

Commissioning Letter

ICF Consulting Services Ltd
Watling House
33 Cannon Street
London
UK
EC4M 5SB

Tuesday, 5th March 2019

Dear Sirs,

**BIS Research and Evaluation Framework Agreement – Lot 6
Literature review: Using behavioural insights in developing alternatives to
regulation initiatives
CR19010**

Thank you for your response to the Specification for the above commission by the Department for Business, Energy and Industrial Strategy (BEIS) (the Customer) through the BIS Research and Evaluation Framework dated 2 January 2016 between (1) Secretary of State for Business, Innovation and Skills; and (2) ICF Consulting Services Ltd (the Framework Agreement).

Annexes: A. Specification for Literature review: Using behavioural insights in developing alternatives to regulation initiatives
B. Tender dated 22nd February 2019

The Department for Business, Energy and Industrial Strategy (BEIS) accepts your Tender (Annex A), submitted in response to our Specification (Annex B). ICF Consulting Services Ltd shall undertake the services in alignment with the specification in Annex A and their bid submitted in Annex B.

The Call-Off Terms and Conditions for this Contract are those set out in Schedule 5 to the Framework.

The agreed total charges for this assignment are **£19,950.00** exclusive of VAT which should be added at the prevailing rate. The agreed invoice schedule is as follows:

First phase review – Mid March - [REDACTED] Excluding VAT
Second phase review – End of March - [REDACTED] Excluding VAT
Final report – End of April [REDACTED] Excluding VAT

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This clause applies at all times prior to publication of the final report. Where the Contractor wishes to issue a Press Notice or other publicity material containing findings from the Project, notification of plans, including timing and drafts of planned releases shall be submitted by the Contractor to the Project Manager at least one week before the intended date of release and before any agreement is made with press or other external audiences, to allow the Department time to comment on factual accuracy. All Press Notices released by the Department or the Contractor shall state the full title of the research report, and include a hyperlink to the Department's research web pages, and any other web pages as relevant, to access the publication/s.

This clause applies at all times prior to publication of the final report and within one month from the date of publication. Where the Contractor wishes to present findings from the Project in the public domain, for example at conferences, seminars, or in journal articles, the Contractor shall notify the Project Manager before any agreement is made with external audiences, to allow the Department time to consider the request. The Contractor shall only present findings that will already be in the public domain at the time of presentation, unless otherwise agreed with the Department.

Congratulations on your success in being selected to undertake this Commission.

Yours sincerely

Yours sincerely,


UK Shared Business Services Ltd

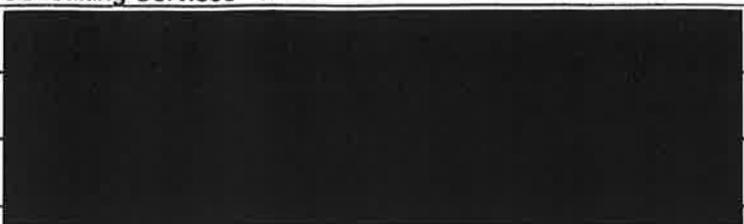
BY SIGNING AND RETURNING THIS COMMISSIONING LETTER THE SERVICE PROVIDER AGREES to enter a legally binding contract with the Customer to provide to the Customer the Services specified in this Commissioning Letter and Annexes incorporating the rights and obligations in the Call-off Terms and Conditions set out in the Framework Agreement.

Department for Business, Energy and Industrial Strategy (BEIS)

Name and Title	
Signature	
Date	

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Signed on behalf of ICF Consulting Services Ltd

Name and Title	
Signature	
Date	

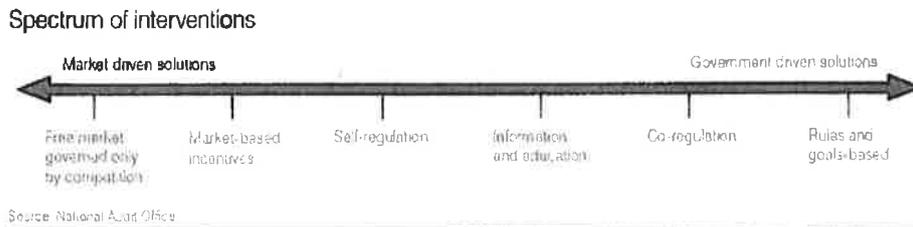
- Annex A Specification

1. Background

The Better Regulation Executive (BRE) is a unit within the Department for Business, Energy and Industrial Strategy (BEIS). It works with colleagues across government to help them identify the best options for delivering policies with a regulatory element; and to promote the use of better regulation principles, which includes the consideration and use of alternatives such as self-regulation, information and education or market-based instruments. Alternatives can contribute to more effective and targeted interventions, reduce unnecessary burdens, be implemented quickly and have the flexibility to respond to changing business practices and technological changes. BRE promotes more efficient regulation, backed by high quality evidence and support transparency and accountability for the costs and benefits of regulation to both business and wider society.

Alternatives to regulation is an important tool to achieve policy objectives, however, as pointed out by NAO¹, a stronger understanding of the factors that increases the success of alternatives is needed. Many alternative initiatives are to some extent underpinned by behavioural techniques, especially in the area of information and education. Behavioural techniques have an important part in informing the design of alternatives and/or their effective delivery and we are looking to get a consistent understanding of how behavioural insight has been used in this area of alternatives to regulation by conducting a literature review to assess the scale of behaviourally informed initiatives; and how behavioural insights have been applied across the range of interventions.

Alternatives to regulation span across a wide area of intervention as outlined by the graph below from the National Audit Office²:



Alternatives

Market-based incentives – The use of economic instruments such as taxes, subsidies or permits to facilitate behaviour change. E.g. Research and Development Relief for Corporation Tax.

Self-regulation - is usually initiated and undertaken voluntarily by those whose behaviour is to be regulated. For example, an industry or profession might choose to develop and adopt its own code of practice promoting ethical conduct. The industry is itself responsible for ensuring compliance. E.g. Lion quality mark for eggs.

Information and education – There are a variety of examples where education and information has been used including independent recommendation schemes, rating systems

or labelling. E.g. nutritional traffic light labelling of food ingredients.

Co-regulation is similar to self-regulation but involves some degree of explicit Government involvement. The Government will usually set the top-level regulatory requirements and leave the market to define how these general principles should be met in terms of technical solutions. For example, an industry might work with Government to develop a code of practice. The code would usually be enforced by the industry itself, or a professional organisation, rather than by the Government.

Goal-based regulation, whilst being regulation, looks to setting objectives instead of specifying rules. This makes it a flexible way of ensuring compliance as it doesn't specify rules upfront. At its limit, this can be a potential nexus between regulatory approaches and alternatives.

There are a variety of existing reviews in relation to behavioural insights but these are generally policy area focused, e.g. health, energy etc. In 2017, OECD published a review of the use of behavioural insight globally which contained over 100 case studies, many of them from the UK.³ Reviewing the case studies OECD concluded that most examples of behavioural insights related to interventions at the later stages in the policy cycle with a focus on improving implementation and compliance. The examples were also mainly focused on information and education; and administrative simplification processes.

BRE is interested in getting a comprehensive and consistent overview of existing evidence base in this area. In first instance we want to understand the extent of robust evidence that exists (e.g. interventions that have been evaluated). We are particularly interested in behavioural insights underpinning the initial policy design of self-regulation and co-regulation.

This work will support the evidence base that BRE has been building up to ensure that alternatives are used effectively when appropriate. It will help BRE ensure that alternatives can be implemented using best practice.

2. Aims and Objectives of the Project

The aim of this research is to better understand how behavioural insights techniques have been used to support alternatives to regulation; and to build up a better evidence base around. BRE therefore wishes to undertake a literature review. The literature review should: 1) provide a broad overview of the available evidence in this area; and 2) highlight examples of best practice in the design and implementation of alternatives to regulation.

The Better Regulation Executive (BRE) promotes the use of better regulation principles, including supporting legislators to intervene without using legislation. BRE engages with departments on high level considerations of the likely effective use of alternatives and any behavioural insight aspects, but this incentives-based understanding for the agents at play would be more effective if more detailed, contemporary examples of the impact of behavioural insights and alternatives could be brought to bear. This work will help BRE to continue to promote effective intervention design and evidence-based approaches to the area of regulation.

3. Suggested Methodology

We wish to conduct a literature review of recently available evidence around the use of behavioural insight to inform alternative interventions. As a first step, we would want to the contractor to focus on the UK including peer reviewed articles as well as reports published by government departments, think tanks and research agencies. We would focus on interventions that have been properly evaluated (e.g. RCTs and experimental design). The review would initially look at self-regulation and co-regulation initiatives. The final search criteria would be agreed in discussion with the successful contractor.

Once an initial overview of the literature had been undertaken, in discussion with the contractor, we would decide whether to continue to focus more in detail in this area of whether to expand.

Ways of expanding the literature review could include:

- Increasing the focus to Europe/US/Canada/Australia; and/or
- Expand the review to include alternative interventions such as market based incentives; and information and education.

We would want to focus on initiatives that are solely based on alternatives rather than when alternatives are used to support the implementation of regulation; or where there is a regulatory framework underpinning the use of alternatives as can often be the case with market based incentives.

Ultimately, we would be looking to understand better:

- To what extent behavioural insight have been used to support alternative initiatives, in particular self, and co-regulation?
- Are there any learnings that can be applied in terms of best practice when designing alternative interventions?
- What, if any, can be said about long-term sustainability of impacted behaviours (e.g. long-term evaluation of behavioural change).

We would be open to bidders suggesting alternative approaches to the literature review that fits within the budget and timings but they need to do this in addition to answering this specification.

4. Deliverables

Deliverables	Timelines
Agreed search criteria for phase 1	End of Feb/Early March
Second phase review	Mid March
Report including recommendations re: best practice in terms of designing alternatives to regulation using behavioural techniques	End of April

PROJ1.1 Approach/ Methodology

Overview of our proposed approach

Our approach is built around the objective to deliver a comprehensive overview of success factors and best practice examples of self-regulation and co-regulation approaches, with a focus on behavioural insights. The key elements of our approach are described below.

Our methodologic approach will provide a comprehensive assessment of evidence on alternatives to regulation. Behavioural insights are recognized for their effectiveness in supporting policy intervention; they are often based on robust evidence, drawn from experiments or field studies. Based on our initial assessment, literature on the use of behavioural insights to inform policy design is relatively scarce: existing approaches tend to focus on policy implementation and enforcement (i.e. consumer information to support tax compliance). Behavioural science is not exempt from criticism, and there is uncertainty around the ability of nudge techniques to provide long term results. Our proposed approach is to critically assess how behavioural insights have informed best practices in policy design of alternative interventions, and to back-up evidence from behavioural insights with data from other disciplines. We will look into the assumptions and common success factors in the design of alternatives to regulation, to identify consistent, comprehensive evidence of best practices. Our framework to identify behavioural elements in policy design will build on the work of Schneider and Ingram (1990), as further explained below (Task 2.3: Data extraction).

Our team has expertise in behavioural studies and beyond. We have a multidisciplinary team, with expertise in behavioural science and broader evidence underpinning alternative approaches to regulation. We are therefore able to provide BEIS with a comprehensive, fair assessment of the latest evidence on self-regulation and co-regulation.

We have experience of undertaking literature review studies to a high standard. ICF's approach to this assignment is informed by lessons learnt from previous comparable assignments, where we conducted intensive data collection and data review exercises within a short timescale and then built on the findings to formulate advice for policymakers, working jointly with selected experts.

We have the resources to efficiently deliver the literature review within a tight timeline. Our team includes four skilled researchers, with expertise in delivering literature reviews for UK regulators.

We have experience of formulating recommendations. The final report for this project will draw on the literature analysis to provide BRE and BEIS with recommendations best practice in the design of alternatives to regulation using behavioural techniques.

Study objectives and the general goal

BEIS has identified the need to build on previous work by the National Audit Office (2014) and the OECD (2017) to obtain a stronger understanding of: the scale of behaviourally-informed initiatives in the UK; how behavioural insights has been or is currently being used to inform and support alternatives to regulation; and the factors that increase the success of alternatives to regulation.

BEIS has therefore identified **three main study questions:**

- To what extent have behavioural insights been used to support alternative initiatives, in particular self- and co-regulation?
- Are there any learnings that can be applied in terms of best practice when designing alternative interventions?
- What, if anything, can be said about long-term sustainability of impacted behaviours (e.g. long-term evaluation of behavioural change)?

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We understand that BEIS is particularly interested in regulatory design, rather than policy implementation. The overarching question is therefore: how can regulators prepare and design efficient alternatives to regulations? There is a risk that the literature available on behavioural insights only includes implementation studies and focuses on informational and educational interventions. Our approach will therefore be to focus more broadly on the literature on alternatives to regulation, prioritising self-regulation and co-regulation, summarising the available evidence and identifying how and where behavioural insights have been used to support such interventions.

Our proposed approach consists of conducting a literature review, making the best use of our experience in this methodology and of our expertise on regulatory issues, to deliver the best value for money to BEIS with the time and resources available.

While a good literature review requires a level of effort that can be provided by anyone, it also requires three essential things:

- **good judgment** on how to distribute resources across a wealth of sources, and within individual sources. Indeed, a literature review cannot mean that one will spend an equal amount of time on each source. While there may be a lot of relevant studies, not all of them might be worth reviewing in detail, or not all elements in those studies may be relevant to the assignment, justifying therefore that only certain sections are reviewed (and that does not necessarily mean only the conclusions section). Similarly, some studies might require an in-depth review, especially on disputed or nuanced propositions and findings. A good literature review requires triangulation of the findings, having regard to the underpinning evidence and the manner it was collected. As a result, it may also be necessary for the team leading the review to come back to certain sources more than once, to compare them with others. It is crucial to the success of a literature review to be able to exercise good judgment as to how the resources available are spent, or else much of the insights the evidence review may bring would be lost.

- **robust knowledge of social science theories and disciplines**, so that any contribution reviewed can be situated and understood in its theoretical and disciplinary context. For example, some sources are theory-driven, with very little empirical testing, while other are driven by empirical evidence. Being able to immediately understand these distinctions is important: comparing and discussing studies that are based on completely different concepts or methods is akin to comparing apples and oranges, and can lead to profound misunderstandings.

- **a trained ability to critically assess academic studies** published in academic journals. While it is customary in some disciplines to outline a study's limitations in the text published, this is not always the case. A trained critical eye is necessary to critically evaluate all studies so that blind spots and black boxes are identified and considered when reporting findings and triangulating them.

Strong literature review skills will be particularly important for this assignment, as the body of relevant literature on regulatory alternatives will be diverse, encompassing a range of study designs, purposes and contexts. Our team and our two experts, Prof. [REDACTED] and Prof. [REDACTED], possess these competencies. We have applied them to a number of assignments and will apply them in this instance to deliver a robust assessment of the literature to BEIS.

We expect the literature review will enable us to:

- develop a comprehensive overview of the extent of robust evidence on the use of behavioural insights in alternatives to regulation (e.g. evaluations of alternative initiatives);
- find detailed and contemporary examples of the use of behavioural insights in alternatives to regulation;
- highlight examples of best practice in the design and implementation of alternatives to regulation; and

- determine the impacts of the use of behavioural insights in alternatives to regulation (this will be subject to availability of long-term evaluation studies of behavioural changes).

Step by step methodology

This section describes our detailed task-by-task method of approach for gathering and analysing the evidence required to answer the research questions, meet the study objectives and deliver the outputs highlighted in the specification document. Our approach divides the study into four tasks:

- Task 1: Inception;
- Task 2: First phase review;
- Task 3: Second phase review; and
- Task 4: Reporting and dissemination

Task 1: Inception (total of 2 staff days)

The inception phase will constitute a preparatory phase that is critical to the success of the study.

Task 1.1: Kick-off meeting (1 staff day)

The project management team will meet BEIS for a kick-off meeting, as early as possible after ICF has been appointed to carry out this study. This meeting will provide an opportunity to discuss the priorities and expectations that underpin this call, to clarify the scope of the assignment, and understand how BEIS can gain most value from our work. We will discuss our approach in further detail and agree milestones and timescales. The process through which progress updates will be provided will also be confirmed at that point. We will deliver minutes of the kick-off meeting within five working days.

Task 1.2: Internal brief / team up (1 staff day)

The strategy for conducting the project will then be discussed within the study team, reflecting on the comments received from BEIS during the kick-off meeting. As we propose to have several researchers working on the literature review simultaneously, this is an important step to ensure that the whole team understands the purpose of the review. The team proposed for this project has experience conducting literature reviews, and as such this also provides an opportunity for the team to highlight any potential issues or opportunities related to the next phase of the project.

Task 2: First phase review (total of 14.75 staff days)

The literature review will be a major task of the study, leading to a better understanding of how behavioural insights can be used to inform alternatives to regulation.

Task 2.1: Search strategy and revision of the method (total of 1.75 staff days)

The literature review will need to be approached in a highly structured manner. The search strategy presented below will be revised based on feedback received from BEIS at the kick-off meeting. This will provide a clear direction of travel for the senior team, who will allocate tasks for the literature review and establish internal objectives and team timescales. We will then update and refine our detailed methodological approach to the study.

Our proposal for the search strategy is as follows.

As a first step, we will focus our literature review specifically on self-regulation and co-regulation initiatives in the UK. We have conducted preliminary research to understand what relevant sources are available and should be included in the literature review (see 0 for some initial examples).

A number of academic papers look at the use of behavioural insights in designing and implementing alternatives to regulation. These will largely focus on educational and informational interventions directed toward the consumer. However, our expert, Prof [REDACTED] is a leading author on the use of behavioural insights in the regulation of firms and will be able to quickly point us toward the most relevant literature. This will be useful to

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obtain an overall understanding of how behavioural insights can be used to support alternative regulation initiatives.

In its call for proposal, BEIS asked the contractor to put an emphasis on interventions that have been properly evaluated, through randomly controlled trials or experimental designs for example. There is a vast amount of such robust evaluation studies examining the impact of behavioural insights on information and education alternatives. However, self-regulation and co-regulation are by definition voluntary initiatives (i.e. not randomly allocated to being subject to regulation), and such evaluation studies will not be relevant for these types of alternatives. We are therefore proposing to focus on studies specifically looking at self-regulation and co-regulation initiatives, making a call on whether their methodology is robust enough. These could involve peer-reviewed articles, or reports published by government departments, think tanks and research agencies (e.g. OECD, Behavioural Insights Team). In addition to relying on keywords (such as regulation/regulated-market/policy design, and behavioural insights/economics, self-regulation, co-regulation, regulatory pluralism, governance, nudge, certification, ISO etc.), we will also adopt a snowballing approach to identifying relevant sources, finding additional relevant papers in the references section of a source and among papers citing the source. This will help ensure extensive coverage of the relevant literature, and identify a corpus of contributions, as well as how the debate has been structured within the academic literature.

The next step in our approach will be to identify relevant examples of co-regulation and self-regulation initiatives in the UK, and look for specific literature (e.g. evaluations, audits etc) around these examples.

We will also submit our search strategy to our two experts, Prof. [REDACTED] and Prof. [REDACTED]. Together, they have combined expertise on the use of behavioural insights in regulating firms, as well as on self-regulation and co-regulation issues, and will be able to help us identify any additional sources we might have missed.

Table 1. Preliminary sources

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	Source:	Explores:
Focus on self-regulation	██████████ and ██████████, Making Self-Regulation More than Merely Symbolic: The Critical Role of the Legal Environment (January 19, 2011). Administrative Science Quarterly, Vol. 55, pp. 361-396, 2010	<ul style="list-style-type: none"> - conditions under which self-regulation is likely to result in improved compliance practices and outcomes; - how different enforcement tools can foster or undermine organisations' motivations to self-regulate
	OECD (2015), "Industry Self-Regulation: Role and Use in Supporting Consumer Interests", OECD Digital Economy Papers, No. 247, OECD Publishing, Paris	<ul style="list-style-type: none"> - roles that industry self-regulation plays in addressing consumer issues and other areas; - conditions and situations where there are likely to be benefits; - steps that need to be taken to help ensure that such initiatives succeed (draws on 23 case studies, four of which in the UK)
	██████████ (2008). New modes of governance in the shadow of hierarchy: self-regulation by industry in Europe. Journal of Public Policy, 28(1), 113-138.	-the role of governmental and legal institutions in ensuring self-regulation is effective
	██████████, ██████████, ██████████ (2013). Do voluntary programs reduce pollution? Examining ISO 14001's effectiveness across countries. Policy Studies Journal, 41(2), 273-294.	-the impact a particular voluntary environmental programme had on intended outcomes

	██████████, ██████████ (2014). Obesity and industry self-regulation of food and beverage marketing: a literature review. European journal of clinical nutrition, 68(7), 753.	-existing literature on self-regulation in the food industry for obesity prevention and the role that public regulation has in its effectiveness
	██████████, ██████████, ██████████, ██████████ (2016). Regulation by reputation: Monitoring and sanctioning in nonprofit accountability clubs. Public Administration Review, 76(5), 712-722.	-factors that impact the effectiveness of self-regulation initiatives in the non-profit sector
	██████████, ██████████ (2013). Self-Regulation in the Regulatory Void: "Blue Moon" or "Bad Moon"? The ANNALS of the American Academy of Political and Social Science, 649(1), 22-34.	-"regulatory voids" that lead to the adoption of self-regulation and what impacts the success of self-regulation within these scenarios
Focus on co-regulation	██████████, ██████████ (1945-1998). Smart regulation: designing environmental policy. Clarendon Press; New York: Oxford University Press, Oxford	<ul style="list-style-type: none"> - potential of 'smart regulation'; - policy outcomes, depending on particular environmental goals and circumstances (draws from studies of regulatory innovation in North America, Europe and Australia)
	██████████, ██████████ (2010). The law and policy of online privacy: Regulation, self-regulation, or co-regulation. Seattle UL Rev., 34, 439.	-the potential role for co-regulation when dealing with online privacy issues

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Focus on UK case studies	<p>██████████ & Centre for the Study of Regulated Industries (Great Britain). (2005). Self-regulation and the regulatory state: A survey of policy and practice. Bath: Centre for the Study of Regulated Industries, University of Bath School of Management.</p>	<ul style="list-style-type: none"> - reason why self/co-regulation is promoted and extent to which it can meet public interest objectives; - whether there is a clear understanding of the new forms of self/co-regulation across governmental actors, regulators in various sectors, regulated companies, users and consumers); - whether self/co-regulation should be explicitly promoted (examples of the practice of self/co-regulation in the UK in the following sectors: communications, energy, water, railways and financial services)
	<p>██████████ (2005) Critically Examining Theory and Practice: Implications for Coregulation and Coregulating Broadcast Advertising in the United Kingdom, International Journal on Media Management, 7:1-2, 2-15,</p>	<ul style="list-style-type: none"> - potential for effectiveness and viability of coregulation; - likelihood of returning to statutory regulation
Additional case studies	<p>EESC (2019) The Database on Self- and Co-Regulation Initiatives. Available at: https://www.eesc.europa.eu/en/policies/policy-areas/enterprise/database-self-and-co-regulation-initiatives</p>	<p>-additional examples of cases of both self- and co-regulation at the EU level</p>
	<p>██████████ (2018). Does Voluntary Self-Regulation Provide Regulatory Relief? A Lesson from the Responsible Care Program in the United States. The Journal of Law and Economics, 61(1), 63-96.</p>	<p>-explores the relationship between self-regulation and public regulation in the context of the chemical industry in the US</p>

Task 2.2: Agreement of the search strategy with BEIS (total of 0.5 staff day)

We are proposing to have a short discussion with BEIS at the end of Task 2.1 (i.e. during the second week of March), to check BEIS is satisfied with our proposed search strategy and has any other suggestions for us to improve our methodology.

Task 2.3: Data extraction (total of 7.5 staff days)

A template for extracting relevant information from the literature will be designed. The template will be structured to record the scope of the source in terms of discipline (e.g. economics, behavioural insights), country, sector and type of regulation alternative. We propose to use a framework to think about policy and policy design in behavioural terms, building on the work of Schneider and Ingram (1990). We will therefore aim to determine whether the policy tools mentioned in the sources address market issues by providing authority, incentives, or capacity; by using symbolic and hortatory proclamations to influence perceptions or values; or by promoting learning to reduce uncertainty. The evidence will then be organised according to the study questions: it will aim to record in detail information relating to best practices, drivers of impacts, successes and failures. Finally, the template will also include an assessment of the methodology and transferability of the sources. This will be particularly important to assess the empirical validity of theoretical claims and more generally the extent to which the team may rely on the findings. This template will enable the consistent and systematic collection and recording of information by team members. This will greatly facilitate the triangulation of information at a later stage.

Task 2.4: Synthesis (total of 5 staff days)

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While the evidence provided on the use of behavioural insights in support of alternatives to regulation within individual sources will have been recorded as part of Task 2.3, Task 2.4 will involve cross-referencing that evidence with that from other sources. This will enable the study team to synthesise and triangulate the information collected. We will then analyse the data against each of the study question, making a note on:

- the extent to which self- and co-regulation have been used or are being used in the UK;
- examples of best practices when designing or implementing self-and co-regulation; and
- impacts (positive and negative) of self-and co-regulation initiatives, and factors that might influence these impacts.

We will send this synthesis to our two experts, Prof. [REDACTED] and Prof. [REDACTED] and invite them to give feedback. Their comments will ensure our work is of strong quality. For instance, Prof. [REDACTED] is a leading author on self-regulation and has focused on the conditions in which self-regulation works and when it does not. Her input means we will be able to understand whether alternatives to regulation actually work, or whether their impacts are only symbolic. Once revised, this synthesis will also be sent as an update to BEIS.

Feedback received will help to inform the strategy chosen for Task 3.

Task 3: Second phase review (total of 8.25 staff days)

Task 3.1: Search strategy (total of .75 staff days)

Based on the information we will have extracted during Task 2, we will decide how to expand our literature review. Based on our experience with literature reviews, we understand that there is often a need to reconsider the search strategy once the team has a better understanding of what the literature offers and associated challenges. We will consider the extent of evidence gathered so far, gaps in our analysis, and our own assessment of what new type of information would be most useful for BEIS. Ways to expand on the literature review could include:

- Including other alternative interventions, such as market-based incentives, or informational and educational interventions. We know from our preliminary research that there is a large amount of robust literature available on these issues.

- Choosing specific case studies of interest identified in the first phase and examining available sources and literature on these cases in further detail.
- Increasing the geographical focus (e.g. to other European countries, the US, Canada or Australia) – note that we will have already collected some evidence on this as part of Task 2 (some of the literature reviewed will contain case studies from different countries). Understanding the use of behavioural insights in alternatives to regulation between countries could prove to be very insightful, providing more examples of best practice for the UK to adopt. However, these sources would need to be reviewed with caution, in light of the inevitable contextual differences between countries.

At this stage, we will have gained a good knowledge of the relevant literature and we will have potentially already identified several useful resources through the first phase review (such as studies on market-based incentives and insights from different countries). We will be able to complete the second phase research efficiently.

Task 3.2 Agreement of the search strategy with BEIS (total of 0.5 staff days)

We are proposing to have a short discussion with BEIS at the end of Task 3.1, to check BEIS is satisfied with our proposed search strategy and has other suggestions of ways for us to expand our literature review.

Task 3.3 Data extraction (total of 7 staff days)

We will use a template similar to that described in Task 2.3 to review, and extract information from, new sources identified as part of Task 3.1.

Task 4: Reporting and dissemination (total of 12.75 staff days)

This stage will involve the draft and final reporting tasks, as well as dissemination activities to present our findings and stimulate policy debate.

Task 4.1: Draft final report (total of 7.75 staff days)

We will produce a draft final report, which will bring together the insights gained from the research conducted under Tasks 2 and 3 and will provide lessons learnt and recommendations based on these findings. The report will be reviewed by our expert advisors, Prof. [REDACTED] and Prof. [REDACTED] before submission to BEIS. This report will be delivered in the BEIS Research paper format, with which we are familiar.

The draft final report will be a maximum of 30 pages and it will include the following sections:

- Executive summary;
- Introduction, describing the background of the study and the methodology;
- Summary of the evidence base;
- Lessons learnt and recommendations on best practice to adopt when designing alternatives to regulation using behavioural techniques;
- Full referencing of all quotes and sources

The lessons learnt and recommendations on best practice will be developed based on a final synthesis and review of the evidence base. By 'best practice', we understand any activity that helps stakeholders improve their initiatives and get better recognition, respect and credibility for their effort, thereby helping them to achieve their intended goals (e.g. societal or environmental) more efficiently. While drafting our recommendations, we will keep in mind some overarching principles of good regulation (i.e. proportionality, accountability, consistency, transparency, targeting). We will also consider the need for a balance between the need for flexibility and freedom of initiative, and the need for accountability and efficiency. We propose that the recommendations should be practical and drafted in terms of 'do's' and 'don'ts', with one short statement summarising the substance of the recommendation, followed by an additional paragraph summarising the evidence underpinning the recommendation.

Task 4.2: Draft final report meeting (total of 1 staff days)

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We will submit the draft final report to BEIS for review. We will also prepare a slide pack presentation summarising the findings, which we will give at a meeting to take place the week after the draft final report is submitted.

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The purpose of this meeting will be to: i) receive feedback from BEIS on our analysis and results; ii) test the feasibility of our proposed recommendations; and iii) seek suggestions from BEIS for revising the draft final report. This process will ensure that the final report is credible and defensible.

Task 4.3: Final report (total of 4 staff days)

Based on BEIS's feedback and suggestions, we will review the draft final report and submit a final report by 30th April 2019. The final report will have the same structure of the draft final report and will be compliant with BEIS' reporting requirements. For budgeting purposes, we have assumed that there will be one first round of substantial comments from BEIS and a second round of editorial/final comments.

With BEIS's agreement, we propose to disseminate the findings through a LinkedIn post and through our networks of policymakers and regulation scholars. For example, the research paper could be further disseminated via the LSE's Centre for Analysis of Risk and Regulation (CARR) to which [REDACTED] is associated.

Managing methodological challenges and risks

The below table describes how we will overcome method-related challenges and risks.

Potential risk	Prob.	Impact	Mitigation
Delays/obstacles in accessing literature due to limited public availability	Low	Medium	We will begin the literature review immediately after the kick-off meeting to ensure that study resources are used effectively. Sources will be identified through searches on academic databases, such as Google Scholar and EBSCO. We hold a subscription to EBSCO, which provides full-text access to hundreds of academic journals.
Confusion in literature review purpose between team members	Low	Medium	We will hold an internal team-up meeting following the kick-off meeting with BEIS to ensure all researchers have a shared understanding of the project purpose and goals and by structuring the review in two phases, allow for a second opportunity to ensure the team's approach is harmonised.
Review of inadequate or low-quality literature	Low	Low	All the evidence gathered from the sources reviewed will be assessed for quality and methodology. Studies will be considered based on methodology, including such factors as: whether data collection is quantitative or qualitative, whether experimental or quasi-experimental methods are used, or sample size and scope.
Insufficient sources on behavioural insights for policy design	Medium	Medium	We will focus on identifying sources in the self-regulation and co-regulation literature. We will also use a framework to think about policy and policy design in behavioural terms, building on the work of Schneider & Ingram (1990).
Inadequate findings and recommendations	Low	Medium	The selection of team members combines good knowledge of UK, regulatory environment and behavioural economics. The kick-off meeting will identify areas of interest to BEIS and subsequent meetings will confirm these areas and help the team to direct their research appropriately.

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Managers' Attitudes Towards Nudges Directed at Their Business or at Their Customers

(January 28, 2019). Available at SSRN: <https://ssrn.com/abstract=3324991> or

<http://dx.doi.org/10.2139/ssrn.3324991>

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PROJ1.2 Staff to deliver

██████████

Our team has the requisite skills and expertise to deliver this study, with extensive experience of supporting policy design and completing literature reviews. Our Project director, ██████████, and Project manager, ██████████, are highly skilled in literature reviews and have experience in designing behavioural interventions, through a recent study for the UK FSA. Our Expert Advisors will provide the following expertise:

- ██████████ has extensive experience in advising regulators on techniques to inform policy design, including behavioural techniques.
- ██████████ has made relevant research into success factors underpinning self-regulation.

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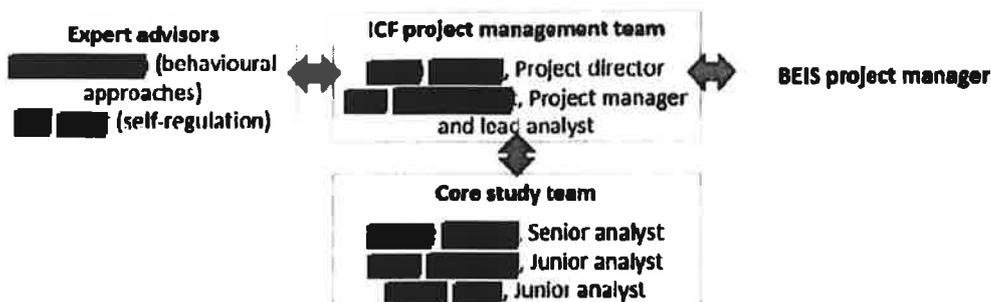
Our project director, [REDACTED], has published various articles as a single author in international peer reviewed journals, including the *Journal of Public Administration Research & Theory*, which is the top ranked Public Administration journal. [REDACTED] has investigated and published on self-regulation and co-regulation initiatives in the chemical and oil processing industries, including a review of the Responsible Care programme and interactions between the HSE and trade bodies ([REDACTED] (2015) Making sense of inter-organizational 'safe spaces' in business regulation, CARR Discussion Paper n°79, London School of Economics and Political Science). He has completed literature reviews both in an academic and in a regulatory context. He is the author of several literature reviews for the FSA. He has also published two reviews of the literature on regulatory compliance ([REDACTED] (2010) Compliance theories: a literature review, *Revue française de science politique* 60(3): 493-517; [REDACTED] (2011) Compliance theory: a goal framing approach, *Law & Policy*, 33(3): 305-333). Under his direction ICF completed recently two literature reviews for the FSA covering a corpus in excess of 150 references each, one on the topic of trust in the food system, and another on the barriers to and drivers for reporting of economic crime to law enforcement authorities. [REDACTED] is also currently conducting a literature review for BEIS/BRE to get a more comprehensive understanding of the impact of different types of regulation on innovation.

Our expert advisor, Prof. [REDACTED], has published various articles on self-regulation in international peer reviewed journals (including *Short, [REDACTED] and [REDACTED], Making Self-Regulation More than Merely Symbolic: The Critical Role of the Legal Environment (January 19, 2011). Administrative Science Quarterly, Vol. 55, pp. 361-396, 2010*). Her research areas include Administrative Law, Regulatory Theory and Design, Corporate Self-Regulation, Compliance and Enforcement. She is well placed to advise on aspects related to the theory and evidence behind success factors for self-regulation.

Our expert advisor, Prof. [REDACTED], will peer-review our analysis, with a focus on assessing the robustness of evidence. He will provide his expertise in behavioural studies and experimental psychology, including randomised control trials (RCTs). He has co-authored more than 50 papers in peer reviewed journals such as the *Public Policy & Law, J. of Institutional & Theoretical Economics, Behavioral Science & Policy, J. of Business Ethics and Regulation & Governance*. His areas of research include Behavioural Analysis of Law, Experimental Law and Economics, Regulatory Impact and Social Norms, Compliance, Formal and Non-Formal Enforcement Strategies.

We have the resources to efficiently deliver the literature review within a tight timeline. Our researchers ([REDACTED], [REDACTED], [REDACTED], and [REDACTED]) will work in parallel on data extraction and analysis, to ensure that the review can be delivered within the timeline set by BRE. Our experts, [REDACTED], [REDACTED], [REDACTED], have expertise in the areas that could be of interest for the Second phase review, such as international literature, and interventions based on market incentives and education.

ICF, more broadly, has significant expertise of working for regulators in the EU and internationally. Our team is also skilled in report writing and project management. We bring a track record of studies on regulation in the UK, including numerous studies for BEIS conducted by ICF over the years (BRE, RPC, OPSS/BRDO/LBRO). The below figure presents our study team, with team profiles set out thereafter.



Project director

█ – Project director

- **Role** – Project Director, attending all meetings, providing guidance on research and analytical methods and ensuring the quality of all deliverables. Total of 5 days on the study.
- **Experience** – Joined ICF in 2016, managing multiple projects for the EC, European agencies and UK clients (Ofgem, BEIS, FSA, EHRC). 6 years of experience as a regulation expert with the LSE's Centre for Analysis of Risk and Regulation. Seconded to the FSA for 2 years as adviser on risk-based enforcement and better regulation. Holds a PhD in political science and sociology.
- **Relevant projects** – Led and published several evidence reviews on behalf of BEIS, FSA; published in academic outlets several papers on behavioural insights and compliance, self-regulation and co-regulation initiatives (principally with reference to the chemical and oil industry in the UK and France); currently leading a study on behavioural insights to improve the reporting of economic crime for the National Food Crime Unit, involving evidence review and experimental research/intervention.

█ – Project manager and lead analyst

- **Role** – Project Manager, attending all meetings, overseeing the research, implementation of analytical methods and managing deliverables, leading workshops. Total of 16.75 days on the study.
- **Experience** – Researcher with ICF experienced in qualitative research and analysis, including literature reviews and desk research. Completed MSc in Food Policy with dissertation on the use of co-regulation for organic certification.
- **Relevant projects** – literature review conducted for the FSA on trust in food, previous project for BEIS on comparative regulatory regimes, current work for BEIS on ethical business regulation and a literature review on the impact of regulation on innovation.

█ – Expert advisor

- **Role** – Advise on relevant literature sources, quality review of final project deliverables. Total of 0.5 days on the study.
- **Experience** – █ is the Honorable █ Professor of Law at UC Hastings. She obtained her Ph.D. in sociology from the University of California, Berkeley in 2008 after receiving her J.D. from Georgetown University Law Center in 1995 and her B.A. in History and Economics from Duke University in 1992.

- Professor ██████ teaches Administrative Law, Constitutional Law, Compliance and Risk Management for Attorneys, and Transnational Labor Regulation. Her areas of research include **regulatory theory and design, corporate self-regulation, corporate social responsibility, corporate governance, and compliance**. She has served as a Senior Policy Fellow at the Georgetown Center for Business & Public Policy, McDonough School of Business. She currently serves as a lead editor of the leading peer reviewed journal, Regulation & Governance.

- **Relevant projects** – Relevant publications include: o ██████ ████. (2013). Self-Regulation in the Regulatory Void: "Blue Moon" or "Bad Moon"? The ANNALS of the American Academy of Political and Social Science, 649(1), 22-34.

- o ██████ ████ & ██████ M. W. (2010). Making self-regulation more than merely symbolic: The critical role of the legal environment. Administrative Science Quarterly, 55(3), 361-396.

██████████ – Expert advisor

- **Role** – Advise on relevant literature sources, quality review of final project deliverables. Total of 1 day on the study.

- **Experience** – ██████████ is The Mori Lazarof professor of legal research at Bar-Ilan University Faculty of Law. He obtained his Ph.D. (Jurisprudence and Social Policy) from the University of California, Berkeley in 2004 after receiving his L.L.B. and B.A (Psychology) from Bar-Ilan University. Professor ██████████ teaches Law and Behavioral Economics and Empirical Legal Studies. His areas of research include **Behavioral Analysis of Law, Experimental Law and Economics, Ethical Decision-Making, Regulatory Impact and Social Norms, Compliance, Formal and Non-Formal Enforcement Strategies**. He is a Senior Fellow at the Israel Democracy Institute, advising various governmental bodies on behavioural informed policies in areas related to regulatory design and enforcement.

- **Relevant projects** – ██████████ has recently worked with ICF on a project for the FSA, which included a behavioural experiment to support food crime regulation. Recent published peer-reviewed papers include: o ██████████ ██████████ ██████████ ██████████ ██████████

- o ██████████ Could Businesses like Nudges? Managers' Attitudes Towards Nudges Directed at Their Business or at Their Customers (January 28, 2019). Available at SSRN: <https://ssrn.com/abstract=3324991> or <http://dx.doi.org/10.2139/ssrn.3324991>

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██████████ ██████████ – Senior analyst

- **Role** – Researcher involved in data gathering and reporting. Total of 4.25 days on the study.

- **Experience** – Senior Researcher with ICF experienced in undertaking research for UK regulatory bodies and in conducting qualitative research, including literature reviews.

- **Relevant projects** – Undertook several literature reviews, e.g. on the effectiveness of debt options for the Money Advice Service, or currently examining the impact of different

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types of regulation on innovation for BEIS/BRE. Took part in a number of studies for UK regulators, e.g. evaluating the General Pharmaceutical Council's

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- approach to regulating community pharmacies or assessing the market for personal injury for the Solicitors Regulation Authority.

██████████ – Junior analyst

- **Role** – Researcher involved in data gathering and reporting. Total of 6.25 days on the study.
- **Experience** – Junior Researcher with ICF experienced in both quantitative and qualitative research, including literature reviews
- **Relevant projects** – ██████████ has worked on literature reviews for a range of clients including a study on the barriers and enablers to the reporting of food crime for the Food Standards Agency and, more recently, as part of a BEIS study developing a taxonomy of regulatory types and their impacts on innovation. ██████████ has also worked on literature reviews for the Department of Education and the European Commission. In the past, ██████████ has worked with energy regulator Ofgem to assess the performance of industry code administrators.

██████████ – Junior analyst

- **Role** – Researcher involved in data gathering and reporting. Total of 4 days on the study.
- **Experience** – Junior Researcher with ICF experienced in both quantitative and qualitative research, including literature reviews.
- **Relevant projects** – ██████████ has contributed to literature reviews for UK and EU clients, including the Home Office, Food Standards Agency and the European Commission. ██████████ also has experience conducting qualitative interviews, including interviews with food industry stakeholders.

Arrangements to ensure continuity

We will ensure continuity of service through maintaining and developing capacity to service the contract, robust project planning, risk monitoring and management arrangements, and having well-defined systems for replacing team members in the unlikely event this is required. We use Deltek's PeoplePlanner application to plan and manage the allocation of staff resources. We have provisionally booked the team's capacity to ensure they have the time available over the duration of the project. Anticipated responses to circumstances that might affect the continuity of services are detailed below:

- **Members of the project management team temporarily absent, e.g. for illness:**
Cover provided by equivalent best qualified person from ICF
- **Research staff lost to the project, e.g. due to illness:** Replacement by other ICF / partner staff with requisite experience
- **Departure of a member of the project management team:** Employment contracts require notice of three months, which is longer than the overall duration of this contract for BEIS
- **Emergency affecting internal ICF office systems:** Emergency response mechanisms already in place, including off site server back-up.

The significant staff and technical capacity of ICF facilitates continuity of service, including in the event of a loss of a team member. However, circumstances may arise where it is necessary to replace a member of the team. In the event this takes place, the Project manager will discuss the matter with BEIS. The team member will be replaced by an alternate who is qualified to carry out the tasks. The new member of the team will be fully briefed and supported. Our nominees for alternate members of the project leadership team are:

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- Replacement for [REDACTED], Lead Managing Consultant
- Replacement for [REDACTED], Senior Consultant

Supporting information

We will seek BEIS' attendance at meetings and feedback on deliverables.

PROJ1.3 Understanding the project environment

As part of the BRE's commitment to improving the UK's approach to regulation, alternatives to regulation offer an opportunity, when used appropriately, to improve the efficiency and effectiveness of government interventions. However, the NAO's 2014 paper on using alternatives to regulation points to several barriers to their use, including "a perception that regulation shows decisive action; an aversion to risk; poor knowledge of alternatives; and limited resource" (NAO 2014, p 5). Above all, the paper notes the lack of useful and appropriate evidence. Such evidence is needed even where alternatives are currently used, as alternatives are not inevitably successful and there is likely potential to improve their design. The NAO also points out the need to include alternative approaches early in the policy-making process, and as such it is important that the evidence collected is suitable not only for informing the implementation of alternatives but also for informing their design. There are a wide variety of interventions that can be considered alternatives to traditional types of regulation. *Educational and informational approaches* have become increasingly popular as ways to facilitate positive behaviour and compliance among citizens and businesses. The application of "nudge" and choice architecture in policy design (as described by [REDACTED] [REDACTED] 2008 and evident in work conducted by the Behavioural Insights Team) has been used to deliver numerous successful interventions and a wealth of robust evidence as to what works well and what does not for educational and informational approaches. *Market-based instruments* have also become increasingly popular and there is an extensive literature considering their effectiveness, particularly in environmental economics.

For self-regulation and co-regulation initiatives, finding robust sources of evidence is not as straightforward. These types of interventions depend on organisational behaviour, and on coordination between representative bodies of the private sector (such as trade associations) and government, and as such are not much discussed in the literature on behavioural insights, as the latter tend to be focused on individual behaviour. Although "nudge" techniques have been used on businesses, [REDACTED] (2019) point out that in the OECD review, only 4% of the interventions mentioned were nudges directed toward firms rather than consumers, and of these, most were experiments and not yet policies. However, organisations are comprised of individuals and many of the principles suggested by behavioural economics will inevitably also apply to co-regulation and self-regulation interventions. Findings from behavioural economics, such as that people are loss-averse, that their self-expectations influence how they behave and that they need to feel involved and effective to make a change (NEF 2006) play a role in arguments both for and against self-regulation and co-regulation initiatives. The scope and diversity of self-regulation and co-regulation initiatives makes these arguments harder to evaluate in a robust way, however. Previous work by [REDACTED] (1990) offers a framework with which to analyse both the implicit and explicit behavioural theories that underpin regulations, and this offers a useful starting point for making sense of a diverse range of evidence.

Self-regulation and co-regulation are also difficult to assess as the terms can be used to describe a variety of scenarios and options. Within self-regulation, this may include standards and codes, voluntary agreements, audit or certification schemes. Self-regulation will sometimes involve only industry partners and in some instances, oversight or input from civil society or NGOs. Co-regulation might also include certification schemes, initiatives around process safety in the chemical industry, as well as negotiated agreements with

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industry and public-private partnerships (Steurer 2013). The NAO paper notes that evidence for alternatives to regulation may also arise from interventions that are not necessarily labelled as 'alternatives to regulation' (NAO 2014 p 25). This means that there is a considerable range of interventions and examples that can be considered under these

headings. This is illustrated by the EU's Database on Self- and Co-regulation Initiatives, which includes information on 138 identified Self- and Co-regulation initiatives at the EU level alone. These initiatives have been undertaken in a variety of sectors and address issues including consumer protection, animal welfare, food safety and environmental protection.

The breadth of their use shows that co-regulation and self-regulation initiatives offer potential benefits to regulators, but they also come with potential risks. As noted by the NAO, self-regulation can lead to industry taking more ownership of regulation and using their knowledge to develop a more tailored and appropriate approach. Conversely, allowing industry to self-regulate may also lead to a loss of transparency for the public and consumers and the system may become self-serving, leading to weak and ineffective sanctions (NAO 2014 p. 16), or in some instances, the achievements of self-regulation may be little more than symbolic (█████ and █████ 2010). Co-regulation, which involves cooperation between government and business, will be subject to similar benefits and risks, although these will likely depend on how responsibilities are split between government and industry actors.

What evidence is relevant

Determining what these benefits and risks are will require a review of different types of evidence. The literature available on co-regulation or self-regulation initiatives is diverse and spans academic literature, work produced by international organisations such as the OECD, papers published by think tanks and other types of grey literature. A brief search through relevant literature finds:

- Arguments for the specific use of either self-regulation, co-regulation or other regulatory alternatives within a given sector and jurisdiction. For instance, █████ (2010) argues for the use of co-regulation to deal with online privacy issues.
- Studies that examine how self-regulation is influenced by the legal environment and the relationships between government and self-regulating industry. For example, █████ and █████ (2010) show that self-regulation helps to motivate compliance among organisations in certain environments, but alone it is not enough to achieve compliance and depends on a level of monitoring of the industry by state regulators. Similarly, █████ (2008) find that for self-regulation to remain effective, it requires a "shadow of hierarchy" in the form of the potential for governmental action if and when self-regulation fails.
- Studies that directly examine the relationship between the adoption of certain interventions and their intended outcomes. For example, Potoski and Prakash (2013) show that the adoption of ISO 14001 (a voluntary environmental programme, and therefore a form of self-regulation) contributes to an improvement in air quality but no apparent changes in water pollution.
- Studies that consider what factors contribute to the success of specific self-regulation or co-regulation initiatives. For example, █████ et al (2016) examine the use of self-regulation (accountability clubs) in the non-profit sector, and what factors impact the effectiveness of such initiatives. Similarly, █████ (2013) considers the various types of "regulatory voids" which lead to the development and adoption of self-regulation and what factors make self-regulation successful within each of these scenarios.
- Reports and publications that draw together case studies and findings on regulatory alternatives more generally, or specific types of alternatives. For instance, in 2015, the OECD reviewed industry self-regulation and its role and use in supporting consumer interests, drawing on 23 case studies in various countries.

An initial overview of the literature therefore indicates that evidence on co-regulation and self-regulation and any learnings that can be applied in terms of best practices will likely come from a range of different sources, disciplines and types of evidence.

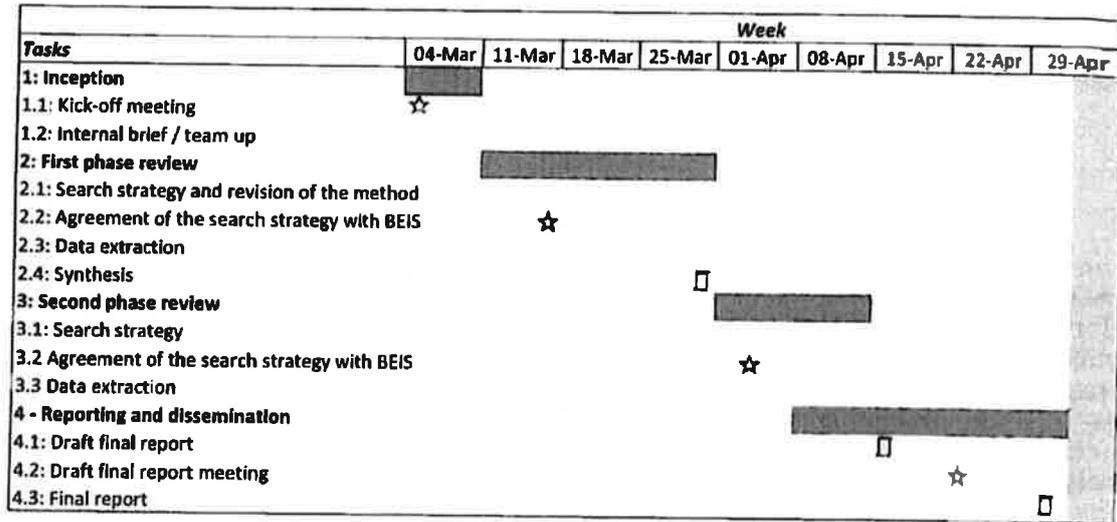
PROJ1.4 Project plan and timescales

This section presents a proposed project plan. It highlights key milestones and deadlines, including suggested meetings and progress reports.

Project plan

The timescale to deliver the work is short. The below timeline complies with the deadline of 30 April for this contract. To achieve this deadline, we have included four researchers who can work in parallel on data extraction and synthesis. We have already identified and scanned an initial list of relevant resources (see section PROJ1.1), which will ensure a quick project start. Our Expert Advisors, [REDACTED], and project Director, [REDACTED], are familiar with literature on alternatives to regulation and behavioural insights, and will ensure that our researchers will focus their efforts on relevant data sources.

Figure 1. Gantt chart



Milestones and deliverables

The following table presents the principal deadlines and milestones for this project. We propose that a representative from BEIS and the project manager interact on a bi-weekly basis to provide updates and clarify any concerns or questions that may arise.

Milestones and deliverables	Proposed date
Kick-off meeting	4 March
Agreement of the search strategy (1 st phase review)	15 March
Note on 1 st phase review	29 March
Agreement of the search strategy (2 nd phase review)	3 April
Draft final report	16 April
Draft final report teleconference	23 April
Final report	30 April

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The below table describes our approach to mitigate risks other than those related to our approach (which are covered in PROJ1.1).

Potential risk	Prob.	Impact	Mitigation
Timescales slip	Low	Medium	Our timetable is realistic and achievable. We have designed our timetable to deliver a Final Report according to a tight schedule (by 30 April). The input from our expert advisors and a quick start to the literature review will be essential to enable the research team to use resources efficiently.
The need to replace study team members for any reason	Low	Low	The study team has established procedures to replace staff if they are unable to continue involvement including: replacing staff members with a person of similar or higher experience, informing clients at the earliest opportunity, providing replacement staff profiles for review and ensuring any staff changes will not influence client costs.

Quality assurance

This contract will be run under ICF's ISO9001:2015-compliant quality management system, to a project-specific quality plan. Key elements of our approach include: developing close working relationships with BEIS; well-defined roles for project coordination and management, including quality assurance/ quality check and peer review, edit and proof read of all deliverables; and a risk register to capture and monitor all potential risks and allow for timely mitigation measures. Quality assurance in this specific assignment is supported through the following aspects of a tailored quality management system. We deploy senior and expert personnel with directly relevant experience. We have assigned senior personnel to oversee key aspects of the work programme. This will ensure that a high level of expertise is reflected in the deliverables. We appoint a member of our project management team with responsibility for quality assurance and control (the Project Director, [REDACTED]). We will seek a clear direction from the contract commencement. Quality assurance efforts begin at project initiation. We will seek clear direction on expectations, deliverables, appropriate content and format. We will document guidance received from BEIS. To ensure mutual understanding and avoid misinterpretations, we will document all key directions and guidance provided by BEIS and submit the documentation to the client for review on request. We will deploy our comprehensive project management systems. ICF has a full suite of project management systems, including electronic timesheets and weekly project cost reports. Each project is subject to a monthly risk assessment against 7 parameters, the results of which are reviewed by senior management to identify where additional support or action is needed. These systems will support the timely/accurate management of the project to the highest standard.

[REDACTED] will have ultimate responsibility for overall quality assurance / quality control for this assignment. He will have final review and oversight of all inputs/deliverables to ensure reporting quality. He has performed a similar role on many past assignments. [REDACTED] will have a complementary role in ensuring the overall rigour, robustness, objectivity and quality of the findings – providing critical challenge and advice. We understand the need for project deliverables to be clear, accessible, well written and accurate. Members of our team have many years of experience in drafting reports for BEIS and other Government departments, UK regulators, consumer bodies and a variety of other

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clients. Deliverables provided to BEIS by ICF will be reviewed and checked by our external experts, [REDACTED], and approved by [REDACTED] prior to despatch.

