investigating current practice and supporting the monitoring of data and accounting quality.
- **A condensed version of the project final report** — the report distils the key insights presented in the final project report submitted to the RPF, tailored for regulators and wider audiences. It encourages use of the Viewer and the Toolkit by signposting readers to these resources and highlighting the opensource elements available to support further innovations.



Beneficiaries of the project



Wider range of users for the Viewer — public, investors, companies, FinTechs and academics.



Regulators — supporting policy staff to understand to understand company reporting practices and supervision staff to identify non-compliance in companies' or auditors' reporting.

Specific beneficiary feedback



Charity Commission

The Charity Commission is an independent department in England and Wales responsible for regulating registered charities. Before the CODEx project, The Charity Commission had been exploring various options to engage with digital reporting in an affordable way.

“We're very small as an organisation, compared to HMRC, Companies House, so...the infrastructure that had previously been required to develop a platform for receiving and processing digital reports, it was just too...expensive for us as a small organisation. So, we've constantly been trying to innovate and find less expensive solutions, working with other stakeholders, collaborating, and what we found was, when the CODEx project came up with the FRC, we saw this as possibly the answer to what we've been looking for.”

They anticipate that the Toolkit will be able to reduce the number of questions asked to charities in their annual return, therefore reducing the burden on charities altogether. The software would also potentially reduce the need for dual filing and use structured data to apply measures and ratios such as look for outliers in the data and create visualisations using power BI.



Longer term outcomes

Ultimately, the project aimed to give equal access to business data for all users with a view to supporting effecting decision-making. It sought to do this by accelerating the use of structured financial data to help businesses make investment decisions, assess suppliers and creditors more effectively, and support regulators and government agencies to use existing data more efficiently.

In the short term, the project team were focusing on encouraging the localised use of both the Viewer and the Toolkit. The FRC supported by Companies House and FCA have now launched the viewer publicly and are planning to continue to host it. The viewer is already being used by the public with over 6,000 calls to the service in the first months. The Toolkit has provided other regulators with a template for using structured financial data, with some using its database model ('dashboard') as a guide for their own work. The FRC also trialled the dashboard internally to 400+ colleagues with a view to building on it further.

Evidence: Indicated by project lead.

In the medium term, wider regulatory collaborations are planned. These collaborations are intended to showcase the Toolkit, explore opportunities and risks in using structured data and to stimulate joined-up working. There is already evidence of this, with the project team presenting at various international regulatory forums involving European and US regulators and the project being referenced in a recent Australian academic paper. They have also recently had a group discussion ('sprint') to discuss AI and structure financial data with local regulators, a Dutch regulator and wider agencies (e.g. the Insolvency Service).

Evidence: Indicated by project lead.

In the longer term, the project intends to continue to develop the Toolkit and the Viewer, informed by a better understanding of how both are being used. The project intends to develop the Toolkit further in-house; for example, by exploring what other data sources can be added to it. Regarding the Viewer, the project has already secured funding to develop it further — which will involve exploring how it is being used and what products are being developed off the back of it. This is part of wider work in FRC to encourage the use of iXBRL data by the market.

Evidence: Indicated by project leads.



Outcome enablers and barriers

The project team indicated that both internal and external factors influenced their ability to move towards achieving their medium- and long-term outcomes.

Internal engagement — as noted earlier, it was important to have senior leadership buy-in at the FRC and other regulators to ensure the project had the time and resources needed.

Funding — to ensure the project team had the time and external resources to develop both the Viewer and the Toolkit.

Encouraging take-up of the Viewer — while the Viewer improves data access, project staff recognise the need to find ways to encourage businesses and others to use it.

Actually, the UK, in producing a viewer, would not quite be the first but would probably be the second country to produce a viewer which enables access to that data! So, there's been a lot of interest internationally about how we did it, thinking about how we could do it themselves, because the challenge is the same in whatever country in relation to this data. (Project lead on the international interest in the Viewer)



The project outcomes in relation to the RPF contribution statements

Statement 3a: Collaboration between regulatory authorities

Input: The RPF funding provided financial resources, which helped to secure organisational support for FRC and partners to work on the Viewer and the Toolkit. The RPF staff also supported the project throughout the funding period.

Process: The project team secured buy-in from other regulators by involving them early, before RPF funding was received, allowing them to identify the Viewer and the Toolkit as the project focus. The RPF funding further consolidated this partnership work by giving senior leaders in these regulators an opportunity to demonstrate their support for the Government's push for regulatory involvement in growth and innovation.

Outcome: FRC continues to conduct cross-regulatory workshops, bringing together international and partner regulators to explore AI and structured reporting data. This partnership allows regulators to further share knowledge, understanding and requirements for the future of structured financial data reporting.

Statement 5: Creating an enabling regulatory environment

Input: The RPF funding provided financial resources, which helped to secure organisational support for FRC and partners to work on the Viewer and the Toolkit. The RPF staff also supported the project throughout the funding period.

Process: The financial resources unlocked an investment by the regulators via staff time and the opportunity to bring in external expertise, such as digital staff and a project manager, to drive the project. The funding also provided an opportunity for all four regulators to work together and share expertise in developing the Viewer and Toolkit.

Outcome: The Viewer is now publicly available, allowing the public and business to access structured financial reporting data to help inform business decisions. The Toolkit has also allowed regulators to develop other tools, such as data dashboards, to allow them to better make use of structured financial data.



PLYMOUTH
CITY COUNCIL

Plymouth City Council



Case study 5: Maritime Regulatory Innovation Framework (MRIF) — Developing regulatory frameworks to support maritime innovation

Project at a glance — Maritime Regulatory Innovation Framework (MRIF)



Regulation role

The project was led by Plymouth City Council and involved a consortium of partners including:

- **University of Plymouth** — a leading authority in marine and environmental sustainability.
- **Plymouth Marine Laboratories** — a leader in the field of marine research.
- **University of Exeter** — The Centre for Future Clean Mobility at the university specialises in decarbonised powertrains. This technology is a greener way to power vehicles and includes battery electric vehicles, hydrogen fuel cells and bio-fuel based engines.
- **The Maritime and Coastguard Agency** — an executive agency of the Department for Transport, which regulates the government's maritime safety policy in the UK.

Project context



Project vision

Context: The maritime sector is undergoing a rapid transformation driven by decarbonisation challenges and the adaptation of new technologies. In particular:

- Decarbonised propulsion — systems that power vessels while producing little or no carbon emissions using, for example, bio-fuel or wind-assisted systems.
- Maritime autonomy — technology that allow ships and systems to operate with little or no human interaction. These technologies are predicted to have a global market of \$136bn over the next 14 years, with the potential for UK to have a 10% market share in this.

Rationale: Current regulations are not fully geared to supporting businesses and innovators to develop and test maritime autonomy and decarbonised propulsion technologies in UK waters. This can slow the adoption of such technologies, though it must be balanced with the need for regulators to ensure vessels and systems are safe.

Project: In response to these challenges, the project aimed to develop regulatory frameworks that support the development and testing of decarbonised propulsion and maritime autonomy vessels in UK waters.

Project detail



Project activities

The project had two workstreams dealing with each aspect of maritime innovation: decarbonisation and maritime autonomy. Each workstream had five work packages:

- **A review of the regulatory regimes within categorised waters and 'at sea'** — to identify economic, legal and technical challenges to testing 'at sea'.
- **Full documentation of use cases of relevant vessels** — this involved sector specific stakeholder engagement to develop the frameworks. For the marine autonomy workstream, a one-day stakeholder workshop was held to discuss the proposed framework. For the decarbonisation workstream, stakeholders were engaged throughout the project, but this culminated in a discussion of the framework with four key organisations.
- **A comparison of UK and international regulations** — to identify learning and opportunities for improvement.
- **Develop proposal for regulatory changes** — to provide the flexibility for 'at sea' testing to accelerate innovation.
- **Produce a final report** — outlining the frameworks and conclusions for MCA's consideration.



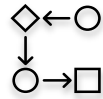
Projects outcomes

- **Two draft regulatory framework for prototype vessels testing** — for autonomy and decarbonised propulsion.
- **Building and strengthening stakeholder relationships** — including UK maritime stakeholders and five international regulators.
- **Clean Fuel Demand Forecast survey** — a user survey to understand stakeholders' future preferences for decarbonised fuels.



...in relation to RPF

- **Promoting partnerships between a range of stakeholders** — including MCA, academia, local authorities and PML.
- **Creating an enabling regulatory environment for innovators** — by producing frameworks that allow for the testing and development of decarbonised propulsion and maritime autonomy vessels in UK waters.



Set-up and delivery experiences

The project successfully developed two draft frameworks relating to decarbonised propulsion and maritime autonomy.

The frameworks were submitted to MCA for review. The project also completed an additional piece of user survey work on understanding stakeholders' decarbonised fuel preferences for the future. However, the project did not have enough time to conduct an on-water trial of a vessel to test the maritime autonomy framework.

Enablers to project delivery

- **RPF support** — RPF staff were engaged and responsive. RPF staff were willing to be flexible when the project faced key issues. This included a slight extension to the project timeline due to contractor recruitment delays and the reallocation of spend across different workstreams.
- **Partnerships** — the project team consisted of a knowledgeable and impactful partnership blend consisting of the local authority, academics, industry experts and MCA as a regulator.
- **Having a dedicated project manager** — the project required strong project management as it had partners working across different workstreams and work packages. Having a dedicated project manager supported this by ensuring timelines were coordinated and that key project administration tasks, such as progress updates and financial returns, were completed to time.

Challenges faced during project delivery

- **Delays recruiting a contractor** — as mentioned above, there were delays in recruiting a contractor to work across both workstreams. This was due to the time needed to develop a clear contractor specification, which involved navigating the procurement processes of different organisations.
- **Needing longer project time** — as noted, the project did not have enough time to test the draft frameworks before submitting to MCA. This was compounded by the noted delays in recruiting a contractor.



Learning

- **A dedicated project manager was important** — to support coordination across multiple partners, workstreams and work packages.
- **Contractor recruitment** — to avoid recruitment delays, the team recommended booking early meetings with partner procurement teams to agree a contractor requirements.

I suppose that is a lesson for other people, that that is something in terms of when you look to procure, or you go through this process again, reiterating the importance of having slots with procurement teams. (Project lead's advice on reducing contractor recruitment delays)

I think the not costing [a project manager] to make sure all the things happen is a mistake on any project...[There was some initial partner pushback]...But I think once they [partners] realised how much work was involved in doing the claims, chasing everything up, making sure that everything's evidenced, writing the summary reports...just dotting the Ts and crossing the Is and making sure [that] it's done on time and [the RPF staff are] kept up to date... That needs to be costed in and done properly (Project lead's advice on having a dedicated project manager)



Internal stakeholders

- **Partnerships with a range of internal partners**



Nature of engagement

Plymouth County Council worked with academics, industry experts and the key sector regulator:

- University of Plymouth
- University of Exeter
- Plymouth Marine Laboratory
- Maritime and Coastguard Agency



Learning

- **The project benefited from multi-agency work** — it brought together organisations that had the capability and capacity to drive the framework development. The regulator may not have been able to do this alone because of limited resources, subject expertise and their other day-to-day responsibilities.
- **Partnership work helped organisation to better understand each other's perspectives** — for example, partners developed a better understanding why MCA may view the framework from a risk management perspective and the resource limitations it faces.
- **Senior regulator leadership team members need to be involved in projects** — although senior MCA staff were involved at the start, they were replaced by more junior members as the project progressed. This may have limited the project's ability to reach senior MCA decision-makers.
- **Navigating different ways of working** — partner organisations had slightly different processes and ways of working which needed to be navigated. For example, navigating procurements processes across partner organisations contributed to delays in recruiting external contractors, as noted earlier.



External stakeholders

- **Contractor** — Decarbonisation and industry expert
- **Contractor** — Marine technology experts
- **International regulators**



Nature of engagement

Contractors

- **Stehr Consulting LTD** — supported the project across both framework workstreams — including mapping existing regulations and setting up and running stakeholder consultations.
- **Tope Ocean** — conducted the Clean Fuel Demand survey to understand the market for decarbonised fuel.

External stakeholders

- **International maritime regulators** — were involved in discussions about regulations that informed the frameworks. Regulators from the following countries were consulted:
 - Decarbonised propulsion workstream — Norway, Denmark and the Netherlands.
 - Maritime autonomy workstream — Norway and Canada.

The consultant was vital in this, because the universities are actual users of... They themselves need MCA. They fall under the regulation, so they could have an unconscious bias in that process, so I think the concept of using an independent, industry-based consultant was the right one. (Project lead on the importance of having a good contractor)



Learning

- **Importance of having an independent contractor** — the external contractor was integral to project delivery for two reasons:
 - Their independence — they were not accountable to the main regulator, which allowed them to openly reflect on current regulations. Their independence also made it easier for international regulators to engage with them than with a national regulator, who may have been seen as a competitor.
 - They were industry based — so were aware of the issues, able to communicate in industry language and have connections within the sector.



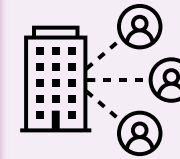
Immediate positive outcomes after project completion

As noted earlier, the project achieved its intended outcomes:

- **Two draft regulatory frameworks produced** — for maritime autonomy and decarbonised propulsions.
- **Building and strengthening stakeholder relationships**— the project team developed both internal and external relationships during project delivery, including with:
 - Internal partners — local authority, academics, industry experts and the MCA.
 - UK maritime stakeholders.
 - Five international regulators — three for the decarbonised propulsion workstream (Norway, Denmark and Netherlands) and two for the maritime autonomy workstream (Norway and Canada).
- **Clean Fuel Demand Forecast survey** — a user survey to understand stakeholders' preferences for decarbonised fuel in the future.



Beneficiaries of the project



Regulators — a provided a clearer understanding of maritime autonomy and decarbonised propulsion. This includes a better understanding of:

- What international regulators want from these innovations.
- Better understanding of key parts of legislation relating to maritime autonomy and decarbonisation. This includes an independent interpretation of how regulations across inland and uncategorised waters work together.



Wider government — the Clean Fuel Demand Forecast survey has the potential to feed into DfT's wider maritime decarbonisation strategies. Its value lies in providing a stakeholder and user perspective on future decarbonised needs, providing insights from ground up rather than through a policy lens.



Longer term outcomes

The project aimed to position the UK as a global leaders in maritime innovation by developing frameworks that allow new decarbonisation and maritime autonomy technologies to be developed, tested and bought to market safely, efficiently and effectively.

In terms of next steps, both frameworks are still with MCA for review with their technical, legal and policy teams. MCA have yet to commit to whether and how they will deliver the frameworks. This will be based on whether the frameworks will be approved and, if so, whether they will be added as guidance notices to existing regulations or form new regulatory guidelines. In the meantime, Plymouth City Council and the Universities of Exeter and Plymouth are in discussions to do further innovation work as partners.

Evidence: Evidence that is necessary for this outcome to occur has not been observed.

In the medium term, it is hoped that the frameworks will be accepted by MCA, subject to further revisions following on from the review process. Assuming the MCA accepts the frameworks, further testing will be needed for the maritime autonomy framework to gain practical evidence. MCA will also need to undertake desk-based research, such as a literature review, to determine how best progress the frameworks within the guidance and regulatory sphere.

Evidence: Too early to observe project outcome.

In the long term, a viable commercial model for the frameworks' implementation will be developed. This will allow the testing of decarbonisation and maritime autonomy technologies in UK waters, allowing the country to remain at the forefront of maritime innovation. A key part of this could also involving setting up a Trial's Authority to support the MCA to assess technological innovation trials in UK waters.

Evidence: Too early to observe project outcome.

This can't drag on for another 12, 18 months, 2 years because people need it now. The whole point of this project was to get the frameworks in place so people could carry on doing their development to keep the UK at the forefront of all these technologies. (Project Team on importance of moving ahead with the frameworks)

That's their [regulator] main thing. The safety of people. Well, there's no people on the autonomous vessels, so you're, culturally, that's quite a hard thing to get your head around if that's what, if that is your background and that's where you have come from. (Project Team regulators reflecting on the importance of thinking about maritime autonomy differently)



Outcome enablers and barriers

The project team highlighted government and industry factors, along with MCA's capacity, as key factors influencing the achievement of medium- and long-term outcomes.

- **Government and industry drivers** — there is an appetite for both decarbonisation and autonomous vehicles in both government and industry. This appetite adds an impetus to developing regulations supporting the UK to test these technologies.
- **MCA capacity** — however, the regulation needs to happen soon to allow UK to remain at the innovation forefront. A key challenge to this is the MCA's capacity to respond to this framework in a timely way, which is affected by three factors:
 - MCA having enough staff and time to prioritise this innovation work, in addition to their business-as-usual activities.
 - The MCA being able to access the technical knowledge and expertise to engage with these technologies.
 - The extent to which MCA can adapt its risk assessment approach to reflect the uniqueness of uncrewed, autonomous maritime vessels.



The project outcomes in relation to the RPF contribution statements

Statement 4: Engagement with industry

Input: The RPF fund provided an opportunity for Plymouth City Council and the MCA, as regulatory authorities', to work with innovators at the Universities of Plymouth and Exeter.

Process: The project enabled the partners to work towards a common objective, better understand each others' priorities and remits, whilst forging new working relationships (e.g. with international regulators and between the local authority and academic organisations). In terms of understanding, the local authority and the academic partners had a better awareness of the resourcing constraints that MCA are working under.

Outcome: The project provides other partners potential avenues for relationship formation with MCA as a regulator. Plymouth City Council and the universities are also planning to work together in further innovation work.

Statement 5: Creating an enabling regulatory environment

Input: The RPF funding provided financial resources for Plymouth City Council and the innovators to work together to support MCA develop their thinking on decarbonised propulsion and maritime autonomy.

Process: The financial resources brought together partners with world-leading expertise in the fields. It also gave them an opportunity to hire an independent expert organisation to consult international regulators to bring in an international perspective. This led to the development of decarbonised population and maritime autonomy frameworks.

Outcome: If accepted, tested and implemented, the frameworks will help create a regulatory environment that is both safe for the public and supportive for innovators.



Case study 6: Operation Jigsaw

Project at a glance — Operation Jigsaw



Regulation role

The National Trading Standards Estate Agency Team (NTSEAT) is responsible for the regulation of estate agency work in the UK. NTSEAT has officers appointed by Powys County Council, as the lead enforcement authority under the Estate Agents Act 1979.

The Powys team is responsible for enforcing and supporting compliance with estate agency legislation across the UK. Their work includes:

- Oversight of how relevant estate agency legislation is working and being enforced;
- Issuing prohibition and warning orders that concern whether a person is unfit to engage in estate agency work;
- Approval and oversight of the UK's consumer redress schemes, Ombudsmen, and Alternative Dispute Resolution entities in the estate agency sector; and
- Publication of guidance and advice for the public and enforcement authorities on estate agency work in the UK.

Project context



Project vision

Context:

Housing enforcement is inconsistent across the country due to a combination of factors, including limited enforcement capacity, varied enforcement strategies and different political priorities. In some areas, weak enforcement allows poor sub-standard housing to continue, and tenants live in unsafe or unfair conditions.

Rationale:

The Renters' Rights Bill, which was progressing through Parliament at the time of writing, will change the rental and enforcement landscape in England. Local authorities will receive new duties, such as enforcement obligations and powers, through changes to the Housing Act 1988.

Housing businesses will need clear advice and guidance on these new rules, whilst local authorities need better tools to share information about common issues and challenges. The Intelligence Database (IDB) stores this information centrally, but only authorities with Trading Standards in their county can access it.

Project: The project aimed to improve the contact and collaboration with local authorities by expanding use of the IDB and establishing a group of regional coordinators. The aim was to ensure that local authorities have the same access to joined-up intelligence about housing enforcement issues that affect not just their area, but their region and the whole country.

Project detail



Project activities

The project involved creating a group of housing regional coordinators and expanded access to the IDB database to improve contact and collaboration. There were five phases of the project:

- **Supporting a group of regional coordinators** — scoping to identify existing regional activities and housing groups. This enabled them to implement the most effective approach for housing teams to collaborate and then establish a team of nine regional coordinators.
- **Establishing communication channels** — between the Ministry of Housing Communities and Local Government (MHCLG) and local authorities. They retrieved contact details from every local authority in the country so that information can be shared easily.
- **Training and skills** — housing enforcement training delivered through webinars and the creation of "Special Interest Groups". This included training around important safeguarding issues, such as female genital mutilation, terrorism and trafficking.
- **Intelligence Sharing** — encouraging Intelligence Sharing and take-up of IDB.
- **Supporting business growth** — by achieving primary authority for the Tenant Fees Act and amendments to powers of entry in the Renters' Rights bill.
- **Developing business case for 2025 onwards** — building a case for funding from MCHLG to do a project about the Renters right bill, which has been successful.



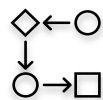
Projects outcomes

- **Increased communication and engagement between local authorities** — during the project, regional leads engaged and maintained contact with 286 of 294 local authorities.
- **A greater understanding of what enforcement is needed** – to reflect this, there have now been amendments to the Renters Rights legislation bill, including changes to the powers of entry law.
- **Increased access to Intelligence database (IDB) for some local authorities** — discounts led to an increase in the use of the database during the project- though less than anticipated.



...in relation to RPF

- **Promoting partnerships with other local authorities to drive innovation** — regional coordinators and increased contact have enabled authorities to share information about enforcement issues.
- **Promoting partnerships with local authorities and industry** — housing businesses are provided with more consistent regulation advice and support from local authorities.



Set-up and delivery experiences

The project delivered against its objective of increasing contact and collaboration between local authorities through creating a group of regional coordinators. The project improved understanding of housing legislation and enforcement needs for local authorities. However, its original goal of providing equal IDB access to all authorities had to be revised, as explained in the following slides.

Enablers to project delivery

- **Engagement from the local authorities** — Powys County Council were able to successfully engage local authorities throughout the project. The following factors helped with the level of engagement:
 - *Timing of the Renters rights bill* — at the time of the project, the government changed and introduced a raft of new housing legislation, which drove the demand from private sector housing to navigate this legislation.
 - *Input from the Ministry of Housing* — senior people from the Ministry of Housing came to meetings with the regional coordinators and people appreciated this level of senior engagement.
 - *Having project ownership* — local authorities were consulted and had input on what they wanted from the project. They felt the project was more relevant to them so were more engaged.
- **RPF support** — RPF support was practical and solution-focused, prioritising learning and overcoming barriers rather than penalising unmet targets—creating space for experimentation and improvement.
- **Face to face meetings** — face-to-face meetings between local authorities were useful as they tended to be longer than online meetings and provided the opportunity to develop rapport and make connections.

Challenges faced during project delivery

Delays to recruitment due to the local authority job evaluation system — due to job evaluation and wage structure governance across various local authorities, the salary levels offered were insufficient to attract candidates with the required expertise for the regional coordinator roles. As a result, Powys County Council had to appoint contractors instead, which led to a lengthier recruitment process.



Learning

- **Background in housing** — project leads, and regional coordinators were trusted by local authorities because their housing background helped them navigate new legislation. Although initial concerns existed about the project lead's Trading Standards role, their dual experience in housing made them relatable and seen as a partner, rather than just a regulator.

I think, as we discovered, the RPF project was — I mean it was asking questions, what did you do? What are you planning to do? What did you learn from it?...That gave us the space to go and make those mistakes. It wasn't about did you achieve the thing that you said you would achieve this month?...That was a really refreshing way to work. (Project lead reflecting on the flexible way of working)



External stakeholders

A total of **45 external stakeholders** participated in regional meetings and workshops or engaged with regional leads to build relationships for future collaboration. Full details of these can be found in Powys' the end of project report.

Police including Regional Organised Crime Units

Government departments: Companies House, Home Office, Ministry of Justice



Nature of engagement

External stakeholders

- **Police:** Due to current issues in the housing industry, such as cannabis farms and trafficking, the police particularly needed help from housing teams to understand who owns and lives in properties. The project helped from having a new group of regional coordinators to contact and access this information.
- **Government departments:** Housing teams worked with government departments to discuss housing legislation and strategic planning and collaborated with the Home Office and immigration teams on targeted enforcement.



Learning

Local regional leads enabled collaboration — appointing regional leads from within their own regions ensured they had local contacts and area knowledge, streamlining communication and enabling faster information sharing between regions.



Companies House



Home Office



Ministry
of Justice



Immediate positive outcomes after project completion

The project successfully improved local authorities' collaboration and communication and has been positive in fostering a sense of community and support among local authorities. Regional leads managed to engage, establish and maintain contact with 286 of 294 authorities during the project. This represents 98% of authorities engaged in this regulatory work. There is a local authority representative now in each region who can easily be contacted, which helps with enforcement and other council issues. This increased contact allows regional leads to understand what other local authorities are doing and identify shared issues, enabling them to tackle challenges collaboratively. The project team set up three Special Interest Groups to bring together specialist officers to help tackle difficult cross-cutting issues around:

- Fire Safety in High and Medium Rise Residential Blocks
- Selective Licensing
- Encroachment of short-term letting arrangements into private rented housing

The project scoping work enabled a better understanding of housing legislation and enforcement needs by identifying what local authorities were doing, and which housing groups existed. The project highlighted gaps in legislation, knowledge, and inconsistencies in how local authorities operate. Powys Council addressed these by providing access to standard policies (e.g., Access to Justice for Tenants) and delivering standardized training. This improved understanding and enabled collaboration with HMCLG to make some amendments to the Renters Rights Bill, including changes to powers of entry legislation.

IDB usage increased during the project as local authorities were given discounted access. The database helped authorities analyse common trends and issues. However, usage grew less than expected due to resource constraints and a planned local government reorganisation. The main barriers were not cost or understanding, but limited capacity within authorities. Additionally, some authorities anticipated free access after reorganisation, making them hesitant to pay during this period of uncertainty.



Beneficiaries of the project



Local authorities: Increased contact with other local authorities so they can identify common housing issues and collaboratively develop solutions.



Private housing sector (including housing businesses, landlords and letting agents): Through consistent regulatory advice and support, the private housing sector is more compliant which in turn will save them time and resource.

That was one of the massive impacts for us...that local authorities from different parts of the country were starting to talk to each other...There is a particular issue with housing in seaside towns...Other areas in places, the South of England, the South West, they were finding that there were the same issues across the country, and linking them up together was huge for them. (Project lead reflecting on local authorities working together)



Longer term outcomes

The project's ultimate goal was to have consistent housing enforcement nationwide by providing shared intelligence and promoting collaborative working across regions.

In the short term, local authorities are prioritising housing enforcement. As discussed, each local authority now has a representative for their region. Throughout the project, a total of 5400 people attended the webinar sessions, which included sharing best practices and learning about different local authority approaches—highlighting local authorities' commitment to training. Additionally, following the RPF project, local authorities wrote to MPs to stress the importance of continued funding.

Evidence: Indicated by project lead.

In the medium term, local authorities and regional coordinators will be fully trained on the new Renters Rights bill.

Powys County Council are now delivering another project with the Ministry of Housing to deliver training and information on the new Renters Rights bill. Training and support will be divided between external partners and MHCLG about the new legislation. The Renter's Rights Bill will be implemented in stages, with full completion expected between 2035 and 2037. Consequently, training on the bill will require alternative funding once this project concludes.

Evidence: Too early to observe project outcome.

In the long term, the intention is that there will be consistent enforcement and shared intelligence nationwide. As discussed in the next box, this will be dependent on whether there is long-term funding to allow regional coordinators to be continuously trained on the new Renters Rights bill. The intention is that all local authorities will have access to the Intelligence database so they have access to this central information and can use it to analyse different issues local authorities are facing.

Evidence: Too early to observe project outcome.



Outcome enablers and barriers

The project team identified two factors that could affect whether they achieve the longer-term goal of having consistent enforcement and shared intelligence across the country:

- **Legacy of funding** — consistent enforcement is dependent on long-term funding to continue training provision on the Renters Rights bill and to oversee the delivery of new legislation.
- **Political differences** — because local authorities are led by different political parties, achieving consistent enforcement and regulation can be challenging. For example, some councils may allocate substantial housing budgets where housing is identified as a strategic priority. These variations often reflect broader political priorities, which shape how national legislation is implemented and determine where investment is focused.

Because there will be different parts of legislation coming in at different times...and then you've got all of the things like appeal cases and support needed for that, as new legislation happens. So there are going to be different levels of support needed at different times, for a variety of different reasons. So I can imagine that we will be asking for more funding. (Project lead reflecting on different parts of the legislation and the need for long-term funding)



The project outcomes in relation to the RPF contribution statements

Statement 3a: Collaboration between regulatory authorities

Input: Within a fragmented regulatory environment, the RPF has provided the opportunity to create a group of regional coordinators so that regulatory authorities can interact, discuss challenges and align goals for housing enforcement.

Process: The RPF project has strengthened connections among local authorities and established a network of regional coordinators, enabling the exchange of information and ideas. This process has formed working relationships between local authorities and produced joint regulatory solutions. These solutions have enabled strategic alignment between the authorities, bringing them closer together and supporting commitment for future collaboration.

Outcome: Local authorities have established processes of working together and collaborating which has led to greater capacity to tackle housing enforcement issues.

Statement 4: Engagement with industry

Input: The RPF program has fostered an environment where local authorities and housing businesses can collaborate to share consistent housing enforcement.

Process: Housing businesses have gained more frequent and in-depth access to local authorities, leading to increased exposure and a more balanced, collaborative relationship. This improved dynamic has promoted open communication, helping both sides better understand each other's needs and responsibilities, providing businesses with more timely and targeted support and authorities with more information on common issues and trends in housing enforcement.

Outcome: The RPF has encouraged greater engagement between local authorities and housing businesses through having a team of regional coordinators to contact.

The background of the slide is a photograph of a large industrial facility, likely a power plant or refinery. Several tall, cylindrical cooling towers are visible, with white steam or smoke rising from them. The facility is surrounded by various pipes, structures, and buildings. In the distance, there are rolling hills under a blue sky with light clouds. The overall scene is an aerial or elevated view of the industrial site.

Case study 7: Outcome Based Collaborative Regulation

Project at a glance — Outcome Based Collaborative Regulation



Regulation role

The Scottish Environment Protection Agency (SEPA) is Scotland's environmental regulator. They are responsible for protecting and improving Scotland's environment, ensuring compliance with environmental law, and supporting the country's transition to a sustainable, net zero economy. Their strategic priorities for 2024—2027 are:

- **Net zero:** Contributing to helping Scotland become a net zero country by 2045.
- **Climate resilience:** Reducing the impacts of floods and droughts.
- **Water environment:** Protecting and improving rivers, lochs, wetlands, and seas.
- **Resource efficiency:** Helping Scotland transition to a circular economy.
- **Business environmental performance:** Securing high environmental performance from those they regulate.

Project context



Project vision

Context:

A “just transition” emerged in the 1980s, describing a shift to an environmentally sustainable economy in a way that is fair and inclusive for all stakeholders. A just transition to a net-zero economy by 2045 is required by the [Climate Change Emissions Reduction Targets Scotland Act 2019](#) and will result in rapid changes to all aspects of society and economy. The transition will require regulatory models that embed collaborative working and support innovation.

Rationale:

Outcome Based Collaborative Regulation (OBCR), developed by Professor Chris Hodges, is an emerging regulatory model that focuses on collaborative working between the community, businesses and regulators together. OBCR is an approach where regulators set outcome goals for organisations rather than prescribing detailed rules and procedures. Research shows that OBCR delivers better results than traditional methods, improving regulatory efficiency and innovation. However, it has not yet been trialled in a regulatory setting and requires testing before wider implementation.

Project:

The aim of this project was to explore and test an OBCR approach to gain an understanding of how it works in practice. The project took a place-based approach, which focused on a specific geographic area to address local needs and empower communities through collaborative efforts. SEPA chose to trial OBCR at Grangemouth because of the significant challenges it faces in meeting net-zero targets. It is Scotland's largest industrial complex, accounting for 30% of Scotland's industrial greenhouse gas emissions.

Project detail



Project activities

SEPA partnered with the Health and Safety Executive (HSE) and Falkirk Council to explore and test the OBCR approach. The project was organised around two themes:

- **Regulatory theme** — a literature review, case studies, stakeholder feedback, and consultancy input shaped a practical OBCR model, applied through three pilots in the Grangemouth area:
 1. **HGV parking** — collecting evidence from a range of stakeholders to understand the issue caused by HGV parking on residential streets in Grangemouth.
 2. **Masterplan Consent areas (MCA)** — assessing feasibility of MCA to guide development and support a just transition to net zero by 2045.
 3. **Grangemouth Community app** — preparing an investment case for developing a public digital platform, which could be key to sharing evidence, tracking indicators and engaging the community in an OBCR approach.
 - **Data theme** — SEPA and HSE reviewed data usage and proposed improvements for stakeholder data sharing. SEPA also mapped industrial and infrastructure plans in a high-level visual planning tool. Additionally, two training courses and an eLearning package on OBCR were developed for SEPA staff.
- In addition to these two themes, two training courses and an eLearning package about the OBCR approach were developed and delivered to SEPA staff.



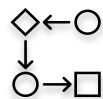
Projects outcomes

- **A better understanding of how to use OBCR in practice** — through the three pilots and developing a model for practical implementation.
- **Developed recommendations to improve data sharing between stakeholders.**
- **Upskilled staff in SEPA** — trained 60 people on the OBCR approach.
- **Built trust and relationships with key stakeholders** — some of which have committed to legacy activities.



...in relation to RPF

- **Promoting partnerships between a range of stakeholders** — including businesses, local authorities, regulators and communities through a OBCR approach.
- **Better understanding of the relationship between regulation and innovation** — SEPA has developed an understanding of how the OBCR approach works in practice to enable innovation.



Set-up and delivery experiences

The project delivered against its objective in understanding how to use an OBCR approach in a real-life setting. The project also developed recommendations to improve data sharing between collaborators, and upskilled staff via training and an eLearning package. However, time and budget restrictions meant that the project curtailed the Masterplan Consent areas pilot early and reduced the scope for the visual planning tool.

Enablers to project delivery

- **Consultancy input** — The OBCR approach has not been applied in regulatory settings, leaving project regulators with no prior experience to draw upon. The Public Risk Management Institute (PRISM) were contracted to support the project by sharing their expertise of implementing the OBCR approach in different countries.

Challenges faced during project delivery

- **Long lead in time between award and project start** — which led to the following:
 - *Loss of momentum for the project* — there was a significant time lapse between applying for the funding and the project starting. As a result, collaboration and momentum among regulators declined as they shifted focus to other priorities during this period.
 - *Staff turnover*— there were gaps in knowledge about the initial project stages because key staff who wrote the application left SEPA during the lead in time.
- **RPF finance** — there was three challenges with the programme finance and spending which led to delays with the project:
 - *No pre-project funding* — while SEPA did not apply for pre-project funding, in hindsight they felt that it would have helped ensure that recruitment activities did not cut into delivery time. SEPA had difficulty recruiting for two of the positions and would have benefited from having funding available to recruit before the project start date. They did not have the resource to prepare the tenders, job descriptions and recruit in the set-up time, so more time was used for mobilisation activities than anticipated.
 - *Delays with reallocating spending* — SEPA underspent on partners in the project and would have liked to reallocate that spending to other work packages. However, the RPF team was unable to reallocate spending quickly enough and therefore there was a long wait to get certain permissions and approval. In hindsight, if SEPA knew their partners at an early stage and how much they would cost, they would have forecasted their work packages correctly.
 - *Financial claims reconciliation took longer than expected* — given that the RPF fund is public money, financial claims were assessed thoroughly by the RPF team, and any small differences had to be corrected. This translated into the project manager and administrative staff spending longer than anticipated to address the RPF team's financial queries.



Learning

Senior staff buy in is important for an innovative regulatory project — it was noted that 18 months is a short time for this kind of project, and therefore internal senior leadership buy-in is useful to get the traction and engagement needed.

Build in extra time for set-up and external engagement activities — as discussed, SEPA lost delivery time due to recruitment and set-up activities and recommended that future projects account for this in their planning. They also suggested planning extra time and budget for external engagement with other RPF projects which they found interesting and useful. Sharing challenges during the project may have provided helpful insights from other regulators who have similar experiences.

Monthly reporting was sometimes difficult given that it was an experimental project — at times, SEPA had little new information to report because activities progressed slowly. They spent considerable time documenting minor updates and suggested that quarterly monitoring reports would have streamlined the process and saved time for both project and RPF staff.

I think looking back on it is that some of the funding that was earmarked for partners that was in their bucket, we could have used for consultancy if we'd known how things would have turned out at the end at an early stage... There was a piece of work we looked at, and in the end we decided we didn't have the budget for, which we could have kicked off at that early stage if we'd known our partners. (Project lead reflecting on reallocating spending)



External stakeholders

- **Formal partners:** HSE, Falkirk Council.
- **Partners of the community app pilot:** Falkirk CVS and Grangemouth Community Council.
- **Steering Committee:** Scottish Government, Scottish enterprise, Scottish Futures Trust, Chemical Industry Association, Grangemouth Community Council.



Nature of engagement

External stakeholders

- **Falkirk Council** — helped with the scope and delivery of the project
- **HSE** — support with training and developing the recommendations for data sharing and led the HGV parking pilot.
- **Steering Committee** — the committee acted as an independent facilitator of the pilots and helped guide the approach. They provided oversight and guidance for the three-pilot technical committees and monitored the efficacy of the OBCR approach being trialled.



Learning

It was challenging to initiate a fully collaborative approach in time-bound project — true collaboration requires shared decision-making and flexibility around different needs. With the limited time available, it was often easier to use a consultative approach to set deadlines and processes rather than enable full collaboration.

It was important to understand stakeholders' aspirations and capacity at an early stage of the project — the basis for collaboration among the three regulators was not set out as clearly as it should have been at the outset, limiting their ability to collaborate effectively throughout the project. Each stakeholder needed a clear understanding of what they could contribute to the project and what they required from it.



Immediate positive outcomes after project completion

The project has provided an understanding of the OBCR approach through desk research and three live pilots. There is now a practical OBCR model that SEPA and other regulators can adopt in a regulatory context.

SEPA developed recommendations for how sharing data or information between stakeholders could be improved to facilitate collaboration. Since a core principle of OBCR is transparent information-sharing to build trust, the regulatory system needs an effective digital tool to enable this approach.

Working collaboratively has strengthened relationships and built trust between stakeholders. This forms a strong foundation for future OBCR projects and for wider collaborative work to support a just transition. Ten of the organisations have committed to legacy activities. These include Falkirk CVS, which took forward the business case for the community app pilot forwards, and the steering group committee partners, who agreed to reform as a steering committee for future projects.

SEPA developed and delivered training materials to support stakeholders to use the OBCR approach in the future:

- *Behaviour change course* — covering a range of approaches to encourage and sustain collaboration between stakeholders. This was delivered to 45 people.
- *Data performance management workshop* — covering the effective use of data in regulation, particularly indicators, with an opportunity to share experiences between HSE and SEPA. This was delivered to 15 people.
- *OBCR eLearning course* – at the time of writing, unavailable to SEPA staff and in the process of being made available more widely outside of the organisation.

SEPA additionally developed a high-level planning visual tool which displays information about Grangemouth. SEPA reviewed the plans for Grangemouth, including industrial developments and infrastructure projects which were then categorised and plotted in the tool. The tool presents all the information about Grangemouth in one place to help both businesses and regulators make decisions when adopting the OBCR approach. However, the tool was not made openly publicly available during the RPF project due to time and budgetary reasons.



Beneficiaries of the project



Communities: They have now developed a business case for a community app which will bring benefits to different communities in Grangemouth.



Regulators: Regulators now have the materials available to use the OBCR approach in a regulatory context.

We've advanced our own understanding, we've developed the model, like I said... We've trained 60 people, so that HSE soft skills training was rolled out to 60 people in SEPA, with a focus on regulatory staff that are probably going to be involved in Grangemouth work initially, and the e-learning is another product. And we've got the recommendations we got from HSE for how to use data. (Project lead reflecting on the project outcomes)

Specific beneficiary feedback



Chemical Industry Association

The Chemical Industry Association (CIA) represents the chemical sector, primarily focusing on chemical manufacturing in the UK.

CIA was invited by SEPA to join the steering committee, where they contributed to various aspects of the project. As part of the steering committee, CIA shared their views on applying the OBCR approach and built relationships with regulators and stakeholders, including Scottish Enterprise. From this work, they developed practical tools and templates explaining OBCR and how to apply it to specific projects. CIA found these templates particularly useful and plan to use them in future projects as opportunities arise.

CIA feel that their involvement in both the steering committee and project has enabled them to advocate for this approach going forwards.

For our organisation, I guess it's just given us...a way to go back to regulators to appeal for a different approach, so without which we've been struggling... to try and engage and try and make changes



Longer term outcomes

The project's ultimate goal was to build a regulatory approach to support the just transition to net-zero.

In terms of next steps, SEPA will continue developing the OBCR approach and it will be trialed in other regulatory areas. Due to a greater understanding of OBCR and how to use it in practice, SEPA are taking this learning forwards into a new project about industrial energy efficiency. The project will involve a regulated business to improve energy efficiency as part of an efficiency first approach to decarbonisation. Since the RPF project, the SEPA leadership team have become more enthusiastic about innovative approaches to regulation and have procured additional OBCR training to upskill more staff within SEPA.

Evidence: Evidence indicated by project lead.

In the medium term, stakeholders will continue to support the OBCR approach and the just-transition of the Grangemouth cluster. The steering committee for the OBCR pilot projects—comprising representatives from community groups, the Scottish Government, trade associations, public bodies, and academia—plans to continue as a formal entity to maintain momentum and support future OBCR pilots. The project will apply the OBCR approach to develop a regulatory or policy framework for use by chemical industries. The Scottish Government has also expressed support for OBCR and included it in its draft “Just Transition Plan for Grangemouth”.

Evidence: Evidence indicated by project lead.



Outcome enablers and barriers

There was implicit enablers of the longer-term outcomes:

- **Senior buy-in** — as discussed, senior buy-in will be important for the continuation of OBCR training within the organisation.
- **The steering committee** — key to fostering future collaboration and supporting new OBCR projects.

...engaging with staff as part of the project and sharing our learning within SEPA has built enthusiasm for embracing innovative approaches to regulation. (Project lead reflecting on culture change within SEPA)



The project outcomes in relation to the RPF contribution statements

Statement 2: Increased capability to support innovation

Input: RPF has allowed SEPA to explore applying the OBCR approach. It has done so by giving SEPA the funds to explore the approach in a just-transition regulatory setting, whilst accepting the associated risks.

Mechanism: Organisational knowledge has been generated from applying the OBCR approach to three pilots, training staff within SEPA about the principles of the approach, and knowledge sharing with other regulatory stakeholders. SEPA found that setting a basis for collaboration is critical to working in an OBCR way, and that outcomes need be grouped so they are practical for stakeholders to use. Learnings on applying the OBCR approach have been captured and shared through a practical implementation model which is available [online](#) for any regulator to use when adopting the OBCR approach.

Outcome: RPF has led to a greater understanding of how the OBCR approach can increase regulatory efficiency and promote innovation. This understanding can be implemented in other areas of work, such as the new project on energy efficiency and decarbonisation.

Statement 3a: Collaboration between regulatory authorities

Input: The RPF has provided the opportunity for regulatory authorities to interact, discuss challenges and align goals in a OBCR approach.

Process: The RPF project provided a channel of communication, which brought together businesses, regulators and communities to share information and ideas. This process has formed working relationships between organisations and has produced joint regulatory solutions. The steering committee for the OBCR pilot projects – comprising representatives from community groups, the Scottish Government, trade associations, public bodies and academia – will continue to support future OBCR pilots.

Outcome: Using an OBCR approach, regulators and businesses have a greater shared opportunity to work together to understand and manage risks, with the objective of collectively facilitating innovation.

Case study 8: Making Alternative Dispute Resolution work better for individuals and businesses'

Project at a glance — Making Alternative Dispute Resolution work better for individuals and businesses

Project context



Regulation role

The Solicitors Regulator Authority (SRA) is the largest regulator of legal services in England and Wales. They are responsible for ensuring solicitors meet the required standards and are fit to offer legal services.

Their strategic priorities for 2023—2026 are:

- Delivering high professional standards through setting, upholding and promoting standards for those they regulate in a way that is far, proportionate and robust.
- Strengthening risk based and proactive regulation using robust evidence based on data, insights and intelligence.
- Supporting innovation and technology that improves the delivery of legal services and access to them, particularly for individuals and small businesses.
- Continue being an authoritative and inclusive organisation, placing consumers at the heart of what they do.



Project vision

Context: Online Dispute Resolution (ODR) is a form of dispute resolution which uses technology to resolve legal disputes between parties. Examples include digital mediation platforms and technology-supported adjudication. The Ministry of Justice and His Majesty's Courts and Tribunals Service (HMCTS) are looking to digitise and improve ODR processes as they help reduce court workloads and case waiting times.

Rationale: ODR offers a simpler and more accessible way to resolve disputes than formal litigation and going to court. This is important as the Ministry of Justice (MoJ) notes that around 68% of civil court users would prefer to avoid court unless as a last resort. ODR provides this opportunity, but there are still issues with its availability and adoption, especially for employment and housing disputes. Many people are unaware of ODR tools, and current platforms often do not prioritise accessibility or fairness.

Project: The project aimed to explore the ODR market and understand what a well-designed, inclusive and accessible ODR tool looks like. The project also explored the potential of using generative AI in an ODR tool to help people and small businesses identify and resolve legal issues.

Project detail



Project activities

SRA collaborated with Bangor University to develop a prototype for a ODR tool using generative AI. There were three phases of the project:

- **Phase 1: Mapping the ODR landscape** — SRA produced a research report identifying the sectors that need ODR the most. This was based on reviewing literature and conducting desk research to identify existing ODR platforms and the usability and accessibility issues faced by specific groups. These groups included those with low digital literacy, disabilities or language barriers.
- **Phase 2: Stakeholder engagement** — the focus of this phase was to understand ODR requirements, barriers to use and the key principles for an accessible and inclusive design. This included six workshops and roundtables with consumers, small business users, and ODR developers, plus semi-structured interviews carried out by the SRA and The Law Society.
- **Phase 3: Development and testing** — SRA worked with Bangor University to create a prototype of an ODR tool drawing on the insights from the first two phases. The tool allows users identify employment law issues and direct them to appropriate ODR platforms.



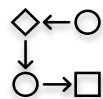
Projects outcomes

- **Research report on the current ODR market** and where gaps still exist.
- **Document that sets out what areas ODR is suitable for** in line with the research and stakeholder engagement.
- **Best practice guidance for ODR developers** that includes practical recommendations for meeting user needs.
- **Prototype of the ODR tool** which uses generative AI to assess a persons' legal needs and then signpost them to suitable ODR options.



...in relation to RPF

- **Culture of innovation** — the project has built SRA's understanding of how digital innovation can support dispute resolution and the market requirements for it.
- **New innovative products and services** — the prototype tool can provide learning and development for other businesses designing similar tools.



Set-up and delivery experiences

The project successfully met its objective of understanding of how ODR can support dispute resolution. The project went beyond its initial scope by developing a prototype tool to help users identify their employment and legal needs and navigate the ODR market. Based on the research and engagement, the SRA produced several outputs, including a research report on the ODR market. They also developed two best practice documents: one advising the public and government agencies on where to focus ODR methods, and another providing guidance to tech providers on accessible design for ODR tools.

Enablers to project delivery

- **RPF support** — the RPF support helped the project in three ways:
 - The monthly RPF catch-ups helped to keep the project on track. The catch-ups provided a regular check-in on the project's financial situation and supported the project team to reflect on the project's activities, goals, and progress.
 - The RPF team connected the project team with a similar RPF2 project, providing valuable insights and learning about designing new technology within the timeframe.
 - The RPF team were flexible and accommodating with spending allocations. This allowed SRA to manage funding arrangements, even though the procurement of Bangor University for the AI tool was not initially planned.
- **Having a dedicated project manager** — was crucial for ensuring the project stayed on track and meetings were well-organised. The internal project manager played a key role in managing meetings with both the internal team and delivery partner, as well as handling reporting and risk systems to communicate any unexpected changes.

Challenges faced during project delivery

- **Late submissions from partners** — some of the financial invoices were not always submitted on time by consortium partners, causing delays.
- **Change in staff** — the turnover of staff who wrote the application and were involved in the set-up led to gaps in knowledge about the initial project stages. This made it challenging to access necessary details, as there was limited legacy documentation and the current team could not consult former staff.



Learning

The key learning for the project was to ensure that everything is documented, both for external partners and the internal project team:

- **Clear written communication for deadlines.** As discussed, one challenge the project faced was receiving late submissions from stakeholders. In response to this, the project team improved their communication around deadlines by documenting agreements. This written communication ensured stakeholders were fully informed and could be held accountable.
- **Ensuring thorough documentation of all aspects of the project.** As discussed, staff turnover meant that some staff were not available to provide information about the set-up stage. The SRA recommended detailed documentation to ensure information is available despite staff changes.

I've just thought of one more challenge that we had on the project which was the fact that there was nobody from the original set-up available to go back and ask questions. So, we had to do some digging at times because sometimes conversations are held and the outputs of those aren't written down, so sometimes you do have to do a bit of guesswork. (Project lead reflecting on the change in staff)



External stakeholders

- **Delivery partner:** Bangor University

- The Law Society
- Access to Justice foundation
- The Law Council of Wales



Nature of engagement

Contractors

Bangor University — technical delivery partner who were responsible for building and developing the AI tool. They were involved in designing the proof of concept, coding and testing. Their team consisted of a PhD student, a data scientist, data visualisation and computer scientist and lecturer to bring everything together.

External stakeholders

- **The Law Society** — supported the stakeholder engagement phase by putting SRA in touch with former solicitors and NFU mediators working in the field. They also helped test the accuracy of the ODR tool and ensured the legal information was correct and up to date.
- **Access to Justice foundation** — also helped with the stakeholder engagement phase by drawing on this networks and helping to organise the workshops.
- **The Law Council of Wales** — although less involved in the project, they were a sounding board for ideas and provided access to various parts of the judicial ecosystem in Wales. This included organisations and stakeholders involved in administering justice.



Learning

- **Established relationship with Bangor University.** SRA's previous experience working with Bangor University benefited the project, as their established relationship engendered trust and confidence that their delivery partner would be dependable and prioritise their project.
- **Having the right technical expertise and experience.** Furthermore, Bangor University had the right technical expertise and experience needed for the project. They had previously worked on similar projects, for example for the Nuffield Foundation, mapping networks for vulnerable individuals with legal issues. They also had done extensive work on legal issues, data and technology which enabled them to create the tool within the timeframe.
- **Having access to the whole ecosystem within ODR.** It was important for the project to gather a range of perspectives to create a fair and inclusive product. They were able to do this by drawing on the Access to Justice Foundation's networks of solicitors, developers, users, frontline advice agencies and government judicial bodies.



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UNIVERSITY



The Law Society

THE
ACCESS
TO JUSTICE
FOUNDATION

Cyngor Cyfraith **Cymru**
Law Council of **Wales**



Immediate positive outcomes after project completion

The project successfully delivered all outputs, demonstrating the potential of an AI powered ODR tool and creating resources to support developers and consumers in the ODR market. SRA are in the process of disseminating the following resources:

- Research insights and recommendations for regulators, courts, legal support organisations, and frontline advisers to help them promote and embed appropriate ODR use in their work.
- Best practice guidance for developers on creating inclusive, accessible ODR tools.
- Practical resources, including insights into how GenAI can assist with legal navigation and support for individuals in understanding and resolving legal issues.

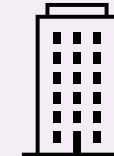
In our initial discussion we thought this could be a signposting portal or something like this. We didn't really think we'd be able in six months with a very limited budget to build a fully functioning GenAI tool that could be massively scaled up and that could do all the amazing things that it does with this accuracy. (Project lead reflecting positively on project outcomes)



Beneficiaries of the project



Tech companies — the best practice documentation will provide ODR developers with practical recommendations of what inclusive and accessible ODR tools look like.



Small businesses — businesses will be able to identify and resolve legal disputes more quickly and accessibly.

Specific beneficiary feedback



Access to Justice Foundation

The Access to Justice Foundation is an organisation that focuses on providing free legal advice services. Participation in the project enabled the Foundation to develop knowledge and insights about online dispute resolution tools and understand how free legal advice agencies such as theirs can support this work. Through the project they have gained more opportunities to engage with other stakeholders, for example, contributing to the Online Procedure Rules Committee consultation.

So it's through this project and our interaction with the front line, that we're able to participate in stuff like the online procedure Rules Committee consultation that's currently live. So there's been a couple of instances where we've been invited by the online procedure Rules Committee to share (Representative at Access to Justice Foundation).

They have also been able to incorporate their learning into discussions with the Ministry of Justice and broader law technology forums. The project also provided them with additional resources to support the facilitation and engage more closely with the justice and innovation group. The Access to Justice Foundation, along with SRA, will continue engaging with this group moving forward.



Longer term outcomes

The project's ultimate goal was to support individuals and small businesses to identify and resolve disputes in a quicker, cheaper and accessible way than formal litigation. The project intended to provide individuals and businesses with reassurance and confidence they are getting the right support.

In the short-term, individuals and small businesses are becoming more aware of how ODR can be used for legal issues. SRA are raising awareness in several ways. They have done a multimedia campaign, involving social media and press releases, to raise publicity for the guidance they have produced and the ODR tool. Since completing the project, SRA have done numerous presentations on the project and the outputs organisations including the Welsh Government, Legal Services Board, and to the Online Procedure Rules Committee. Once the different outputs are published and made publicly available, they will also be able to track how many people are downloading the different documents to understand what kind of businesses are aware of and utilising the reports.

Evidence: Indicated by project lead.

In the medium term, SRA and other stakeholders will develop a code of conduct so that ODR tools are regulated to a high standard. The project may influence future workstreams, should the SRA want to create a code of conduct for tech companies to ensure ODR tools are regulated. This future work may give consumers confidence to use the tool by demonstrating that it is accessible and meets the highest best practice standards.

Evidence: To early to observe project outcome.

In the longer term, the intention is that there will be a range of tools that will help individuals and small businesses identify and resolve legal issues quickly, affordably and accessibly. Currently, the SRA is having internal discussions about whether the ODR tool will remain a prototype or be developed by another organisation with more resources. Even if the tool remains a prototype, it will still be used for learning and development for other businesses who are making similar ODR products. There has been significant interest from other organisations who want to replicate the tool and build similar platforms. For example, the Law Society wrote a blog online and referenced the RPF3 project, recommending that the Ministry of Justice fund a 'one-stop-shop' platform to help people find the best way to resolve their disputes. Other organisations in the ODR space have reached out to SRA for advice on the tools they are developing.

Evidence: To early to observe project outcome.



Outcome enablers and barriers

The project team identified that funding and resources could potentially affect long-term outcomes.

The AI tool is currently hosted on the Bangor University servers as a prototype. Going beyond a prototype to make the tool is dependent on whether another organisation takes it on or provides funding, as SRA do not have enough resources to manage the tool.

As noted, even if the tool remains a prototype, this will serve as good learning and development for other businesses who are developing similar products.

But yes, there are quite a few commercial companies now developing similar tools, using similar technology. They do it slightly different to us, obviously, but yes, we're seeing more and more of those tools emerge, definitely. (Project lead reflecting positively on businesses developing similar tools)



The project outcomes in relation to the RPF contribution statements

Statement 2: Increased capability to support innovation

Input: The RPF funding has allowed SRA to explore new ways of working with online dispute resolution.

Process: The project built organisational knowledge through 'learning-by-doing', bringing in new expertise via staff and partnerships, and engaging with other regulatory stakeholders to fill knowledge gaps in ODR technologies. These learnings have been recorded via a research report and best guidance documents and shared within the SRA to support future use.

Outcome: RPF has led to a better understanding of the relationship between innovation and regulation. SRA has increased their organisational knowledge on the impact of innovations through the development of new ODR technology and how it can be used to resolve disputes in individuals and small businesses.

Statement 4: Engagement with industry

Input: The RPF programme has encouraged collaboration between regulatory authorities and innovators, with the shared goal of identifying and resolving legal issues more quickly, cheaply and more accessibly.

Process: Innovators now have more frequent contact with SRA, leading to better exposure and a more balanced, collaborative relationship. This has improved communication, helped both sides understand each other's needs and responsibilities, and has provided more timely and targeted support.

Outcome: Greater collaboration between regulatory authorities and innovators has created a more efficient regulatory process. Innovators have started actively reaching out to SRA for advice on the tools they are developing. Closer working has generated greater confidence in each other's ability to develop safe innovations in ODR tools and trust their needs will be supported.