

[REDACTED]

From: [REDACTED]
Sent: 22 July 2021 13:39
To: harm
Subject: [External] CAP and BCAP consultation: harm and protected characteristics

Dear Committee of Advertising Practice,

I have examined your *Committee of Advertising Practice's and Broadcast Committee of Advertising Practice's proposals for rules on harm and protected characteristics* document, dated 1 June 2021.

Frankly, I find it difficult to provide a reasoned response to this consultation document for the following reasons:-

1. There is no clear definition of 'harm' – or 'offensive' – provided.
2. There are no statistics provided to justify why the proposed changes are needed.
3. Presently, it appears to be a "solution" in search of a "problem" (which may? – or may not? – exist).
4. Has an analysis been carried out as to the probable number of annual legal cases the proposed change will generate?
5. Has an analysis been carried out as to the probable extra legal costs this will generate for the CAP?
6. Does the CAP have sufficient funds available to meet any extra legal costs arising from the proposed changes?

I will be grateful for your response to the points outlined above so that I may make a truly reasoned response.

Thank you,

[REDACTED]

Sent from [Mail](#) for Windows 10