



CORPORATE REPORT

1 April 2025 – 31 March 2026

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FOREWORD



I am pleased to once again have the opportunity to comment on the past year's activity at the RPC.

Operationally, it has been a remarkably successful year – we delivered over 95% of cases on time (the highest number in over 10 years) despite an increase of over 40% in the number of cases handled and a reduction in the size of the RPC secretariat.

Our scrutiny of departmental Options Assessments has also been extremely effective in improving the quality of the evidence and analysis underpinning Government regulatory proposals – only 73% of OAs were fit for purpose as first submitted, but as a result of our scrutiny, this was increased to over 95%. We also published tables of departmental performance (reproduced in this report) to highlight the departments that are performing well and encourage the others to improve.

We continued our initiative from last year of tracking and publishing departments' performance in completing Post Implementation Reviews. While progress in addressing the remaining overdue PIRs has slowed, I expect the commitments that I have received from Permanent Secretaries to be honoured and to help eliminate the backlog. However I also want to see departments taking forward the recommendations in the PIRs and feeding them into future policy development so that when a PIR identifies a potential improvement to regulation, that improvement opportunity is not ignored.

A new initiative that we have developed this year is to introduce a Code of Practice for Regulatory Evidence, which sets out the standards that we think evidence should meet in regulatory assessments. The core principles are that evidence should be: Relevant, Objective, Proportionate, Candid, Enduring and Accessible. We will be rolling out the Code of Practice over the coming months.

A more worrying development earlier this year was reading media reports that the Government were considering replacing the RPC with an internal body and getting rid of independent regulatory scrutiny. In response, we published a series of Blog posts setting out why the RPC matters and why independent scrutiny is important for growth, for businesses, for Parliamentary scrutiny of legislation, for investment, for innovation and for better regulations. In addition, we received strong support from business representative groups, Parliamentarians, leading think tanks and many other external stakeholders. While I have no doubt that the Better Regulation Framework within which the RPC operates has a number of weaknesses and that it could (and should) be improved, abandoning independent scrutiny would have been a huge step backwards in the government's approach to regulatory policy making. We hope that any future reforms of the BRF take account of both the evidence and deep expertise that we have in the RPC, and also the views of external stakeholders.

Finally, I would like to thank all the members of the RPC committee and secretariat who have worked so hard supporting our work over the last 12 months.

Stephen Gibson
Chair, Regulatory Policy Committee

Summary

The Regulatory Policy Committee (RPC) is an advisory non-departmental public body sponsored by the Department for Business, Innovation, Science and Trade (BIST), previously the Department for Business and Trade. Our mission is to improve the quality of evidence and analysis informing government regulatory decisions, through independent scrutiny and challenge. We are the UK's independent better regulation watchdog and, as a key part of the Better Regulation Framework (BRF), we seek to ensure that regulatory decisions are evidence-based and conducive to better regulation.

The RPC provides independent scrutiny of the analysis and evidence in government options assessments (OAs), impact assessments (IAs) and post-implementation reviews (PIRs) as well as Free Trade Agreement impact assessments (FTA IAs). Our scrutiny helps produce more-effective evidence-based regulation, minimise unnecessary burdens on businesses and civil society organisations (particularly small and micro businesses), and avoid the unintended consequences of poorly designed regulation.

Information about how we produce opinions can be found on our [website](#) and in this [blog post](#).

During 2025-26, we:

- Reviewed 109 submissions from 16 different departments, agencies and public bodies (a 42% increase from 2024-2025)
- Reviewed 14 PIRs from 7 departments, representing a 100% increase in PIRs reviewed and a 133% increase in departmental coverage from last year.
- Published data to show which government departments have uncompleted PIRs that are beyond the statutory deadline
- Published 19 blog posts and 12 LinkedIn posts over the year covering: the quality of department OAs and IAs, departments' progress on completing PIRs, why the RPC matters, and OA/IA methodological issues, as well as general updates – almost 2½ times as many as in 2024-25
- Delivered 95% of opinions within our 30-day target, up from 83% in 2024-25, an increase of 12 percentage points, comfortably exceeding our 90% target for the first time in several years
- Continued to engage with and build on our relationships with parliamentarians (MPs and peers), business representative groups, civil society organisations, consumer groups, thinktanks and other stakeholders inside and outside government.

- Engaged internationally, including with Indonesia, Italy, Singapore, Sweden, the EU and the USA, to share best practice and learn from each other's approaches to regulatory scrutiny.

About the report

This report summarises the activities of the Regulatory Policy Committee during the period 1 April 2025 to 31 March 2026. The report sets out the RPC's performance against its objectives (see the box below) and provides an overview of our scrutiny activity, wider engagement, and organisational performance. It also includes information on our finances, staffing and compliance with the Freedom of Information Act 2000.

This year, our corporate report includes a new section (Annex A) providing detailed analysis of the quality of departmental submissions under the 2023 BRF. This aims to support transparency, encourage continuous improvement across government, and share lessons learned from the operation of the revised framework.

The RPC's objectives are:

1. To deliver independent opinions on impact assessments and post-implementation reviews, that are timely, clear and consistent;
2. To encourage and assist departments to improve the quality of their impact assessments and evaluation of regulation;
3. To engage effectively with business, civil and voluntary organisations, parliamentarians and the public on the evidence and analysis supporting regulatory proposals;
4. To contribute to the development and implementation of policies for better regulation; and
5. To enhance UK regulatory scrutiny through engagement with international counterparts, and to encourage evidence-based regulation in our trading partners.

PERFORMANCE

Information on RPC casework

The RPC's primary role is to provide independent scrutiny of the evidence and analysis supporting government's regulatory proposals and evaluations. During 2025-26, we reviewed a significantly higher volume of casework than in the previous year whilst maintaining strong performance against our timeliness targets.

This document provides a summary of RPC casework over the year; more information can be found on our [website](#) and [blog](#). We now publish spreadsheets with detailed information on the fitness-for-purpose, quality rankings etc for all OAs, IAs and PIRs we have published opinions on since December 2020.

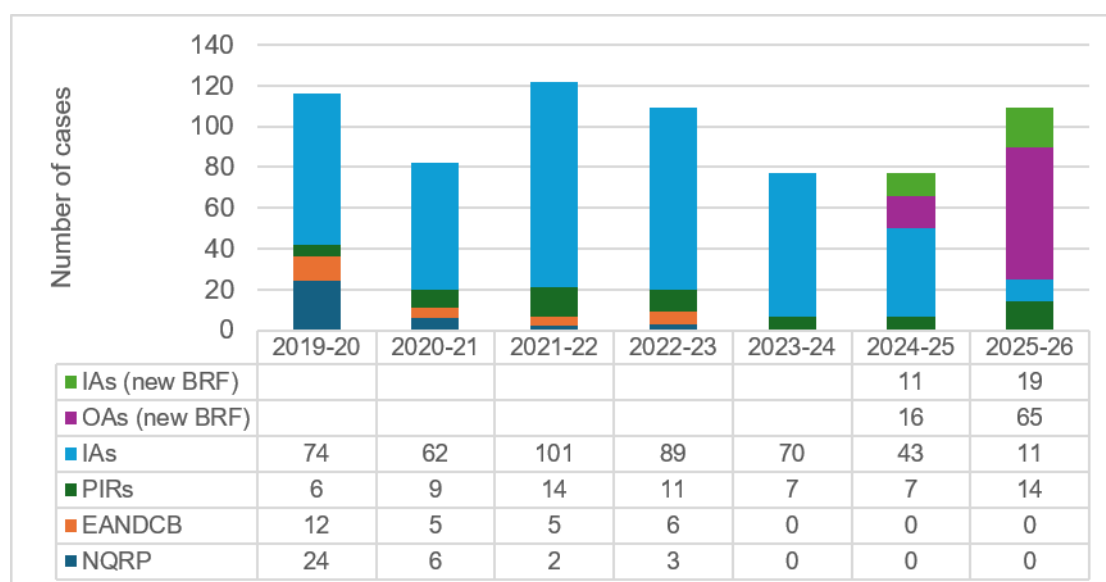
Number of submissions

The RPC reviewed 109 submissions during 2025-26, compared with 77 during 2024-25, representing a 41% increase in casework volume. These covered:

- 84 OAs and IAs submitted under the revised BRF;
- 11 legacy IAs submitted under the previous framework; and
- 14 PIRs.

The profile of submissions has also continued to evolve. Under the previous framework, departments primarily engaged with the RPC at the final IA stage. Under the revised framework, scrutiny increasingly takes place earlier through OAs. This seeks to support departments' efforts to strengthen evidence, improve appraisal and refine policy design before decisions are finalised.

Figure 1: Types of submissions to the RPC, 2019-2026



Timeliness of RPC opinions

The RPC has a target of completing scrutiny of 90% of cases within 30 days of submission, with an extra 15 days allowed for re-scrutiny following the issue of an Initial Review Notice (IRN). In the reporting period, we exceeded the target, issuing opinions on 95% of cases within the target 30-day timeframe, with an average of 23.8 days (Table 1).

Table 1 – Time taken for RPC scrutiny by reporting year

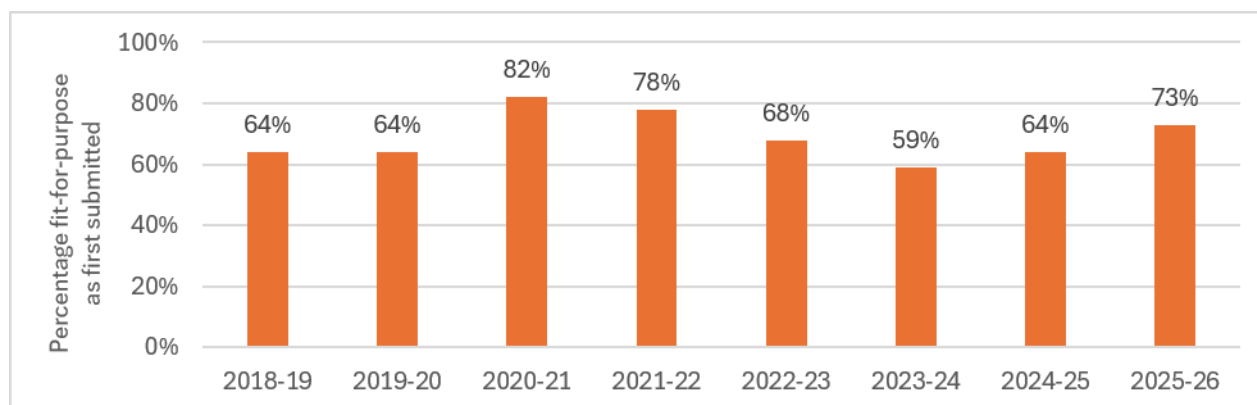
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
<i>Total number of cases submitted</i>	125	116	82	122	109	77	77	109
<i>Average number of days for RPC scrutiny</i>	19.5	22.9	21.8	22.7	24.1	22.1	24.5	23.8
<i>Percentage of opinions issued on time (all cases) – Target 90%</i>	80%	89%	92%	86%	79%	82%	83%	95%

Fit-for-purpose ratings

The RPC's principal assessment is whether a submission is fit for purpose. If this is the case, we award a green rating. If not, we award a red rating. This judgement reflects the quality of evidence and analysis supporting a proposal and whether decisionmakers have been provided with sufficient information to understand its rationale, identification of options, and justification for the preferred way forward.

Across all submissions reviewed during 2025-26, 73% were assessed as fit for purpose when first submitted (Figure 2), compared with 64% in 2024-25.

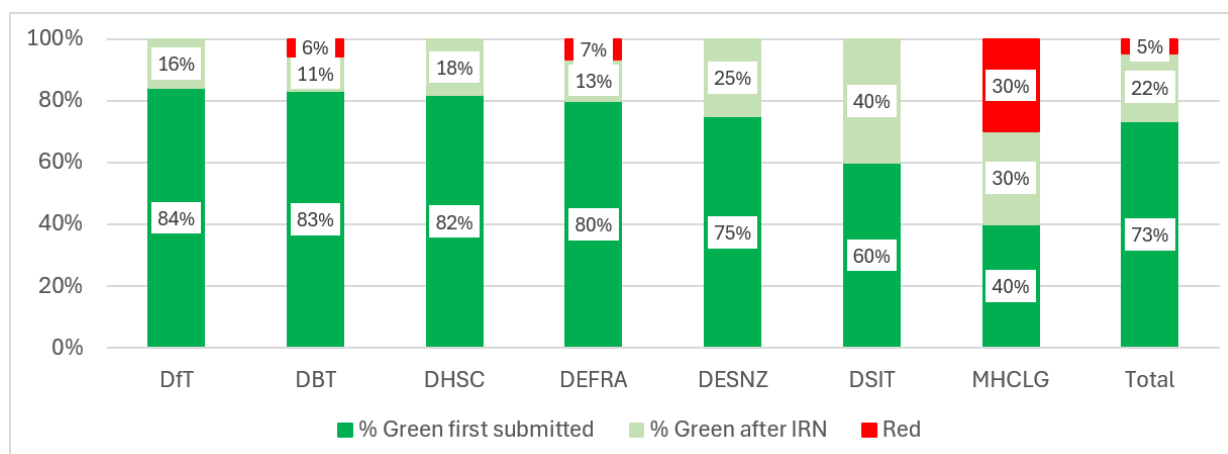
Figure 2 – Percentage of submissions fit-for-purpose at first submission



Note: Figures combine previous BRF final stage IAs and revised BRF OAs and IAs.

The proportion of submissions that were fit-for-purpose as first submitted varied significantly by department (Figure 3) from 40% for the Ministry of Housing, Communities and Local Government (MHCLG) to 84% for the Department for Transport (DfT). After receiving an IRN pointing out the weaknesses in the initial submission, most departments resubmit a revised assessment addressing the concerns identified in the IRN and receive a green, fit-for-purpose opinion. The IRN process enables departments to address concerns before a final opinion is issued and is one of the most effective mechanisms for improving the quality of analysis across government.

Figure 3: Proportion of Green rated OAs/IAs/PIRs by department, 2025-2026¹



¹ Departments with at least five OA, IA or PIR submissions: DfT – 19, DBT – 18, DHSC – 11, DEFRA – 15, DESNZ – 8, DSIT – 10, MHCLG – 10, Total – 109 cases.

The issues most frequently leading to an IRN included:

- insufficient evidence of the scale or persistence of the problem being addressed;
- limited consideration of alternative policy options;
- weak assessment of impacts on small and micro businesses;
- inadequate explanation of assumptions underpinning quantified impacts; and
- insufficient justification for the preferred option.

Submissions made under the revised BRF

During 2025-26, we reviewed 84 submissions under the revised BRF, of which 65 were OAs, seven were urgent-measure IAs and 12 final-stage IAs.

Where significant concerns were identified during scrutiny, departments were given the opportunity to revise and resubmit their assessments through the IRN process. In total, the RPC issued 25 IRNs during the year. Following revision, 22 of these submissions subsequently achieved a fit-for-purpose rating.

Red ratings

Only 3 submissions (all from MHCLG) received a final red rating under the revised BRF, as shown below.

Table 2: Published, red-rated opinions issued by the RPC under the revised BRF

Lead department	OA/IA title
MHCLG	Decent Homes Standard
MHCLG	Future Buildings Standard
MHCLG	Future Homes Standard

Submissions made under the previous BRF

Table 3: Published, red-rated opinions issued by the RPC under the old BRF

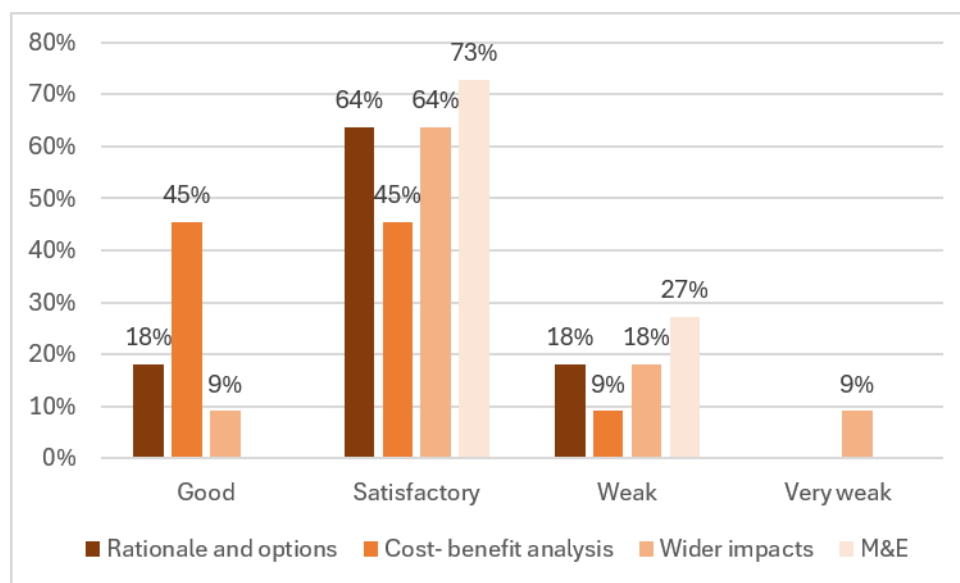
Lead department	OA/IA title
Defra	Environmental protection – Ban on the supply and sale of consumer wet wipes containing plastic

Quality ratings

The RPC also provides quality ratings on a four-point scale – ‘good’, ‘satisfactory’, ‘weak’ or ‘very weak’, against additional categories depending on the type of submission. Information on how we rate submissions can be found [in this blog post](#).

For IAs submitted under the previous BRF, the areas most frequently requiring improvement were the assessment of wider impacts and Monitoring and Evaluation arrangements (M&E). As shown in Figure 4, more than a quarter of the ratings in both areas (27%) were assessed as either weak or very weak.

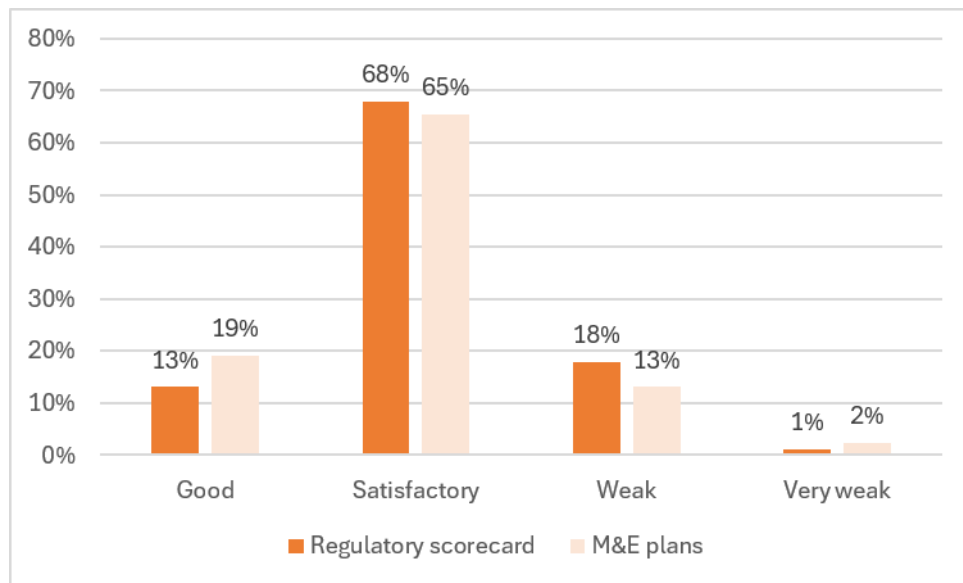
Figure 4 - Quality ratings at final stage for IAs submitted under previous BRF



The revised BRF places greater emphasis on both the Regulatory Scorecard and Monitoring and Evaluation Plans. These elements are intended to provide transparency around the expected impacts of regulation and strengthen departments' plans for assessing whether regulations achieve their intended objectives.

As shown in Figure 5, most submissions received ratings of either good or satisfactory in both categories. However, 19% of submissions received a weak or very weak rating for the Regulatory Scorecard, while 15% received a weak or very weak rating for their M&E Plan.

Figure 5 – Quality ratings for OAs and IAs submitted under revised BRF



These findings suggest that departments are adapting to the requirements of the revised framework, but that further improvements are required to ensure impacts are assessed consistently and robust plans are in place to evaluate whether regulatory interventions deliver their intended outcomes. Further analysis is included in Annex A.

OTHER RPC ACTIVITIES

Alongside its core role of scrutinising government regulatory assessments, the RPC also scrutinises free trade agreement IAs (FTA IAs). We also work to improve the general quality of government regulatory analysis by sharing best practice across government through in-person and online training, by publishing RPC case histories and guidance documents, and via external engagement. This section summarises some of our non-casework activity over the past year.

Scrutiny of Free Trade Agreement Impact Assessments

Following Brexit, the government has been developing and implementing a new independent trade policy. To support this, we agreed in September 2020 to extend our role to provide independent scrutiny of the IAs of significant new free trade agreements (FTAs).

As with regulatory proposals, we produce opinions that provide a fitness-for-purpose rating on the analysis and consideration of impacts in the final FTA IA. In these new opinions on trade agreement IAs, we comment on the strength of evidence and analysis of the impacts of the negotiated agreement. We have provided opinions on the following FTA IAs:

- UK-Japan Comprehensive Economic Partnership Agreement (October 2020),
- UK-Australia FTA (December 2021),
- UK-New Zealand FTA (February 2022),
- The Comprehensive and Progressive Agreement for Trans-Pacific Partnership (July 2023), and
- UK- India FTA (July 2025).

Our reviews of FTA IAs have improved the quality of analysis by ensuring a more balanced presentation including greater discussion of the potential costs as well as benefits, greater discussion of risks and uncertainties, better framing of the confidence of forecasts, more contextualised estimates, and improved assessment of the impacts on businesses, especially small and medium sized businesses.

Guidance documents

The RPC continues to provide methodological advice and guidance documents on its [website](#) and [blog](#). These cover a range of methodological questions that arise during our scrutiny of assessments, as well as best practice case histories that highlight how to deal with complex analytical questions. We have updated the guidance on our website to reflect the revised BRF and continue to provide additional material to support departments in producing high-quality analysis under the BRF.

International Engagement

We promote best practice and share technical knowledge on regulatory scrutiny to enhance bilateral and multilateral regulatory compatibility. Our international outreach develops and strengthens the RPC's reputation and allows us to learn from best practice elsewhere.

We continue to engage with our international counterparts and others with an interest in regulatory scrutiny, including at the Organisation for Economic Co-operation and

Development (OECD), RegWatch Europe (RWE) and the EU Regulatory Scrutiny Board, to promote international co-operation and cohesion across the regulatory landscape. As a member of RWE, we exchanged best practice on regulatory scrutiny generally and on ex-post evaluation specifically.

Over the past year, we met with a variety of international stakeholders and presented on our work across Europe, London and North America (both online and in-person).

Stakeholder engagement

The RPC has maintained engagement with business representative groups, industry associations and civil society organisations over the past year. This engagement is very valuable in helping to understand the different perspectives on impacts that might result from specific regulatory proposals. We also receive input from stakeholder presentations at our bi-monthly committee meetings. We maintain our contacts within Westminster, speaking to parliamentarians (key ‘customers’ of our opinions) and improving parliamentary committees’ awareness of our work.

Our continued engagement has allowed us to hear stakeholders’ views on the government’s approach to regulation. Our stakeholders’ views on the role of independent scrutiny in ensuring that robust evidence and analysis underpin the government’s regulatory programme and decision-making.

We maintain close working relationships with departmental better regulation units, departmental policy and analytical teams, regulators and BIST’s Regulation Directorate, as our sponsor.

Raising awareness of the importance of regulatory scrutiny

A key component of our engagement with stakeholders is our blog and LinkedIn page. We have published articles on a range of topics including updates on what we have been doing, updates to guidance documents, new trends in analysis, data on departmental performance, and our views on aspects of the better regulation system. This is designed to encourage our stakeholders to engage with government.

In 2025/26 the RPC Chair gave speeches and presentations at a range of stakeholder events including:

- Institute for Government conference;
- Institute of Regulation annual conference;
- Re:State conference;
- The Society of Benefit-Cost Analysis Annual Conference;
- Regulatory Policy Institute annual conference; and
- Financial Conduct Authority’s Cost Benefit Analysis panel meeting.

We encourage anyone interested in the work of the RPC to bookmark our blog site:

<https://rpc.blog.gov.uk/> and register for alerts on new posts

<https://rpc.blog.gov.uk/subscribe/>.

Our LinkedIn page is: <https://www.linkedin.com/company/regulatory-policy-committee/>.

FINANCES

The RPC is funded by BIST with expenditure covering the costs of the Secretariat, Committee member remuneration and wider operational activities.

Table 4 – RPC budget for period 2024-25 to 2026-27

	Budget 2023-24	Outturn 2023-24	Budget 2024-25	Outturn 2024-25	Budget 2025-26	Outturn 2025-26	Budget 2026-27
Pay costs	£964,468	-	£1,138,058	£1,237,175	£1,183,749	£1,303,880	£1,178,926
Honoraria	£198,000	-	£250,000	£277,626	£377,000	£343,850	£374,000
Other costs	£18,000	-	£36,000	£21,107	£37,440	£18,534	£53,850
Total	£1,180,468	£1,307,328	£1,424,058	£1,535,909	£1,598,189	£1,666,264	£1,606,776

Table 4 sets out the RPC budgets and outturn expenditure for 2024-25 and 2025-26, and the budget for 2026-27. The overspends in both 2024-25 and 2025-26 were anticipated as each year progressed and accommodated within an underspend in the overall budget for BIST's Regulation Directorate (of which the RPC budget is a part).

Pay costs refer to the salaries and associated costs of the civil servants in the RPC secretariat, all of whom are employed by BIST and subject to the Department's terms and conditions. Staff numbers across the period are set out in the next section. Honoraria refers to the payments made to committee members for the services they provide as public appointees. For the period covered by this report, Committee members were paid at a daily rate of £500 and the Chair at a daily rate of £650. The budget is based on members being paid for 1.5 days' work per week (78 days per year) and the Chair for 2.5 days per week (130 days per year). 2025-26 was the first full year at these rates and this is reflected in the 12% increase in budget for that year.

Other costs refer to non-staff costs such as travel, catering and office supplies.

PERSONNEL

The Regulatory Policy Committee

The RPC has economist and generalist members from a range of regulatory, business and academic backgrounds. Committee members are appointed through an open competition process, adhering to the Governance Code on Public Appointments. The committee is comprised of eight members, their biographies can be found on the RPC website [here](#).



Stephen Gibson
May 2018 – present
Chair



Hilary Jennings
Jan 2022 – present



Caroline Elliott
March 2024 – present



Ryan Williams
March 2024 – present



John Davies
April 2025 – present



Allan Little
April 2025 – present



Caroline Turnbull-Hall
April 2025 – present



Frances Warburton
April 2025 – present

The RPC secretariat

The RPC secretariat supports the committee and is staffed by civil servants employed by BIST. During the period of the report, the secretariat was headed by a senior civil servant (at SCS pay band 1) who reported to the Director of Regulation in BIST. Staffing in the RPC secretariat was at 15 people (14.1 FTE) for the year.

REQUESTS FOR INFORMATION

Requests for information made to the RPC are handled under either the Freedom of Information Act 2000 (FOI) or the Environmental Information Regulations 2004 (EIR).

The RPC endeavours to be an open and transparent organisation. It makes available on its website a variety of information such as minutes of meetings, the register of committee members' interests, the gifts and hospitality register and various other publications, thereby helping to minimise the number of FOI and EIR requests.

The RPC is required to respond to FOI and EIR requests within 20 working days, although it aims to provide information sooner. Table 7 summarises the numbers of FOI and EIR requests the RPC has received and responded to since 2021–22. The RPC received 3 information requests over the period covered by this report and responded to 2 within the target timeframe.

Table 5 – FOI and EIR performance for 2021-22 to 2025-26

	2021-22	2022-23	2023 -24	2024 - 25	2025 - 26
Number of requests	9	10	4	10	3
Requests met within 20 working days	9	9	3	8	2
Requests not met within 20 working days	0	1	1	2	1
Average turnaround time in working days	3	8.5	10	11.7	10

Annex A: Quality of submissions under the revised Better Regulation Framework

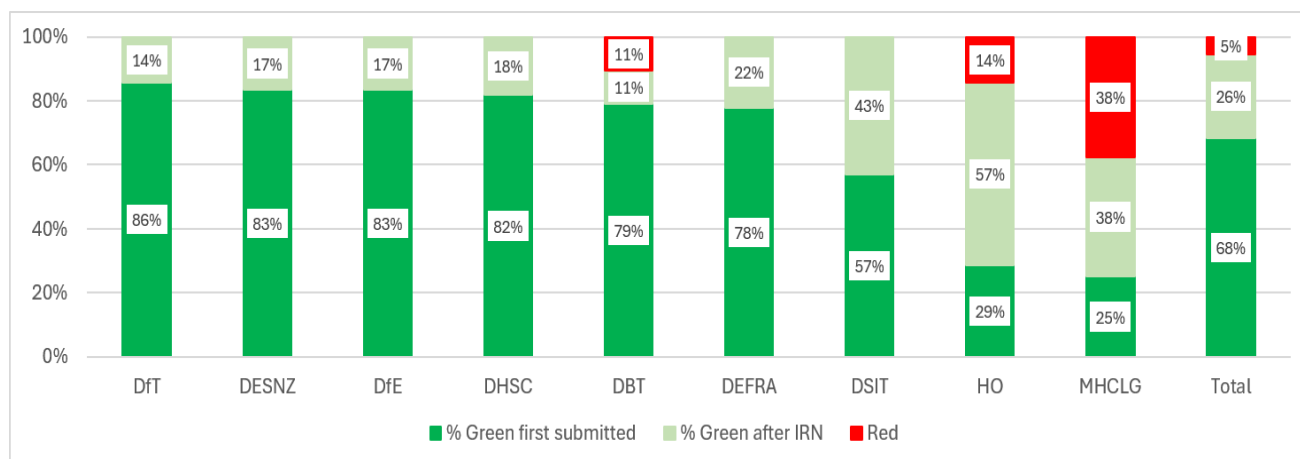
The BRF was revised in 2023 following a detailed review and public consultation. After a transition period, the RPC received OAs and IAs developed under the revised framework from September 2024. Since that time, the RPC has provided independent scrutiny of the quality of evidence and analysis in 111 OAs and IAs.

This annex draws on evidence from the operation of the revised BRF to present departmental performance data, analysis of fit-for-purpose ratings and IRNs, quality ratings for Regulatory Scorecards and M&E Plans, and insights from the RPC's scrutiny and guidance activities.

In April 2026, we published a blog explaining [how the RPC rates OAs and IAs](#) with practical tips for departments to help get it right. Our overall assessment of whether an OA or IA is fit for purpose is based on three specific areas set out in the BRF where we offer a red or green rating, i.e. rationale, identification of options, and justification for the preferred way forward. A red rating in any of these areas indicates that we have significant concerns over the quality of evidence and analysis presented and will lead to the OA or IA being assessed as not fit for purpose.

68% of all 111 OAs and IAs received a fit for purpose (or green) rating upon initial submission to the RPC (Figure A1). However, there is considerable variation by department. The Department for Transport (DfT) and the Department for Energy Security and Net Zero (DESNZ) had the highest proportion of OA/IAs being rated as fit for purpose as initially submitted to the RPC at 86% and 83% respectively. MHCLG was the weakest performer, with only 25% of OA/IAs rated as fit for purpose on first submission.

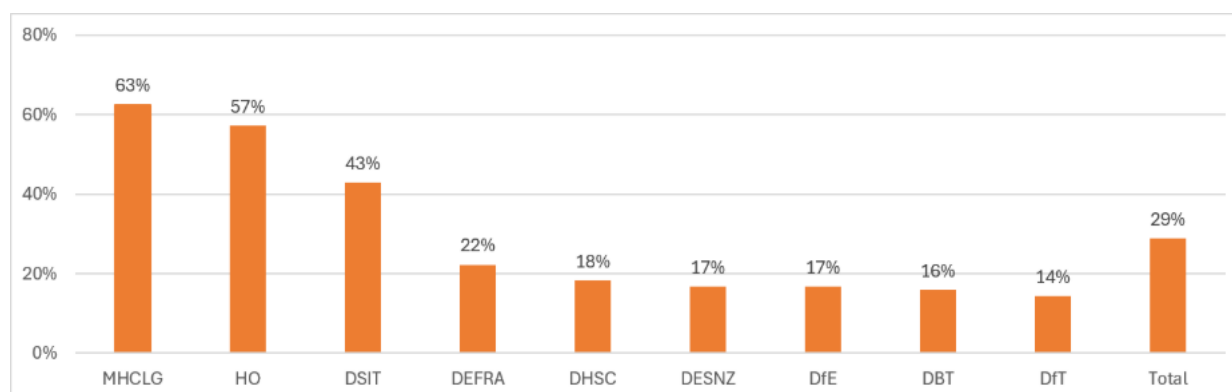
Figure A1: Percentage of OA/IAs rated as fit for purpose on first submission by department*, April 2024 to March 2026



*Departments with more than 5 submissions

Where the RPC identifies concerns that may lead to a not fit for purpose rating during its scrutiny of a department's initial submission, it issues an IRN, providing the department with an opportunity to address the concerns and resubmit the OA/IA. Overall, 32 (29%) of the 111 OA/IAs received an IRN (Figure A2). This varies by department with MHCLG receiving the highest proportion of IRNs (63%), compared to DfT which received the lowest (14%).

Figure A2: Percentage of OA/IAs receiving an initial review notice by department*, April 2024 to March 2026



*Departments with more than 5 submissions

Based on the IRNs issued to departments, Table A1 summarises some of the most common concerns raised during RPC's initial scrutiny of OA/IAs.

Table A1: Summary of common themes in initial review notices (IRNs)

Area of scrutiny	Common areas for improvement
Rationale	- describing problems (e.g. delay, inefficiency, uncertainty, harm) without evidence of scale or persistence - reliance on stakeholder views without discussion of how representative these views are - generic market failure language not clearly linked to the proposed intervention; or language not clearly linked to the proposed intervention - framing delivery or capacity constraints as the primary justification for regulation
Identification of options	- identify a long list of options but not using it meaningfully - narrow options too quickly to "do nothing" versus a preferred option - bundle multiple measures into a single package without assessing them separately
Small and micro business assessment (SaMBA)	the SaMBA is missing, minimal, or confined to the scorecard

	• exemptions are rejected on the basis of assertion rather than evidence • disproportionate impacts are not explored • mitigations are not clearly identified where exemption is not granted
Justification for preferred way forward	• limited or no comparison between shortlisted options • benefits described for the preferred option without showing why they might not arise under alternatives • monetised analysis presented without transparent assumptions or build-up • where monetisation is limited, qualitative comparison is also missing

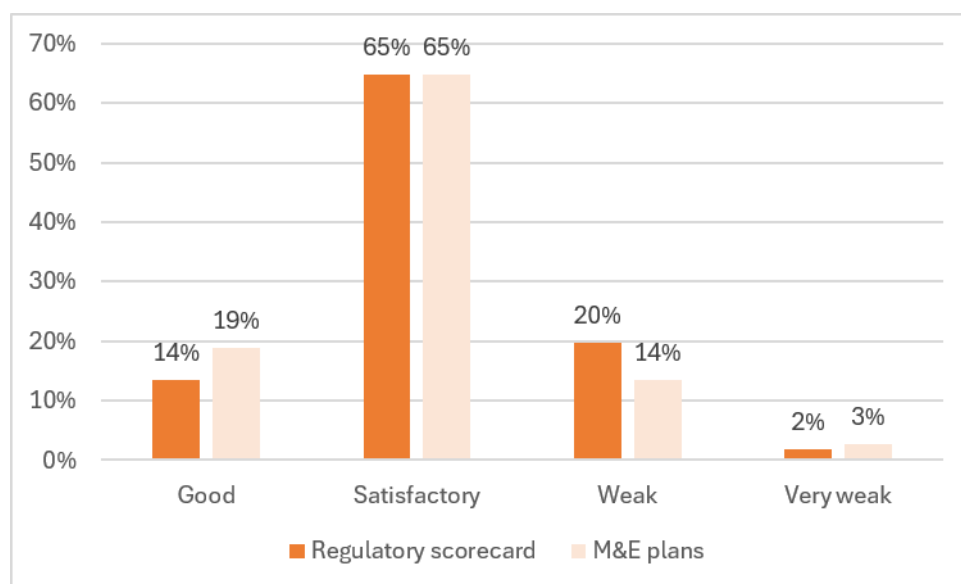
Following the resubmission of an OA/IA after receiving an IRN, 91% (29 out of 32) receive a fit for purpose rating. This demonstrates the value of the IRN process in raising the quality of evidence and analysis in OA/IAs. Only three cases received a final red rating from the RPC following an IRN. In some situations, including where the department has already published the OA/IA before the RPC has completed its scrutiny, a not fit for purpose opinion is issued if there are concerns with the quality of the analysis rather than using the IRN process. This has happened on 3 occasions, taking the total number of red-rated opinions to 6 (5%). MHCLG, Home Office (HO) and Department for Business and Trade (now DBIST) are the only departments to receive a red-rated opinion, either on first submission, or following an IRN (Figure A1).

Four-point quality indicators for OA/IAs

Beyond the red/green fit for purpose indicators outline above, the RPC uses four quality indicators (good, satisfactory, weak, and very weak) on two other important areas of OAs/IAs: completion of the regulatory scorecard summarising the impacts of the regulatory proposal; and the inclusion of a proportionate plan setting out the monitoring and evaluation arrangements to help determine in future if the regulation is having the intended effect.

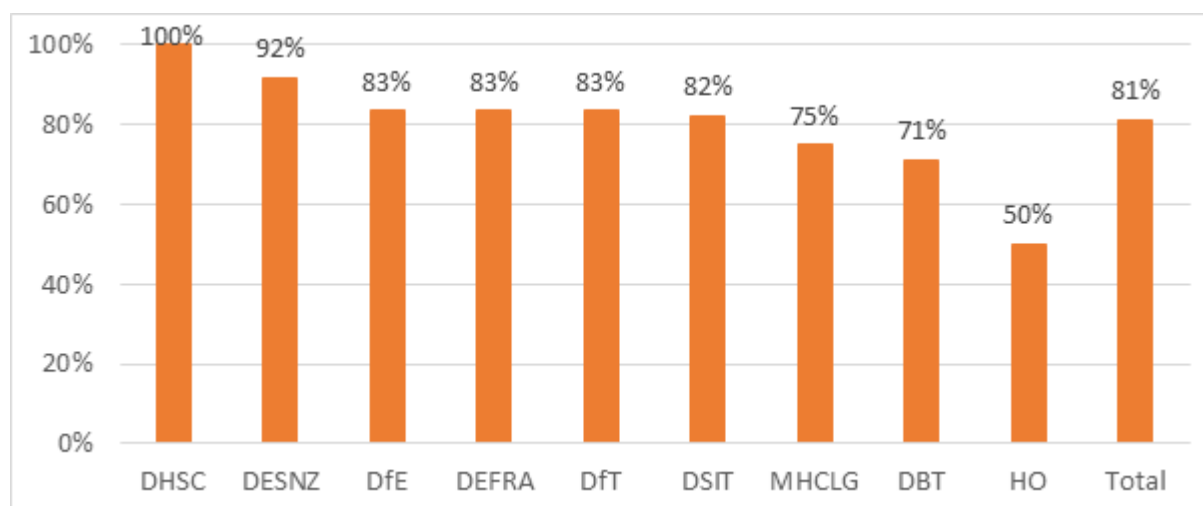
Across all 111 OA/IAs submitted, 22% and 17% of the regulatory scorecards and monitoring and evaluation plans were rated as either weak or very weak.

Figure A3: Quality ratings for the regulatory scorecard and M&E plans, April 2024 to March 2026



When combining the regulatory scorecard and monitoring and evaluation plans ratings, 81% of OAs/IAs received good or satisfactory ratings (Figure A4).¹ DHSC received good or satisfactory ratings in all its OA/IAs, followed by DESNZ with 92%. At the other end, MHCLG, DBT and HO were the weakest performers with 75%, 71% and 50% of ratings being good or satisfactory.

Figure A4: Percentage of quality ratings that were either good or satisfactory by department*, April 2024 to March 2026



*Departments with more than 5 submissions

Guidance on assessing impacts for the regulatory scorecard

With 22% of OA/IAs receiving a 'weak' or 'very weak' rating for the assessment of impacts within the regulatory scorecard, the RPC has published additional guidance to assist departments in appraising the impacts of regulatory proposals.

The regulatory scorecard was introduced to OA/IAs in 2023 as part of the reforms made to the BRF. It aims to present a summary of the impacts of the regulation on businesses, households, and wider society in terms of both monetised and non-monetised impacts as well as highlighting key distributional effects. The scorecard also presents a relatively high-level summary of how the intervention may impact key policy objectives relating to the business environment, international trade and investment, and natural capital and decarbonisation. While the regulatory scorecard summarises these impacts, OA/IAs should also contain more detailed sections setting out how departments have calculated the impacts of the regulation as part of appraising a shortlist of options that meet the policy objectives.

In September 2026 the RPC published a new guidance document as part of its suite of analytical guidance aimed at departments and practitioners. In addition to presenting some examples of good practice from published OA/IAs, the guidance provides some tips and advice to departments on what the RPC is looking for when it scrutinises the scorecard, including:

- justify the level of analysis supporting the OA or IA, which should be proportionate to the size of the impacts;
- the degree of quantification and monetisation of impacts is expected to increase between OA and IA stage reflecting the development of the policy proposal;
- at OA stage, a proportionate attempt should be made to estimate the direct impacts on business (EANDCB) and, where possible, the direct impacts on households (EANDCH);
- an indication of the scale of other impacts, including non-monetised impacts, should be provided at OA stage;
- for the final stage IA, the scorecard should be finalised including as much quantification and monetisation as possible and the key metrics (NPSV, EANDCB, EANDCH, BNPV) clearly presented;
- where it may be disproportionate to quantify some of the costs and benefits of the preferred option, or where there may be insufficient evidence to provide reliable estimates, these impacts should be clearly described qualitatively and included as part of the scorecard;
- for the part of the scorecard assessing the impact on business environment, international considerations, natural capital and decarbonisation, departments should draw on existing literature and evidence from other policy/international examples for how regulation within the broad policy area may have an impact, making this specific to the proposal itself rather than being too generic; and
- where impacts on, for example, natural capital and decarbonisation are monetised, this should be included as part of the wider impacts reported in the NPSV, but care should be taken in the presentation to avoid the risk of the reader ‘double counting’ impacts.

Over the last year, members of the RPC have published a series of blogs signposting departments to existing guidance and techniques that may be used to estimate the wider impacts of a regulatory proposal. The use of carbon values for estimating environmental

impacts and quality adjusted life years for health impacts are two of the most common wider impacts monetised within OA/IAs. We have also offered advice on appraising the benefits to individuals and wider society of regulations that raise educational attainment.

Table A2: Advice on estimating societal impacts

Area of societal impact	Methodological advice from RPC blogs
Education	Regulation that supports investment in human capital is just as an important driver of economic growth as physical capital. The UK has world-leading data on how lifetime earnings are associated with different educational outcomes which departments should use when appraising regulatory proposals that affect these outcomes. Research using this data estimates the impact on lifetime earnings for undergraduate degrees by subjects and institutions, GCSE subjects, and secondary school attendance. However, the value of education to individuals goes beyond earnings, with research finding links between education and better health, civic engagement, and life satisfaction. At a societal level, education is found to reduce crime and strengthen social cohesion. As the labour market reshapes in response to AI and technological change, the skills commanding a premium today may not be the same as in the future. However, the historic data we have is a good source of evidence to guide the appraisal of interventions affecting educational outcomes. Valuing skills: how the government estimates the returns to education – Regulatory Policy Committee
Carbon values	Carbon values are the monetary value that society places on one tonne of carbon dioxide equivalent emissions (£/tCO₂e) and are an important part of the economic appraisal of regulatory policy proposals. UK government uses the marginal abatement cost (MAC) approach to value carbon which produces an upward sloping costs curve to reflect the fact that cheaper abatement options are exhausted first and as we reduce emissions further more expensive interventions are required. The Green Book sets a central carbon value of £273 per tonne CO₂e for 2025 (2022 prices), with a +/- 50% sensitivity range reflecting uncertainty. The value rises to £398 by 2050 as abatement becomes more costly. Where a regulatory policy's value for money is influenced by carbon values, the RPC expects the appraisal to include sensitivity analysis testing across this +/- 50% range. While carbon valuation is one of the most challenging impacts to assess, it is important in regulatory policy appraisal by: capturing the benefits of climate change mitigation; guiding efficient resource allocation; ensuring

	consistency; supporting environmental goals; and improving transparency. The RPC scrutinises carbon appraisal in the same way as other societal impacts, looking at proportionality, consistency and transparency. Carbon valuation: why it matters for regulatory policy – Regulatory Policy Committee
Quality-adjusted life years and the value of life	Estimating the impact of an intervention on healthcare and the prevention of accidents are key questions for government to consider when appraising healthcare expenditure, transport investments and the regulation of products like tobacco and alcohol. Government uses Quality Adjusted Life Years (QALYs) to help decide between different regulatory and spending decisions. QALYs are defined as “<i>A measure of the state of health of a person or group in which the benefits, in terms of length of life, are adjusted to reflect the quality of life. One quality-adjusted life year (QALY) is equal to 1 year of life in perfect health</i>”. QALYs combine both quantity of life and quality of life so that an intervention that increases two people’s lives by one year of 50% quality of life is worth one QALY. The Green Book uses a value of £70,000 per QALY (2021/22 prices). In 2024, when deciding to raise the legal age for the sale of tobacco, DHSC used this to value the health benefits from the reduction in the number of people taking up smoking at £417 million. There are some variations in approach. For example, NICE use £20,000 to £30,000 for general assessments and higher values for ultra-rare diseases. Alternative tools have also been developed including the Value of a Prevented Fatality which estimates the societal value of a small change in the probability of a fatality. How should Government choose between different life-saving policy options? – Regulatory Policy Committee

Guidance on developing robust monitoring and evaluation plans

Although the RPC cannot rate an OA/IA as not fit for purpose based on the strength of the M&E plan, it is an important early step to ensure that departments are considering how they intend to measure the impacts of the regulation to assess whether it is achieving its intended objectives. 17% of the OA/IAs reviewed by the RPC received either a ‘weak’ or ‘very weak’ quality rating, indicating there remains room for improvement in this important area.

In 2025, the RPC published new guidance to departments on developing robust M&E plans for both OAs and IAs.² As with the regulatory scorecard guidance, this includes examples

from published OAs and IAs showing how different methodologies can be used to assess impact, the importance of setting clear objectives and collecting relevant data. The guidance also includes some helpful high-level tips, including the following.

- **Importance of Early Planning:** Evaluation should be integrated from the outset of policy development. Drawing on principles from the Magenta Book and the Green Book, the guidance highlights that early planning can maximise learning and minimise data collection costs. It can also help ensure that the rationale for intervention is robust.
- **Data Collection:** Effective data collection is at the heart of successful M&E. The guidance outlines best practices for collecting both quantitative and qualitative data, including the use of existing data sources and the planning of new data collection efforts. It stresses the importance of aligning data collection with the Theory of Change to ensure comprehensive evaluation.
- **Addressing Uncertainty:** The guidance also addresses the need to consider external factors that might impact the evaluation. It encourages departments to account for uncertainties and unintended consequences, ensuring that evaluations provide a realistic picture of an intervention's effectiveness.

Post-implementation reviews (PIRs)

The guidance on M&E aims to encourage departments at an early stage to think about how they will evaluate the effectiveness of regulation. Having a robust M&E Plan helps to conduct high-quality post-implementation reviews (PIRs) which are typically carried out within five years of a regulation coming into force. A good PIR should use a range of evidence and stakeholder views to address the following questions³:

- to what extent is the existing regulation working and has the policy achieved its objectives?
- is government intervention and the regulation itself still required?
- is the existing form of government regulation still the most appropriate approach?
- if this regulation is still required, what refinement could be made, if any?
- if this regulation is not required, but government intervention in some form is, what other regulation or alternatives to regulation would be appropriate?

Since April 2024, the RPC has scrutinised 21 PIRs from departments. The RPC offers an overall fit for purpose rating based on whether the department's recommendation to retain, amend or remove the regulation is evidenced sufficiently. 17 of the 21 PIRs received a green rating on first submission, with the remaining 4 receiving an initial review notice. It is disappointing that after revising and resubmitting the PIRs, half went on to receive a red rated opinion.

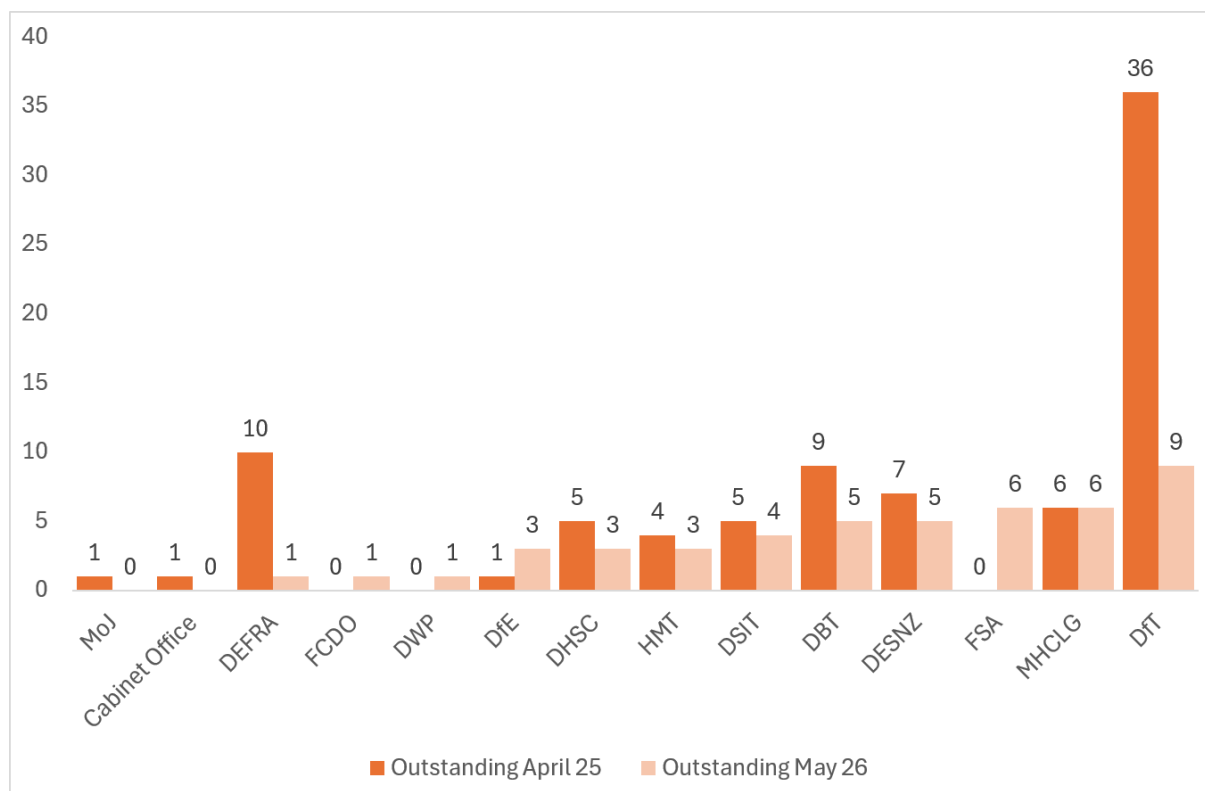
Section 28 of the Small Business Enterprise and Employment Act (2015) places a statutory duty on UK Government Ministers to either:

- a) include review provisions in secondary legislation that regulates business; or

b) publish a statement that it is not appropriate in the circumstances to do so. It is the inclusion of the review provisions that requires departments to undertake PIRs in line with these legislative requirements.

However, as early as 2021, we highlighted that less than 40% of PIRs were being completed on time (typically within 5 years). In 2024, the government asked the RPC to publish data on departments' performance in completing PIRs to strengthen accountability and compliance⁴. In April 2025, there were 83 outstanding PIRs of which 36 related to DfT measures (Figure A5).

Figure A5: Number of PIRs outstanding by department



Alongside the publication of the original data in [April 2025](#), the RPC Chair wrote to the permanent secretaries of departments and secured commitments to reduce the backlog within each department. By May 2026, the number of outstanding PIRs had decreased to 47, with significant progress having been made by DfT, DBT and Defra. However, much of the progress occurred within the first six month. The subsequent slowdown has been driven by new PIRs becoming overdue in addition to departments making less progress to clear their backlogs.

9 (43%) of the 21 PIRs that were reviewed by the RPC since April 2024 included a recommendation to 'amend' the regulations. The RPC has [commented previously](#) that it has seen cases where the PIR identifies that a regulation could be improved based on a well evidenced 'amend' recommendation, but where no further action has been taken. As a result, changes are not made and the problem with the regulation persists. Where a PIR does recommend change, the RPC believes it should also include:

- ownership of the recommendation;

- a proposed action plan for implementing the recommendation;
- a timetable;
- a named accountable team or official; and
- a mechanism for tracking progress.