"under FOI Act, S40 Personal Information and S43 Commercial Information".

APPENDIX D - CALL OFF AGREEMENT FORM

CALL OFF AGREEMENT FORM		
This Form is to be used by the Client when requesting that work be undertaken within the terms of the Call Off Contract. The Parties agree that each completed and approved Form will form part of and be interpreted in accordance with the terms and conditions of that Call Off Contract.		
Project Title: Work Package 34 – FS430998 Best Practice Regulatory Change – from FS107010 Social Research Call-off Contract	**Reference:**	FS107010
	Date:	12th April 2022
Client – Project Representative: [redacted]	**Tel:**	n/a
	E-mail:	[redacted]
Supplier – Project Representative: [redacted]	**Tel:**	n/a
	E-mail:	[redacted]
Project Start Date:	12th April 2022	
Project Completion Date:	22nd July 2022	

Background – please include

- **details of any previous research commissioned in this area by FSA or other organisations**

Changing the way businesses or an industry is regulated is complex, with a range of different elements, stakeholder interests, risks and opportunities. The FSA is not the only regulator in the UK or internationally that is grappling with regulatory

change. We want to learn from what has happened in the past, the current landscape of regulatory change, and what good practice looks like.

The Achieving Business Compliance (ABC) programme wants to commission research to understand the potential challenges and barriers to regulatory changes that were faced and how they were dealt with so we can learn from what works or what doesn't. We want to learn from any parallels that can be drawn from other industries to the food landscape and how real change was achieved, so that we do not spend time, effort and resource on 'reinventing the wheel'. The programme wants to be prepared for the range of significant issues ahead.

Objectives – please include

- why you wish to commission this work
- how the outputs from this work will be used
- what difference / impact you anticipate the research will make
- how does this align to FSA strategic priorities?
- How outputs will be used

The ABC programme is working towards changing the principles of regulation and our utilisation of resources, data and technology.

Our aim continues to be making sure consumers have food they can trust in the future and in a rapidly evolving food sector, we need to regulate in a smarter way to make sure that food is safe, and is what it says it is.

The ABC programme will develop a set of smarter regulatory approaches which:

- Make it easier for businesses to provide safe and trusted food for consumers.
- Target regulatory resources at the areas which pose the greatest risk.
- Improve compliance across the system by working with and through others, including regulatory partners and influential businesses.

The overarching aim of this research is to identify transferable lessons learnt and best practice in regulatory change from UK and international regulators with a focus on the process of change and a high level view of impact.

As ABC is a large and complex change programme, it would be beneficial to gain insight into other wholesale or organisational changes of a similar scale from which

we could learn from and apply to our own processes as we move into design and pilot phases across the workstreams.

Within this research we would like to explore the following questions:

Planning and Implementation of change

Essential to gain insight into

- The evidence base/case for change
- The scale of the changes
- The process of the change
- how the transformation was delivered – what were the critical components and dependencies for delivery? E.g. information, infrastructure, technology, behaviour change
- if legislation change was required, what was this and how it was this achieved
- The timeframe from the initial initiation to the delivered changes

Relationships

Essential to gain insight into

- How are dynamic relationships developed between regulators and industry stakeholders? (E.g. what changes were needed to achieve joint objectives, how do regulators maintain authority and distance as an enforcer while building partnerships and encouraging cooperation).

Desirable to gain insight into

- When change brings about a closer relationship between industry stakeholders and the regulator, are the public aware of this? What actions have regulators taken to communicate and influence public perception of the change in relationship and its impact? (e.g. ensuring the public are clear that this is not a change to industry self-regulating).

- If behavioural change was required (e.g.: stakeholders taking greater responsibility, ownership, accountability), how was this addressed

Outcomes and lessons learned

Essential to gain insight into

- Did the change achieve the intended outcomes?
- Any key risks and challenges and how they were mitigated / overcome e.g.: resourcing, external stakeholders, internal organisational change, perceptions of certain businesses (e.g. SME's) being disadvantaged by the changes

Desirable to gain insight into

- A high level view of the impact of change on the industry, regulator and other key stakeholders.

- Any unforeseen / unintended consequences

Scope

Regulatory reform or significant regulatory change that has been carried out or is in the process of taking place in the UK and internationally.

Whilst any relevant food hygiene / standards examples are of interest, the focus should not be restricted to the food landscape. It should include other UK industries or professions. UK regulators we are aware of, operating within an inspection, safety and standards environment, which may of interest to the research include but not limited to:

- Care Quality Commission (CQC)
- Civil Aviation Authority (CAA)
- Office for Standards in Education, Children's Services and Skills (Ofsted)
- Health and Safety Executive (HSE)
- UK Accreditation Service (UKAS)
- World Bank

Countries and organisations of interest include those where there is similar regulatory governance as the FSA and political structure as the UK. For example, those with a similar type of capacities and challenges such as those heavily dependent on collaboration of other organisations to carry out key functions such as monitoring and enforcement. The US, Canada, Australia & New Zealand are of interest.

In your response we request that you outline any suitable industries/professions, regulatory and countries which you perceive to be in scope of this research.

Out of scope-

This is not looking at change towards a self-regulatory system, so we have less interest in systems that have incorporated this.

Methodology –
This research will consist of two components:

- An evidence assessment of the available literature on regulatory change programmes from the UK and internationally (academic, literature published by regulators and grey literature).

- Expert interviews with domestic and international regulators. Interviews will provide an opportunity to identify relevant change journey case studies, as well as

sense-check literature review findings. Interviewees will be identified in collaboration with FSA who can help facilitate access.

Given the timeframes for this research we appreciate that the interviews are likely to start before the literature review is finalised however the aim is for emerging findings from the literature review to inform the topic guide for interviews.

We understand that literature may not be publicly available to answer all of the research questions for this project. Therefore we ask Ipsos to advise on level/number of interviews which will be required to obtain evidence to answer the questions posed above and to inform best practice recommendations. We request that in your response you provide us with different options for the number of interviews conducted as part of the research and costings for each option.

Expertise outside of the Ipsos MORI research team is likely to be needed to successfully deliver this project. In your response, please outline any sub-contractors or expertise outside this team which will be required.

Research process

Working with the FSA Social Science and ABC teams, Ipsos (and any subcontractors) will be required to develop a list of search criteria for the evidence review in addition to developing the topic guides for the qualitative interviews.

Analysis and review

Standard evidence review protocols and qualitative analysis should be utilised for this project.

Please detail in your response your proposed approach to the analysis of the interview data qualitatively.

Outputs – (NB. all outputs must be in line with FSA brand guidelines and meet FSA accessibility requirements)

- A full written report in a 1-3-25 style containing an executive summary, detailed findings from the research and best practice recommendations
- A presentation of findings for dissemination amongst key FSA stakeholders.

- A presentation of initial insights from the review of literature to be presented to the FSA.

The FSA will review all outputs, suggesting alterations and amendments, before final versions are approved for sign-off. Project timescales should be appropriate to account for this review process.

The outputs should be appropriate for publication on the FSA website as well as internal use. All outputs should meet the FSA accessibility standards.

How will the outputs of this research be disseminated for effective/maximum impact?

Ipsos to present final research findings to ABC team and wider stakeholders. Ipsos to generate this presentation (as stated above).

We also request that Ipsos present emerging findings once the evidence review has been conducted.

Timescale milestones – please include any hard deadlines

please consider all above stages

Project Phase	**Deliverable**	**Revised Dates**
Project initiation	FSA submit work package template to Ipsos Mori	2nd March 2022
	Response expected from Ipsos Mori to work package template	15th March 2022
	Final-sign off of work package template	18th March 2022
	Initial meetings with project team	w/c 21st March 2022

Literature review	Agree search terms and scope for literature review	w/c 28th March 2022
	Literature review commences	4th April 2022
Fieldwork	Participant recruitment and preparation (including topic guide design)	April 2022
	Fieldwork/Research	April/May 2022
Report	Analysis and report writing	May/June 2022
Completion	Draft outputs (report and presentation) to FSA for review	w/c 13th June
	FSA return draft output to Ipsos with comments and suggested amendments	w/c 20th June 2022
	Final outputs to FSA	w/c 27th June 2022 (hard deadline)

Special Terms: **To include any terms or conditions not covered in the overarching contract or any terms amended for the purposes of this Call Off Agreement**	
Sub-Contractors	Approved Ipsos suppliers, this includes recruitment agencies and TakeNote.
Deliverables:	See Annex 1 – Suppliers Response

Foreground IPR – Ownership	See Clause 20 Intellectual Property Rights in the overarching Contract
Personal Data (GDPR)	See Annex 1 – Suppliers Response
Price	See Annex 2 – Suppliers Financial Template
Payments & Invoicing	Please submit invoices to [redacted] for work with FSA. Please include the referring FSA purchase order number in the email title and within the invoice to allow Invoice/Purchase Order matching. Note that invoices that do not include reference to FSA Purchase Order number will be returned unpaid with a request for valid purchase order through email. Further details can be found at Schedule 5 'Invoicing Procedures & No PO / No Pay' in the Call-Off Contract.
We confirm receipt of this Form seeking approval for the above project to proceed. We agree to provide the goods and/or services requested according to the terms and conditions set out in the Call Off Contract between the FSA and Ipsos MORI	
Signed on behalf of the FSA:	

[redacted]

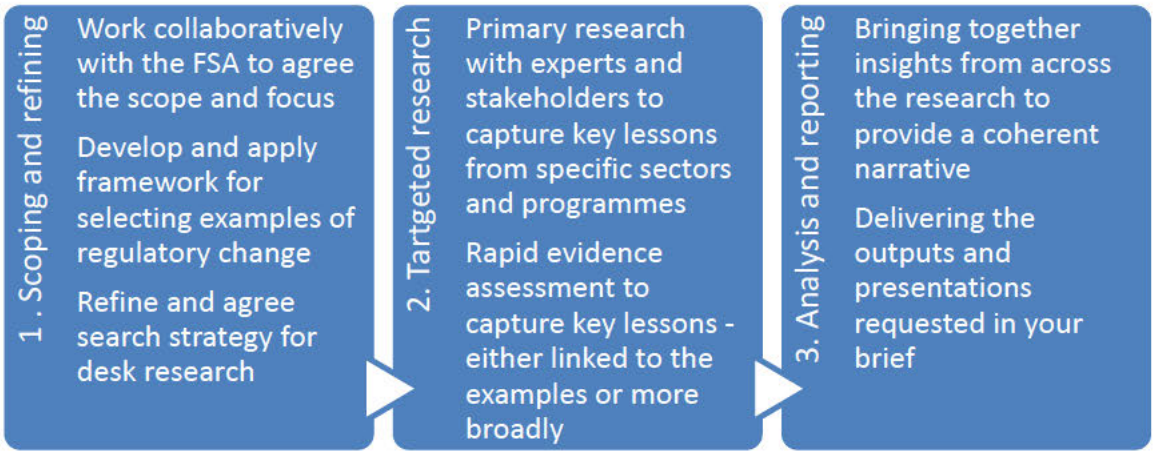
Annex 1 – Supplier Response

Supplier response – please provide a brief overview of your approach including a detailed methodology of how you will deliver the requirements

Overall approach and key considerations

Having carefully considered the research questions in your brief, we recommend taking an iterative approach to delivering this project. This will help ensure we make the most of the resources available to address the research questions and issues faced by the ABC programme. An iterative approach means we will be able to continually review, reframe and prioritise to ensure the most important learnings are informing the next steps in the research.

We understand that you are interested in capturing lessons learned about the delivery of regulatory change in practice, rather than focusing primarily on more theoretical issues. In addition, your brief makes clear that you are less interested in changes or programmes that have moved towards a self-regulatory system, and this will need to be considered in the identification and selection of examples. The balance between these different considerations is something we would welcome discussing further at the early stages of the study.
We therefore suggest a three-phase approach to the project: an initial scoping phase, followed by a second phase of targeted primary and secondary research focused on examples that are of most relevance to the ABC programme. The final phase will bring together the findings from across the study to capture learning around the research questions.



A key risk for the study is that the published evidence may be limited, or may not use a framing that is directly relevant to the research questions outlined above (e.g. focusing more on evaluating the effectiveness of a regulatory change, rather than how it was achieved or the impact on relationships). This will be explored during the scoping phase. The potential for limited existing evidence also emphasises the importance of identifying organisations and individuals that we can access to conduct interviews to capture the most relevant evidence around the current regulatory landscape and best practice for regulatory change.

Another related issue to be explored during Phase 1 will be whether the Phase 2 research should focus only on specific examples of regulatory change, or whether there is more general evidence available to draw together broader lessons for the ABC programme through the research activities.

The alignment between the evidence assessment and expert interviews will also need to be agreed as part of Phase 1. For example, all the interviews at Phase 2 could be with regulators or government departments responsible for implementing specific regulatory changes. Alternatively, we may want to interview experts – for example in regulation across a particular sector in multiple countries. Similarly, the evidence assessment could focus on supplementing the learning about the specific examples being explored through the interviews or could take a broader look at regulatory change (if the literature is available to enable this).

Given the global and advisory nature of the work, the team will include colleagues from Ipsos Strategy3. Their core business is evidence-based advisory work for private sector clients around the world, including using all of the primary and secondary approaches described in this response. We feel their expertise – also drawing on projects they have carried out for public sector clients like the FCA – will be valuable in ensuring findings are useful for the ABC programme.
In addition, we have engaged Prof Bridget Hutter and Prof Martin Lodge at LSE to act in an advisory capacity on the project. Their availability has been limited during the preparation of this response (including because of illness), but in principle they are interested in further discussing their involvement.

However, we are aware that the team may need to be strengthened with further academic expertise to inform Phase 1 – and to support with delivery depending on the final plan for Phase 2. We have allocated a proportion of the budget to external consultancy and will make recommendations of how best to use this during the scoping phase.

These considerations mean that the methodology outlined here will be refined during the early stages. In particular, the outcomes of Phase 1 will shape the development and focus of the targeted research and materials for Phase 2. These first two phases may also overlap to some extent. Below we set out our suggested approach in more detail.

Phase 1 - scoping and refining

During the scoping phase, we would work collaboratively with the FSA to further refine the project, ensuring clarity about the scope and use of the research to align with the needs of the ABC programme. Throughout, the priority will be identifying the most appropriate ways to address the key research questions:

- What lessons can be learned from how regulatory change was planned and implemented in relevant contexts?
- What lessons can be learned about developing effective relationships between regulators and industry stakeholders when delivering regulatory change?
- Were the desired outcomes realised through the relevant regulatory changes? How were risks mitigated and unintended consequences dealt with?

Recognising the overall considerations, Phase 1 will include the following key steps:

1) Following a set-up meeting with the immediate teams, we recommend an **inception** workshop with FSA stakeholders to clarify the purpose of the research and agree next steps. For example, our work to develop our approach suggest it would be helpful to describe in more detail what is meant by a ‘regulatory change programme’, as this is not a familiar term in the academic or wider literature. As such, we will need to agree the features of any examples of regulatory change to ensure they are relevant and the lessons applicable to the ABC programme. Drawing the distinction between general good regulatory practice and best practice around regulatory change will be particularly

important.

2) In parallel with the workshop, we will also hold **conversations with Ipsos colleagues** across Ipsos Public Affairs and Strategy3 who are experts in the countries and/or regulated sectors of interest. Ipsos has a strong presence in the US, Canada, Australia, New Zealand – and we would also suggest considering EU examples. These conversations will focus on exploring whether Ipsos experts are aware of any major regulatory changes in relevant sectors, and whether they have any government contacts we may be able to use to access those involved.

3) Conducting **focused desk research** to understand the availability of relevant academic, grey and government literature about regulatory change. As mentioned previously, our early discussions with Ipsos experts and academic contacts – as well as some initial internet searches – suggest that it is likely much of the information we require is not captured in the published academic literature.[1]

This would therefore be a purposive search of key websites and databases, rather than a more systematic review (which may come during Phase 2). This will include domestic[2] and international[3] regulators undergoing change programmes, as well as those responsible for reviewing regulation more broadly in countries of interest.[4] It will also be useful to include global organisations such as the World Bank and OECD who carry out research and consultancy around regulation with different countries.

The aim of this aspect of the scoping phase would be to assess the feasibility of accessing useful information in answer to the research questions through desk research, and to inform the search strategy for Phase 2. We would also be happy to speak to relevant experts within the FSA or review documents recommended by policy teams to help shape our approach.

4) Based on the inception workshop, discussions with Ipsos experts and the purposive desk research we will develop, iterate and apply a framework for **selecting relevant UK and international examples** of regulatory change for further exploration during Phase 2. This framework is likely to include consideration of some or all of the following:

1. Mapping (and potentially scoring) – as far as possible – the agreed sectors by country using key criteria around regulation, including but not limited to: relevance to research questions, similarity to UK environment, nature of regulatory interventions, available evidence, recent changes in regulatory approach, reliance on stakeholders/networks in delivering standards. Please note, for some sectors in some countries it may not be possible – or useful – to assess against all of these criteria depending on the information available from secondary sources.
2. Developing a long-list of up to 20 examples of regulatory change across the agreed sectors and countries that provide a range of potentially useful lessons learned. This will be grounded in the agreed scope and based on the other activities during Phase 1.

[1] For example, see the introductory discussion here: https://www.tandfonline.com/doi/full/10.1080/09537325.2021.1963426

[2] For example, https://www.cqc.org.uk/get-involved/consultations/consultation-changes-flexible-regulation

[3] For example, https://inspection.canada.ca/about-cfia/cfia-2025/framework/eng/1634243898653/1634243899028

[4] For examples, see https://www.nao.org.uk/report/principles-of-effective-regulation/ from the NAO in the UK, and https://obpr.pmc.gov.au/resources/research-and-other-resources for Australia.

Table 1 outlines the main countries and sectors that will represent our starting point for what is in scope for the research. We expect this to be refined further as we carry out Phase 1, and this would form the basis for mapping examples of regulatory change.

Table 1 – Potential sectors and countries of interest

Regulated industry/sector	Country					
	UK	US	Australia	Canada	NZ	EU
Aviation						
Construction						
Medicine/health/care						
Food safety						
Education						
Environmental						
General workplace health and safety						
National Accreditation Bodies						

We would summarise the outcomes of Phase 1 in a short scoping note/presentation in late-April. This will suggest options and recommendations for Phase 2, including the alignment between the evidence assessment and expert interviews with regulators (and potentially others). The scoping note will also set out any suggested changes to the use of resources within the project.

Phase 2 - targeted research

The specific research undertaken during Phase 2 will depend on findings of Phase 1, particularly around the alignment of primary and secondary research and how much to focus on specific examples of regulatory change vs. whether we include any wider lessons from best practice in implementing regulation. However, we agree with your brief that this is likely to involve a mixture of desk/literature research and speaking directly to those involved with implementing regulatory changes, as well as potentially interviews with industry and academic experts.

Rapid evidence assessment

We will conduct a desk-based evidence assessment, building on Phase 1. The review will bring together available existing evidence about relevant examples of regulatory change and regulatory change programmes to address the key research questions as far as possible from the academic, government and grey literature. We recommend taking an iterative approach to the desk review:

- We suggest having two review points to assess the emerging evidence with the FSA, identify any gaps and prioritise areas of focus.
- Further secondary research building on suggestions from the expert and stakeholder interviews described below.

The review itself is likely to be undertaken systematically, beginning by first developing a concise search protocol (search terms, inclusion/exclusion criteria) which will be used to search available literature (Open Grey, Open Access, Science Direct, and other publicly available sources of information and literature identified through searches). The search protocol will be designed to address the key research questions, recognising the broad range of sources likely to be in scope. We can also draw on our global specialists in secondary research – the Ipsos Knowledge Centre (based in Singapore) – to search and identify evidence from a broad range of commercial databases and sources.

The extent or size of the REA (i.e., how much literature is reviewed) will be determined in part by the availability of relevant literature and evidence. However, the timescale and budget allows for c.40-50 substantial pieces of evidence to be reviewed (equivalent to full length journal articles), based on up to 20 days of researcher time. If the evidence is more from grey and government literature, then it is possible that more evidence sources can be included in the final review. If the initial searches during Phase 1 identify a larger pool of relevant evidence, we will discuss with the FSA increasing the resources available for the REA – but this will need to be balanced against other elements of the project.

Expert interviews with domestic and international regulators

We expect to carry out c.20-30 interviews with experts involved with regulatory change programmes identified during Phase 1. At this stage, we anticipate that most experts will work directly for the regulators and other government agencies responsible for the example regulatory changes shortlisted during Phase 1.

The number of interviews included in our cost options is larger than the number of examples we expect to shortlist. This is because it will be important to consider whether multiple perspectives are needed for some or all of the examples long listed to ensure a fully rounded picture, recognising the challenges around timings for the overall study. We would expect to see some differences across different roles in their familiarity with aspects of design, delivery and outcomes. The larger numbers also give us some flexibility to include more examples should more be identified as relevant.

A sample of organisations will be generated during Phase 1, and we would look to approach named contacts where these are available, either by phone or email. We have assumed that the FSA can help facilitate access to domestic regulators, and that you will also be able to send introductory emails with a formal covering letter to international regulators. In our experience this improves engagement significantly. In addition, we can approach organisations directly where Ipsos already has contacts through our client networks.

We will use our network of recruiters to approach organisations. At this stage we would have included offering a charity donation of £100 (or equivalent) to encourage participation in the interviews, particularly given the limited time available for the primary research.

The discussion guides for the interviews will be drafted following the initial desk research as part of Phase 1 and iterated further after the initial Phase 2 interviews and ongoing evidence assessment. This will help ensure they are fit for purpose and capture the learning and best practice you are interested in. We expect to develop a small number of

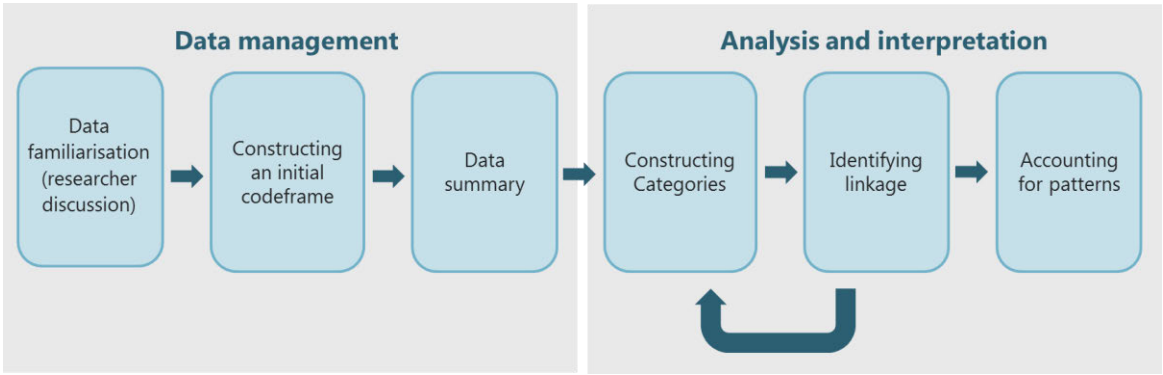
flexible discussion guides that can be used across those involved with regulatory change programmes.

The discussion guides would address the research questions outlined in your brief and be informed by the findings of Phase 1, including the early desk research. Again, this is something we would set out in more detail during Phase 1.

Phase 3 – analysis and reporting

The report will include a summary of the REA presenting 1) an overview of existing literature related to the examples selected and/or the research questions more broadly; 2) an outline of what this tells us about how well regulatory change programmes are understood; 3) a review of the evidence provided by these studies, including key emerging themes against the research questions; 4) annexed Excel database of data sources and evidence. We would also be happy to discuss gaps in the evidence.

The qualitative element of the study will generate considerable data. To support rigorous, systematic analysis of the material, we employ a two-phase approach, summarised below. Interviews will be recorded and notes written up in Excel pro-forma to enable thematic analysis. Alongside this, we will hold regular analysis meetings to explore the data and identify emerging themes.



We will produce a full written report in 1-3-25 style, including findings from the research and best practice recommendations and meeting FSA accessibility requirements. This will include verbatim quotes and relevant journey case study examples. We do not anticipate producing detailed case studies for every example; instead, we will develop a thematic narrative around the research questions and include more detailed examples where these are relevant. However, this is something we are happy to discuss further. The methodology will be described in a written annex to the report, including details of the sampling and research materials.

We will also develop and deliver a final slide pack presentation of key findings from both the review and the qualitative research, drawing on the outputs for each stage to bring together an overall narrative. As with all the outputs, this would be provided in advance for review by the FSA team.

Quality management – please set out you will embed quality management

As with all Ipsos UK projects for the FSA, quality management and assurance are crucially important. We will work collaboratively with you on the study design, delivery and outputs. Our starting point will be to ensure we have a common understanding of how the study should run, working iteratively to deliver the best insights within the resources available.

At the inception meeting we will discuss and finalise the finer points of the design, approach to materials development, project and risk management arrangements, deliverables and timings. After the meeting, a revised timetable will be produced which will clearly identify where the FSA's input will be required, and the nature and extent of involvement.

The project director will oversee the work and will be accountable for ensuring the quality of all outputs, and delivery to agreed timelines. A named project manager will act as a single point of contact, to ensure the right level of co-ordination and control across fieldwork, analysis and reporting. They will also ensure that the relevant member of staff at Ipsos fulfils their sign-off obligations for key milestones. This includes arranging for fieldwork and all outputs to be delivered on time and to a high standard. The team will collaborate with colleagues across Ipsos to conduct case study interviews.

We will agree a schedule for regular (at least weekly) contact with the FSA by telephone and email throughout the project to provide clear updates on progress, address emerging issues quickly and provide feedback to inform operational needs. This will include sharing a weekly fieldwork update spreadsheet during Phase 2, detailing our progress scheduling and completing interviews. We will also be available to discuss any emerging issues and join video-call meetings at key milestones.

Ipsos UK's focus on quality and continuous improvement means we have embedded a 'right first time' approach throughout our organisation. Good research requires exhaustive quality procedures which are put into practice. We work to very strict quality management processes and standards, many of which *exceed* that required for the industry. These include:

- **ISO 9001:2008**, international general company quality standard with a focus on continual improvement through quality management systems
- **ISO 20252:2006**, International market research specific standard that supersedes MRQSA (BS 7911) & incorporates IQCS (Interviewer Quality Control Scheme); it covers the 5 stages of a Market Research project
- **ISO 27001:2005**, International standard for information security designed to ensure adequate and proportionate security controls are in place
- **MRS Company Partnership**
- **Fair Data** - In order to demonstrate our commitment to ensure personal data is processed fairly, ethically and in compliance with all relevant Data Protection & Privacy laws, including the Data Protection Act, we have signed up to the "Fair Data" accreditation scheme.

We have an integrated quality, compliance and information security management system, our 'Business Excellence System' (BES). Its objectives are:

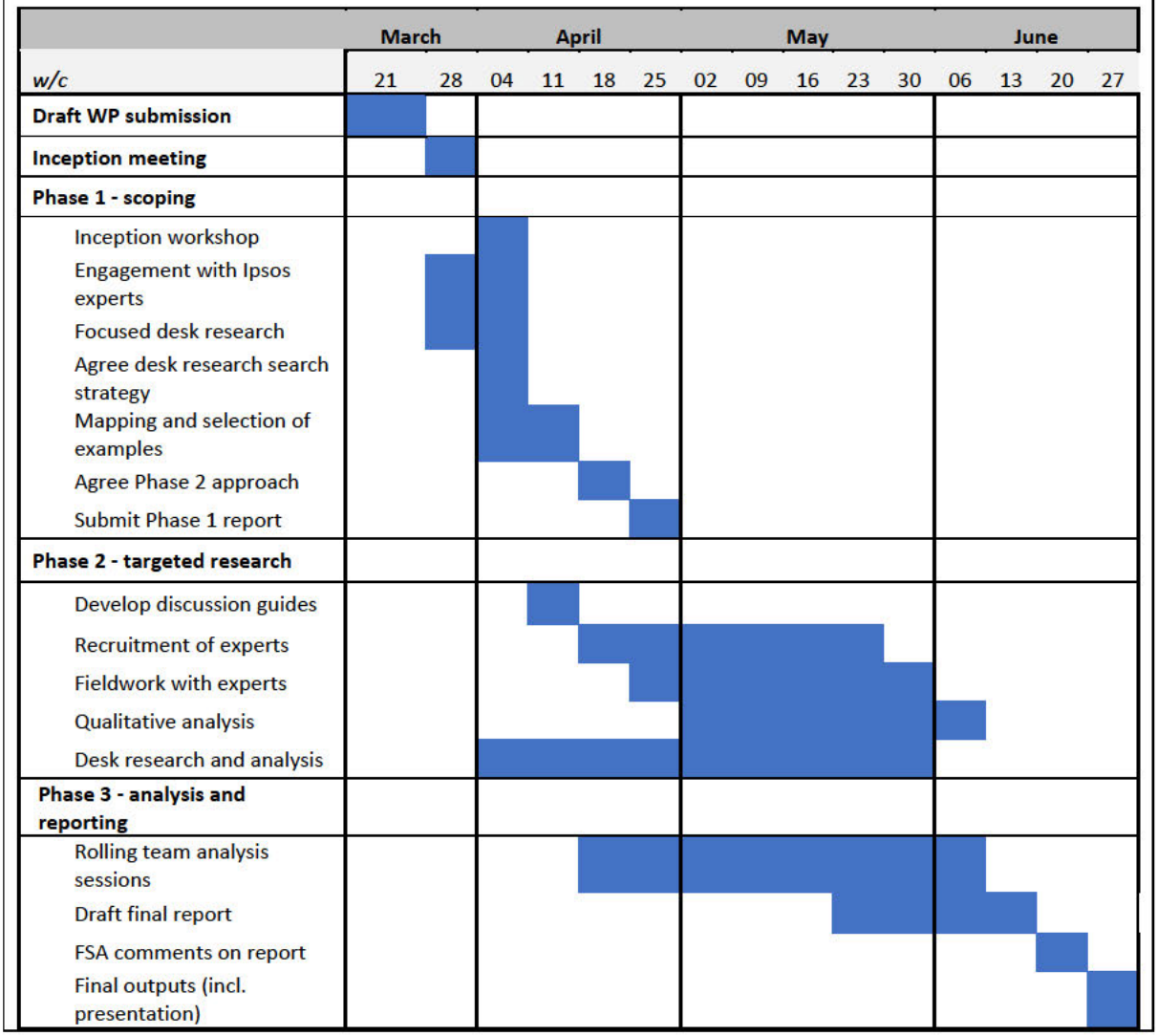
- To provide assurance to Ipsos MORI's clients that we will deliver reliable and robust research findings by, among other measures, meeting the requirements of the international quality standard for market research (ISO 20252); and

- To minimise risk to the business by focussing on quality and continuous improvement.

Delivery timescales – Please provide a detailed plan of when you will deliver the specified outcomes
Please detail any assumptions you have made

Below we have included a draft overall timetable for the study, with a focus on Phase 1. We will provide a more detailed timetable for Phase 2 at the end of Phase 1.

Please note that we are expecting some overlap between Phases 1 and 2, particularly around the expert interviews. Where it is clear that we should include a specific example in the study early on we will look to approach them quickly to maximise the time to engage potential experts. This is something we are happy to discuss further as we begin the inception phase.



Project-specific risks and proposed mitigation measures

Every project has associated risks and challenges. The key lies in identifying these at the outset, assessing them, and putting countermeasures and contingencies in place so that the project is not adversely affected. Responsibility for the identification, communication and management of risk rests with the Project Director. Project risks are considered at two distinct levels:

1. The likelihood of different 'risk events' occurring (disregarding our proposed counter-measures).

2. The impact of a 'risk event' if it does occur.

The table below identifies some of the key risks associated with this project, and the main mitigation measures. We would look to refine and expand this risk register at the set-up meeting.

Risk	Assessment	Mitigation measures
Limited availability of relevant literature focusing specifically on regulatory change programmes	Likelihood: Medium Impact: Medium	The phased design will allow us to identify this issue early on, enabling us to pivot the research towards more primary research with regulators and experts if required. The extensive reach across academic, government and wider grey literature and reports should give us confidence that we have carried out comprehensive searches.
Low engagement from domestic and international regulators	Likelihood: Medium Impact: High	Our recruiters are experienced at engaging different types of organisations to take part in research. They will flag any concerns around engagement with the Ipsos MORI research team. We will keep engagement under regular review and can follow up directly where required. If recruitment continues to be challenging, we will consider additional steps including offering or increasing incentives, or reviewing the length of the fieldwork period to ensure the required interviews are achieved.
Lack of relevant examples of regulatory change programmes	Likelihood: Low Impact: High	The iterative approach will allow us to agree the criteria for relevance to the ABC programme and to identify examples at an early stage. We will discuss any concerns about this with the FSA during Phase 1, and can scale the approach to the research accordingly. We could look to deepen our understanding of specific programmes if there are few considered relevant enough – or we could explore more general good practice guidelines.

IT failure	Likelihood: Low Impact: High	The REA relies on desk and internet-based evidence gathering. Loss of connectivity or loss of data could have a major impact on project timescales. In the case of lost connectivity for remote workers our offices are open and Covid secure working in place; ensuring our work can be continually delivered in a safe manner. Both our office and remote working is supported by secure VPN to ensure all data is backed-up regularly. Furthermore, protocols are in place to ensure that regularly backup reports and data on the network, computer hard drives and data storage device as appropriate.
Risk of GDPR or data breaches	Likelihood: Low Impact: High	As with all Ipsos MORI projects, careful attention is given to ensure any personal data is handled with respect to GDPR requirements and regulations. All personal information will be transferred using Ipsos MORI's secure data transfer system: Ipsos Transfer. All personal information will be securely destroyed using digital shredding software at the end of the project. Informed consent will be gained from participants for the collection of personal data and for this data to be shared with the FSA team. Prior to the commencement of the study, Ipsos MORI will ensure a data flow is created that details when, how and why the data will be collected, used, and shared. More information is included in the ethical considerations section below.
Escalation of COVID-19 in the UK	Likelihood: Medium Impact: Low	Ipsos MORI has robust systems in place to enable remote working, as described above. This will limit the impact of any escalation of the COVID-19 pandemic, or restrictions on movement as a result of local lockdowns. We will review the appropriate methodology for qualitative interviews, but it will be possible for all of these to take place remotely, either online or by telephone. This removes the need for travel time.

		We will be able to recruit replacement participants should this be required due to drop-outs linked to illness or changes in personal circumstances.

Ethical considerations

Ensuring ethical research is a key concern for our team and core to our professional practice. This means we will make every effort to deliver the study in a way recognises key ethical issues, and much of this is built into our standard ways of working. The main ethical considerations for this project are during the primary research at Phase 2, and the specifics will depend on the final design agreed. Any potential ethical issues will be highlighted in the Phase 1 outputs for consideration.

As standard, we will secure informed consent for participation in the study, asking participants to opt-in to taking part. We will share clear information about what is involved in the study at recruitment stage (via a warm-up email and privacy notice) and at the beginning of each interview. We will share a link to a privacy policy in the initial invitation email which will provide detailed information about the study and how their data will be used by Ipsos UK and the FSA. We will also brief participants further on the study during the first five minutes of any interviews or other discussions.

Prior to project commencement, we will create a 'data-flow' to clearly map out what data will be collected, stored, and shared throughout the project. It is also important that Ipsos UK are fully informed on the systems put in place by the FSA team to ensure that any personal information shared is secured.

Ipsos UK and the FSA will agree the content of privacy policies, including information on retention and destruction of personal data, prior to recruitment. To ensure informed consent, participants will be informed of what data is collected, for what purpose the data is collected, who will hold the data, how the data will be transferred, and when and how their data will be destroyed, at the recruitment stage. All data will be transferred using our secure platform 'Ipsos Transfer'.

As with all our projects, this study will be subject to an internal review within Ipsos MORI by the Ethics Group on its commencement. This review considers the methodological approach taken by a study and the key ethical issues relating to (but not limited to), informed consent, vulnerable audiences and potential for harm, data sharing and security, use of gatekeepers, and confidentiality.

We will check all our final reporting outputs maintain anonymity. For example, checking that individuals are not identifiable from a quote if there is only a small number of individuals from their sector/nation. In certain cases, we may redact identifiable information or decide to use a different quote to illustrate a point.

Subcontractors

We will only use approved Ipsos suppliers for the primary research elements. This includes recruitment agencies and TakeNote, who provide us with transcription services.

We have assigned [redacted] of the budget for consultancy from academics or other experts. They will not handle sensitive personal information through this project. As such, we will put in place a service agreement with them, rather than the full supplier approval process.

Sustainability – pls set out measures to maximise sustainability

The research is currently planned to take place remotely and will not involve any travel or consumables. As such, the recommended design is the most sustainable way to achieve the objectives. This will be revisited during Phase 1.

GDPR – Please complete the below table detailing personal data that will be processed as part of this work package. Additional questions are also provided beneath the table to provide additional assurances.

Description	Details
Subject matter of the processing	The processing is needed in order to ensure that Ipsos UK can contact experts and invite them to participate in the research.
Duration of the processing	March – June 2022
Nature and purposes of the processing	Expert contact details will be gathered and stored to enable interviews to be scheduled. Data collected during interviews will be stored securely on Ipsos MORI servers. This includes audio recordings of interviews which will be stored by Ipsos UK on secure servers, in password protected WinZip files. Consent will be gained at the beginning of the interview including explaining what data will be used for and how long it will be stored for. This will inform analysis and reporting.
Type of Personal Data	Contact details incl. name, organisation name and address, email address, telephone number. Audio voice recordings.
Categories of Data Subject	Experts working at regulators in the UK and globally; other relevant industry or academic experts.
Plan for return and destruction of the data once the processing is complete UNLESS requirement under union or member state law to preserve that type of data	Data will be stored securely for three months after project completion in June 2022. As such, it will be securely destroyed by September 2022. All

	personal data is destroyed using Blanco shredding software.
Please respond to remaining questions in this table to provide further assurances of data protection. Completion of this section is only required for primary data collection, or desk-based research that uses personal or sensitive data.	
Will Ipsos Mori complete a PIA for this project?	No A DPIA is required when processing is likely to result in a high risk to the rights and freedoms of individuals. This is not generally relevant for standard market and social research projects such as this. All participants will receive a privacy notice setting out the nature of the processing and their rights.
Please read each statement below. If the answer to any statement is 'no' please provide further details. • Is the research being carried out solely to fulfil the objectives set out by the FSA? This means that Ipsos Mori, or any sub-contractors, will not use the research data for any other purposes. • Does Ipsos Mori accept that it is the data processor (not data controller) for the research data collected? • Is the data that is collected in the Project proportionate to achieve the required research outcomes?	Yes Yes Yes
Please read each statement below. If the answer to any statement is 'yes' please provide further details. • Will the FSA receive any personally identifiable participant data throughout the research project? • Is the research study about FSA staff? • Is the study about any other party where we may not have consent (e.g. FSA stakeholders/local authority contacts)?	No No No

• Will the work package involve collecting children's data? The Data Protection Act states that under 18s class as children, but those 13 or over have a right to consent. • Will any of the data be used to make a decision about the individual? • Will the study involve combining information from other sources and linking it directly to individual responses in a way that the individual may not expect or may object to? • Will we be re-using/re-purposing any old research personally identifiable research data that the data subject may not have consented to?	No No No No
• Is this research likely to cause damage, distress or harm to someone (e.g. physical harm, financial loss or psychological pain) as a result of the topics discussed and audience involved? Please assess the level of risk as Low, Medium or High and include what mitigating actions will be taken if the answer is 'Medium', or 'High'.	Low risk – given the nature of the audiences involved.
Will we be seeking to recontact the participant?	Possibly – we may want to have permission to recontact to clarify any specific points in the interview. Consent for this will be captured at the end of the interview, and details will be recorded in the spreadsheet used to manage recruitment.
Please provide a date by which the participant information notice will be provided to the FSA. If participant notice is not required, please state why.	8th April 2022

Total Cost – Please provide the total cost for this work package. **Please provide a detailed breakdown of costs in the financial template which is to be submitted alongside this Project Proposal Document. This should include payment milestones (where applicable)**
The total cost for this study will be £58,000 +VAT based on the assumptions outlined in this response, including that we would conduct [redacted] with domestic and international regulators.

[redacted], so there is flexibility within to overall resources available to scale up or down. [redacted] meaning that we would have to alter the scope of other elements of the project if this is required.
Completed by: [redacted]
Date: 21/03/2022

For completion by [redacted]
I confirm that the assurances provided under the GDPR section of this form have been reviewed and that: • *research can commence on the assurances provided*
Completed by: [redacted]
Date: 12/04/2022

Annex 2 – Supplier Financial Template

Tender Reference	FS430998

Tender Title	Work package 34: Best regulatory practice

Full legal organisation name	Ipsos

Main contact title	[redacted]
Main contact forname	[redacted]
Main contact surname	[redacted]

Main contact position	[redacted]
Main contact email	[redacted]
Main contact phone	[redacted]

[redacted]

[redacted]

Total Project Costs (excluding VAT) **	**£ 58,000.00**

Project Costs Summary (*Automatically calculated*)	
[redacted]	
Total Project Costs	**£ 58,000.00**

[redacted]

Consumable/Equipment Costs

[redacted]

[redacted]

The Pricing Schedule

[redacted]

Total	**£ 58,000.00**	Totals Agree

Summary of Payments

[redacted]