

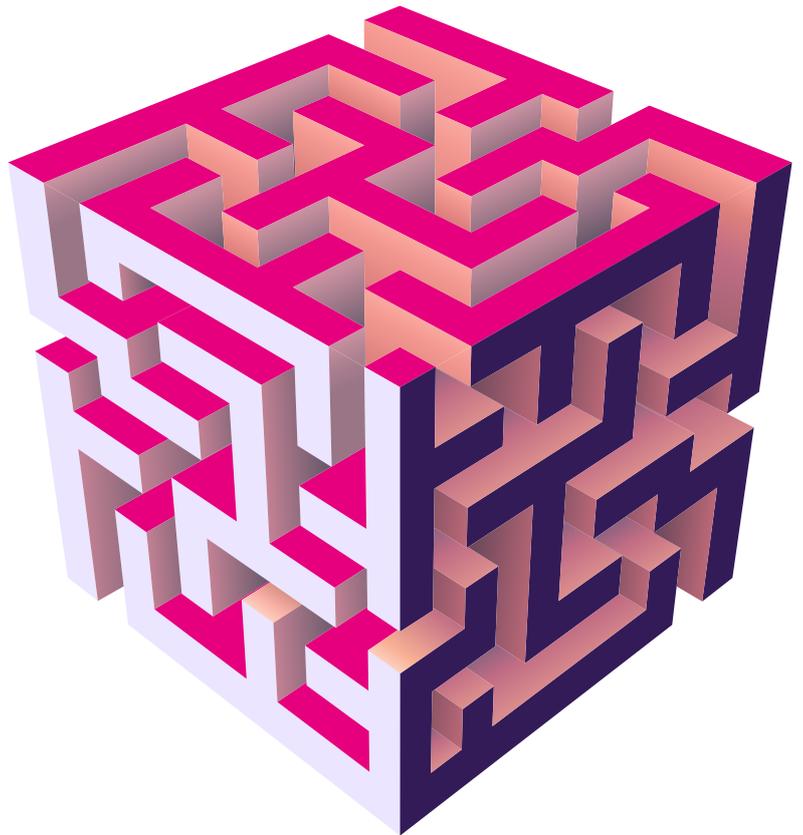
# Regulatory update

November 2019

Welcome to the November edition of our monthly Regulatory Update, which aims to pull together key developments from the past month across the various UK regulators – and help you to navigate the regulatory maze.

From the ASA's use of avatars in the bid to tackle irresponsible advertising to a huge jump in allergy-related food recalls and major new environmental changes announced through the Queen's speech, last month was a busy one for the UK regulators. Click on the sections below to read more about the regulatory developments over the past month.

I hope you enjoy reading this latest update. Please do not hesitate to contact me, or your normal RPC contact, if you would like to discuss any of the topics highlighted or have any suggestions for areas you would like to see in future updates.



A handwritten signature in black ink, appearing to read 'Gavin Reese'. The signature is fluid and cursive, with a long, sweeping tail on the 'e'.

**Gavin Reese**  
Partner, Head of Regulatory

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## WHITE COLLAR CRIME

by Sam Tate

### Serious Fraud Office issues Corporate Co-operation Guidance

The Serious Fraud Office (SFO) has published revised Corporate Co-operation Guidance to assist in assessing co-operation from organisations. Co-operation is a relevant consideration in the SFO's charging decisions, as outlined in the Deferred Prosecution Agreements Code of Practice and the Guidance on Corporate Prosecutions.

As seen by the SFO, co-operation involves providing assistance to the SFO and includes: identifying suspected wrong-doing or criminal conduct, reporting this to the SFO and promptly providing evidence. It advances the interests of justice by

allowing the SFO to understand the facts, obtain admissible evidence and progress investigations. Most controversially, the SFO places considerable weight on the waiver of privilege.

The Corporate Co-Operation Guidance provides advice on preserving and providing material including hard-copy or physical evidence, digital evidence and devices, financial records and analysis, and industry and background information.

Click [here](#) to access the Guidance.

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### Office of Financial Sanctions Implementation publishes its annual review

Office of Financial Sanctions Implementation (OFSI) has published its annual review for the period April 2018 to March 2019, outlining its use of funding, establishment of new teams and governance board, and preparations for Brexit.

Last year OFSI was granted increased funding, allowing it to establish two new teams to cover growing priority areas: managing legal risk and improving the effectiveness of financial sanctions. In 2018 OFSI also established a governance board to serve in an advisory capacity.

The report outlines OFSI's efforts to tackle non-compliance with financial sanctions. This year OFSI imposed its first monetary

penalties for breaches of financial sanctions, demonstrating its willingness to take proportionate action in every instance of breach. Even as this Update went to press, OFSI issued a further penalty of £146,341 for breach of sanctions relating to Syria, reduced from £300,000 after ministerial review.

Brexit remains a key focus, with OFSI developing statutory and non-statutory guidance to assist industry in making preparations.

To read more, and to access the full report, click [here](#).

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### Serious Fraud Office provides update on case progression

The SFO has released a review of its case progression systems and processes between case acceptance and charge. Six cases were selected at random and inspected, looking at various aspects of SFO business and procedure.

Although the SFO has clear internal casework processes, the inspection found some inconsistency in application. Individual case managers often operate in their preferred way, which can hinder efficiency of case progression. The inspection concluded that the SFO could do more to improve its assurance processes.

Although cases are accepted in a timely matter, delays often occur. The SFO has taken steps to address concerns regarding the backlog of digital material, however is inevitably faced with resourcing issues. A strategic approach to resourcing and case management has been recommended to mitigate this.

To read the full review, click [here](#).

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## TAX

by Adam Craggs

### Tax report to G20 finance ministers released

The Organisation for Economic Co-Operation and Development (OECD) secretary-general has published his tax report to G20 finance ministers. The report outlines the latest proposal for taxation of multinational enterprises and provides an update on tax transparency.

Part 1 of the report covers a proposal for a unified approach to an international solution to the challenges of the digital economy. Part 2 considers tax transparency challenges arising from new technologies. The OECD is currently developing a standardised reporting and exchange framework for participating jurisdictions.

Seven jurisdictions have been identified as failing to comply with tax transparency standards: Brunei, Darussalam, Dominica, Montserrat, Niue, Sint Maarten, Trinidad and Tobago and Vanuatu.

For more information, and to access the report, click [here](#).

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### Working through an intermediary IR35

HMRC has updated existing guidance and published new guidance to assist taxpayers prepare for the off-payroll working changes which will come into force in April 2020.

To access the updated guidance and new guides, click [here](#).

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### Updated HMRC guidance on registering a non-resident company for corporation tax

HMRC has updated its guidance on the corporation tax registration of non-resident companies who have sold, gifted or transferred interests in UK land or property. The aim of the update is to provide non-resident companies and their agents with clear information on what to report

To access the updated guidance, click [here](#).

for the new corporation tax rules and outline key areas including who should register, when to register, relevant requirements, how to register, and post-registration activity.

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## HEALTH, SAFETY AND ENVIRONMENTAL

by Gavin Reese

### Queen's Speech 2019: Environmental protection a key priority

The Queen's speech has set the tone for environmental policy moving forward, with the announcement of a landmark Environment Bill. For the first time, environmental policies will be enshrined in law, with air quality and plastic pollution key priorities.

The government has indicated that a new plastic tax will be enforced, introducing charges for specified single-use plastic items. This comes following the success of the government's 5p charge on single-use carrier bags back in 2015, which reduced single-use bag sales by 90%.

The government plans to fight air pollution by setting a legally-binding target to reduce fine particulate matter, PM2.5, and by increasing local powers to address sources of air pollution.

A new independent Office for Environmental Protection will be established to investigate complaints and take enforcement action against public authorities.

Boris Johnson's new plan also pledges to tackle waste crime and introduce a deposit return scheme for bottles and glass.

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### Display screen equipment safety guidance issued to employers

The Health and Safety Executive (HSE) has issued advice to employers whose workers use display screen equipment (DSE), such as laptops, computers, smartphones and tablets. The Health and Safety (Display Screen Information) Regulations set out what employers need to do to protect their employees from any risks associated with the use of DSE.

The Regulations apply to employers whose workers use DSE daily, for an hour or more at a time. This includes employees who hot-desk or work from home, in addition to those who work at a fixed workstation.

In order to comply, employers must conduct a DSE workstation assessment, provide training and information for workers, provide an eye test if requested, and ensure workers take regular breaks from DSE work.

To read more about the regulations, click [here](#).

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### Government responds to climate change recommendations

The government has set out its plans to tackle climate change, in response to recommendations from the Committee on Climate Change (CCC). Key objectives include accelerating the decarbonisation of transport and improving the energy performance of rented commercial buildings.

There are also plans to strengthen governance to galvanise the government to do more to tackle climate change. The government's response comes four months after the UK became the first major economy to legislate for net zero emissions by 2050.

The new Environment Bill was introduced in Parliament this month, outlining ambitious proposals to strengthen the UK's environmental protections, including the establishment of the Office for Environmental Protection.

Click [here](#) to read more about the Government's objectives.

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## PRODUCT REGULATION

by Gavin Reese

### UK allergy-related food recalls jump 20% in a year to 5-year high

As concerns rise over the dangers of poorly labelled foods, food recalls relating to allergens have jumped 20% in the past year – with over 122 food products withdrawn from the market in 2018/19, compared to 102 in 2017/18.

Allergen recalls occur when a food product is found to contain undeclared traces of allergens, which could prove harmful, even fatal to some people. The rise in recalls related to food allergies following EU legislation that came into effect in December 2014, requiring all food labels in shops to display information on 14 different allergen types.

Natasha's Law, named after the teenager who died after eating a baguette from a sandwich chain that contained undeclared sesame, will require all businesses that sell food to print a full list of ingredients on pre-packaged food from October 2021. This may lead to further allergen related issues if mislabelled products find their way into fast food and casual dining chains. Government guidance to businesses about how to manage this requirement is expected imminently.

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### Medical device alerts hit four-year high

The number of alerts issued by the Medicine and Healthcare products Regulatory Agency (MHRA) has hit a four-year high of 35 in the past year\*, up from 32 last year and more than double the 17 alerts issued three years ago.

A number of alerts issued by the MHRA in 2018/19 involved a full product recall or an instruction to destroy remaining products. Furthermore, the Medical Devices Regulation 2017 that will fully apply in 2020 will toughen the requirements on medical device manufacturers to self-report when problems with devices are discovered.

The latest information from the MHRA suggests that medical device manufacturers are taking a low-risk approach, and are increasingly engaging with the MHRA where issues may exist with a product.

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## COMPETITION

by Lambros Kilaniotis

### The tale of large cartel fines, director disqualifications and a sole criminal conviction

This month the Competition and Markets Authority [announced](#) the latest, and potentially final, development in a long-running series of investigations into an illegal cartel relating to concrete drainage products for the construction industry when it fined three construction firms over £36 million.

The cartel itself had lasted nearly seven years and had involved price-fixing, customer sharing and the regular exchange of competitively sensitive information. Senior executives had participated in cartel meetings.

A criminal investigation commenced back in February 2013. This resulted in one individual being prosecuted and, following his guilty plea in March 2016, subsequently receiving a suspended two year prison sentence and a six month curfew order, as well as being disqualified from acting as a director for seven years. Due to a lack of evidence, no-one else was prosecuted.

In April 2016, the CMA then launched its civil investigation into the construction firms. Earlier this year, two other individuals were disqualified from acting as directors. This investigation has now culminated in all three companies now being fined. Two of the firms received reduced fines as a result of entering into a 'settlement' with the CMA where they admitted that they had infringed competition law and agreed to a streamlined administrative process. One of these firms had also received a further fine reduction as an applicant under the CMA's leniency policy.

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### The European Commission employs rarely used enforcement powers

This month the European Commission [announced](#) its decision to impose interim measures on Broadcom, the world's leading supplier of chipsets for TV set-top boxes and modems, whilst it continues its in-depth competition investigation into the company. It is the first time in eighteen years that such action has been taken.

The European Commission is currently investigating whether Broadcom has abused a dominant position in various markets through practices including exclusive or quasi-exclusive purchasing obligations or commercial advantages for such purchases, and the tying or bundling of products. The interim measures require Broadcom to refrain from applying the anti-competitive contractual provisions identified.

Interim measures can only be imposed where there is a prima facie finding of an infringement and there is a "risk of serious and irreparable damage to competition" so as to warrant urgent

intervention. Usually, any enforcement action is taken once an investigation has completed and there is a formal infringement finding. However, this can take a number of years.

The European Commission was concerned that, if Broadcom's current contractual arrangements were allowed to continue unchecked, competitors would not be able to compete on equal terms for the numerous tenders being launched by the telecom and cable providers "in the coming years" and that this could have a "fatal effect" on their viability and, thus, ultimately lead to higher prices, reduced choice and less innovation.

The European Commission has made clear that it is not afraid to be pro-active and use this 'important tool' where necessary, so there may not be as long a wait until interim measures are employed again.

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## The CMA takes tougher stance over information requests in merger investigations

The CMA has recently issued a [penalty](#) of £20,000 on Sabre Corporation (“Sabre”) for failing ‘without reasonable excuse’ to comply with two compulsory information notices which it had issued under s109 Enterprise Act 2002 (“s109 Notices”) as part of its investigation into Sabre’s acquisition of Farelogix, Inc.

This is the third penalty this year for failure to comply with S109 Notices and demonstrates the CMA’s stricter approach to compliance in merger investigations, a growing trend amongst competition authorities generally. Requests for information and documents are a ‘key tool’ for the CMA to collect the information it requires in order to carry out its merger investigations and reach evidence-based decisions within its statutory timetable.

Sabre had failed to comply with the two S109 Notices by submitting a substantial number of responsive documents about two months after the statutory deadline. These documents had

previously been withheld or redacted as a result of incorrectly being designated as being legally privileged. Parallel US merger proceedings had been taking place. Sabre had relied on the search methodologies for these US proceedings in responding to the Notices and had not put in place a quality control process to ensure compliance with the requirements of the s109 Notices.

It is always advisable to check carefully whether any information request received from the CMA is voluntary in nature or is a S109 Notice and is, thus, compulsory. If the request is voluntary, it should be borne in mind that the CMA can decide to issue a S109 Notice in the absence of a response. Irrespective of the nature of the request, any information provided must be accurate and must not be misleading.

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## ADVERTISING AND MARKETING

by Oliver Bray

### ASA uses child avatars to tackle irresponsible ads targeted at children

The ASA is proactively using avatars (which mimic child-like behaviour) to identify when age-restricted ads (gambling, alcohol, food high in fat, salt and sugar (HFSS) etc) are being irresponsibly targeted at children. The introduction of this new technology has already had an impact on ad monitoring and enforcement.

Retailers of products which are subject to advertising age restrictions (gambling, alcohol, HFSS etc) must make sure that their business or any company which their business uses to place their ads takes sufficient measures to keep ads which promote

these products from being directed at children. This is the case even if the ad is not offensive and is therefore unlikely to attract a complaint – the introduction of avatars means that no wrongly placed ad is safe from the watching eyes of the ASA’s avatar operators!

To find out more, click [here](#).

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## INSURANCE AND FINANCIAL SERVICES

by Matthew Griffith

### Financial Conduct Authority releases unit-linked funds governance review

Following its previous concerns about weak price competition in the sector, the FCA has recently completed an additional review of governance standards for unit-linked funds, the dominant fund structure through which people save for their defined contribution pensions. The review follows on from the findings in policy statement [PS18/8: Asset Management Market Study \(AMMS\)](#) remedies and changes to the handbook.

Unit-linked funds account for approximately £1 trillion of assets and are therefore similar in size to authorised funds. However, although insurance companies providing unit-linked contracts are subject to firm-level and product governance requirements, and the ABI has made additional guidance available, there are currently no specific rules prescribing governance practices at the level of individual unit-linked funds.

Among other things, the FCA focussed on a number of items related to value and pricing, for example it found that firms often do not compare fund fees with others in their range and that there is limited sharing of economies of scale or assessments of whether product benefits offered good value. The FCA will assess its findings alongside its continuing work on non-workplace pensions, the effectiveness of Independent Governance Committees (IGCs) and the governance of unit-linked mirror funds.

Click [here](#) to read more.

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### Consumers urged to carefully consider choice of travel insurance

The Financial Conduct Authority (FCA) is urging consumers to carefully consider the cover they require before purchasing travel insurance and is reminding firms involved in travel insurance to ensure that they are complying with applicable FCA regulations. Since the implementation of the insurance distribution directive last year, firms distributing general insurance are required to comply with more extensive rules regarding the provision of appropriate information, including insurance product information documents (IPIDs), on insurance products and to ensure that customers' demands and needs are properly considered.

For more information on the FCA's recent reminder click [here](#).

The travel insurance market was also subject to the FCA's focus earlier this year as they released a [consultation paper](#) in the summer on the introduction of new rules and measures to help consumers better navigate the travel insurance market. The consultation includes a particular emphasis on ensuring consumers with pre-existing medical consideration are given more support in finding cover.

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### FCA general insurance pricing study – interim report published

The FCA has released its interim report of its general insurance practices market study into the pricing of home and motor insurance.

In the FCA's view, its analysis raises concerns about how these markets are working for consumers and the outcomes being delivered, focusing on the sale of policies at discount to new consumers and practices potentially leading to increased prices at the point of renewal. The FCA considers that an estimated 6 million policyholders paid high prices for their insurance in 2018, noting that, if these customers paid the average premium for their risk, £1.2 billion could have been saved.

In this report, the regulator has outlined potential remedies to tackle its concerns about general insurance pricing, including limiting practices that allow firms to charge higher prices to consumers who do not switch, automatic switching of consumers to lower priced products that provide equivalent cover and potentially banning or limiting the use of auto-renewal or making auto-renewal opt-in only. It appears that the FCA is conscious of the impact on the advantages of auto-renewing insurance, noting that it will carefully consider this in developing any potential remedy.

To read the full report, click [here](#).

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## PROFESSIONAL PRACTICES

by Graham Reid

### New SRA Standards & Regulations

The Solicitors Regulation Authority is introducing the new SRA Standards & Regulations (STaRs) with effect on 25 November 2019. This is the biggest change in the regulation of solicitors since 2011, when the SRA Handbook came into force.

Arguably, the most significant aspect of STaRs is its introduction of two new forms of practice for solicitors. First of all, solicitors will be able to provide their services to the public as 'freelancers', without the formalities of full regulation by the SRA as a sole practitioner. Although not quite identical there are strong similarities between this new concept of the freelancer solicitor and the self-employed Bar.

The second change is to unleash the in-house solicitor. From 25 November 2019, a solicitor employed in-house by an employer who is not regulated by the SRA will be able to sell his or her legal services to the public without the restrictions currently imposed on in-house solicitors, and provided s/he avoids providing "reserved legal activities". This allows the in-house solicitor to become a source of revenue for his or her employer.

These changes may well usher in a revolution in the way legal services are sold.

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### Actuarial monitoring scheme announced

First announced in 2018, the IFoA has recently unveiled the Actuarial Monitoring Scheme (AMS), designed to "improve the effectiveness of actuarial regulation in the public interest, provide meaningful, credible, independent feedback to Members and their employers and promote ongoing reinforcement and continuous improvement".

The AMS is part of a new framework, which aims to improve professionalism across the industry by:

- Providing evidence of the quality of actuarial work;

- Promoting best practice; and
- Considering issues of relevance to members in the profession.

The IFoA has confirmed that regular Thematic Reviews will take place (ensuring that areas or work relevant to actuaries are covered) as well as data gathering on an ad hoc basis. The changes will also see the introduction of a new Actuarial Review Team which will undertake reviews on topics relevant to actuaries. Click [here](#) to read more.

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### Kingsman on the failure to include legislation reforming the FRC in the Queen's Speech

Following the Queen's Speech, Sir John Kingman expressed his concerns that legislation on the new regulator to replace the Financial Reporting Council (the Audit, Reporting and Governance Authority) was not included in the Queen's Speech, and warned that lack of government action risks letting the watchdog "drift on, half-reformed".

When questioned, Business Secretary Andrea Leadsom, said Sir John's recommendations would be taken forward in Q1 of next year following a further report into the future of audit by

Sir Donald Brydon, which is due to be published before the end of the year. Meanwhile, the Business, Energy and Industrial Strategy Select Committee has continued to keep up public pressure for reform, by opening an enquiry into the demise of Thomas Cook and summoning its recent auditors to give evidence.

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## NAVIGATING THE MAZE

From the world's largest financial, corporate and professional services firms, to highly successful entrepreneurs and individuals, many turn to our specialist Regulatory team to navigate the maze. They do this because they know we don't sit on the fence, we work with our clients to ask the tough questions and challenge conventions; ensuring they continue to thrive in a rapidly evolving regulatory world.

From helping to implement robust compliance strategies to conducting investigations and defending against enforcement proceedings, our multidisciplinary team can be relied on to add value, provide ideas and deliver a complete regulatory service whatever challenges you face, now and in the future.

- **White collar crime and investigations:** The burden of facing a regulatory or criminal investigation can be significant. We defend clients under investigation for regulatory breaches, corruption including; breaches of financial sanctions, false accounting, insider dealing and market misconduct.
- **Anti-bribery and corruption:** Our team works closely with clients to implement robust, cost effective anti-bribery programmes in line with international standards, and to manage risks and responses when things go wrong.
- **Anti-money laundering:** AML continues to be one of the most significant regulatory risks to firms. We help clients from implementing effective AML processes and controls to defending clients under investigation of breaches.
- **Data protection:** Protecting the data you hold has never before been so essential to your business. We regularly advise on data regulations, including GDPR, relating to subject access requests, data handling, sharing and processing, breaches, and training strategies.
- **Product liability and compliance:** Our Products team have the expertise you needed if you are faced with product recall or class actions.
- **Health, safety and environmental:** our expert team can support you whether you are shoring up your health, safety and environmental protocols, or facing an investigation in respect of an incident.
- **Tax investigations and dispute resolution:** Our dedicated tax dispute lawyers provide a comprehensive service covering pre-emptive advice on a wide range of risk issues, tax investigations and litigation before the tax tribunals and higher courts.
- **Insurance and financial services:** Our specialist lawyers advise on regulation, business and financial crime and compliance, including both contentious and non-contentious matters to ensure our clients avoid the pitfalls.
- **Competition and anti-trust:** No business can afford to ignore competition law. We help clients through all issues including; compliance, investigations, merger control, cartels and litigation.
- **Dawn raids:** A dawn raid situation can be extremely stressful – and if you get it wrong, the repercussions can be severe. Our experienced team can provide an immediate response to help you on the ground, as well as in the all-important preparation for the possibility of a dawn raid.
- **Professional practices:** Our team combines sector knowledge with regulatory expertise to provide comprehensive support and advice for professional services firms, covering all aspects of their regulated business.
- **Advertising and marketing:** Some of the world's largest corporates rely on us to keep their brand communications above board, from advertising standards to consumer regulation we help clients to simplify the complex.



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