IPPR National Renewal Programme

# EMPOWERING PEOPLE TO HOLD TECH ACCOUNTABLE

**Swee Leng Harris**

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# 1. SUMMARY AND INTRODUCTION

*"Justice is what love looks like in public."*
**Dr Cornel West**

Process is political. Legal procedures are governed by rules that structure whether and how people can access the courts for justice. Questions of power underpin the often-overlooked topic of this paper: civil procedure laws for litigation against tech companies. Current laws essentially preclude people and non-governmental organisations (NGOs) from suing tech companies because of financial risks, limitations on who can bring a claim, and burdensome processes for collective actions (litigation on behalf of many people) when harms occur at scale. The cumulative effect of these laws is to block public interest litigation against companies on issues such as workers' rights, privacy and consumer protection when people are negatively affected by technology, including artificial intelligence (AI). Big tech, in particular, wields deeply inequitable power over people, and civil procedure reinforces this one-sided power dynamic. Reforms recommended in this paper would remove structural barriers to people and civil society taking direct action against tech companies in UK courts – putting more power in the hands of people.

Addressing corporations' negative impact on people from technology, including AI, is at the heart of this paper; tech harms present a new policy challenge because of technology's opacity and scale, and big tech's market dominance. A well-known example of harm from technology is the Post Office scandal, in which errors by Horizon software caused hundreds of people to be wrongly accused of theft and fraud. The human impact included sub-postmasters being dismissed, criminally prosecuted, bankrupted or suffering poor mental health, and several died by suicide (Department for Business and Trade 2024). In a more recent example, Grok, the generative AI developed by Elon Musk's xAI, was used to create non-consensual nude images of people. It is estimated that Grok was used to generate 3 million sexualised images, including 23,000 of children, over 11 days (Center for Countering Digital Hate 2026). These examples illustrate the ways that corporations' technology can cause people to lose control in their lives and experience serious harms.

Holding tech companies legally accountable has widespread public support. Lack of agency over AI is a key source of concern for the UK public (Devlin et al 2026). YouGov polling indicates that two-thirds of people in the UK believe it is important for the law to be enforced against tech giants (Sellman 2025). This sentiment was reflected in the interest that the British public showed in Meta's recent legal settlement and defeat in the US (see, for example, Kleinman 2026).

Civil procedure law reforms recommended in this paper would open access to justice for people harmed by tech companies. Section 2 identifies three categories of tech harms – labour, public and consumer – with examples of worker exploitation, disinformation-fuelled racist violence and predatory advertising. Bearing these examples in mind, I highlight procedural barriers preventing direct legal action against companies, and make recommendations to remove them. Section 3 makes the case for enabling people and NGOs to

litigate directly against tech companies, using the rule of law as a countervailing power to tech corporations, and explains the relationship between civil litigation and regulators. Finally, section 4 outlines the interaction between procedural rules and funding for litigation, and makes further recommendations to improve funding availability.

### LEGISLATIVE RECOMMENDATIONS

The government should do the following.

1. Legislate for NGOs to have standing in civil litigation against tech companies, empowering them to bring public interest cases.
2. Introduce opt-out collective action procedures for claims against tech companies, including in workers' rights cases, and enable NGOs to act as litigants representing collective interests. These procedures make it significantly easier to collectivise legal claims common to many individuals (eg workers at the same company).
3. Legislate to align capping adverse costs in public interest civil litigation with cost capping in judicial review, which would limit the financial risk of losing a case.
4. Implement the Civil Justice Council (CJC) recommendations for regulation of commercial litigation funding to help protect claimants and strengthen their position in relation to funders.
5. Act on the CJC's recommendation for legislation to remove the legal barrier to litigation funding resulting from a 2023 Supreme Court decision, enabling commercial litigation funding.

Taken together, these recommendations would be a bold package of legislative reforms, but there are some 'low-hanging fruit' that could be implemented swiftly. As a first step under recommendation 1, standing for NGOs could be established through secondary legislation for data protection law and the Digital Markets, Competition and Consumers Act 2024. Recommendation 3 could be included in the promised legislation to address SLAPPs (strategic lawsuits against public participation). Implementing the recommendations in full would require coordinated cross-departmental action by the Department for Digital, Culture, Media and Sport (DCMS), Department for Business, Innovation, Science and Trade (DBIST), and the Ministry of Justice, as well as engagement with the courts.

The vast power of big tech companies that are largely based in the US has intertwined with the power of President Trump's administration. Big tech's power is reflected in corporate profits and market valuations, which are comparable to the economic power of some countries. The UK's GDP in 2025 was £3,040 billion in cash terms, while Google's parent company Alphabet's annual revenue was over $400.2 billion and its market capitalisation reached $4 trillion in January 2026 (Powell 2026; Roush 2026). Tech company founders and CEOs prominently attended President Trump's 2025 inauguration: Elon Musk (Tesla, X), Mark Zuckerberg (Facebook, Instagram, WhatsApp), Jeff Bezos (Amazon), Sam Altman (OpenAI), Shou Zi Chew (TikTok) and Sundar Pichai (Google) (Metzger et al 2025). Photos of President Trump flanked by the 'broligarchy' at the ceremony reflected the administration's close relationships with the industry (Samuel 2025; Harrington 2024).

The UK government is under pressure from the US not to regulate tech companies, while also navigating China's increasing power. Tech has augmented China's

power – for example, China controls 60 per cent of global production of rare-earth elements, which are essential components in digital technology (Szczepański 2025), and Chinese companies are developing AI models that rival those from US companies (Velasquez 2026). Meanwhile, President Trump recently threatened punitive trade tariffs aimed at coercing the UK to remove its digital services tax on major tech companies (Sky News 2026). In January 2026, US government representatives threatened retaliation for UK regulatory investigation of X and Grok AI's creation and distribution of non-consensual sexual images (Clifton 2026). The UK government has seemed to follow a deregulatory logic in this context, pressuring regulators such as the Competition and Markets Authority (CMA) not to act against tech companies (Jack and Edwards 2025), causing a majority of the UK public to believe the government prioritises the interests of tech companies over public interest (Nuala and Modhvadia 2025).

Fairness demands that people should have the power to take direct action against tech companies in court to enforce their rights and hold companies accountable for unlawful practices, but UK civil procedure thwarts such efforts. These processes and procedures are not neutral; they are political and shape power in our legal system, reinforcing corporate power.

This paper's focus on civil litigation's potential to empower civil society and people to enforce laws against tech companies differs from most tech policy arguments, which concern new substantive laws on how tech companies should operate – for example, banning social media for children – or only consider the role of regulators. Too often, policy debates on substantive laws neglect due consideration of how they will be enforced, resulting in rights and protections on statute books that are not implemented (Harris 2024). Civil litigation as a parallel enforcement mechanism to regulators empowers people to take direct legal action to counter corporate power. Civil litigation provides a complementary avenue alongside public regulatory enforcement that can bolster regulators' power or mitigate the risks of inactive regulators and changing political winds.

# 2. TECH HARMS AND PROCEDURAL BARRIERS TO JUSTICE

This section illustrates three categories of tech harms with examples: labour, consumer and public harms.[1]

Many of the problems caused by tech companies are not new, but tech harms are particularly challenging due to the opacity of data-driven systems, dominant market power of big tech companies and scale of impact. Dominant market power and scale especially characterise harms from big tech companies, but as the Horizon IT scandal demonstrated, tech's opacity and scale can characterise tech harm outside the big tech context. The UK urgently needs to get ahead of tech's harmful effects given the rise of AI, which perpetuates similar patterns of harm to other data-driven technology.

### EXAMPLE 1

***Labour harms: Exploiting workers***

Tech companies use data and algorithms to exploit workers, and the ur-example of this is Uber. In 2023, Uber introduced a 'dynamic pay' system that algorithmically determines driver pay and price for passengers. Importantly, "The price the passenger pays and the fee the driver receives vary independently of each other, and are calculated dynamically" (Binns et al 2025). Uber discloses only some of the factors in this calculation. Research on Uber's system published in June 2025 found that:

- workers' pay has declined and become less predictable
- pay inequality has widened
- Uber's commission is less transparent and has increased
- drivers' working time is increasingly unpaid (Worker Info Exchange 2025).

#### OPACITY OF ALGORITHMIC SYSTEMS

This research required a concerted effort of data gathering due to the opacity of Uber's systems. NGO Worker Info Exchange worked with 258 drivers to obtain access to their personal data and build a dataset of 1.5 million trips, which academics at Oxford University analysed. A single driver acting alone would not have been able to undertake such research based only on their personal data.

British requirements on who may bring civil litigation, which is called 'standing', generally exclude NGOs because only individuals whose rights have been

1 There may be other categories of tech harms such as competition harms to other businesses, and the categories discussed here are not exhaustive. For example, another framework of tech harm categories distinguishes between individual, collective and societal harms (Smuha 2021). For the purposes of this paper, the categories of labour, consumer and public harms are helpful for understanding the nature of procedural reforms discussed.

infringed or have suffered harm can bring a claim. By contrast, EU laws make it easy for organisations to bring cases on behalf of individuals or in the public interest (Harris 2024). This approach means that an organisation rather than an individual takes on the pressure of litigation, and such organisations can have in-house legal expertise, making them stronger actors in a legal process than a potentially more vulnerable individual.

Opacity of tech companies' systems, like Uber's, presents challenges for evidence gathering and legal action, and NGOs can play an essential role to overcome them. For example, I chair the supervisory board of Dutch foundation Worker Info Exchange International, which has commenced litigation against Uber in the Netherlands demanding legal redress to compensate workers for the algorithmic exploitation explained above, including for drivers in the UK (Hills 2026; Stichting WIE International 2025). At present, digital rights NGOs can only litigate against tech companies for suspected unlawful conduct under UK data protection law if an individual expressly delegates their rights to the NGO, which constrains the potential for NGOs to litigate in the public interest (UK General Data Protection Regulation (GDPR) article 80(1); Delli Santi 2022). Digital rights and social justice NGOs should be empowered through standing for civil litigation in the public interest across all legal areas if they identify possible unlawful conduct by a tech company.[2]

#### RECOMMENDATION 1

**The government should legislate for NGOs to have standing in civil litigation against tech companies, empowering NGOs to bring public interest cases (Harris 2024; see also European Union Agency for Fundamental Rights 2020; and Tennison 2024). As a first step, this could easily be done through secondary legislation for data protection law and the Digital Markets, Competition and Consumers Act 2024.[3]**

## EXAMPLE 2

### *Public harms: Fuelling racist violence*

Racist violence and protests in the UK were fuelled by online mis- and disinformation following the horrific attack and murders of three young girls in Southport in summer 2024. The source of disinformation about a suspect was a story on Channel3Now, which it posted on X: that post was viewed nearly 2 million times according to NGO Check My Ads.

Check My Ads (2025) explains that Channel3Now is one of many Made for Advertising (MFA) websites, which are 'low-quality publishers that exist to profit from ads'. Channel3Now receives revenue from ad tech companies for displaying ads on its website, which people visited if they clicked on the Southport

2 Environmental law has a well-established principle that environmental NGOs have standing to challenge environmental decisions (Article 9 of Aarhus Convention; Passarini 2023; see also United Nations Economic Commission for Europe 2014).The broad scope for standing to bring environmental law cases enabled the NGOs Foxglove and Global Action Plan to challenge the approval process for a new hyperscale datacentre in the UK, which has resulted in the developer accepting that it must be subject to binding environmental conditions (Foxglove 2026; Global Action Plan 2026). See also discussion of standing by Abate (2025).

3 The UK GDPR empowers the secretary of state to give NGOs standing to challenge unlawful use of data by companies without requiring express mandate from individuals affected, but no UK government has decided to enact such a rule (Article 80(2)). Public interest standing for NGOs is also provided for in the Digital Markets, Competition and Consumers Act 2024 sections 151–153, under which the secretary of state may give NGOs standing to apply for court enforcement orders to stop unlawful commercial practices. See also article 11 of Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market, under which organisations with a legitimate interest in combatting unfair commercial practices must be able to bring litigation or regulatory complaints against such unfair commercial practices. This mechanism for standing has been used by a German consumer protection association to litigate against Meta (Meta Platforms Ireland Limited v Bundesverband der Verbraucherzentralen und Verbraucherverbände – Verbraucherzentrale Bundesverband e.V., Case C-319/20).

story on social media. Check My Ads identified nine ad tech companies with a direct relationship with Channel3Now, including Google. Google did not answer questions from the UK parliament's Science, Innovation and Technology Committee (2025), such as how much revenue Google derived from ads on Channel3Now and how much revenue Channel3Now derived from Google.

### UNPRECEDENTED SCALE

People have spread mis- and disinformation with technology since the invention of the printing press, but the scale and speed of dissemination enabled by social media is novel and AI is supercharging disinformation production. The Channel3Now disinformation was spread on social media such that misinformation about the suspect's identity received at least 155 million impressions on X within 12 days (Check My Ads Institute 2025; Jones 2025).

The large scale of tech harms needs to be met with collective action litigation ('class action' type proceedings) to uphold people's rights, which these companies breach at scale (Tennison 2024). For example, a Dutch collective action against Oracle and Salesforce seeks redress on behalf of millions of individuals for data harvesting practices that profile internet users for ads, illustrating this dimension of scale (The Privacy Collective no date). Dutch civil procedure for collective actions means that Dutch individuals are represented by default in collective actions against a company, but UK individuals have to actively opt-in for most collective actions.[4] British civil procedure law's opt-in structure places an administrative legal burden on people in the UK that poses a barrier to access to justice not faced by those in the Netherlands (BEUC 2022b).

### RECOMMENDATION 2

**The government should introduce opt-out collective action procedures for claims against tech companies, including in workers' rights cases, and enable NGOs to act as litigants representing collective interests.**

## EXAMPLE 3

***Consumer harms: Predatory marketing based on privacy violations***

A man recovering from gambling addiction has sued Sky Betting & Gaming (SBG), one of the UK's largest online gambling companies, for using personal data to target him with online marketing.[5] SBG used data about the claimant that it collected directly and from third-party ad tech companies for invasive profiling and marketing. Confidential documents revealed "hundreds of thousands of pieces of data that were used to profile and target him. The data filled more than 2,400 spreadsheets and had been used to predict his behaviour and select him for targeted marketing campaigns" (Ungoed-Thomas and Das 2025). The claimant succeeded at first instance, but the final outcome remains a matter of appeals and future proceedings.[6]

Actors across the ad tech industry are implicated in these kinds of predatory marketing practices, including social media companies (Dent 2025). Targeted ads on social media also produce other harms, such as distress for people who

4 The only area of law in which people are represented by default in a collective action at present is Competition law.

5 The claimant's identity remains anonymous.

6 The appeal was allowed and the first instance judge's decision was set aside due to the Court of Appeal's differing interpretation of the law. However, the case was to be remitted to the High Court (RTM v Bonne Terre [2026] EWCA Civ 488).

experience pregnancy loss and are nevertheless bombarded with baby-related ads due to social media profiling (Compton 2025).

### DOMINANT MARKET POWER – HOBSON'S CHOICE OR PUTTING THE 'CON' IN CONSENT

The dominant market power of tech giants is an important factor in the dynamics between tech companies and individuals, enabling companies to stipulate terms of service with unfair extractive data practices. Many people want more control over how data about them is used, as shown by people exercising choices available. For example, the introduction of Apple's App Tracking Transparency reduced the tracking rate by 45.55 per cent in analysis of 18 countries that included the UK.[7]

Power asymmetry between individuals and tech corporations is compounded by the 'loser pays' rule for legal costs in the UK, which means a losing litigant will usually be required to pay most of the winner's costs (called 'adverse costs') (Civil Justice Council 2025; Harris 2026).[8] Companies use this rule to intimidate people not to bring or to drop or settle claims because corporate giants can afford to pay exorbitant legal fees, creating a significant financial risk for claimants if they lose.[9] Adverse costs mean that very few cases have been brought against ad tech companies even though there are legal protections regarding targeted ads, and unlawful practices are ubiquitous (Irish Council for Civil Liberties 2025).

By contrast, litigants against the government can seek an order capping their adverse costs in public interest judicial review (Criminal Justice and Courts Act 2015), which facilitates public interest cases against the government because litigants do not face an unlimited financial risk. Two philanthropic funders, the Access to Justice Foundation and Law for Change (2026), have proposed that such cost-capping orders should also be available in civil litigation against private corporate actors for public interest cases. In theory, there is a mechanism for cost capping in civil litigation (Civil Procedure Rules 1998), but its criteria are impracticable and would not cap costs as low as the cost-capping mechanism for cases against the state, so NGOs are not able to use it in litigation against companies (Ahmed 2022).

#### RECOMMENDATION 3

**The government should legislate to align capping adverse costs in public interest civil litigation with cost capping in judicial review, with an option to apply for such an order pre-action.[10] Such a procedure could be included in the new legislation to curb strategic lawsuits against public participation (SLAPPs) that the government promised in this parliament.[11]**

7 The tracking rate is the proportion of total app users the app can track. There was no disaggregated analysis of the 18 countries in the published research by Kraft et al (2024). See also data from marketing analytics company Adjust that indicates 35 per cent of users opt in to tracking when given a choice under Apple's ATT (Wetzler, 2025).

8 Claimants can try to purchase insurance to cover the risk of adverse costs, but insurers will not necessarily offer to insure a claim, and the premiums are prohibitively high in cases where a claimant is only seeking injunctive relief or the potential damages are modest.

9 A recent high-profile example of this kind of intimidation was the settlement of legal claims against the *Sun* for its invasion of privacy in the phone hacking scandal (Holden and Tobin 2025).

10 The Civil Justice Council (2025) has recommended pre-action cost management orders by courts to improve control of litigation parties over their costs. From a policy perspective, it may be best to preclude such cost-capping orders if the claimant has commercial third-party litigation funding.

11 Lord chancellor David Lammy made repeated promises in 2026 on government legislation to curb SLAPPs in this parliament (Rogerson 2026; Rose 2026). Given that such legislation is aimed at preventing use of legal tactics to intimidate and prevent civil society participation in public life, it would be appropriate to include a new procedure on cost-capping for public interest cases in the anti-SLAPP legislation.

# 3. ACCESS TO CIVIL JUSTICE AS COUNTERVAILING POWER AGAINST CORPORATIONS

This paper's recommendations would enable the public and NGOs to use the power of the courts to curb tech corporations under the rule of law through litigation directly against companies, which is an alternative to regulatory complaints and can complement the role of regulators.

Regulators do not have endless resources, and they are effectively part of the executive branch of government – which can influence regulators, even though regulators are supposed to be independent. There are three branches of government: the legislature (parliament), executive (government) and judiciary (courts). Classically, parliament makes laws that are administered by the executive and enforced by the courts (R (on the application of UNISON) v Lord Chancellor; Lord Hodge 2021). A 2024 House of Lords report found that government influence over regulators comes from government's setting priorities for regulators, and from controlling funding for regulators and appointments to regulators' boards or senior executives (Industry and Regulators Committee 2024). The Starmer government's criticism of the Competition and Markets Authority, firing of the former chair (Jack and Edwards 2025), and appointment of former Amazon UK boss Doug Gurr as the new chair (Department for Business and Trade 2026), reflect these dynamics between executive government and regulators. In addition to political influence, the litigious behaviour of tech companies exploits a structural disincentive for regulators against regulating tech. For example, Meta is suing Ofcom and Apple has sued the CMA (Kelly 2026; Competition and Markets Authority 2023). Procedural fairness requires that people can challenge regulatory decisions against them but big tech has used this to intimidate regulators, who face significant legal costs when big tech litigates against them.

Legislation regulating corporations can enable people to sue a company which breaches that law, providing an alternative enforcement mechanism that structurally empowers people compared to regulatory complaints. When suing a company, a claimant can seek a court order to change the company's behaviour in compliance with the law (sometimes called 'injunctive relief') and/or financial compensation (referred to as 'damages'). Damages differ from fines by a regulator – these go to the state, whereas damages go to the affected person. A further difference is that courts do not have discretion on whether to hear a case, while regulators have broad discretion on how to handle complaints. For example, in 2023 the Court of Appeal found that UK data protection regulator the Information Commissioner's Office (ICO) is not required to make a decision on the merits of every complaint (Delo v The Information Commissioner 2023; Good Law Project 2026). Thus, civil litigation for a compliance order is a more reliable way to force a corporation to comply with the law compared to a regulatory complaint. Even when regulators act on a complaint, people are often marginalised in the process, with little to no participation in what happens after a complaint is filed (Harris 2024).

Mechanisms for civil litigation mitigate the shortcomings of enforcement by regulators, including regulators' limited resources, but the scope for people to use the rule of law to counter tech corporate power depends on procedural laws and availability of funding. As explained above, UK civil society is effectively blocked from litigating against tech companies due to procedural laws that limit who can bring a case, impose a high administrative burden for collective claims, and impose the risk of paying the corporate defendant's legal fees if a claim is lost. Such procedural laws entrench corporate power because they inhibit and prevent people from suing tech companies for unlawful conduct.

No surprise, then, that the most strident advocates for the status quo are business and neoliberal lobbyists, frequently supported by American corporate funding. For example, arguments against collective legal claims and litigation funding are espoused and promoted by the US Chamber of Commerce-backed organisation 'Fair Civil Justice' and neoliberal think tank the Adam Smith Institute (Kennedy 2023; Courea 2024; Maxwell 2024; Rigby 2024; Rose 2024).

### RIGHT TO OBJECT LITIGATION: A CASE STUDY FOR CIVIL LITIGATION BOLSTERING REGULATORS

Digital rights activist Tanya O'Carroll litigated against Meta for better control over her personal data, exercising her right to object to Facebook using personal data for direct marketing, and the ICO intervened supporting her (Information Commissioner's Office 2025a).[12] The case settled in March 2025 when Meta agreed to stop processing O'Carroll's personal data for direct marketing. Over 10,000 people subsequently asserted the same right against Meta (Good Law Project no date; Open Rights Group 2025), demonstrating widespread appetite for more control over personal data. However, Meta then introduced a 'pay or consent' model in the UK in September 2025 instead of honouring these thousands of objections, requiring that users pay for a premium ad-free version or 'consent' to invasive data processing (McMahon 2025).

Meta had previously introduced this model in the EU, where it was found to be unlawful (European Commission 2024). Even though the EU had found Meta's model unlawful because 'consent' to data processing was not freely given by users, the ICO welcomed Meta's introduction of the model in the UK (Information Commissioner's Office 2025b).[13] As a result, people who want to opt-out of Meta's surveillance-based advertising, such as those who have suffered pregnancy loss in example 3 above, have no way to do so unless they pay for a premium ad-free service in the UK.

This case study shows how civil litigation against tech companies can empower civil society and complement regulators in that the ICO supported O'Carroll's case. It also illustrates UK regulators' failing to robustly enforce the law and protect people against corporations (see, for example, Jones 2025).

12 I had some involvement in Tanya O'Carroll's case, which was funded by Luminate's strategic litigation programme under my leadership.

13 Note that the EU Commission found that 'pay or consent' was unlawful under the Digital Markets Act (DMA), which does not exist in the UK. However, the relevant DMA article cross references and relies on the GDPR and its provisions on consent to data processing. Hence the EU decision on pay or consent was effectively a decision on the GDPR as well as the DMA.

# 4. IMPROVING FUNDING

The nature, structure and availability of funding for litigation is shaped in part by civil procedure laws, and the recommendations above would improve availability of funding. There are different kinds of litigation funding, including philanthropic non-profit funding and commercial for-profit funding, in which the funder covers the costs of a claim for a share of financial damages if the claim succeeds. Recommendation 3 on cost capping would encourage philanthropic grant-making as the financial risk of losing a case would be capped. Recommendation 2 on opt-out collective actions would encourage commercial litigation funding, which only funds claims where the potential financial damages would be extremely high, since collectivising people's claims enables high-value claims (Meeran 2021; Dunn and Curtis 2021).

It may seem counter-intuitive to see scope for progressive action in commercially funded litigation, yet it can challenge tech power. Alan Bates was the representative litigant in a collective claim over the Post Office's Horizon IT system, seeking redress for harms from that system's errors. He has highlighted that the litigation was only possible because of commercial funding, and criticism of such funding has been promoted by US Chamber of Commerce-affiliated Fair Civil Justice (Bates 2024). The Civil Justice Council (CJC 2025) underscored that commercial funding can be the only way to find resources for collective claims because other sources are not available. Furthermore, the CJC noted that commercial litigation funding promotes 'equality of arms', meaning that claimants can have access to legal resources more equal to those of companies.

Commercial litigation funding has drawbacks, particularly potential influence over a case, and there have been initiatives in Europe to consider other funding models for collective actions. A claimant should control their case, yet funders have a legitimate interest in being kept informed of all developments and, in reality, commercial funders tend to exercise some degree of influence over cases (Dunn and Curtis 2021; European Commission DG Justice and Consumers 2025). Given the risk of commercial funders' undue influence, the CJC rightly recommended regulation to protect claimants. In addition, the government could explore other approaches to funding, such as a publicly funded revolving litigation fund for collective claims.[14]

**RECOMMENDATION 4**

**The CJC's recommendations for regulation of commercial litigation funding should be implemented to mitigate and manage its drawbacks, given its value for access to justice against tech companies (CJC 2025).**

**RECOMMENDATION 5**

**The CJC's recommendation for legislation to remove the current legal barrier to litigation funding resulting from a 2023 Supreme Court decision should be implemented as the government promised in December 2025 (CJC 2025; Ministry of Justice 2025).**

**RECOMMENDATION 6**

**The government should initiate research on litigation funding options.**

14 There are collective litigation funds in Quebec and Ontario (Canada) and Israel, and the topic has been researched in Europe by academics and civil society experts (Kramer et al 2023; BEUC 2022a).

# 5. CONCLUSION

Unlocking people's access to justice through civil procedure reforms would bolster tech accountability in the UK. Tech companies' power is reinforced by current civil procedure laws that determine who has access to the courts, and my recommendations propose a more just way forward to empower people to take direct legal action. My analysis has focussed on tech companies, but has broader relevance across business and human rights in all commercial sectors.

Legal policy bodies are already considering many of the access to justice recommendations in this paper, but a broader transformative vision must underpin legal reforms. CJC recommendations on funding were highlighted and endorsed above. In April 2026, the Law Reform Commission announced a new project considering the potential introduction of consumer class actions, sponsored by the Department of Business and Trade following its consultation on opt-out collective actions (Hilborne 2026; Law Commission 2026; Department for Business, Innovation, Science and Trade 2026). This consideration of opt-out collective actions is welcome, but the narrow scope risks continuing the status quo and should be widened to all areas of civil litigation, including labour disputes, given the wide range of ways that people can be harmed by technology.

The access to justice barriers identified in this paper have a cumulative effect to prevent public interest litigation against tech companies. NGOs decide not to bring cases because they do not have standing and because of the adverse costs risk. Collective claims are not brought because of burdensome opt-in procedures and the partial prohibition on commercial funding. Given this cumulative effect, a holistic approach to civil procedure reforms addressing all of the barriers across all areas of law for civil litigation is necessary to meaningfully empower people to hold tech corporations accountable in court.

# REFERENCES


Abate R (2025) 'Standing' in *The Cambridge Handbook on Climate Litigation*, Wewerinke-Singh M and Mead S (eds), Cambridge University Press

Ahmed M (2022) 'Landmark decision on costs capping orders', *Law Society Gazette*. https://www.lawgazette.co.uk/legal-updates/landmark-decision-on-costs-capping-orders/5112209.article

Bates A (2024) 'Our Post Office victory is being twisted by those who don't want to see its like again', *Guardian*. https://www.theguardian.com/commentisfree/article/2024/may/10/post-office-litigation-funders-subpostmasters-corporate-interests

BEUC (2022a) *Funding of collective redress Financing options in the EU and beyond.* https://www.beuc.eu/sites/default/files/publications/BEUC-X-2022-116_Funding_of_collective_redress.pdf

BEUC (2022b) 'Opt-out and opt-in collective redress: why does it matter'. https://www.beuc.eu/sites/default/files/publications/BEUC-X-2022-086-Opt-out_and_Opt-in_in_collective_redress.pdf

Binns R, Stein J, Datta S, Van Kleek M and Shadbolt N (2025) 'Not even nice work if you can get it; A longitudinal study of Uber's algorithmic pay and pricing', *Proceedings of the 2025 ACM Conference on Fairness, Accountability, and Transparency* (FAccT '25) 1484–1497, Association for Computing Machinery. https://doi.org/10.1145/3715275.3732099

Center for Countering Digital Hate (2026) 'Grok Floods X with Sexualized Images of Women and Children'. https://counterhate.com/research/grok-floods-x-with-sexualized-images/?utm_source=li_organic&utm_medium=social&utm_campaign=grok

Check My Ads Institute (2025) *Digital Advertising and Its Role in the 2024 Southport Riots.* https://checkmyads.org/wp-content/uploads/2025/03/Digital-Advertising-and-Its-Role-in-the-2024-Southport-Riots_20250225-web.pdf

Civil Justice Council (2025) *Review of Litigation Funding: Final Report.* https://www.judiciary.uk/wp-content/uploads/2025/06/CJC-Review-of-Litigation-Funding-Final-Report-2.pdf

Civil Procedure Rules 1998 (UK). https://www.legislation.gov.uk/uksi/1998/3132/contents

Clifton M (2026) 'US State Department threatens UK over probe into Elon Musk's X', *Politico*. https://www.politico.eu/article/us-state-department-threaten-uk-probe-elon-musk-x-grok/

Competition and Markets Authority (2023) 'CMA wins appeal in Apple case', press release. https://www.gov.uk/government/news/cma-wins-appeal-in-apple-case

Competition and Markets Authority v Apple Inc [2023] EWCA Civ 1445. https://www.judiciary.uk/wp-content/uploads/2023/11/CMA-v-Apple.pdf

Compton H (2025) 'The women taking Meta to task after their baby loss', BBC. https://www.bbc.co.uk/news/articles/ce8450380zyo

Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention), adopted at the Fourth 'Environment for Europe' Ministerial Conference in Aarhus, Denmark, on 25 June 1998

Courea E (2024) 'Mandelson firm worked for campaign critics say would hinder Post Office-style lawsuits', *Guardian*. https://www.theguardian.com/politics/article/2024/may/08/peter-mandelson-firm-worked-for-campaign-that-critics-say-would-hinder-mass-lawsuits

Criminal Justice and Courts Act 2015 (UK). https://www.legislation.gov.uk/ukpga/2015/2/contents

Delli Santi M (2022) *ORG representative actions under the UK GDPR: Guide and lessons learned*, Open Rights Group. https://www.openrightsgroup.org/publications/org-representative-actions-under-the-uk-gdpr/

Delo v The Information Commissioner [2023] EWCA Civ 1141. https://www.judiciary.uk/wp-content/uploads/2023/06/Delo-v-The-Information-Commissioner-ewca_civ_2023_1141.pdf

Dent A (2025) *Profiling by Proxy: How Meta's Data Driven Ads Fuel Discrimination*, Open Rights Group. https://www.openrightsgroup.org/app/uploads/2025/06/Profiling_by_Proxy_How_Metas_Data_driven_ads_fuel_discrimination.pdf

Department for Business and Trade (2024) *Horizon scandal factsheet: Post Office (Horizon System) Offences Bill*, policy paper. https://www.gov.uk/government/publications/post-office-horizon-system-offences-bill-supporting-documents/horizon-scandal-factsheet-post-office-horizon-system-offences-bill

Department for Business and Trade (2026) 'Doug Gurr confirmed as the new Chair of the CMA', press release. https://www.gov.uk/government/news/doug-gurr-confirmed-as-the-new-chair-of-the-cma

Department for Business, Innovation, Science and Trade (2026) 'Opt-out collective actions regime review: call for evidence'. https://www.gov.uk/government/calls-for-evidence/opt-out-collective-actions-regime-review-call-for-evidence/opt-out-collective-actions-regime-review-call-for-evidence

Devlin K, Stilgoe J, Orchard D and Peter O (2026) 'AI: The growing UK pushback. Research briefing and initial findings', King's Digital Futures Institute. https://kclpure.kcl.ac.uk/ws/portalfiles/portal/380083322/DFI_AI_Pushback_Report.pdf

Digital Markets, Competition and Consumers Act 2024 (UK). https://www.legislation.gov.uk/ukpga/2024/13/contents

Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005. https://eur-lex.europa.eu/eli/dir/2005/29/oj/eng

Dunn S and Curtis F (2021) 'Litigation Funding: Practical Aspects' in *Human Rights Litigation against Multinationals in Practice*, Meeran R (ed), Oxford University Press

European Commission (2024) 'Commission sends preliminary findings to Meta over its "Pay or Consent" model for breach of the Digital Markets Act', press release. https://ec.europa.eu/commission/presscorner/detail/en/ip_24_3582

European Commission (2025) 'Commission finds Apple and Meta in breach of the Digital Markets Act', press release. https://ec.europa.eu/commission/presscorner/detail/en/ip_25_1085

European Commission DG Justice and Consumers (2025) *Mapping Third Party Litigation Funding in the European Union*. https://commission.europa.eu/document/download/65adb710-1a36-4550-a4c6-a606adbff061_en?filename=Final%20Report%20EC%20Mapping%20TPLF%20in%20the%20EU.pdf

European Union Agency for Fundamental Rights (2020) *Business and Human Rights – Access to Remedy*. https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-business-human-rights_en.pdf

Foxglove (2026) 'UK Government admits "serious error" in forcing through hyperscale data centre without environmental protections', press release. https://www.foxglove.org.uk/2026/01/22/uk-government-admits-serious-error-data-centre/

Global Action Plan (2026) 'Landmark data centre case sets precedent for binding environmental protections', news. https://www.globalactionplan.org.uk/insights/news/landmark-data-centre-case-sets-precedent-for-binding-environmental-protections

Good Law Project (2026) 'We're challenging the ICO for ignoring thousands of data complaints'. https://goodlawproject.org/were-challenging-the-ico-for-ignoring-thousands-of-data-complaints/

Good Law Project (no date) 'This action is now closed', webpage. https://goodlawproject.org/this-action-is-now-closed-meta/.

Grieve D (2025) 'One brave woman wrenched back control of her data from the tech giants. Now, go and do the same', *Guardian*. https://www.theguardian.com/commentisfree/2025/mar/25/control-personal-data-tech-giants-meta-targeted-ads

Harrington B (2024) 'What the broligarchs want from Trump', *The Atlantic*. https://www.theatlantic.com/politics/archive/2024/11/broligarchy-elon-musk-trump/680788/

Harris SL (2024) 'Opportunities and Difficulties for Strategic Litigation to Advance Digital Rights in the Internet Audience Economy', *German Law Journal* 25(6), pp. 956–76

Harris SL (2026) 'Financing Digital Rights Litigation against Big Tech', *Transformative Private Law Blog*, Amsterdam Centre for Transformative Private Law. https://transformativeprivatelaw.com/financing-digital-rights-litigation-against-big-tech/

Hilborne N (2026) 'Government eyes consumer class actions regime', news, Legal Futures. https://www.legalfutures.co.uk/latest-news/government-eyes-consumer-class-actions-regime

Hills J (2026) 'Uber accused of using drivers' personal data to determine how much they are paid', ITV News. https://www.itv.com/news/2026-09-02/uber-accused-of-using-drivers-personal-data-to-determine-how-much-they-are-paid

Holden M and Tobin S (2025) 'Prince Harry hails "monumental" legal win over Murdoch newspapers', Reuters. https://www.reuters.com/world/uk/prince-harry-v-murdoch-lawyers-due-back-court-after-last-gasp-deal-talks-2025-01-22/

Industry and Regulators Committee (2024) *Who watches the watchdogs?*, House of Lords. https://committees.parliament.uk/publications/43211/documents/215050/default/

Information Commissioner's Office (2025a) 'Statement on O'Carroll vs Meta'. https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2025/03/statement-on-ocarroll-vs-meta/

Information Commissioner's Office (2025b) 'ICO statement on changes to Meta advertising model'. https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2025/09/ico-statement-on-changes-to-meta-advertising-model/

Irish Council for Civil Liberties (2025) 'EU ruling: Tracking-based advertising by Google, Microsoft, Amazon, X, across Europe has no legal basis'. https://www.iccl.ie/digital-data/eu-ruling-tracking-based-advertising-by-google-microsoft-amazon-x-across-europe-has-no-legal-basis/

Jack S and Edwards C (2025) 'Government ousts UK competition watchdog chair', BBC. https://www.bbc.co.uk/news/articles/c2d3e6zklxgo

Jackson R (2009) *Review of Civil Litigation Costs: Final Report*, Ministry of Justice. https://www.judiciary.uk/wp-content/uploads/JCO/Documents/Reports/jackson-final-report-140110.pdf

Jones C (2025) 'Charities warn Ofcom too soft on Online Safety Act violators', *The Register*. https://www.theregister.com/2025/09/19/ofcom_osa_enforcement/

Jones MO (2025) Written evidence submitted to the House of Commons Science, Innovation and Technology Committee. https://committees.parliament.uk/writtenevidence/138332/html/

Kelly J (2026) 'Meta brings High Court challenge over Ofcom fees', BBC. https://www.bbc.co.uk/news/articles/cj0pqpgvvn2o

Kennedy S (2023) 'Consumer clicks and class actions', *Law Society Gazette*. https://www.lawgazette.co.uk/practice-points/consumer-clicks-and-class-actions-/5114856.article

Kleinman Z (2026) 'Meta's $18bn settlement may hasten reckoning for social media on child safety', BBC. https://www.bbc.co.uk/news/articles/clyq4gxwe7go

Kraft L, Bleier A, Skiera B and Koschella T (2024) 'Granular Control and Privacy Decisions: Evidence from Apple's App Tracking Transparency (ATT)'. https://ssrn.com/abstract=4598472

Kramer X, Tzankova I, Hoevenaars J and van Doorn K (2023) *Utility, necessity, design and costs of a (revolving) litigation fund for collective actions* Tilburg University and Erasmus School of Law. https://www.rijksoverheid.nl/site/binaries/site-content/collections/documents/2023/09/18/tk-bijlage-3-summary-wodc-onderzoek-processenfonds/tk-bijlage-3-summary-wodc-onderzoek-processenfonds.pdf

Law Commission (2026) 'Consumer class actions'. https://lawcom.gov.uk/project/consumer-class-actions/#1-Background

Lord Hodge (2021) 'The Scope of Judicial Law-making in Constitutional Law and Public Law', speech, Supreme Court. https://supremecourt.uk/uploads/judicial_law_making_in_constitutional_law_and_public_law_paper_0f2a80f421.pdf

Maxwell F (2024) 'Mr Bates vs the Post Office sparks bitter fight over UK legal funding', *Politico*. https://www.politico.eu/article/alan-bates-v-post-office-case-inspires-attempted-crackdown-on-uk-legal-funding/

McMahon L (2025) 'Facebook and Instagram to get £2.99 UK subscription fee to stop ads', BBC. https://www.bbc.co.uk/news/articles/c5y4xl5x8q7o

Meta Platforms Ireland Limited v Bundesverband der Verbraucherzentralen und Verbraucherverbände – Verbraucherzentrale Bundesverband e.V., Case C-319/20. https://infocuria.curia.europa.eu/tabs/document?source=document&text=&docid=258485&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=643441

Meeran R (2021) 'Perspectives on the Development and Significance of Tort Litigation against Multinational Parent Companies' in *Human Rights Litigation against Multinationals in Practice,* Meeran R (ed), Oxford University Press

Metzger B, Tecotzky A, Jackson S, Tan KWK and Spirlet T (2025) 'See the billionaires and CEOs who attended Trump's inauguration', *Business Insider*. https://www.businessinsider.com/trump-inauguration-ceo-guests-bezos-zuckerberg-musk-2025-1

Ministry of Justice (2025) 'Increased access to justice for claimants to take on powerful organisations in court', press release. https://www.gov.uk/government/news/increased-access-to-justice-for-claimants-to-take-on-powerful-organisations-in-court

Nuala P and Modhvadia R (2025) 'Great (public) expectations', policy briefing, Ada Lovelace Institute. https://www.adalovelaceinstitute.org/policy-briefing/great-expectations/

Open Rights Group (2024) 'ICO's Failure to Enforce Is Putting the Public at Risk'. https://www.openrightsgroup.org/press-releases/icos-failure-to-enforce-is-putting-the-public-at-risk/.

Open Rights Group (2025) 'Meta Opt-Out'. https://action.openrightsgroup.org/meta-opt-out

Passarini F (2023) 'Legal standing of individuals and NGOs in environmental matters under Article 9(3) of the Aarhus Convention', *The Italian Review of International and Comparative Law*, 3(2), 283–305. https://doi.org/10.1163/27725650-03020007

Powell A (2026) 'Gross domestic product (GDP): Economic indicators', research briefing, House of Commons Library. https://commonslibrary.parliament.uk/research-briefings/sn02783/

R (on the application of UNISON) v Lord Chancellor [2017] UKSC 51. https://supremecourt.uk/uploads/uksc_2015_0233_judgment_d0f3da86aa.pdf

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation), Regulations originating from the EU. https://www.legislation.gov.uk/eur/2016/679/article/80

Rigby B (2024) '"Nakedly one-sided": War of words breaks out over CMS class action report', *Global Legal Post*. https://www.globallegalpost.com/news/nakedly-one-sided-war-of-words-breaks-out-over-cms-class-action-report-1165246531

Rogerson P (2026) 'Lammy repeats anti-SLAPPs pledge as media lawyers deny lobbying coup, *Law Society Gazette.* https://www.lawgazette.co.uk/news/lammy-repeats-anti-slapps-pledge-as-media-lawyers-deny-lobbying-coup/5126844.article

Rose N (2024) 'Think tank calls for FCA to regulate third-party litigation funding', Legal Futures. https://www.legalfutures.co.uk/latest-news/think-tank-calls-for-fca-to-regulate-third-party-litigation-funding

Rose N (2026) 'Lammy hints that action on SLAPPs might come soon', Legal Futures. https://www.legalfutures.co.uk/latest-news/lammy-hints-that-action-on-slapps-might-come-soon

Roush T (2026) 'Alphabet beats earnings expectations as annual revenue tops $400 billion for first time', *Forbes*. https://www.forbes.com/sites/tylerroush/2026/02/04/alphabet-beats-earnings-expectations-as-annual-revenue-tops-400-billion-for-first-time/

RTM v Bonne Terre [2026] EWCA Civ 488. https://www.judiciary.uk/wp-content/uploads/2026/04/RTM-v-Bonne-Terre-2026-EWCA-Civ-488.pdf

Samuel S (2025) 'The broligarchs have a vision for the new Trump term. It's darker than you think', *Vox*. https://www.vox.com/future-perfect/395646/trump-inauguration-broligarchs-musk-zuckerberg-bezos-thiel

Sellman M (2025) 'UK "risks losing £5bn if it drops tech tax" in deal with Trump', *Times*. https://www.thetimes.com/uk/technology-uk/article/uk-tech-tax-trump-digital-services-7d2bmvc0x?gaa_at=eafs

Science, Innovation and Technology Committee (2025) *Social media, misinformation and harmful algorithms,* House of Commons. https://committees.parliament.uk/publications/48745/documents/258221/default/

Sky News (2026) 'Trump threatens "big tariff" if UK does not drop digital services tax on US tech firms'. https://news.sky.com/story/trump-threatens-big-tariff-if-uk-does-not-drop-digital-services-tax-on-us-tech-firms-13535705

Smuha N (2021) 'Beyond the individual: Governing AI's societal harm', *Internet Policy Review* 10(3) pp. 1–32

Stichting WIE International (2025) 'Drivers in UK and Europe set to sue Uber for unfair pay set by algorithm', press release. https://workerinfoexchange.nl/press-release-stichting-wie-international-launches-dynamic-pay-claim/

Szczepański M (2025) 'China's rare-earth export restrictions', European Parliament. https://www.europarl.europa.eu/RegData/etudes/ATAG/2025/779220/EPRS_ATA%282025%29779220_EN.pdf

Tennison J (2024) *Developing a Framework for Collective Data Rights*, Centre for International Governance Innovation. https://www.cigionline.org/static/documents/Tennison_Special_Report.pdf

The Access to Justice and Foundation and Law for Change (2026) Supplementary Evidence to the Access to Justice Inquiry of the House of Commons Justice Committee. https://committees.parliament.uk/writtenevidence/164121/html/

The Privacy Collective (no date) 'Veelgestelde vragen'. https://theprivacycollective.nl/veelgestelde-vragen-salesforce-oracle/

Ungoed-Thomas J and Das S (2025) 'UK betting giants under fire for ads targeting at-risk gamblers', *Guardian*. https://www.theguardian.com/society/2025/feb/01/uk-betting-giants-under-fire-for-ads-targeting-at-risk-gamblers

United Nations Economic Commission for Europe (2014) *The Aarhus Convention: An Implementation Guide.* https://unece.org/fileadmin/DAM/env/pp/Publications/Aarhus_Implementation_Guide_interactive_eng.pdf

Velasquez F (2026) 'China's Moonshot AI claims Kimi K3 can rival OpenAI and Anthropic', BBC. https://www.bbc.co.uk/news/articles/cy9w4q8pgp0o

Wetzler T (2025) 'ATT opt-in rates: The latest benchmarks by app category and country', blog, Adjust. https://www.adjust.com/blog/att-opt-in-rates-2025/

Worker Info Exchange (2025) 'New research exposes deepening exploitation of Uber drivers by algorithmic pay'. https://www.workerinfoexchange.org/post/new-research-exposes-deepening-exploitation-of-uber-drivers-by-algorithmic-pay

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