

Regulatory Outlook: Summer reading list

Advertising and marketing

As foreshadowed in last year's summer call to action, the UK government has brought forward legislation (in the form of the Advertising (Less Healthy Food Definitions and Exemptions) Regulations 2024) restricting the advertising of junk food to children. From 5 January 2026, adverts for less healthy food and drink will be banned from being shown on TV before 9pm and paid-for online ads will be completely prohibited in the UK. Originally slated for 1 October 2025, the effective date has been pushed back to allow the government to consult on secondary legislation that will exempt "brand advertising" from these rules, following industry concerns over the ASA's implementation guidance. However, in-scope companies have committed to complying with the restrictions from the original effective date of 1 October 2025. This means that, although compliance will be expected from this date, the ASA cannot enforce until the legislation becomes effective. Businesses should also keep an eye out for the government's consultation exempting brand advertising and further implementation guidance from the regulators.

Artificial intelligence

On 2 August 2025, [provisions](#) on general-purpose AI (GPAI) in the EU AI Act become applicable, along with the conformity assessments, governance, penalties and confidentiality provisions. The AI Office has finalised its GPAI code of practice, which is designed to assist GPAI model providers in complying with the Act. Once the code is endorsed by the member states and the European Commission, GPAI model providers (who voluntarily sign the code) will be able to demonstrate compliance with the relevant Act obligations by adhering to it.

Bribery, fraud and anti-money laundering

Failure to prevent fraud: the clock is ticking!

Preparations should be well under way for businesses to ensure they have reasonable procedures in place to prevent fraud before the new failure to prevent fraud offence comes into force on 1 September 2025. For more on what businesses should do to prepare, see our [video series](#) and read our [Insight](#).

Competition

Get prepared to respond to CMA RFIs.

It is expected that the CMA's increased investigatory powers under the Digital Markets, Competition and Consumer Act 2024 (DMCCA) will lead to an increase in "requests for information" (RFIs) from the CMA. Businesses will need to ensure these requested are managed in both a compliant and efficient manner. As a useful starting point, our [flyer](#) provides some easily digestible top tips to ensure you are well prepared.

Consumer law

Compliance with the DMCCA should be high on the agenda for all consumer-facing businesses. The unfair commercial practices provisions came into force on 6 April 2025, and the CMA has already outlined how it intends to implement its consumer protection duties, taking the "4Ps" approach – pace, predictability, proportionality and process – which will govern its enforcement strategy.

While the CMA has said it will assist businesses with compliance over the next 12 months, it has also made it clear that it will take enforcement action immediately against "clear infringements of the law". Further, its three-month grace period for complying with the new fake reviews regime has now ended and the regulator has said that it now plans to look into "the conduct of players across the sector", including businesses whose products and services are listed on review sites, to determine whether further action is needed. It is also currently conducting a sweep of review platforms to identify those that "may need to do more to ensure compliance". As for the new "drip pricing" and "material information" pricing provisions, the CMA is adopting a phased approach to compliance. It is currently consulting on

draft price transparency guidance covering what traders need to do to ensure compliance – organisations have until 8 September 2025 to provide feedback.

Cyber security

Businesses which will be caught by this new law should begin preparations for the introduction of the forthcoming Cyber Security and Resilience Bill. The bill, which was announced in the King's Speech last July, will align with the EU's NIS 2 Directive. It aims to strengthen the cyber resilience in sectors deemed critical for the UK and its economy. See more in our [Insight](#).

Data law

With the [Data \(Use and Access\) Act 2025](#) finally becoming law, businesses need to be aware of the changes it brings. A few provisions took effect immediately, while others will be implemented in stages. The Information Commissioner's Office (ICO) has also announced plans for new and updated guidance on various issues following the Act coming into force, so businesses should keep an eye out for these updates. The ICO is currently consulting on a new chapter in its draft updated "Guidance on storage and access technologies" (previously known as the "Guidance on the use of cookies and similar technologies") which was added to the updated draft guidance to reflect changes introduced by the Act.

Businesses, particularly those in the adtech sector, have until 29 August 2025 to provide their views on the ICO's approach to enforcing the Privacy and Electronic Communications Regulations regulation 6 consent requirements. The regulator is exploring whether there are circumstances in which storage and access of information for certain advertising purposes can pose a low risk to users' privacy and, therefore, should not require consent.

Digital regulation

The provisions of the Online Safety Act 2023 (OSA) are rapidly coming into effect, and Ofcom is already taking proactive steps to enforce them. The illegal content duties under the OSA are in full effect and, by 24 July, services likely to be accessed by children must also complete and record a children's risk assessment to assess the risk of children encountering harmful content on their service and the impact on them. From 25 July 2025, they will need to implement measures outlined in the protection of children codes of practice, or equivalent measures, to safeguard children and mitigate the risks identified in their children's risk assessments. Ofcom has already established four enforcement programmes to monitor compliance, focusing on illegal content risk assessment and record-keeping duties, age assurance measures to protect children from encountering pornographic content, targeting child sexual abuse online and children's risk assessment duties. Ofcom is also now consulting on additional measures for its illegal content and protection of children codes of practice – responses must be submitted by 20 October 2025.

Employment, contingent workforce and immigration

Employment Rights Bill

On 1 July, the government [published its roadmap](#) for implementing the Employment Rights Bill, together with anticipated commencement dates for different parts of the bill. Headline proposed implementation dates are that April 2026 will see reforms to statutory sick pay, simplification of the trade union recognition process and day one paternity and unpaid parental leave rights coming into force. Under current proposals, these will be followed in October 2026 by changes to the fire and rehire rules, strengthening of trade unions' right of access and changes to employment tribunal time limits. The changes to unfair dismissal, requirements around gender pay gap action plans and reforms to tackle exploitative zero hours contracts will not now happen until 2027.

The roadmap confirms that, for many measures, the government will consult on the detail of policy and implementation. Read more in our [Insight](#) and on our [dedicated microsite](#) tracking the changes.

EU Pay Transparency Directive

The EU Pay Transparency Directive provides a significant shift in how pay equity is approached in EU member states. It aims to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through greater pay transparency, reporting obligations and enforcement mechanisms. EU member states must transpose the directive into their national law by 7 June 2026.

While the UK is no longer a part of the EU, the directive will be relevant to UK-based businesses that operate in or hire employees based in EU member states, or who are part of organisations with EU operations where a global approach towards compliance is being adopted. UK employers will also need to be alert to and pre-empt any employee relations issues where different obligations apply across different jurisdictions. Read more in our [Insight](#).

Immigration

On 12 May 2025, the UK government published a white paper policy document called [Restoring control over the immigration system](#). It is important that sponsor licence holders and employers with overseas workers take note of changes and review their current sponsored and overseas workers to ensure that they will qualify for extensions and what actions can be taken to ensure continued right to work in the UK. This is particularly relevant where the new entrant rate was relied upon, as salary changes could be significant and could mean continued sponsorship is not possible. Therefore, employers are encouraged to plan ahead and manage expectations. See more in our [Regulatory Outlook](#).

Environment

Businesses that operate within the water and sewerage industry will need to ensure familiarity with the new legal requirements introduced on 23 June 2025, including the obligation on water and sewerage businesses to produce annual drainage and wastewater management plans to reduce pollution incidents, outlining specific measures to tackle pollution. Furthermore, the plans will need to include strategies for using nature-based solutions in order to promote sustainable and eco-friendly practices within the industry. Our environmental specialists can provide expert support and guidance to businesses affected by the new requirements.

ESG

As the EU's Omnibus I package progresses through the European Parliament and Council, businesses should stay informed about the proposed changes to the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD). After the summer recess, negotiations between the institutions will soon begin, and it will be important for businesses to monitor these developments to see how the changes to the CSRD and CSDDD will affect them.

For an overview of the changes under the EU Omnibus I as proposed by the European Commission, watch our latest [Eating Compliance for Breakfast webinar](#).

Fintech, digital assets, payments and consumer credit

The Supreme Court aims to deliver its judgment in *Johnson v FirstRand Bank Ltd* in July 2025, and the Financial Conduct Authority (FCA) plans to confirm, within six weeks of the judgment, whether it is proposing to introduce an industry-wide consumer redress scheme. If the FCA decides to propose a redress scheme, businesses should look out for the FCA's consultation setting out how it would work, together with draft rules. Following the consultation, the FCA is expected to confirm whether it goes ahead with the scheme, and if so, what the final rules are.

Food law

The Genetic Technology (Precision Breeding) Regulations 2025, coming into force on 13 November, will establish a new [regulatory framework](#) to facilitate the use of precision bred organisms (PBOs) in England. This will enable businesses to start applying for release and marketing authorisations for PBOs. Companies operating in this sector should familiarise themselves with the new framework and application process ahead of the regulations coming into effect.

Health and safety

The Terrorism (Protection of Premises) Act received royal assent earlier this year. Companies within scope have until 3 April 2027 to assess whether they are standard tier or enhanced tier dutyholders, and implement policies and procedures to reduce the likelihood of injury in the event of a terror attack occurring at their premises and events. We recommend assessing whether your organisation is within scope of the Act, the duties that will apply, and conducting a risk assessment to prepare the required policies and procedures.

Modern slavery

The first half of the year has seen significant developments in the UK's efforts to combat modern slavery. This includes an [inquiry into forced labour in global supply chains](#), updated [government guidance](#) for businesses on slavery and human trafficking in supply chains, and new regulations set to be [introduced](#) to tackle modern slavery in NHS procurement. We anticipate continued progress from the UK government in this area during the second half of the year. The 2024 World Uyghur Congress Court of Appeal decision clarified the potential anti-money laundering risks that can arise from forced labour in supply chains. This year, activist groups and stakeholders have sought to use it to bring greater focus onto the issue, and force businesses to do more to address it. Businesses need to be alive to developing reforms, but also to the wider potential impacts and consequences of modern slavery issues in their supply chains.

Products

The Product Regulation and Metrology Bill has received Royal Assent. The government is expected to launch several consultations in the autumn regarding various pieces of secondary legislation it plans to introduce using the new powers granted by the bill. Consequently, businesses should stay informed about these consultation processes and decide if they want to participate. Read more in our [Products Regulatory Outlook](#).

Regulated procurement

The government has launched a consultation on proposed reforms to public procurement aimed at improving access to public contracts for small and medium-sized enterprises and voluntary, community and social enterprises; maximising value for money through social value; strengthening the UK's economic resilience; and supporting British businesses. The most significant changes for suppliers relate to contracts valued at over £5 million. Proposals for contracts over £5m include excluding suppliers who do not pay invoices in their supply chain in accordance with the Prompt Payment Code, introducing a mandatory KPI on social value and permitting contracting authorities to decide where social value must be delivered. The consultation closes on 5 September.

Sanctions and export control

US tariffs pause ends 1 August – are you prepared?

The 90-day pause on tariffs announced by President Trump on US imports around the world was due to expire on 9 July 2025 but has now been extended to 1 August – further delaying a much needed resolution to the global economic uncertainty. Businesses should keep an eye out for the final tariffs that may apply to different countries and how these will affect their current and future contracts. In this [Insight](#), our experts provide guidance to businesses looking to mitigate the impact of any new tariffs on their commercial arrangements and supply chains.

OFSI market reports – time for a policy refresh?

The Office of Financial Sanctions Implementation (OFSI) has published a series of threat assessment reports identifying sector-specific threats, red flags and providing guidance on how to ensure sanctions compliance. The reports currently cover the following sectors: [financial services](#), legal services, [property and related services](#) and [art market participants and high value dealers](#). Our experts have published an [Insight](#) on the property sector report, but firms in other sectors should also be looking to refresh their policies to ensure they incorporate sanctions checks and reporting processes as OFSI has made it clear that they will be expecting better compliance across the board.

Telecoms

Strengthen your compliance with existing telecoms regulations

While there are no major telecoms-specific regulatory changes on the immediate horizon, our sector experience has shown that there are many providers who are still not complying with the current regulatory requirements. This summer period therefore presents a valuable opportunity for providers to review and ensure that their processes, documentation and contracts are fully aligned with current standards. Failure to do so places providers at risk of enforcement action from Ofcom, who continue to proactively investigate companies of all types and sizes.

In particular, providers should focus on ensuring they meet the following recently introduced requirements:

- contracts, related documents and the sales journeys should be updated to reflect January's [ban on mid-contract price rises linked to inflation](#);
- security procedures should be reviewed to ensure compliance with the Telecommunications (Security) Act 2021. This is especially important for Tier 2 providers (relevant turnover over £50million) for whom the compliance deadline was March this year and affects day to day cyber-security operations as well as supply chain contracts;
- roaming notifications should be checked to confirm they align with the [new requirements](#) introduced at the end of 2024;
- responding to Ofcom's [general demand for information](#) under the Premium Rate Services Order if you satisfy the meaning of a "liable network operator";

- [registering with Ofcom](#) if you are involved in the provision of a premium rate service. This includes intermediaries, merchants and network operators; and
- having in place a gaining provider led switching process for fixed line services. This applies to both business and consumer customers.

A timely new consultation has also been launched by the CMA in respect [of price transparency guidance](#) under the Digital Markets, Competition and Consumer Act 2024 which addresses concerns from the telecoms sector regarding the requirement to state the "total price" for subscription contracts in an invitation to purchase. The CMA has proposed that for telecoms services with a monthly price and minimum fixed term, that the total price information requirement can be satisfied by including the total monthly price together with the minimum number of months of the fixed term. The consultation closes on 8 September 2025.

At Osborne Clarke, we believe that taking proactive steps now can help providers to avoid the significant time and resource cost of responding to an Ofcom investigation in the future. Use this period to review and enhance your compliance measures and safeguard your operations.

For tailored guidance and expert support, please do not hesitate to reach out to our team.

