



Department for  
Business, Energy  
& Industrial Strategy

# Professional Qualifications Bill

Impact Assessment: Supplementary Note



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## Executive summary

1. The Professional Qualifications Bill will improve on the current system for recognising overseas professional qualifications and experience by revoking legislation based on EU law, giving more autonomy to UK regulators to decide on the right approach that suits the needs of their professions. The Bill will allow government to act if this revocation creates workforce shortages, and to implement the professional qualifications elements of new trade deals.
2. The regulatory landscape is complex, and policy responsibility for regulated professions is spread across many government departments and all the devolved administrations. Over summer 2021, the Department for Business, Energy and Industrial Strategy (BEIS) conducted an exercise to improve the data available about which regulators and professions meet the definitions in the Bill. There are 205 regulated professions and 81 regulators, as published on 14 October (<https://www.gov.uk/government/publications/professions-regulated-by-law-in-the-uk-and-their-regulators>).
3. Given the increase in the number of regulators and professions understood to be affected by the Bill since the Impact Assessment was conducted, there is a corresponding increase to the total costs of the Bill provisions. The updated Net Present Value of the Bill is estimated to be - £12.87m. The passage of the Bill, including the introduction of an amendment tabled in Lord Grimstone of Boscobel's name to Clause 1, has not introduced any changes to the purpose of the Bill provisions. The purpose behind each clause remains the same as when the Bill was first introduced and therefore this factor has no impact on the estimated costs and benefits.
4. This supplementary note to the Impact Assessment outlines:
  - a. further detail on the Bill definitions and what the provisions mean for the regulators and their duties; and
  - b. the updated cost and benefit estimates of the Bill provisions.

## Introduction

5. The Professional Qualifications Bill (“the Bill”) was introduced in Parliament in May 2021. The Bill establishes a new approach for the recognition of professional qualifications and experience gained overseas, based on regulator autonomy. It will revoke and replace the interim system for recognition of professional qualifications that derives from the UK’s previous membership of the EU.

6. The Impact Assessment<sup>1</sup> for the Bill, published in May 2021, estimated the costs and benefits of the Bill based on an early understanding of the affected regulators and professions. Since then, BEIS has conducted a comprehensive exercise with other government departments, devolved administrations and regulators to better map the regulatory landscape, so it is timely to review the impact of the Bill provisions.

## What has changed since the impact assessment, as published on 11 May 2021?

7. During Committee Stage, an amendment to Clause 1 was introduced by Lord Grimstone to make it clear that, in the event the power under this clause is used in relation to a particular profession, the relevant regulator can assess whether an applicant’s knowledge and skills are the same as if they had the relevant UK qualification in whatever way they consider appropriate before an applicant becomes eligible to practise. This does not change the policy intent or the costs or benefits of the provisions to regulators.

8. During parliamentary debates, greater clarity has been provided in relation to the policy intentions of the Bill. There has been no change to the underlying policy intent nor the ways that the clauses would impact on affected regulators or professions, either previously understood to be affected or now understood also to be covered by the Bill provisions.

9. We have developed more information about the regulators and professions affected by the Bill. The list of regulators and regulated professions which fall within the Bill definitions has been informed by extensive engagement with other government departments and devolved administrations. In addition, we have contacted each regulator on the list regarding the professions they regulate to ensure they understand that they are included on this list. This changes the estimated costs of the Bill and is the basis for the calculations set out in this note.

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<sup>1</sup> The Professional Qualifications Bill Impact Assessment can be found at: <https://bills.parliament.uk/bills/2865/publications>.

## The Professional Qualifications Bill – regulators and their duties

10. The passage of the Bill has not changed the policy intentions. The Bill's purpose is to deliver the following policy objectives:

- a. end the interim system for professional qualifications that derives from the UK's membership of the EU. This system placed a range of requirements on UK regulators when considering applications from holders of qualifications from the European Economic Area (EEA) and Switzerland;
- b. establish a new approach, based on regulator autonomy, for the recognition of professional qualifications and experience gained overseas by professionals seeking to practise in the UK, or a part of the UK, to meet the needs and demands for the services provided by those professions;
- c. enable government to implement international agreements or parts of international agreements that the UK strikes with partners so far as they relate to the recognition of professional qualifications;
- d. enable government to provide regulators with a consistent set of powers to enter into agreements with regulators overseas to recognise professional qualifications;
- e. maintain a designated 'Assistance Centre' with which regulators must cooperate, to provide advice and guidance to the public;
- f. require regulators in the UK to provide certain information to overseas regulators where an individual is or has been entitled to practise that profession in the UK, or a part of the UK, and is seeking entitlement to practise overseas;
- g. require regulators of professions in all parts of the UK to publish information on the entry and practice requirements of their profession;
- h. require regulators in the UK to, where requested, provide certain information to counterpart regulators in other parts of the UK; and
- i. amend the Architects Act 1997 to allow a new recognition system for architects, alongside adjustments to the administration of the Architects Registration Board to support efficiency.

### Bill definitions

11. The Bill defines "a regulated profession" as a profession which is regulated by law in the UK or a part of the UK, with the word "profession" including an occupation or trade, or any subdivision and specialism within a profession. It also sets out that a profession is regulated by

law where there is legal requirement for an individual to have certain qualifications or experience (or meet an alternative condition) in order to undertake certain professional activities or use a protected title.

12. A “regulator” is defined in the Bill as a person with functions under legislation relating to the regulation of a regulated profession. Regulators can carry out a range of functions in their professions, from ensuring individuals have the required qualifications or experience to taking any necessary enforcement action.

13. For some professions, all regulatory functions are carried out by one regulator. For other professions, these functions are distributed across several regulators. Some regulators can delegate their regulatory function(s) to another body or bodies. These bodies are also “regulators” under the Bill definition, although they may not be specified in other legislation.

14. The types of activities that an organisation undertakes is important because this informs whether the body is a regulator of the profession within the Bill definitions. It is possible that bodies acting only as providers of qualifications and/or training would be too far removed from the types of functions considered as regulation of a profession. However, there may be situations where a body serves an educational function alongside, or as part of a regulatory function, where the link can be more closely drawn to the regulation of the profession.

15. The Bill does not contain a definition of what amounts to “regulation”. The following are non-exhaustive, illustrative examples of functions that relate to the regulation of a profession:

- a. setting standards that individuals practising the profession must meet;
- b. imposing rules or requirements that such individuals must meet; or
- c. securing compliance with, or enforcement of, any such standards, rules or requirements.

16. It is a matter for those close to the underlying legislation and knowledge of the particular functions of a body under consideration, such as the responsible government departments and devolved administrations, to come to a view on whether its functions amount to regulation of a profession.

## Revised cost estimates of the Bill’s provisions

17. Table 1 summarises the change in the total, transitional and annual ongoing cost estimates of the Professional Qualifications Bill, due to the increase in the number of regulators and professionals considered to meet the definitions in the Bill, as set out in paragraphs 11-16. Table 2 details how the estimates related to each provision have changed and the magnitude of these changes, which inform the updated totals. Overall, the total cost across the ten-year appraisal period has increased by c. 11%, or by £1.92m from £18.16m to £20.08m. This

changes the Net Present Value by £1.92m from -£10.95m to -£12.87m. In terms of how this affects business, assuming that the ratio of private and public regulators remains the same as estimated in the Impact Assessment where 17 regulators were treated as businesses out of a total of 57, the Equivalent Annual Net Direct Cost to Business increases by £0.07m, from £0.16m to £0.23m. The potential indirect cost to employers who are businesses as a result of costs passed through from regulators to professionals to employers is estimated to increase from £0.31m to £0.35m per year.

**Table 1 - Summary: Analysis and evidence**

Price Base Year	PV Base Year	Time Period	Net Benefit (Present Value (PV)) (£m)	
			Best Estimate:	-12.87
2019	2020	10 Years		
COSTS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
<b>Best Estimate</b>	8.87	1-2	1.30	<b>20.08</b>
<b>Monetised costs</b>				
<p>The direct and indirect costs of the Bill fall on regulators, who are mostly public sector organisations, and the estimated total cost over the ten-year appraisal period is £20.08 million (an increase of £1.92 from the Impact Assessment published 11 May 2021). The share of these costs that could be indirectly passed through to businesses that employ regulated professionals is estimated to increase by £0.3 to £3.0m. The Equivalent Annual Net Direct Cost to Business is estimated to increase by £0.07 to £0.23m.</p>				
<b>Non-monetised costs</b> remain as described in the IA as published 11 May 2021, i.e.:				
<p><b>Businesses and consumers</b> who use the services of regulated professionals will be indirectly affected to the extent that recognition of professionals leads to changes in prices or quality or range of services available to them. <b>Professionals from overseas seeking recognition</b> will be indirectly affected to the extent that they would be more or less easily able to apply for and achieve recognition to practise their profession. This will vary by profession and context.</p>				
BENEFITS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
<b>Best Estimate</b>	0	N/A	0.84	<b>7.21</b>

**Monetised benefits** remain as described in the IA, as published 11 May 2021, i.e.:

**Professionals** seeking qualification recognition and individuals seeking to qualify in the UK may have indirect benefits such as time savings through improved access to information.

**Regulators** may experience some cost-savings but, in the main, these are small and have been considered against the costs of implementing the new recognition framework.

**Businesses and consumers** are unlikely to experience monetised benefits.

**Non-monetised benefits** remain as described in the IA, as published 11 May 2021, i.e.:

**Professionals** qualified overseas in certain professions will be more able to access UK recognition.

**Individuals** seeking to qualify in the UK will benefit through improved access to information.

**Regulators** will benefit to the extent that they are able to set their own requirements for recognition.

**Businesses and consumers** will benefit to the extent that they are able to access a greater quality or range of services available to them. In all cases, these non-monetised benefits will vary by profession and context.

**Changes to key assumptions**

**Discount rate (%)**

3.5%<sup>2</sup>

- The numbers of regulators and professions affected by the provisions are taken from the list as published by BEIS on 14 October 2021. The count of regulators does not include enforcing authorities or competent harbour authorities as we anticipate they will incur minimal costs under the Bill.
- Where a profession has multiple regulators, we assume each regulator will be fully impacted by each provision in the same way. This is a conservative estimate, as they may be able to share the statutory duties, reducing the cost impact on each.
- To estimate the ongoing costs of revoking the interim arrangements (Clauses 5 and 6) and the ongoing benefits of the transparency provision (Clause 8), we assume no change to historical numbers of decisions given by regulators or the annual new entrants to regulated professions. See paragraphs 35-38 and 42-44 for more detail.
- As described in the IA (11 May 2021), engagement with 12 regulators (who provided over 90% of the recognition decisions recorded in the European Commission’s Regulated Professions Database<sup>3</sup>) informed the estimates of monetised costs to regulators. We have extrapolated these costs across all regulators affected by each provision to inform our estimates.

<sup>2</sup> As set out in Section 5.4 of The Green Book guidance issued by HM Treasury on how to appraise policies, programmes and projects: <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020>.

<sup>3</sup> European Commission’s Regulated Professions Database: [https://ec.europa.eu/growth/tools-databases/regprof/index.cfm?action=stat\\_ranking&b\\_services=false&id\\_host\\_country=15&id\\_period\\_from=8&id\\_period\\_to=17](https://ec.europa.eu/growth/tools-databases/regprof/index.cfm?action=stat_ranking&b_services=false&id_host_country=15&id_period_from=8&id_period_to=17).

- To estimate the Equivalent Annual Net Direct Cost to Business, we assume the updated list of regulators has the same proportions of regulators who are public and private sector organisations.

### Primary change to assumptions: Number of affected groups

18. The conclusions in Table 1 are driven by changes to the number of professions and regulators affected. In the Impact Assessment we stated that there are over 160 professions that are regulated by legislation across more than 50 regulators. As a result of quality assurance work with regulators, devolved administrations and other government departments, as described in paragraph 9, these figures have been revised to 205 regulated professions and 81 regulators, as taken from the list as published by BEIS on 14 October 2021.

19. The increased number of professions results from the addition of some social work, food safety and other professions; and counting separately those professions such as school teachers where requirements differ across the UK nations. Certain professions have been removed, such as pig farmers, fund managers and some aviation professions, on the advice of regulators. Others have been consolidated on the advice of regulators and relevant government departments, such as different medical specialties which are now listed solely as ‘medical practitioner’.

20. The increase in the number of regulators is predominantly due to professions where engagement revealed that multiple bodies have regulatory responsibilities and carry out regulatory functions delegated from other regulators, such as solicitors and F-Gas handlers.

21. To update our cost estimates for the Bill, we make the conservative assumption that each of these regulators would be fully impacted by each provision. However, in practice, where regulatory functions are delegated or multiple regulators are responsible for a profession, each organisation may not be affected equally. For example, an oversight regulator might only have some, but not all, of the duties under the Bill, with its delegated regulator being responsible for the other duties. This means that our calculations are likely to be an over-estimate of the true impact.

22. Some of the regulators listed are described as “enforcing authorities” (<https://www.gov.uk/government/publications/professions-regulated-by-law-in-the-uk-and-their-regulators>). While these organisations meet the Bill definition of regulators, we do not expect that they would be responsible for implementing the provisions. They are therefore not included in the count of affected regulators used to estimate impacts.

23. The list of professions and regulators also includes “maritime pilots” regulated by several Competent Harbour Authorities (CHAs) and Trinity House. The Department for Transport has indicated that there are over 100 of these authorities across the UK, but they are predominantly smaller organisations, many of which do not employ maritime pilots at all, and

we believe international recognition numbers are likely to be low<sup>4</sup>. CHAs are therefore not included in the count of regulators, as we have assumed that the impacts of Clauses 5, 6, 9 and 10 are minimal. CHAs are only included in the cost estimates for Clause 8.

24. The increased number of regulators and professions only impacts on the costs associated with Clauses 5,6,8,9 and 10.

## Updated cost estimates of each clause

25. This section discusses the effect of and any changes in the estimated impacts for each Clause in the Bill, with all the costs summarised in Table 2.

**Table 2: Updated cost estimates per provision of the PQ Bill<sup>5</sup>**

Provision assessed		Original cost estimate	Assumed change in impact	Change in estimate	Updated cost estimate
Global recognition routes to meet unmet demand (Clauses 1 and 2)	Transitional (1-2 years)	£1.34 m	No change		
	Ongoing annual	£0.31 m			
Route of appeal (Clause 1)	Transitional	£0.06 m	No change		
	Ongoing annual	£0.21 m			
Regulator and international recognition arrangements (Clauses 3 and 4)	No monetised impacts				
Revoking EU recognition system and retained law (Clauses 5 and 6)	Transitional	£6.37 m	Increases proportionally with the increase in total legal and voluntary regulators	c. 22% increase: +£1.40m	£7.78m

<sup>4</sup> Approximately 1,000 maritime pilots work in the UK, but the requirements to qualify are different in each CHA, based on the unique requirements of each port or harbour, and so the qualifications are not interoperable or transferable between ports harbours around the world, or even within the UK.

<sup>5</sup> 2019 prices, not Present Value (PV) adjusted. Totals may not sum due to rounding.

**Table 2: Updated cost estimates per provision of the PQ Bill<sup>5</sup>**

Provision assessed		Original cost estimate	Assumed change in impact	Change in estimate	Updated cost estimate
	Ongoing annual	£0.70 m	No change		
Assistance centre (Clause 7)	No monetised impacts				
Transparency (Clause 8)	Transitional	£0.09 m	Increases proportionally with the increase in total professions and regulators, including for maritime pilots	c. 85% increase: £0.076	£0.17m
	Ongoing annual	£0.03 m		c. 85% increase: £0.02m	£0.05m
Supporting information sharing between regulators in the UK (Clause 9)	Transitional	£0.03 m	Increases proportionally with the increase in total regulators <sup>6</sup>	c.44% increase: £0.01m	£0.04m
	Ongoing annual	£0.004 m		c. 44% increase: +£0.002.	£0.006 m
Overseas information sharing (Clause 10)	Transitional	£0.09 m	Increases proportionally with the increase in total regulators <sup>7</sup>	c. 43% increase: +£0.04m	£0.13m
	Ongoing annual	£0.08 m		c. 43% increase: +0.04m	£0.12 m

### **Clauses 1 and 2: Global recognition routes to meet unmet demand**

26. Clause 1 provides a power to appropriate national authorities to make regulations which would oblige regulators to determine whether professionals, whose qualifications and experience were gained outside of the UK, should be treated as if they had the specified UK

<sup>6</sup> The number of regulators has increased from 57 to 81, an increase of approximately 42%. However, for clauses which only affect a proportion of regulators, we have rounded to get a whole updated number, meaning the subsequent change in costs is slightly higher in percentage terms (44% for clause 9 and 43% for clause 10).

<sup>7</sup> As above.

qualification or experience, for the purposes of making a decision on whether an individual is entitled to practise a regulated profession.

27. Clause 2 limits Clause 1 so that regulations can only be made if the appropriate national authority is satisfied that it is necessary to do so to meet the demand for the services provided by that profession in the UK, without unreasonable delays or charges.

28. These clauses have no material impact on regulators at the point that the Bill becomes law. Impacts will only fall on those regulators who are deemed to have unmet demand and are required to have routes to recognition, which will only take effect once further regulations are laid.

29. The Impact Assessment assumed 18 regulators and 88 professions are included in regulations, all in the public service sector. 14 of these regulators already had global routes to recognition, and so the costs per regulator were only assumed to fall on 4 regulators, with only 3 regulators assumed to be required to set up appeals processes.

30. We have assumed that the number of regulators impacted, and therefore the costs and benefits of these clauses, remain unchanged from the Impact Assessment.

### **Clauses 3 and 4: Regulator and international recognition arrangements**

31. Clause 3 empowers appropriate national authorities to implement any parts of international agreements (such as Free Trade Agreements) that the UK has entered into that relate to the recognition of professional qualifications.

32. There are no monetised impacts calculated for this provision as we do not know the frequency, coverage or extent of future international agreements.

33. Clause 4 provides a power to make regulations to enable regulators of regulated professions to enter into regulator recognition agreements. A regulator recognition agreement is an agreement between a UK regulator and an international counterpart on the recognition of professional qualifications.

34. There are no monetised impacts calculated for Clause 4 as it places no obligations on regulators. Rather, it gives them additional powers that they are free to use as they wish.

### **Clauses 5 and 6: Revoking EU recognition system and retained law**

35. Clause 5 revokes the general system of overseas qualification from the European Economic Area (EEA) and Switzerland (2015 Regulations). Clause 6 allows for other retained EU recognition law, relating to qualification recognition and outside of the scope of the 2015 Regulations, to be revoked.

36. The Impact Assessment estimated a transitional cost per regulator to revoke their existing processes for recognising European professionals and, if they choose, implement new recognition routes. We previously assumed 57 regulators of professions regulated by law and a further 52 voluntary regulators, primarily Chartered bodies, for a total of 109 regulators, would be affected by these provisions. The new list includes 81 regulators of professions regulated by law, for a total of 133 regulators affected by these provisions, assuming the number of voluntary regulators impacted remains the same. This is an increase of c. 22% in the number of regulators affected, which increases the transitional costs by £1.40m to £7.78m. We assume that when the relevant EU legislation is revoked, all regulators would replace their existing systems for EEA and Swiss applicants with more resource-intensive systems. It is probable, however, that not every regulator will need a new system. Some may be able to choose to continue existing processes or to cease recognising European professionals. Our estimate is therefore likely to over-estimate the transitional costs.

37. The ongoing costs of new recognition systems were calculated based on the number of historic recognition decisions given by each regulator to European professionals and an estimated increase in costs per future application. 92% of the 150,000 total historic recognition decisions between 2009 and 2016 were for only 11 generic professions, with no other generic professions contributing more than 1% of total decisions<sup>8</sup>. However, the European Commission's Regulated Professions Database does not directly map to all those professions and regulators defined in UK legislation, and so there will be professions covered by the PQ Bill where there are no recorded decisions in the Database. We do not believe this affects the assumptions for total impact, as many of the added regulators are jointly responsible for previously identified professions and may not accrue additional decisions. We therefore assume that the additional regulators identified are in line with the majority of regulators in giving very few historic decisions, and do not increase the estimate of ongoing costs for these provisions.

38. Reporting recognition decisions to the EU Commission was a requirement under the Mutual Recognition of Professional Qualifications Directive. But it may be the case that there was underreporting; we also anticipate that some of the professions identified as meeting the definitions in the Bill may not have been included in the UK's returns to the Commission, or indeed may not have been captured at all by the requirement. Therefore, our estimates of the future numbers of applications and thus the ongoing costs may be an underestimate.

## **Clause 7: Assistance centre**

39. Clause 7 provides for an assistance service for individuals who wish to gain recognition in, and practise in, a regulated profession in the UK. It can also provide help and advice to UK professionals wishing to practise their profession overseas.

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<sup>8</sup> European Commission's Regulated Professions Database's record of recognition decisions given by UK regulators: [https://ec.europa.eu/growth/tools-databases/regprof/index.cfm?action=stat\\_ranking&b\\_services=false&id\\_host\\_country=15&id\\_period\\_from=8&id\\_period\\_to=17](https://ec.europa.eu/growth/tools-databases/regprof/index.cfm?action=stat_ranking&b_services=false&id_host_country=15&id_period_from=8&id_period_to=17).

40. Providing a statutory basis for the continued existence of an assistance centre places a duty on competent authorities to cooperate with it. This is to ensure that the assistance centre has the necessary information needed to help support the delivery of its functions, rather than relying upon voluntary information-sharing arrangements.

41. It is expected that the Assistance Centre will provide a similar service to that currently provided by the UK Centre for Professional Qualifications (UKCPQ), which exists outside the provisions within the Bill. The UKCPQ is provided under contract by a private organisation on behalf of the government, and on this basis it is expected that there will be a continued on-going cost to the government for the future Assistance Centre service at the conclusion of the existing contract. However, we do not expect significant additional costs for the provision of this service as a direct result of this legislation, and therefore have not included the costs of the Assistance Centre.

### **Clauses 8, 9 and 10: Information sharing provisions**

42. Clause 8 requires regulators to publish information, such as the requirements they place on individuals to enter or remain in their profession, their application process/es, and fees payable. This transparency requirement aims to reduce the risk of a lack of information being a barrier to entering and practising professions.

43. The costs of Clause 8 were estimated based on the number of professions for which regulators would have to publish the specified information. For any professions which have now been assessed to have multiple regulators, they are each assumed to incur some cost as a result of this requirement. It also includes maritime pilots as regulated by Competent Harbour Authorities and Trinity House, as per paragraph 23. This gives a total of 215 'profession-regulator' pairs incurring costs, an increase of 85% on the Impact Assessment. The transitional costs therefore increase by £0.08m to £0.17m, and the ongoing costs increase by £0.02m to £0.05m. This may be an overestimate if not all regulators incur costs, for example, where one body has delegated its powers to another.

44. The estimated benefits of Clause 8 relate to better access to information leading to time saved by individuals who are joining the profession. In our previous analysis, 18 generic professions accounted for 83% of the estimated annual new entrants to regulated professions, with no other professions accounting for more than 1% of entrants. We therefore assume that the additional professions now accounted for do not materially alter the total number of entrants and so we do not increase our estimate of the benefits of Clause 8.

45. Clause 9 requires regulators to provide relevant information to counterpart regulators in the UK if requested. This is to enable UK regulators to determine the entitlement of an individual who is or was entitled to practise in another part of the UK to practise in the regulator's part of the UK. e.g., on an individual's fitness to practise.

46. The estimated costs for Clause 9 were calculated by estimating the number of regulators operating in different parts of the UK, which regulate equivalent professions, and which do not

share information already. We assume these costs increase in line with the increase in the overall number of regulators, which goes from a total of 57 to 81: an increase of c. 42%. The transitional cost estimate therefore increases by £0.01m to £0.04m, and the annual ongoing cost estimate increases by £0.002m to £0.006m.

47. Clause 10 requires UK regulators to provide certain relevant information to overseas regulators, if requested, with the authorisation of the professional in question. This is to enable overseas regulators to determine the entitlement of an individual who is or was entitled to practise in the UK to practise in the overseas regulator's country or territory.

48. The costs for Clause 10 were calculated by multiplying the estimated costs of sharing information with an estimate of the number of regulators that meet the definition in the Bill that do not already share information with their international counterparts. We assume these costs increase in line with the increase in the overall number of regulators, which goes from a total of 57 to 81: an increase of c. 42%. The transitional cost estimate therefore increases by £0.04m to £0.13m, and the annual ongoing cost estimate increases by £0.04m to £0.12m.

49. The costs of these provisions contribute to only a small proportion of the Bill's overall impacts, but the changes could be greater or lower to the extent that the additionally identified regulators already publish transparency information, have equivalent regulators across the UK nations or already share information with overseas regulators. The impacts would be marginal under any scenario.

## **Clauses 11-19: Architects and final provisions**

50. Clause 11 amends the Architects Act 1997 to create a system that allows UK businesses to recruit architectural talent from across the globe, while ensuring that those internationally qualified architects have a proper understanding of the UK context at the point of entry onto the architects register.

51. There are no monetised costs as the changes this clause introduces are either administrative with negligible costs or will operate on a cost-recovery basis.

52. Clauses 12-19 are provisions defining the reach and operation of the Bill. They cover Crown Application, parliamentary procedure for making regulations, interpretation, territorial extent, commencement, and short title. These clauses do not have associated monetised impacts.

## **Next steps**

53. Understanding the extent to which the Bill achieves its intended outcomes and for which stakeholder groups is critical to achieving our overarching policy objectives. Monitoring and evaluation plans for the Bill will allow us to better understand impacts, check compliance

through key indicators, and identify any improvement needed. This will include monitoring the recognition routes being put in place, and entry and practice requirements being published on regulator websites.

54. The list of regulators and professions will be maintained. Changes to the list will be made when regulators and professions are added or removed through sector legislation. If, and when, a new professional activity is regulated or a regulator delegates its functions to another body, this will already have been debated in Parliament through the updates to existing or new sector specific legislation.

55. Since Bill introduction we have intensified our stakeholder engagement. We will continue to build on those stakeholder relationships which will improve consultation of the Bill provisions.

56. We consider the need for the government to consult vitally important, whether this is before exercising its delegated powers, or working collaboratively with counterparts in the Scottish and Welsh governments and the Northern Ireland Executive, or as part of the ongoing and continuous dialogue with regulators.

57. Regulator autonomy remains paramount. The Bill does not undermine regulators' ability to determine who is fit to practise. Rather, it ensures that government is able to respond to the needs of professions at any given time and that professional qualifications can be recognised.

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