



Home Office

Knives and offensive weapons: consultation on personal liability measures on senior executives of online platforms or marketplaces

Government Response

24 April 2025

Contents

1.	Introduction	3
2.	Executive Summary	5
3.	Proposal	6
4.	Summary of Responses	8
4.1.	Support for the Government's proposal	8
4.2.	Impact of measures on online platforms	10
5.	Question-by-Question Analysis and Government's Responses	11
6.	Business and Trade Responses	19
7.	Next Steps	20
8.	Consultation Analysis Methodology	21

1. Introduction

- 1.1.** Knife crime devastates families and communities across the country. To address this, the Government has an ambitious mission to halve knife crime over the next decade. We will pursue a range of avenues to achieve this mission, including a renewed focus on early intervention and tougher sanctions against those who offend. The Government is also aware of the need to tackle the online space, where it is currently too easy to buy a knife when underage or purchase a prohibited weapon.
- 1.2.** The Government has acted with urgency to address the online market to keep weapons off the streets and out of the wrong hands. We have already banned zombie-style knives and zombie-style machetes and are progressing with a ban on ninja swords.
- 1.3.** The government is also steadfast in its commitment to making prevention a central part of its knife crime action plan through the new Young Futures Programme. This programme will identify young people at risk of being drawn into violent crime and provide the interventions necessary to steer them in the right direction.
- 1.4.** In October 2025, the Home Secretary commissioned Commander Stephen Clayman, the National Police Chiefs' Council lead for Knife Crime, to conduct an end-to-end review into the sale of knives online. The now published review made several recommendations around the sale of knives online to prevent dangerous weapons falling into the wrong hands.
- 1.5.** Under “Ronan’s Law”, named in honour of Ronan Kanda who was tragically killed in 2022, new measures to tackle sales of knives are being introduced. These include a requirement on retailers to report bulk and suspicious purchases to the police and a new offence of possessing an offensive weapon with intent for violence which will come with a sentence of up to 4 years in prison. This will apply even if the weapon is legal.
- 1.6.** Following the tragic Southport murders in July 2024, which revealed systemic failings in the age controls preventing the sale and delivery of knives to under 18s, the government will also strengthen age identification checks on the sale and delivery of knives.

- 1.7.** The Government committed in its manifesto to introduce tough sanctions against senior executives of online companies who flout the law on the online sale of knives. This will mean senior executives of online platforms which fail to remove illegal content relating to the sale of knives and other offensive weapons will be held personally liable.
- 1.8.** Private sellers are using online platforms to sell knives and offensive weapons illegally. These sellers are marketing prohibited weapons and knives in ways which encourage violence or promotes their suitability for use in violent attacks. Some of these knives are eventually used in knife attacks and homicides.
- 1.9.** Whilst these sellers are already committing criminal offences under section 141 of the Criminal Justice Act 1988, the Restriction of Offensive Weapons Act 1959 and the Knives Act 1997, there is a need for swifter action by online platforms to take down this illegal content.
- 1.10.** To fulfil our manifesto commitment, we have developed legislative proposals to provide the police with the power to direct online companies hosting social media platforms, online marketplaces and search services to remove specific pieces of illegal content related to the sale of prohibited offensive weapons and the illegal marketing of knives. Failure to remove the specified content will result in a financial penalty for that company and as well as a designated senior UK based executive of that company.
- 1.11.** On 13 November 2024, the Government launched a consultation on ‘Knives and offensive weapons: personal liability measures on senior executives of online platforms or marketplaces’. The consultation closed on 11 December 2024.
- 1.12.** The consultation covered the overall approach being proposed by the Government as well as the mechanism for the sanction, the penalty, and reasonable defences.
- 1.13.** This report summarises respondents’ views on the consultation proposals and the Government’s response and next steps.

2. Executive Summary

- 2.1.** The consultation was open to the public. On the day of publication, we wrote to over 150 stakeholders directly, inviting them to provide input, and raised awareness of the consultation through the media, Parliament, and various stakeholder groups. We also discussed the policy with several online companies. and the National Police Chiefs' Council lead on knife crime.
- 2.2.** The consultation received a total of **74** completed responses. Some respondents indicated they wanted their response to be confidential. Not all respondents answered every question; therefore, figures provided are based on the responses received for each question via both the online survey and email. All responses have been analysed and given full consideration in the preparation of this Government response.
- 2.3.** **74** responses were submitted. Of these, **22** indicated that they had been submitted on behalf of organisations. In terms of the organisations which did respond, the three most common categories of respondents were online companies and trade associations representing them, voluntary sector or charitable organisations and councils. Taken together they were **55% (12)** of identifiable organisations. The remainder of respondents who identified themselves were from retailers or retail organisations, Serious Violence Prevention Partnerships and policing.
- 2.4.** Respondents were broadly in favour of the proposals, some respondents expressed concerns about the measure. Responses included:
- Concerns that the proposals did not go far enough.
 - 32 respondents wanted companies to only be given 24 hours to remove content when served with a content removal notice. This was the most popular option.
 - Five respondents did not believe the severity of the penalty would be an adequate deterrent.
- 2.5.** The responses have informed the proposed measure. The Government will introduce legislation to provide the police with the power to issue Content Removal Notices for illegal knife and other offensive weapons related content. If a company ultimately does not comply, the police are able to decide whether to issue a Civil Penalty Notice against the company and a senior executive of that company.

3. Proposal

- 3.1.** Under the consultation proposal, the police would be given the power to issue Content Removal Notices to online platforms and marketplaces that fail to remove illegal content relating to the sale of knives and offensive weapons. The notice would require them to remove specific pieces of content within 48 hours. Failure to comply with a notice would have resulted ultimately in civil proceedings being brought against a designated senior executive. We have considered the consultation responses carefully and made changes as set out below.
- 3.2.** We anticipate that in most cases the online company will respond to the Content Removal Notice and the relevant material will be removed from the platform or the marketplace.
- 3.3.** The proposal contained a set of safeguards in case of disagreement over the legality of the specified content and where the designated executive may have a reasonable excuse for failing to comply with a Content Removal Notice.
- 3.4.** Should a company fail to comply with a Content Removal Notice within 48-hours of its issuance, a second notice will be issued to both the company and the relevant senior executive. Failure to comply with the second notice would result in the police issuing a notice of intent to the relevant senior executive. It was proposed in the consultation that the police could then initiate civil proceedings against the relevant senior executive who would be personally liable to a fine of up to £10,000.
- 3.5.** A company in receipt of a Content Removal Notice would have the right to request that the police review the notice and whether the specified content is illegal. The police would have duties to consider the reasons for removal and to respond.
- 3.6.** Proposed defences for failure to comply with a Content Removal Notice are where the senior executive:
- has taken all reasonable steps to comply with the Content Removal Notice;
 - was too new in post to be considered responsible for failing to comply with content removal notices; and
 - had no knowledge of being named as the senior executive with responsibility for ensuring the content removal notice was actioned.

3.7. Following this consultation, we gave further consideration to aspects of the proposed measure and made some important changes These are:

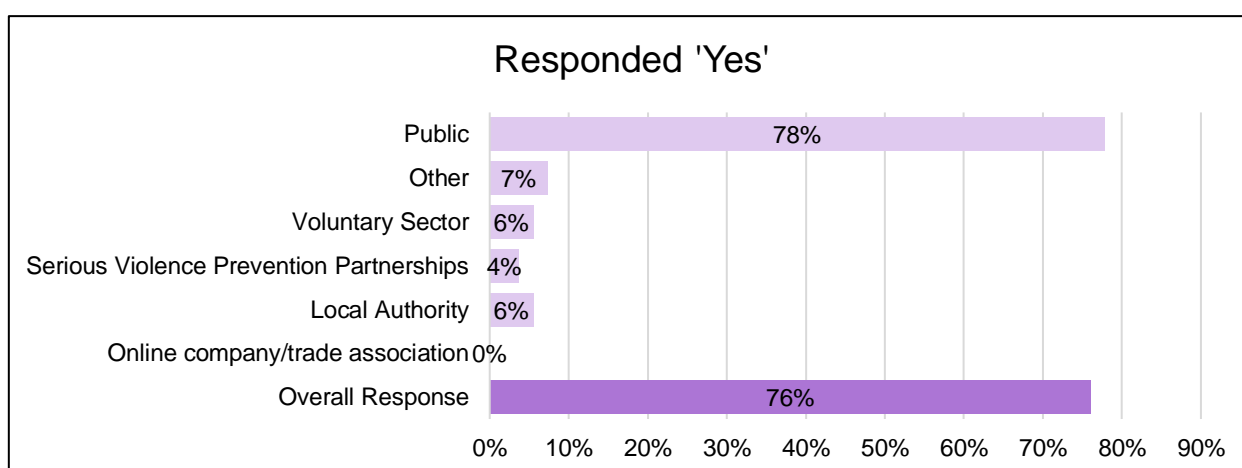
- a. *Inclusion of online search services* – The extent of the measure will be extended to include online search services as well as platforms and marketplaces. Including online search services will allow the police to reduce the ease with which UK users can access illegal content relating to the sale of knives and offensive weapons posted by overseas sellers. These sellers do not have a physical presence in England & Wales so their executives cannot be sanctioned under this policy. Content Removal Notices issued to online search services will require the removal of search results in the UK which link to illegal content relating to the sale of knives and offensive weapons.
- b. *Use of Civil Penalty Notices* – Civil Penalty Notices will be used to implement the sanction. The police will have the power to issue Civil Penalty Notices of up to £10,000 to designated executives should they fail to comply with a Content Removal Notice.
- c. *Civil Penalty Notices for companies that fail to comply with a Content Removal Notice* – Companies will receive a Civil Penalty Notice of up to £60,000 for failure to comply with a Content Removal Notice; this Civil Penalty Notice will be issued alongside that of the £10,000 maximum penalty issued to the designated executive. This will make the policy fairer for executives by placing an incentive on companies themselves to remove content specified in a Content Removal Notice. Additionally, this added incentive will support the prompt removal of illegal knife and offensive weapons content.
- d. *Civil Penalty Notices for companies that fail to nominate an appropriate executive* – To ensure companies nominate an appropriate senior UK based executive the police will have the power to issue Civil Penalty Notices of up to £60,000. This penalty aligns with the civil penalty an employer may receive for employing an illegal worker.
- e. *Use of a single Content Removal Notice* – The police will issue one Content Removal Notice jointly to an online company and its designated executive. If the company and executive fail to comply with this notice they could be issued with a Civil Penalty Notice. This will enable the prompt removal of illegal knife and offensive weapons content.

3.8. The measure is separate to the regulatory regime under the Online Safety Act 2023 (OSA) but complements its action relating to illegal content on knives and offensive weapons. Under the OSA, online companies are required to assess the risk of illegal knife-related content being disseminated on the platforms they operate and ensure they have robust governance measures in place to manage these risks. Where there is a high risk of such content appearing on their platforms, they will need to resource and train their content moderation teams so they are able to accurately identify such content and quickly take it down once they become aware of it. Ofcom have supplemented these provisions with detailed guidance on what types of knife-related content are illegal and must be removed and how to recognise such content. Where platforms do not follow the new rules, Ofcom has robust powers to take action, including the authority to impose fines of up to £18million or 10% of a company's qualifying worldwide revenue.

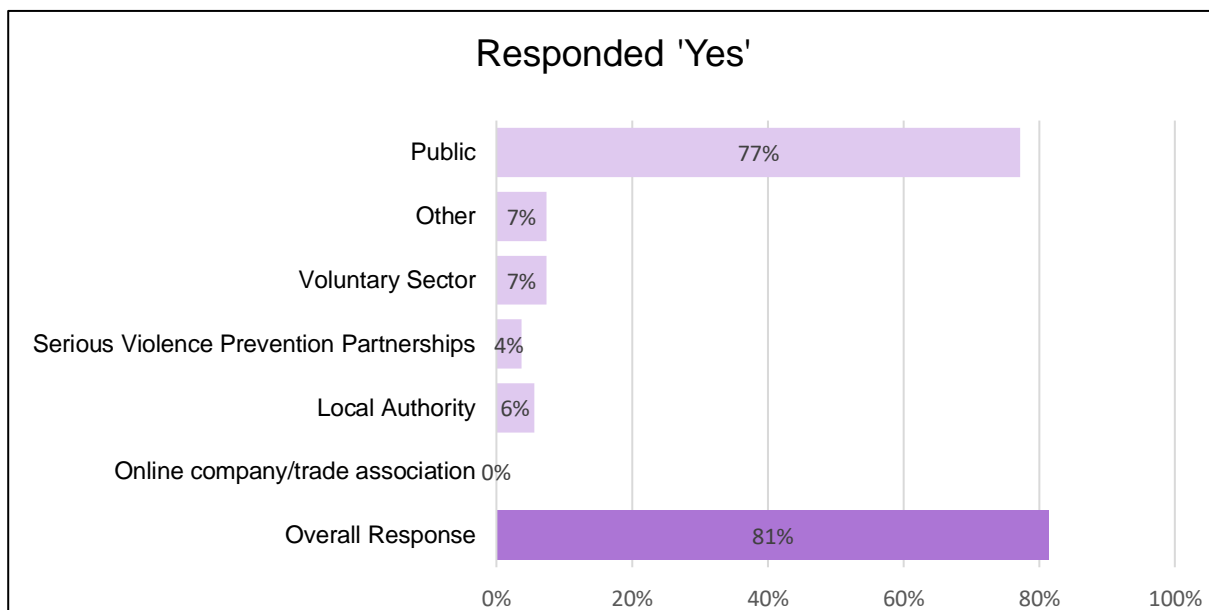
4. Summary of Responses

Support for the Government's proposal

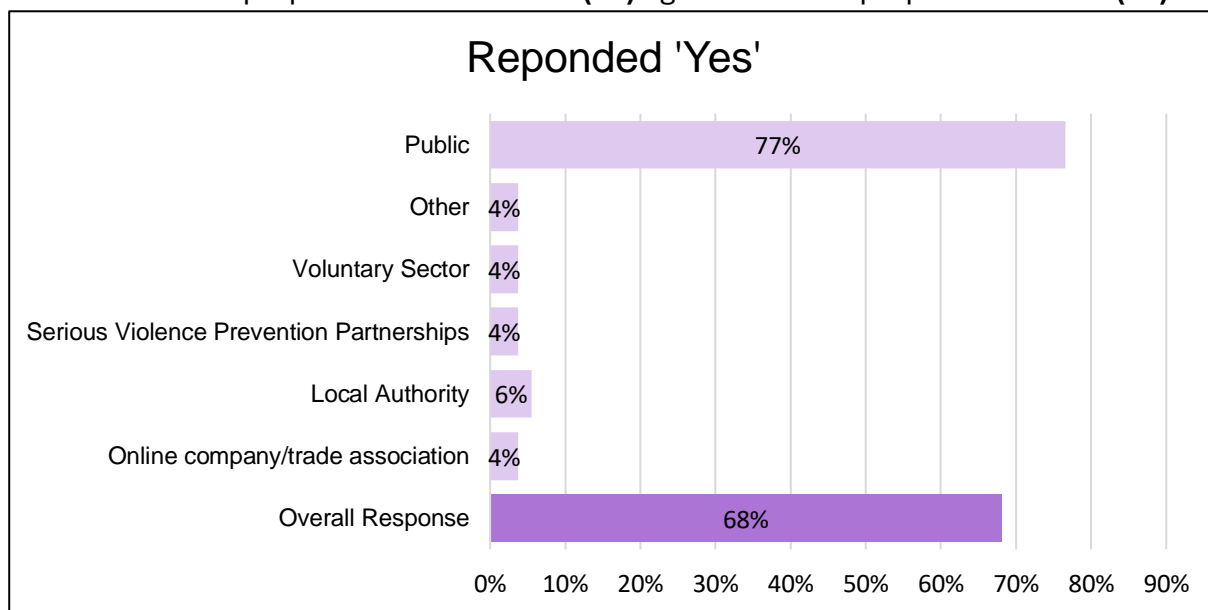
4.1 When asked whether they agreed with the Government's position on content removal notices, **76% (54)** of the 70 respondents who answered the question stated their support with **24% (16)** disagreeing. Of those who respondent yes to the question:



4.2 Of the **70** respondents who answered the question on whether they agreed with introducing content removal notices, **81% (57)** agreed with our proposal to introduce content removal notices, with **19% (13)** disagreeing. Of those who responded yes to the question:



4.3 Of the **69** respondents who answered the question on whether they agreed with the Governments proposed defences **68% (47)** agreed with the proposal and **32% (22)** disagreed.

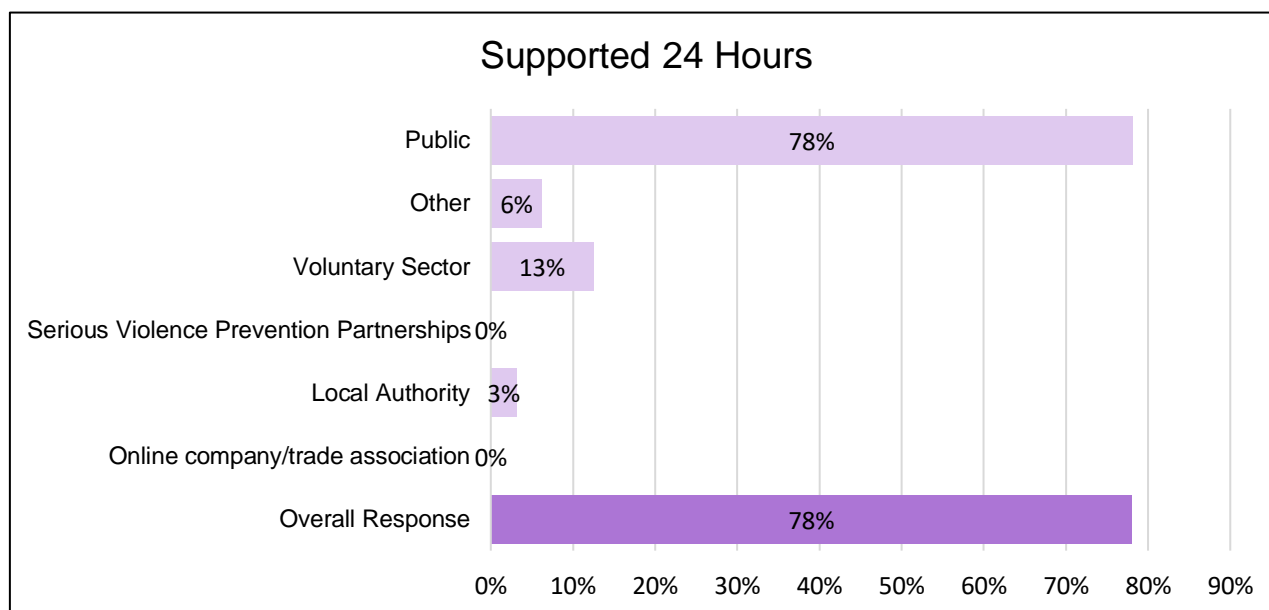


4.4 A majority of respondents had differing views about the proposal that online platforms should have 48 hours to take down content once they received a content removal notice. Of the **68** responses **37% (25)** supported this proposal while **63% (43)** did not. Of those who did support the 48 hours **84% (21)** were members of the public with **8% (two)** respondents from the 'Other' and 'Local Authority' categories.

4.5 We invited respondents who answered ‘No’ to the question to state their preferred time period. **41** respondents answered this question in the correct format. This was a multiple-choice question, with respondents able to select one of the below options:

- 24 hours – this option was selected by **78% of respondents (32)**.
- 72 hours – this option was selected by **10% of respondents (four)**.
- 168 hours – this option was selected by **12% of respondents (five)**.

Of those who supported 24 hours:



Impact of measures on online platforms

4.6 The consultation asked online platforms or marketplaces whether they anticipated having to make any changes to their processes and systems if this proposal came into force. This was a yes/no question. If they did anticipate any changes, we asked them to specify what changes they would have to make and the anticipated costs. This was a free text question. We wanted to develop our knowledge of any potential resourcing costs that online platforms and marketplaces would incur by complying with this measure to better understand the impact of the proposal.

4.7 **21% (11)** of the **53** respondents who answered the question anticipated that they would have to make changes to their systems. However, no respondent was able to provide us with details on any additional costs. This meant we were not provided with any data or information to assess the impacts of our proposals on companies.

4.8 We received comments in response to the free text questions around the effectiveness of the measure and suggested defences. These are summarised below.:

- Several respondents considered that this measure did not go far enough and was too lenient. Respondents expressed several reasons for this, believing that the penalty was too low, the sanctions should be criminal rather than civil and the company should not have a right to review the content. There were also comments reinforcing the preference for the online platforms to have 24 hours to take down the content which was demonstrated in the yes/no questions.
- Several comments were supportive of the measure. They stated that it would be effective and a step in the right direction.
- Some respondents considered that the measure was unnecessary. Respondents either believed the measure was unnecessary as online platforms were already doing enough to remove content and felt that the measure would impinge on freedom of speech or negatively impact legitimate knife sellers.

5. Question-by-Question Analysis and Government's Responses

Question 1: Do you agree with the Government's approach to introduce personal liability measures on senior executives of online companies and marketplaces?

5.1 We asked respondents to select one of the following responses:

- Yes
- No

5.2 70 respondents answered this question. **76% (54)** agreed with the government's approach, whilst **24% (16)** did not agree.

5.3 The Government will maintain the broad outline of the approach as consulted.

Question 2: Are you a marketplace or platform involved in the online sale or marketing of knives, or which has resellers operating on your platform (even if these resellers are not abiding by the terms of service)?

5.4 We asked respondents to select one of the following responses:

- Yes
- No

5.5 Of the **69** respondents who answered this question:

- **99% (68)** said they did not represent a marketplace or platform involved on the online sale of knives, or which has resellers operating on its platform
- **1% (one)** respondent said that they did represent a marketplace or platform involved in the online sale or marketing of knives, or which has resellers operating on its platform.

5.6 There were supplementary questions for online marketplaces or platforms. These asked the estimate of the volume of online sales and knives that takes place on their marketplace or platform, the anticipated changes being required to their processes and systems, and what would be the changes that would need to be made and estimated costs.

Government Response

5.7 No data or costs were provided in response to the supplementary questions. It was not possible to assess the impacts of our proposals on marketplaces or platforms involved in the online sale or marketing of knives, or which has resellers operating on its platform.

Question 3: If Yes, are you able to provide us with an estimate of the volume of online sales of knives that take place on your marketplace or platform?

5.8 We asked respondents who answered yes to question 3 to give an estimate of the volume of the online sales of knives that took place on their marketplace and platform.

5.9 Only one respondent provided an answer for this question.

[Government Response](#)

5.10 Due to the insufficient data provided in the consultation we will not use the information on the volume of knife sales in our Impact Assessment.

Question 4: If you are responding as a representative of an organisation or body, please tell us about them.

5.11 22 respondents indicated that they were from an organisation or body. The three most common categories of respondents were online companies and trade associations representing them, voluntary sector or charitable organisations and councils. Taken together they were **55%** of identifiable organisations. The remainder of respondents who identified themselves were from retailers or retail organisations, Serious Violence Prevention Partnerships and policing.

[Government Response](#)

5.12 We are pleased that we received responses from a wide range of organisations who have an interest in this measure. This has meant that we were able to take the viewpoints of all key stakeholder groups into consideration and within our consultation response.

Question 5: Do you agree that we should introduce content removal notices?

5.13 We asked respondents to select one of the following responses:

- Yes
- No

5.14 Of the **70** respondents who answered this question, **81% (57)** agreed with our proposal to introduce content removal notices, with **19% (13)** disagreeing.

[Government Response](#)

5.15 The Government will continue with its plans to introduce Content Removal Notices.

Question 6: Should online platforms and marketplaces have 48 hours to take action against a seller or reseller once issued with a content removal notice?

5.16 We asked respondents to select one of the following responses:

- Yes
- No

5.17 Of the **68** respondents who answered the question, **37% (25)** did think that online platforms and marketplaces should be given 48 hours to take action against a seller or reseller before being considered to have failed to comply with a content removal notice whilst **63% (43)** did not.

Government Response

5.18 The Government believes that having a 48-hour period strikes the right balance in giving online companies sufficient time to take down the specified content and still provides a relatively quick removal of the relevant material.

Question 7: We have proposed 48 hours but how long do you think online companies should have to take down illegal content when notified by a content removal notice (please select as appropriate)

5.19 This question was for respondents who answered no to question 4. It gave the choice of three alternatives to select which were:

- 24 hours
- 72 hours
- 168 hours

5.20 **41** respondents answered this question. Of these respondents:

- **78% (32)** wanted online platforms and marketplaces to have 24 hours to take down the content,

- **10% (four)** wanted to give them 72 hours to take down the content and
- **12% (five)** wanted to give online platforms and marketplaces 168 hours to take down the content.

5.21 The option of giving online companies 24 hours to take down illegal content was popular with respondents who identified themselves as being from the voluntary sector and members of the public.

Government response

5.22 The Government believes that having a 48-hour period strikes the right balance in giving online companies sufficient time to take down the specified content and still provides a relatively quick removal of the relevant material.

Question 8. Do you agree with the proposed defences for online platforms and marketplaces in relation to flouting the rules on knives?

5.23 We asked respondents if they agreed with the proposed defences for executives of online platforms and marketplaces in relation to flouting the rules on knives. We provided examples of the defences similar to the defences provided to senior executives under sections 109 and 110 of the Online Safety Act 2023. These included defences covering instances where the senior executive has taken all reasonable steps to comply with the Content Removal Notice or where the senior executive was too new in post to be considered responsible for failing to comply with the notice or had no knowledge of being named as the senior executive with responsibility for ensuring the notice was actioned.

5.24 We asked respondents to tick one of the following responses:

- Yes
- No

5.25 Of the **69** responses to this question:

- **68% (47)** of respondents agreed with the proposed defences

- **32% (22)** of respondents disagreed.

5.26 More respondents who identified themselves as being from an organisation and answered the question were in favour of the proposed defences than not:

- **61% (11)** agreeing with the defences
- **39% (seven)** disagreeing with the defences.

5.27 Support was evenly distributed across all categories of respondents who identified themselves as being from an organisation.

[Government Response](#)

5.28 Recipients of Content Removal Notices will have the opportunity to request the police review the notice. They will also have the opportunity to send representations to the police before being issued with a Civil Penalty Notice as well as challenge the penalty in the county court. This will provide both a fair and effective process to support the prompt removal of online illegal knife related content for those subject to it.

[Question 9: Are there any further defences that we should consider to be included?](#)

5.29 We asked respondents if there were any further defences which we should consider. This was a free text question.

5.30 Of the **21** respondents who commented:

- **24% (five)** did not think the measure should be introduced. Respondents who expressed this sentiment were concerned that the measure was too restrictive and questioned its necessity, often both at the same time.
- **14% (three)** felt that there should be no defences. This was a similar percentage to those who expressed the view that executives should face criminal sanctions.

[Government Response](#)

5.31 Recipients of Content Removal Notices will have the opportunity to request the police review the notice. They will also have the opportunity to send representations to the police before being issued with a Civil Penalty Notice as well as challenge the penalty in the county court. This will provide both a fair and effective process to support the prompt removal of online illegal knife related content for those subject to it.

Question 10: Do you anticipate changes being required to your processes and systems, on relation to this specific change (in addition to any changes you have made or plan to make to comply with your duties under the Online Safety Act 2023)?

5.32 This question was aimed at online platforms and marketplaces to assess the regulatory impact of our proposals on them. We asked respondents to select one of the following responses:

- Yes
- No

5.33 Of the **53** respondents who answered this question, **21% (11)** said that they would have to change their processes and systems.

Government Response

5.34 The Government considers that reducing the risk that individuals, especially under-18s, could acquire illegal weapons or illegally marketed knives online justifies this proposal.

Question 11: If you have answered 'Yes', what would be the changes that you need to make and estimated costs (including the hiring of additional content moderators and their FTE costs)

5.35 We asked respondents to provide more detail of the changes they would need to make. This was a free text question intended to help us develop our Impact Assessment.

5.36 Respondents were unable to provide any details of the changes they would have to make.

5.37 Due to the insufficient data provided in the consultation we will not be able to add information on the volume of knife sales to our Impact Assessment.

Question 12: To what extent do you feel this policy will result in illegal content in relation to knives and offensive weapons being more swiftly removed from online platforms?

5.38 We asked respondents for their views on the impact of the policy. This was a free text question.

5.39 30 respondents answered this question. Of these respondents:

- **50% (15)** believed that this measure would have a negative impact or no impact at all,
- **33% (10)** felt it would have a positive impact and
- **17% (five)** were unsure or made comments which were unrelated to the impact of the policy.

5.40 Respondents who did not believe this measure would have a positive impact had several concerns. Respondents who felt that the measure would be ineffective believed aspects of it were too lenient towards the senior executive. There was concern with the level of the penalty, which several respondents thought should be higher, as well as the fact that this was a civil penalty notice rather than a criminal offence. Respondents felt that this prevented the measure from being an effective deterrent. There were also suggestions that content which was under review should be taken down as a default to prevent overly slow takedown of illegal knife related content.

5.41 Similar views that the measure should go further, were also expressed by some respondents who were unsure about the measure.

5.42 Respondents who believed that this measure would have a positive impact felt that the accountability this legislation provides to senior executives would help ensure there was less illegal knife related content online and as a consequence less knife related crime.

5.43 The Government does not believe that criminal sanctions are proportionate. The purpose of the measure is to ensure the swift take down of illegal knife related content and that illegal sales and/or marketing of knives is prevented. The Government believes that to achieve this, a Civil Penalty notice issued by the police will achieve the intended outcome.

6. Business and Trade Responses

- 6.1** We received several responses from online companies and the trade associations representing the tech sector. This included a trade association for the UK technology sector, which represents over 1000 members, and an international trade association which has been in operation for more than 50 years and whose' members are collectively responsible for over 1.6 million jobs worldwide.
- 6.2** Some respondents believed that the measure was unnecessary as online companies already had a range of effective systems in place to take down illegal content and quickly responded to law enforcement requests.
- 6.3** Some respondents also expressed concern that the this could potentially conflict with the Online Safety Act 2023 and its stance on personal senior executive liability and lead to the creation of duplicate and thus inefficient reporting regimes.
- 6.4** Responses from this group included concern that the 48-hour time period did not reflect the approach taken by the Online Safety Act 2023, which places a duty on companies to have processes in place allowing for the swift removal of content rather than set a specific timeframe. There were also concerns about whether a company would be liable if the police failed to provide sufficient information in a Content Removal Notice which caused the company to fail to meet the 48-hour deadline, or if the company was unable to decide whether a piece of content was illegal or not within 48-hours.
- 6.5** Some respondents also suggested some additional defences for senior executives. One respondent wished for platforms to be able to provide a reporting route for law enforcement to serve Content Removal Notices to, with a defence being available if law enforcement did not

appropriately follow this process. There was also a suggestion that there be defences available in instances where ambiguity over the legality of a piece of content required detailed dialogue with law enforcement.

[Government Response](#)

- 6.6** The Government considers that more needs to be done to reduce the ease with which illegally marketed knives and other offensive weapons can be bought on online platforms and marketplaces.
- 6.7** The proposed measure sits alongside, and does not conflict with, the structures established through the Online Safety Act 2023 and is aimed at supporting the police in seeking the removal of specific pieces of content relating to the sale of illegal knives and weapons and the illegal marketing of knives.
- 6.8** The Government believes that the review process designed within the proposal adequately addresses online companies' concerns with cases where it would be difficult to determine the illegality of content.

7. Next Steps

- 7.1** The Government will introduce legislation to support the removal of illegal knife related content from online platforms, marketplaces, and search services. Failure to remove this material will ultimately lead to the senior executives of online companies facing penalties.
- 7.2** The measure being brought forward will:
- Require online companies to designate an appropriate senior UK based executive when requested by the police. Should they fail to do so the police may issue them with a Civil Penalty Notice of up to £60,000.
 - Provide the police with the power to issue Content Removal Notices to online companies and their designated senior UK based executive. These will require companies to take down specified illegal knife and offensive weapons content within 48-hours.

- Provide the police with the power to issue Civil Penalty Notices of up to £60,000 to online companies and up to £10,000 to the designated executive when they fail to comply with Content Removal Notices.
- Allow online companies and designated executives to have the police review Content Removal Notices
- Allow online companies and designated executives to make representations before being issued with a Civil Penalty Notice.

8. Consultation Analysis Methodology

8.1 The questions stated throughout this document were the questions as worded in the full consultation document published on Gov.uk.

8.2 All responses were considered equally. We received responses via the online survey and through the dedicated mailbox.

8.3 The analysis was conducted against only completed consultation responses. The decision was taken not to include incomplete or partial online survey responses on the grounds that the respondent had not formally submitted the data and may not have intended for their responses to be read and used within the analysis.

8.4 Data from the quantitative data (i.e. closed questions which invited “Yes” and “No” responses) were automatically extracted and analysed. All qualitative data (i.e. those responses to open questions or where a respondent had submitted a letter or email rather than answer specific questions) were also logged and analysed. This was done by coding responses to identify frequently occurring themes. The findings have been reported within this consultation response.

8.5 Whilst there is an element of subjectivity when coding qualitative responses, this was minimised by carrying out additional quality assurance.

8.6 A number of detailed consultation responses were received that did not adhere to the formal structure and questions posed. These were fed into the Government’s response.

8.7 All percentages provided in this document have been provided to the nearest whole number.

- 8.8** Respondents were not required to respond to each question to submit a response. This meant that we received a different number of responses to each question. Therefore, figures provided are based on the number of responses that we received for that question and not on the total number of responses.
- 8.9** The consultation included some multiple choice and some free text questions. We have included the most common responses to the free text questions.
- 8.10** We considered responses which were submitted via a non-standard format separately from the others. We received 3 responses in a different format to the consultation which we did not include in our analysis of the consultation responses, though we did take them into account.
- 8.11** Some responses were submitted in confidence. We have endeavoured to prevent any respondent being identified in our consultation response.