

Digital Regulation Cooperation Forum

2022/23 Annual Report









Welsh translation available

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Foreword



Gill Whitehead, outgoing DRCF Chief Executive

The Digital Regulatory Cooperation Forum (DRCF) is a voluntary forum with a mission to drive greater regulatory cooperation between members and deliver coherent approaches to digital regulation for the benefit of people and businesses online

The last year has seen the pace of change across the digital landscape accelerate, as the UK develops novel legislative and regulatory proposals, the industry grapples with a shifting economic environment, and new technologies promise further disruption. Against this backdrop, the DRCF brought its member regulators together to tackle a series of complex issues. This has resulted in each regulator being able to develop a more holistic, cohesive, and informed approach to digital regulation, and deliver positive outcomes for industry and the public.

Over 2022/23 we have focussed on delivery across our projects. We have published joint statements on the intersections between online safety, competition, and data protection so that tech businesses will have a coherent regulatory landscape that gives them certainty and their customers appropriate protections. We have deepened our understanding of emerging tech - such as the metaverse, Web3 and quantum technologies – through our horizon scanning activities, so that digital regulation can be adaptable, while also being able to anticipate and address potential harms. We also secured government funding for a new project to research a potential multi-agency advice service for innovative companies. We have continued to adapt our agile approach to working together and will build on this this as we carry out our workplan for 2023/24.

I am stepping down from my role as DRCF Chief Executive as I transition over to lead Ofcom's Online Safety work. It has been a privilege to be the DRCF's inaugural Chief Executive and I am incredibly grateful to the many colleagues I have worked with over the last 18 months. I particularly want to thank Bethan Watts for stepping up as interim CEO for the last few months while my successor Kate Jones was appointed, and I look forward to working with her and continuing to support the DRCF's work from my new seat. I am confident that the insights the DRCF brings to digital regulation will continue to drive better outcomes for all those impacted by digital technology.

Gill Whitehead

DRCF 2022/23 highlights

The DRCF has worked together to deliver regulatory coherence, collaboration, and capability on a range of digital issues

Last year the DRCF set out an ambitious programme of work to tackle a wide range of complex digital issues. Collectively the DRCF has:

- examined the intersections between regulatory regimes;
- shared best practice on issues including algorithmic processing and enabling innovation;
- contributed thought leadership on the implications of emerging technologies such as the metaverse, Web3 and quantum technologies;
- built networks of expertise on digital issues across its member regulators.

This work has meant that each regulator has a more holistic view of the digital landscape and can be more effective in their individual responsibilities, to the benefit of people and businesses.

Our year in highlights 2022/23





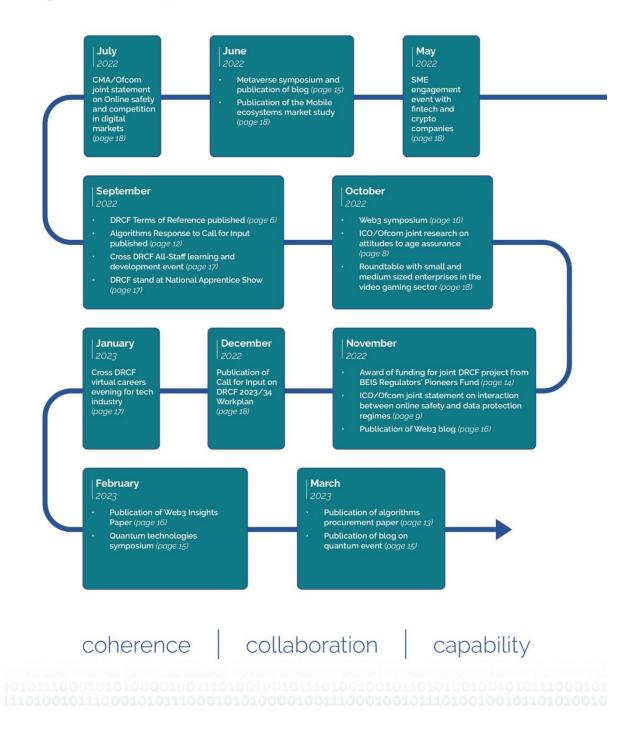


responses to DRCF call for input

131 Presearch reports on the DRCF research portal



Key DRCF outputs across year 2022/23



1. Introduction to the DRCF

The DRCF brings UK regulators together to deliver a coherent approach on digital regulation for the benefit of people and businesses online

- 1.1 The DRCF currently consists of four UK regulators tasked with applying regulation to digital market issues. The members are:
 - the Competition and Markets Authority (CMA)
 - the Financial Conduct Authority (FCA)
 - the Information Commissioners Office (ICO)
 - the Office of Communications (Ofcom)
- 1.2 Last year the DRCF published Terms of Reference, which set out that member regulator CEOs will agree and publish two key documents. First, a workplan setting out the areas of work for the next financial year, and second, an annual report which provides an account of progress and achievements over the previous year.¹ This is the second Annual Report for the year 2022/23, which is published alongside the 2023/24 Workplan.
- 1.3 As stated in the Terms of Reference, the DRCF is a voluntary cooperation forum that facilitates engagement between regulators on digital policy areas of mutual interest. It is not a statutory or incorporated entity and does not provide formal advice or direction to member regulators, who remain individually accountable for the delivery of their functions.

¹ <u>DRCF: Terms of reference - GOV.UK (www.gov.uk)</u>, DRCF 5 September 2022

2. Delivering our priorities

The DRCF has worked to promote coherence, collaboration and capability building across its members and their remits

- 2.1 The DRCF's 2022/23 Workplan set out the member regulators' commitments and goals for the year ahead.² The aim for the year was to focus on the DRCF's delivery so that industry and the public could see tangible outputs as a result of this collaboration.
- 2.2 We were successful in achieving this. The DRCF's coherence projects built a body of work that prepares the member regulators to develop a cohesive approach from the outset of new legislative and regulatory regimes; our collaborative work fostered best practice and our capability work developed joined up approaches in horizon scanning, recruitment, and skills development.
- 2.3 This report outlines how the DRCF's work promoted the three overarching goals set out in our Terms of Reference and 2022/23 Workplan:
 - Coherence between regimes
 - Collaboration on projects
 - Capability building across regulators

Coherence

The DRCF has focussed on promoting coherence where regimes intersect, both under existing regulation and in preparation for potential new or upcoming legislation

2.4 Last year, our coherence work prioritised laying the groundwork for the implementation of the proposed online safety regime through joint work between Ofcom and the other DRCF members. This included protecting children online and the intersection between online safety and competition. It also built on previous bilateral work between the ICO and CMA to promote competition and privacy in online advertising.³

Protecting Children Online (ICO/Ofcom)

2.5 Both the ICO and Ofcom have specific duties for the protection of children online; under the Online Safety Bill (OSB) Ofcom will take on further responsibilities in this area. Through the DRCF, the two regulators have been working together to develop an aligned approach to protecting children online, with the aim of improving outcomes for children, parents, and carers.

² DRCF Workplan 2022/23 GOV.UK DRCF 28 April 2022

³ <u>CMA ICO Joint Statement GOV.UK</u> CMA/ICO 19 May 2021

- 2.6 Over the last year, ICO and Ofcom continued to closely collaborate on the supervision and delivery of services under the Children's Code and the video-sharing platform (VSP) regime respectively.⁴ The regulators published joint research on parental and children's attitudes to age assurance technology across different online contexts. ⁵ This research informed the regulators' understanding of privacy and trust as they relate to users' engagement with age assurance tools and will continue to assist as the DRCF members develop a coordinated approach to these regulatory technologies.
- 2.7 The scope of Ofcom and the ICO's work together expanded beyond protecting children online, with the publication of a joint statement addressing the broad interactions between online safety and privacy (See **Box A**).⁶ This work will continue into 2023/24, as set out in the accompanying workplan.

⁴ ICO Age Appropriate Design Code

⁴ Ofcom video sharing platforms regulation

⁵ <u>Age Assurance research GOV.UK</u> 11 October 2022

⁶ Ofcom ICO Joint Statement GOV.UK 25 November 2022

Box A: ICO and Ofcom joint statement on data protection and online safety

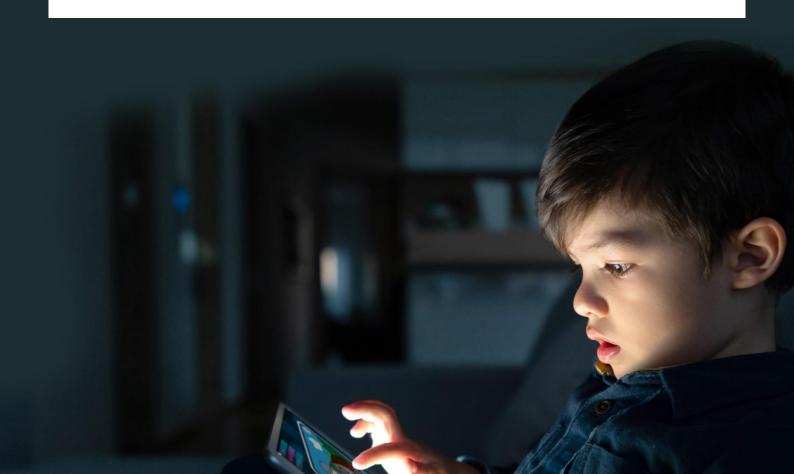
In November 2022, the ICO and Ofcom published a joint statement on how they plan to maximise coherence between the data protection and proposed online safety regimes and work together to promote their compliance.

The joint statement sets out a shared vision between the two regulators, which is intended to act as a north star for both regulators under their respective regimes. This is that:

- users of online services will have confidence that their safety and privacy will be upheld, and that the regulators will take prompt and effective action when providers fail in their obligations, and that
- providers of online services of all sizes will comply with their obligations and continue to innovate and grow, supported by regulatory clarity and free from undue burdens.

The statement makes clear that organisations should design their online services with both privacy and safety in mind. It acts as a statement of intent for how the two organisations will work together to support this cohesive approach, as legislation develops. This will include Ofcom consulting the ICO in its preparation of Codes of Practice and guidance for the proposed online safety regime, and the ICO preparing guidance, with Ofcom's close involvement, on data protection expectations for online services deploying safety technologies such as age assurance and automated content moderation.

The process of producing the Joint Statement has ensured there are now deep working relationships across the relevant teams in Ofcom and the ICO, and that these teams have a more holistic understanding of the objectives and duties of both regulators. These relationships will only become more important in the operationalising and smooth running of the respective regulatory regimes.



Promoting competition and privacy in online advertising

- 2.8 While online advertising has driven the growth of many internet services, the technologies that are used for targeted online advertising (subject to their implementation) can create risks, both to users' privacy and data protection rights, and to effective competition.
- 2.9 Building on the joint statement they published in 2021, the CMA and ICO cooperated closely throughout 2022/23 on issues in the online advertising ecosystem. Through their DRCF relationship, they have been combining expertise and insights to support supervisory and investigation activities in this ecosystem. A central focus was close dialogue on two real world cases that will impact millions in the UK using online services:
 - the ICO and CMA cooperated on the ongoing oversight and reporting taking place under the Google's Privacy Sandbox commitments,⁷ and
 - the ICO and CMA undertook joint engagement on Apple's App tracking Transparency and intelligent tracking prevention initiatives through the CMA's Mobile Ecosystems Market Study.⁸

Intersection of online safety and competition

2.10 In July 2022, Ofcom and the CMA published a joint statement on online safety and competition.⁹ It highlighted both opportunities and potential tensions created by the intersection of the online safety and competition objectives and set out how the CMA and Ofcom expect to work together to provide a



Figure 1: Ofcom and the CMA event on online safety and competition

cohesive regulatory approach across the new regimes.

- 2.11 The statement outlined areas for potential joint working, while noting that this collaboration will depend on the nature of the interactions and the ultimate shape of the new legislation. These areas included: working together to realise synergies between the two regimes, coordinating where interventions in one policy area can have negative implications for the other, and sharing expertise to inform specific regulatory assessments.
- 2.12 The statement was supported by a joint event in Manchester in September 2022, attended by around 100 people from across the regulators, industry, and academia. Ofcom and the CMA will continue to work together where competition interventions have implications for online safety and vice versa.

⁷ Investigation into Google's 'Privacy Sandbox' browser changes - GOV.UK (www.gov.uk)

⁸ Mobile ecosystems market study - GOV.UK (www.gov.uk)

⁹ <u>CMA Ofcom Joint Statement GOV.UK</u> 14 July 2022

Further coherence priorities

- 2.13 Ofcom and the FCA continued their programme of joint work on online fraud and scams in the context of the OSB. This has focused on the FCA sharing expertise on illegal online financial promotions with Ofcom as it prepares to take on new responsibilities when the regime comes into force, for example, through a programme of workshops to facilitate input to various regulatory products which Ofcom will produce after the OSB receives Royal Assent.
- 2.14 The DRCF member regulators continued to deepen their understanding of end-to-end encryption (E2EE), publishing a summary of their January 2022 stakeholder roundtable.¹⁰ Held by the FCA, ICO and Ofcom, this roundtable explored the benefits and risks of E2EE for online services, their users, and its implications for digital regulation. Informed by this discussion, the project developed shared working definitions of E2EE taking account of the existing ways it is defined by stakeholders.
- 2.15 To support the coherence work, DRCF members also explored how a wider set of relevant regulatory regimes covering digital services could inform future cooperation. This included an internal digital regulatory landscape mapping exercise during 2022.

Collaboration

The DRCF's collaboration work focussed on sharing and promoting best practice in areas of common interest across members.

2.16 Algorithmic processing and enabling innovation in industry were the priority areas of collaboration in 2022/23. Both these projects brought together experts from all four of the DRCF members to share best practice and identify and tackle common challenges. This work will continue into 2023/24, as set out in our accompanying workplan.

Algorithmic processing

- 2.17 The use of algorithms underpins many current and emerging digital services. Understanding how to support the use of algorithmic processing in a way that promotes their benefits and mitigates their risks is a common aim for all DRCF members.
- 2.18 This project carried out activities that built on the findings of the DRCF's papers on algorithmic processing and algorithmic auditing landscape which were published early in 2022.¹¹ This included deep dives into issues around auditing and procurement, with the aim of fostering best practice across the algorithm ecosystem (see **Box B** for more details). The team also:

¹⁰ <u>DRCF End-to-End-Encryption roundtable summary GOV.UK</u> 28 July 2022

¹¹ DRCF Findings from Algorithmic processing GOV.UK 28 April 2022

- co-hosted a roundtable event at the GovTech conference at the Hague, bringing together international regulators, academics, and industry to discuss approaches to Artificial Intelligence regulation.
- published findings from their Call for Input on potential harms and benefits of algorithmic processing and the algorithmic auditing landscape, with more than 30 stakeholders providing responses.¹²
- In addition to the work set out in last year's work plan, all DRCF members have been engaging with government as it develops its approach to AI regulation.

¹² <u>DRCF Response to Algorithms Call For Input GOV.UK</u> 23 September 2022

Box B: Fostering best practice in algorithmic processing

This project published two papers in April 2022 which highlighted the key harms and benefits of algorithmic processing and the current landscape of <u>algorithmic auditing</u>. Over the last year, the team has carried out more detailed work to understand some of the systems risks identified in these papers. This work specifically explored issues around auditing and procurement with the aim of fostering best practice across the algorithms ecosystem.

Building on gaps identified by the harms and benefits paper, the team held a series of cross-regulator workshops to build internal understanding of algorithmic auditing. Attended by specialists from across a mix of teams (including economists, policy, and technology experts) the workshops explored the types of skills and resources required to undertake such assessments, and which auditing methods are effective in different contexts. These workshops enabled the regulators' teams to share experiences and learn from each other in a safe and candid forum. In addition to bolstering internal capabilities, the team also produced desk research into the market for third party auditing, to consider how the regulators can support the development and quality of the third-party audit market.

The harms and benefits paper also identified that businesses who are procuring and/or using algorithms often know little about their origins and limitations. The team therefore scoped further work on the transparency of the procurement process, resulting in a published paper in March 2023 examining how to improve <u>transparency for buyers of algorithmic systems</u>, so they have a better understanding of what they are purchasing and the potential strengths and limitations of these systems.

The algorithms project is now a key collaborative function for the DRCF – it has established strong working relationships among technology experts from within each of the member regulators, identified common challenges and shared best practice. As a result, each regulator benefits from a more holistic sense of the challenges posed by algorithmic processing and the work needed to address them.

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Enabling innovation in industry

- 2.19 The fast-paced nature of digital services means it is important for DRCF member regulators to consider how to support responsible innovation whilst also delivering on their respective policy objectives. We established a dedicated project to share insights on how to support responsible and compliant innovation in digital markets.
- 2.20 Our aim was to identify opportunities to work together to support innovators. The starting point was to map the existing offer to innovators, identifying the capabilities, approaches, and duties of each DRCF member, including the existing services provided by the ICO and FCA and the successful collaboration that already exists between them. This work informed our understanding of where the DRCF member regulators could increase their impact and inform each other's innovation offerings. The DRCF also engaged directly with industry, such as the fintech and videogaming sectors, to hear directly about the regulatory challenges faced by innovative businesses.
- 2.21 These insights informed DRCF efforts to explore a multi-agency advisory service aimed at digital innovators. In November 2022, the then BEIS department announced that the DRCF was successful in a bid for funding from the government's Regulators' Pioneer Fund to research and pilot such a service.¹³ More detail on this work is outlined in the accompanying 2023/24 Workplan.¹⁴

Capabilities

The DRCF's capability work saw members learning from each other and building expertise in horizon scanning and how they approach recruitment, learning and development.

- 2.22 Our key priorities in this area were:
 - a) to join up on horizon scanning emerging technologies;
 - b) to cooperate in relation to how DRCF members develop the skills and capabilities needed for digital regulation; and
 - c) establish knowledge sharing networks on best practices and expertise on regulatory issues.

¹³ The Regulators Pioneer Fund, launched by the then Department for Business, Energy and Industrial Strategy (BEIS) enables UK regulators and local authorities to bid for funding for projects that help create a UK regulatory environment that unleashes innovation and makes the UK the best place to start and grow a business. <u>https://www.gov.uk/government/publications/projects-selected-for-the-regulators-pioneer-fund/projects-selected-for-the-regulators-pioneer-fund-2022</u>.

¹⁴ The service will be designed around the views, needs and working practices of innovators across the digital economy. Success will be measured by the accessibility of the pilot service and the impact of our advice on the businesses who use it. By August 2023, the project will deliver a report to the DRCF on whether and how to introduce a multi-agency advice service for innovators.

Horizon scanning for emerging technology

- 2.23 The DRCF's joint horizon scanning work analyses the cross-regulatory implications of specific emerging technologies. This innovative work enables DRCF members to share knowledge, identify future challenges and potential solutions together and ahead of time.
- The focus for the programme in 2022/23 was to convene events on specific topics with 2.24
 - invited experts, followed by publishing blogs and insights papers to share learnings. The team held symposiums on the metaverse in May 2022, on Web3 in October 2022, and on quantum technologies in February 2023.
- 2.25 These events brought together academia, industry, government, and regulators to discuss the development, risks and opportunities of these



Figure 2: DRCF horizon scanning team at Web3 Symposium

technologies and their potential

regulatory implications. After each of these events the DRCF published a joint blog setting out members' reflections on the topic and next steps for continued engagement on these issues, in order to share insights and stimulate discussion amongst a wider group of stakeholders.¹⁵ The Web3 symposium was followed by the publication of a joint insights paper in February (see Box C).¹⁶ The DRCF worked on these events with partners including Digital Catapult, the National Quantum Computing Centre, UCL and Imperial College London to ensure the discussion benefited from industry and academic expertise.

- 2.26 The project also showcased its work externally, including to leaders of government-wide emerging technology units at the Government Office for Science's (GO-Science) EmTech Community of Interest event and through stakeholder events on the findings of its Web3 insight paper.
- 2.27 In addition to external activities, the team held a series of best practice sessions for each of the regulators to share their respective approaches to horizon scanning, including methodologies, information sources, and ways of working. This has helped to develop a more co-ordinated and consistent approach to horizon scanning across the regulators.

¹⁵ <u>DRCF Web3 blog GOV.UK</u> 10 November 2022

DRCF Quantum blog GOV.UK 6 April 2023

¹⁶ DRCF Insight Paper on Web3 GOV.UK 3 February 2023

Box C: Horizon scanning on Web 3

In February 2023, the Horizon Scanning programme published an '<u>Insight Paper</u>' providing a joint regulatory perspective on Web3. This was the team's first publication and is a pioneering example of regulators working together to understand emerging technologies.

The team convened over 200 representatives from academia, industry, government and regulators at the DRCF Web3 Symposium in October 2022, held partnership with the <u>UCL Centre for Blockchain</u> <u>Technologies</u>, and with contributions from the <u>Imperial College London Centre for Financial</u> <u>Technology</u> and <u>Digital Catapult</u>. Key themes from the event, which included discussions on how the Web3 ecosystem is evolving as well as the regulatory opportunities and challenges facing both firms and public authorities, were <u>published in a blog</u>.

The DRCF <u>published an Insight Paper</u> following the event. The process of producing this paper exemplifies how the DRCF develops collaborative working relationships across its members. Ofcom, ICO, FCA and CMA worked closely and iteratively to develop, challenge, and refine their shared positions within this contested topic, and seek internal input from a wide range of specialist teams.

The final paper presented the DRCF's joint perspective on the possible benefits of the concepts and technologies associated with Web3 as well as the existing and potential consumer harms and wider societal risks. It also explored the regulatory considerations across the DRCF member remits that may be relevant to applications associated with Web3.

The horizon scanning team has subsequently engaged with relevant colleagues across the four regulators to ensure that the key findings are fed back within their respective organisations, as well as with industry, government, academia, and other regulators. By working together, DRCF members were able to harness their expertise and provide a cohesive and thoughtful stimulus to the wider stakeholder community on this topic.

The publication of the Web3 insight paper is illustrative of the Horizon Scanning programme's more proactive approach to emerging technologies, with the aim being to understand potential harms and opportunities before they mature. The programme also demonstrates the development of a new 'cross-regulatory' lens to analyse and understand the impact of emerging technologies.

Skills and Capabilities

- 2.28 The DRCF provides a forum for members to build capability and communicate with the talent market in an efficient way, supporting each of the regulators' individual transformation programmes.
- 2.29 DRCF members collaborated on a series of pilot projects across recruitment and learning and development. This included:
 - hosting a joint careers event attended by over 130 people in January 23 to highlight the wide range of jobs on offer across the DRCF regulators, including data engineers, technology advisers, analysts, and policymaking;
 - conducting outreach at the National Apprentice Show in October 22, introducing early careers candidates into the range of career paths on offer in digital regulation;
 - appointing the DRCF's first graduate onto a rotating graduate scheme. The graduate will complete a series of six-month rotations across relevant DRCF member regulators; and
 - holding a learning event for the staff of all member regulators, which covered upcoming expected legislative reform, how each regulator works as well as the opportunities of collaboration.

Knowledge sharing networks

- 2.30 To further develop knowledge and expertise on digital issues, the DRCF established three knowledge sharing networks on specific topics across the members. These brought together experts across the DRCF members on shared policy areas to drive sustained information sharing and collaboration.
- 2.31 Three networks were established in 2022/23, sharing knowledge on regulatory and supervisory technology, online choice architecture, and privacy enhancing technologies. The DRCF also supported effective and appropriate knowledge sharing on the wider regulatory landscape for cloud services to support Ofcom's cloud market study.¹⁷ In addition to linking experts across the regulators, the knowledge sharing networks have contributed to the pipeline of DRCF's future work, identifying opportunities for more formal collaborations as part of the next workplan.

Developing the DRCF

The DRCF has strengthened its governance and transparency

2.32 The DRCF is an innovative model of regulatory coordination that is continuing to evolve. We operate on a 'hub and spoke' model –with a small, centralised 'core team' led by a dedicated DRCF Chief Executive, working closely with project teams who are embedded within the

¹⁷ <u>Call for inputs: Cloud services market study OFCOM 6 October 2022</u>

regulators. Each of the regulator CEOs meet quarterly to agree and set the strategic direction of the DRCF.

- 2.33 Over 2022/23 the DRCF worked to strengthen its governance and transparency mechanisms. These efforts included:
 - publishing a Terms of Reference, setting out in more detail the DRCF's purpose, remit, and core objectives;
 - publishing a Call for Input on the 2023/24 Workplan that asked external stakeholders for their views on the DRCF's priorities and to identify opportunities for greater increased/continued cooperation;
 - developing and launching a dedicated DRCF website that brings together in one place details of what the DRCF is, information about events and publications as well as providing a future home for the DRCF research portal; and
 - increasing the volume of external DRCF publications, from joint statements to blogs sharing insights from the DRCF's events and activities.^{18 19}

The DRCF invested in relationships with stakeholders from across industry, government, Parliament, other regulators, and international groups.

2.34 The DRCF engages widely in order to share its insights and learn from others. We invested time in building relationships with a wide network of stakeholders:



Digital sector engagement: The 2022/23 workplan set out the DRCF's ambition to engage with small and medium enterprises (SMEs), to increase awareness of regulatory issues among this group. This work included targeted events with fintech and gaming companies in Manchester and Edinburgh, as well as

engaging with both large and small companies through industry groups such as Coadec and TechUK. We also met with consumer groups and charities including the NSPCC, the Carnegie Trust, Which?, and the 5Rights Foundation to raise awareness of the DRCF model and understand their views on how regulators could be working in a holistic way to serve consumers. The DRCF projects sourced industry input throughout their working including the joint statements, horizon scanning events, papers on algorithmic processing and how regulators can support the work of innovators.



Government and parliament engagement: The DRCF met with a range of parliamentary stakeholders including updating the Chairs of the House of Lords Digital and Technology Committee and the BEIS Select Committee on its work

¹⁸ <u>DRCF Terms of Reference GOV.UK 5</u> September 2022

¹⁹ DRCF Workplan 2023 to 2024 Call for Input GOV.UK 7 December 2022

(following their references to the DRCF in Committee reports) and hosting an event with the all-party Parliamentary Internet, Communications and Technology Forum (PICTFOR). We continue to engage with digital regulation teams within government.



Regulatory engagement: The need to build knowledge and capability in digital regulatory issues is broader than just the DRCF membership, and so it is important to also share lessons with and learn from other regulators. The DRCF led a guarterly Regulator Roundtable to share insights on how different

regulators are approaching digital issues – with topics discussed in 2022 including the metaverse and approaches to deploying data science expertise. The number of regulators represented at the Regulator Roundtable in 2022/23 increased to ten.²⁰ Across the year, we also met bilaterally with other regulators including Ofgem and the Office for Statistics Regulation and continued regular bimonthly engagement with the UK Regulators Network to discuss respective priorities and synergies.



International engagement: As other jurisdictions around the world are considering their approaches to digital policy, the DRCF engaged extensively with international authorities. This included meeting with other regulatory authorities in Ireland, Mexico, the US, Australia, Canada, the Netherlands and

others, to share best practice approaches to regulatory cooperation. We shared insights with other territories establishing similar collaboration mechanisms to the DRCF, such as the Samenwerkingsplatform Digitale Toezichthouders (SDT) in the Netherlands, the Digital Regulators Group (DRG) in Ireland and the Digital Platform Regulators Forum (DPRF) in Australia.

²⁰ Attendees of the Regulator Roundtable are: the Advertising Standards Authority, Bank of England, British Board of Film Classification, Care Quality Commission, Electoral Commission, Equalities and Human Rights Commission, Gambling Commission, Intellectual Property Office, Medical and Healthcare Products Regulatory Agency and Payment Systems Regulator.