



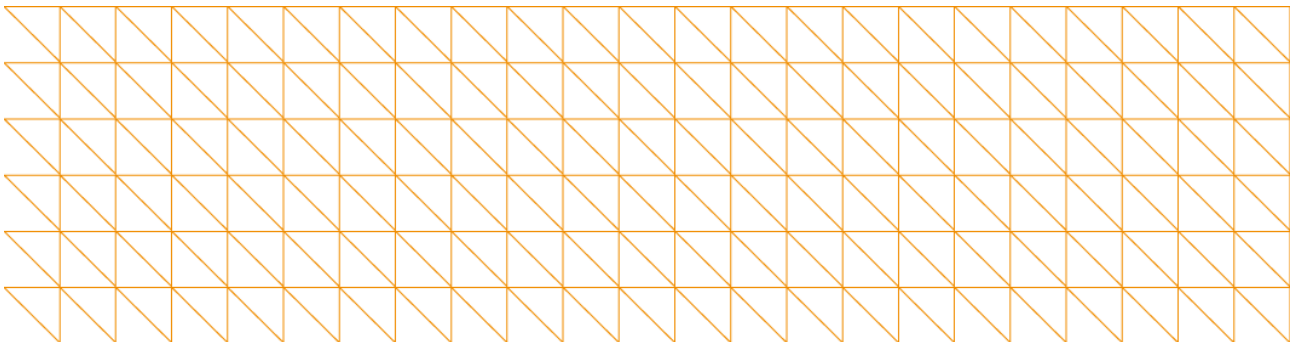
Ministry
of Justice

Claims Management Regulation

Regulation fees paid by claims management
businesses

Fees Determination 2014–2015

This response is published on 14 February 2014





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of Justice

Claims Management Regulation

Regulation fees paid by claims management companies

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Response to consultation carried out by the Ministry of Justice.

**This information is also available on the Ministry of Justice website:
<https://consult.justice.gov.uk/>**

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Introduction and contact details

This document is the post-consultation response for the consultation paper Claims Management Regulation, Regulation fees paid by claims management companies.

It will cover:

- the background to the response
- a summary of the responses to the consultation
- a detailed response to the specific questions raised in the consultation
- the next steps following this report.

Further copies of this report and the consultation paper can be obtained by contacting **Claims Management Regulation Unit** at the address below:

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This report is also available on the Ministry's website: <https://consult.justice.gov.uk/>

Alternative format versions of this publication can be requested from claimsmanagementregulation@justice.gsi.gov.uk

Complaints or comments

If you have any complaints or comments about the consultation process you should contact the Ministry of Justice at the above address.

Executive Summary

1. The Claims Management Regulation Unit was established in 2007 within the Ministry of Justice, with responsibility for regulating claims management companies operating in the following sectors; personal injury, financial products and services, criminal injuries, industrial injuries disablement, employment matters and housing disrepair.
2. The consultation paper issued on 15 November 2013 set out the Claims Management Regulation Unit's proposals to:
 - Hold the existing application fee at £1,400.
 - Increase the annual regulation fee pay scales by 10% for claims management companies under the flat-fee threshold of £142,000.
 - Increase the percentages of annual turnover levied above the £142,000 threshold.
 - Increase the fees cap by 10% to £55,000.
 - Increase the financial products and services uplift by 15% to 0.145% of annual turnover from regulated activities in the financial products and services sector.
 - Increase the financial products and services uplift fees cap to £55,000.

Paying for Annual Regulation

3. The consultation outlined a number of factors that could potentially impact the full recovery of costs of regulation, particularly given the recent reforms in the personal injury sector which included the banning of referral fees implemented under the Legal Aid, Sentencing and Punishment of Offenders Act 2012 and the ban on offering inducements to make a claim. All regulated sectors; personal injury, financial products and services (such as claims for mis-sold payment protection insurance), employment matters, criminal injuries, industrial injuries disablement benefit and housing disrepair, were impacted by toughened regulatory rules introduced in April and July 2013. Claims management companies operating in the employment sector were also affected by the introduction of fees to the Employment Appeals Tribunal.
4. A proportion of regulated CMCs cause high-profile detriment to consumers and add unnecessary costs to the financial industries redress processes, which is why the Claims Management Regulation Unit are presently introducing further policy reforms and up-scaling enforcement activity.
5. The consultation paper was sent to all regulated claims management companies and interested parties. A total of 33 responses were received, 30 of which were from claims management companies and three from other respondents impacted by the activities of claims management companies. Details of the responses to each of the proposals are set out later in this document.

6. The responses have been considered and the following conclusions have been reached in order to ensure the continuing adequate resourcing of the Claims Management Regulation Unit:
- The application fee will remain at £1,400.
 - The annual regulation fees cap will increase by 10% to £55,000.
 - The annual regulation fee bands for claims management companies with turnovers below £15,000 will hold from 2013–2014 levels.
 - The annual regulation fee bands for claims management companies with annual turnovers between £15,000 and £142,000 will increase by 10%.
 - The percentages of annual turnover levied above the £142,000 threshold will increase to the levels consulted on; with claims management companies paying an amount equal to 0.500% (up from 0.490%) of annual turnover up to £1m, plus 0.360% (up from 0.332%) of annual turnover between £1m and £5m, plus 0.260% (up from 0.240%) of annual turnover above £5m.
 - The annual regulation fee uplift will increase from 0.125% to 0.145% of annual turnover from regulated activities in the financial products and services sector. The cap will be increased to £55,000.
 - The Claims Management Regulation Unit will retain for use if necessary, the option of an in-year fee adjustment should market uncertainties result in the Regulator recouping insufficient funding.

Background

7. The consultation paper 'Regulation fees paid by claims management companies – proposed regulation fee levels for 2014–2015' was published on 15 November 2013. It invited comments on the proposed regulation fees for claims management companies in the regulatory year 2014–2015.
8. The Compensation Act 2006 stipulates that businesses providing regulated claims management services must be authorised, must pay the relevant application and annual fees and comply with the Conduct Rules prescribed by the Regulator. Regulation 15 of the Compensation (Claims Management Services) Regulations 2006 enables the Regulator to determine the fees. Regulation 16 of the regulations enables the Regulator to revoke or amend any fee determination. The Claims Management Regulation Unit is intended to be self-financing with operating costs recovered from applicants and regulated claims management companies. Fee levels are based on estimates of income receipts and the costs of operating the regulatory regime.
9. The consultation period closed on 13 December 2013 and this report summarises the responses, including how the consultation process influenced the final shape of the proposals consulted upon.

A Welsh language response paper can be requested via claimsmanagementregulation@justice.gsi.gov.uk

A list of respondents is at Annex A.

Summary of responses

10. The consultation paper was sent to approximately 2,300 regulated businesses from across all regulated sectors; personal injury, financial products and services, criminal injuries, industrial injuries disablement, employment matters and housing disrepair, and to stakeholders that form part of the Claims Management Regulatory Consultative Group. The full consultation list and list of respondents is at Annex A.
11. A total of 33 responses were received, 30 of which were from authorised claims management companies, and three were received from other stakeholders or individuals. The majority of responding claims management companies operate in the financial products and services sector, with other responding claims management companies operating in the personal injury and employment sectors, and several authorised to operate across multiple sectors. Responses to the questions as set out in the consultation are summarised below.

Responses to specific questions

1. Do you have any comments on the proposal to hold the application fee at £1,400?

There were 32 responses to this question. 20 of these were either in favour or had no objection to the proposal. There was generally high support for the continued careful scrutiny of new claims management companies, and for this activity to be adequately funded. Five respondents believed the application fee was excessive and should be reduced for companies or individuals who undertook little or no claims management activity. Three respondents (including two claims management companies) believe that the application fee should be raised further. Reasons given included a disincentive to claims management companies with short-term business plans and little impetus to invest in the reputation and regulation of the claims management industry. Two respondents were concerned that the current level of the application fee could be creating an 'underground market' of unregulated claims management companies, and two respondents commenting that existing, compliant claims management companies should not subsidise the scrutiny of new entrants.

2. Do you have any comments on the fee scales as set out above and the proposed draft Fees Determination for 2014–2015 at Annex A?

There were 32 responses to this question, 29 of which were from claims management companies with three received from other interested parties. 17 claims management companies supported this proposal, as did two of the other respondents.

Of the respondents that did not support the proposal, three claims management companies that undertook little or no claims management activities believed that there should be either no fee or a lower band for small, periodic activity. Four claims management companies believed that fee levels should be sector specific; three authorised persons operating in employment proposed lower fees to reflect the high compliance levels in that sector. In an opposing view, a financial products and services claims management company felt that it unfairly subsidised claims management companies operating in lower-activity sectors. Three claims management companies believed that fee levels should correlate with levels of regulatory compliance. The non-claims management company respondent believed that the fee levels were too low; as did one responding claims management company. One claims management company believed that the fees should be lowered given the effects of various legislative changes on claims management companies.

There was high support for the draft Fees Determination overall, with the highest number of concerned responses coming from small companies authorised as a sideline to a main business, or individual authorised persons such as consultants, paralegals and other representatives operating in the employment sector.

3. Do you have any comments in relation to the proposal to increase the annual fee brackets of claims management companies with a turnover £142,000 or below by 10% in respect of the annual regulation fee?

There were 31 responses to this question, 28 of which were from authorised claims management companies and three from other interested parties. 14 claims management companies either supported or did not object to the proposals, as did two interested parties, with the third believing the fee brackets should be higher. One claims management company believed that the fees were too low.

13 claims management companies felt that the increases were excessive, citing the current financial climate, the comparative level of inflation, projected industry retraction and various sector-specific legislative measures as reasons why fees should not be increased. Some respondents suggested that the fee scales should be further differentiated between large and small businesses. Smaller businesses suggested increasing the annual turnover threshold over which increases are applied. Larger businesses felt they were unfairly subsidising others in the claims management industry including non-compliant businesses. Other suggestions included splitting funding between claims sectors or by compliance levels by adopting a 'polluter pays' model. Respondents in the personal injury sector argued for sector-specific exemptions from the increases on the basis of other recent and impacting legislative and regulatory reforms. Authorised persons operating in the employment sector, typically very small businesses or self-employed consultants authorised as a side or contingency to a main endeavour, were particularly concerned at having to adjust to the introduction of fees in the Employment Appeals Tribunal alongside the proposed increase in regulatory fees.

4. Do you have any comments in relation to the proposal to increase the percentages levied on annual turnovers in excess of £142,000?

27 claims management companies responded to this question, as did three other interested parties. Overall 21 responses either directly supported or had no objection to this proposal, with the objecting seven respondents believing that this proposal would detrimentally impact the claims management industry, with high-turnover claims management companies operating compliantly believing they were being treated unfairly. Two responses, which include one from a claims management company, believed that the fees should be set higher.

5. Do you have any comments on the proposal to increase the fees cap by 10% to £55,000?

30 responses to this question were received, of which 19 were either supportive or offered no objections. 10 claims management companies believe that the proposal is excessive, and that the increase should only be applied to specific sectors, or should correlate with compliance levels. One interested party believed that the proposed cap should be increased further.

6. Do you have any comments on the proposal to increase the uplift on the annual regulation fee for claims management companies in the financial products and services sector to 0.145% of annual turnover?

There were 28 responses to this question, 25 of which were from claims management companies, and three from other interested parties. Of the replying claims management companies, 12 supported the proposal and 11 believed it was excessive, with one claims management company believing it was not set high enough. Those that considered the measure excessive believed that fully compliant claims management companies should not be levied, and a 'polluter pays' model of compliance-based levying introduced. One claims management company put forward a counter proposal that the financial industry should be made liable for clients' costs in full. Of the responses from other interested parties, one supported the measure while two considered it may be insufficient to recoup full regulatory costs.

7. Do you have any comments in relation to the proposal to raise the financial products and services cap to £55,000?

There were 27 responses to this question, 25 of which were from claims management companies and two of which were from other interested parties. 15 claims management companies were either in favour of or did not object to the proposal. 10 claims management companies oppose it, considering it to be disproportionate and unreasonable. Some considered that an uplift should also apply to the personal injury sector to offset the proposed cap increase on the financial products and services sector. Of the three responses from interested parties, one was supportive of increasing the cap given that the option of removing the cap was not consulted on, one believed the option of removing the cap should be revisited and one believed the cap should be increased further than the proposal.

8. Do you have any other comments related to these proposals?

Many respondents submitted alternative proposals for consideration, and many responses recorded above are summaries of a larger set of responses inclusive of measures not in the scope of this consultation. There were some suggestions for annual regulation fees to be scaled so claims management companies operating compliantly and using little regulatory resource would incur lower regulatory fees; a 'polluter pays' model.

There were many comments made on sector-specific issues for claims management companies, which can be attributed to the number of policy reforms both recently implemented and ongoing. In both the personal injury and employment sectors, it was felt that recent reforms; the ban on referral fees under the Legal Aid, Sentencing and Punishment of Offenders Act 2012 and the introduction of fees in the Employment Appeals Tribunal, had financially impacted claims management companies in those areas. It was argued that claims management companies in those sectors should be exempted from fee increases, levied a lower amount or exempted from fees altogether.

There were opposing comments in respect of the annual regulation fee scale from claims management companies at either end. Those with very small turnovers felt aggrieved that in terms of percentage of annual turnovers, they paid more than larger firms; while large compliant firms believed that they unfairly subsidised the regulation of the smaller, less compliant firms and the wider claims industry. There were responses from employment consultants authorised on a contingency basis without necessarily handling claims, who believed the scale should start with either a lower bracket to reflect minimum incomes, or that small businesses should be exempted from the proposed fee increases.

Conclusion and next steps

Paying for regulation

1. The consultation outlined the recent changes and difficulties both within the claims industry and regulating it, and explained that without changes to the fee structure, the costs of regulation would unlikely to be fully recovered given the required expansion and policy developments to address the high levels of detriment caused by the industry.
2. Several responses referred to a perceived unfairness that regulatory costs were increasing where overall, the claims management industry is contracting. Regulatory costs, however, are not expected to reduce in proportion to the reduction of the claims management industry, but are expected to increase under the ongoing demands of the financial products and services sector generated by mis-sold PPI; an area that although showing initial contraction, is likely to remain a dominant issue over the regulatory year 2014–2015. Ongoing resource will also be required to police the bans on referral fees and inducements to claim.
3. It is not possible to fully recover the costs of operating the regulatory regime by increasing fees only by the rate of inflation if, as in recent years, the regulated industry itself causes the need for an increase in regulatory resource on a much larger scale.
4. Likewise, insufficient funding would be recovered if regulated claims management companies paid annual regulation fees scaled on their use of regulatory resource. A 'polluter pays' model is not appropriate as this does not take into account the wider regulatory costs outside of those incurred through specific enforcement action that should be applied to the wider claims management industry.
5. Employment consultants, although representing only 0.6% percent of authorised claims management companies over 2012–2013, contributed 10% percent of the responses from claims management companies, which can be attributed to the low-volume claims work undertaken in this sector coupled with the recent introduction of fees in the Employment Appeals Tribunal. The suggestion by all respondents in this sector that they should not incur the fee increases necessitated by developments in other sectors is noted. However applying regulatory resource to a sector-specific authorisation process may be administratively burdensome and generate increases. It may also present a risk of claims management companies intending to operate in the financial products and services sector, but declaring only an intention to operate in another sector to circumvent the specific scrutiny applied to that sector. Although, the Regulator does not rule out sector-specific consultations in the future, should circumstances in different sectors become more divergent.

Application fee

6. The vast majority of responses supported retaining the application fee at the present level. A claims management company in the financial products and services industry agreed that the level should be maintained to ensure that only companies that have been thoroughly assessed can access the market. There were also views from claims management companies that believed the application fee should be reduced, removed or varied according to sector. All of the views put forward were considered, however applying a sector specific application fee may discourage full transparency by the applicant business, and in such circumstances there would likely be an increase in monitoring and compliance work.
7. The application fee will remain at £1,400. The greatest amount of support was for this option with no credible evidence to support either raising or lowering it. Retaining it at the current level will continue to underpin the existing robust authorisation process.

Fee pay scales – annual turnover £142,000 or below

8. In respect of fee scales for claims management companies with annual turnovers of £142,000 or less, the opinions of claims management companies were almost evenly distributed between those supporting the proposed 10% increase, those believing the increase should be higher and those opposing the increase.
9. Cogent points were made throughout many responses by the employment sector, typically made up of small companies or single authorised persons, in respect of the affordability of annual regulation fees for persons holding an authorisation on a contingency basis in the event they are required to represent at an employment tribunal, while not necessarily earning any income from claims handling activity.
10. The annual regulation fee bands for claims management companies with annual turnovers between £15,000 and £142,000 will increase by 10%. The annual regulation fee bands for claims management companies with turnovers below £15,000 will be held at the 2013–2014 levels. £15,000 is a relatively low annual turnover threshold that should distinguish micro operations and operations where claims handling is an ancillary activity. This is a fair levy for consultants authorised to operate in the employment sector on a contingency basis and those operating micro businesses.
11. The annual fee for turnovers below £5,000 will remain at £200; the annual fee for turnovers between £5,000 and £14,999 will remain at £300 with the annual fee for turnovers of £15,000 or more increasing by 10%.

Fee pay scales – annual turnover above £142,000

12. Of the 30 responses in respect of fee scales for claims management companies with annual turnovers over £142,000, 23 supported the proposed increase or believed the increase should be higher. Seven responses were received from claims management companies that felt the fees should not increase.
13. The annual regulation fee bands for claims management companies with annual turnovers over £142,000 will increase as proposed.

Fees cap

14. The majority of responses received in relation to this proposal were supportive of increasing the fees cap by 10% to £55,000, or believed that it should be increased further or removed altogether. 10 claims management companies opposed the proposal.
15. Some claims management companies asserted that increasing the cap would place an unfair levy on a handful of successful claims management companies that have high standards of regulatory compliance. Several respondents asked about the criteria the Regulator would use to revisit the removal of the cap in the future; the previous 2013–2014 fees determination consulted on the removal of the fees cap, and indicated that the matter may be revisited in the 2014–2015 fees determination. The removal of the caps was not a consideration in this determination; it would have applied only to a few specific claims management companies and was unnecessary to meet the calculated annual regulatory costs. In the consistent application of a 10% increase to the fee cap and across the regulation fee scales, a fair apportionment is achieved. If in future fees determinations it is deemed a fair and reasonable method of achieving full costs recovery, the removal of the fee cap will be consulted on as necessary.
16. The fees cap will increase 10% from the 2013–2014 level of £50,000 to £55,000. This strikes an appropriate balance between meeting the rising costs of the regulatory regime and a fair apportionment of the fees.

Financial products and services uplift

17. Of the 28 responses received in respect of raising the financial products and services uplift by 15% to 0.145% of annual turnover, 16 supported the proposed increase or believed the increase should be higher. 12 claims management companies did not support the proposal.
18. The financial products and services uplift will increase from 0.125% to 0.145% of annual turnover. This is a fair apportionment of the cost of regulatory resource given that the financial products and services sector, and the mis-sold PPI reclaim market in particular, continues to dominate regulatory activity.

Financial products and services uplift cap

19. Of the 28 responses in respect of raising the cap applied to the financial products and services uplift, 18 supported the proposed increase or thought the cap should be further increased or removed. 10 claims management companies did not support the proposal.
20. The financial products and services cap will increase to £55,000, aligning both fees caps.

Consultation principles

The principles that Government departments and other public bodies should adopt for engaging stakeholders when developing policy and legislation are set out in the consultation principles.

<http://www.cabinetoffice.gov.uk/sites/default/files/resources/Consultation-Principles.pdf>

Annex A – List of respondents

Claims Management Companies

A1 Claims A1 Hire Ltd
Accident Management Helpline Ltd
AJ Claims Limited
Aqualibra Claims
Ariana Direct Claim Ltd
Brixton Bizness Café Limited
Consumer Champion Group
Credo Claims Limited
Curly Wig
Davies & Co (UK) Ltd
EMC Advisory Services Ltd
Financial Services Redress (UK) Ltd
Fiona Satiro Consulting
Free Motor Legal Ltd
GHA (Cornwall) Limited
Immediate Claims Ltd
injurylawyers4u
Legal Car Care (UK) Ltd
Lionhead Law Ltd
One Stop Services UK Limited
Robin Oliver Legal
Rosewood Injury Claims
SNT Professional Services
The Onion Group
Torchwood Legal Services Ltd
We Fight Any Claim
Whitehall Randall & Associates
Your Claim Refunded Limited
2 x unstated Claims Management Companies

Other respondents

British Bankers Association
The UK Cards Association
Bank employee

Annex B – Fees Determination 2014–2015



Ministry
of Justice

Fees Determination
2014–2015

This Determination is made under Regulation 15 of the Compensation (Claims Management Services) Regulations 2006 and sets out the application and annual fees applicable from 1 April 2014.

Definitions

1. In this determination:

‘the Act’ means the Compensation Act 2006;

‘Regulator’ has the same meaning as in Section 14 of the Act;

‘Applicant’ means a person who has applied for authorisation under the Act;

‘Authorisation’ means an authorisation to provide regulated claims management services under the Act;

‘Authorised Business’ means a person who is currently authorised under the Act;

‘Client’ means a person for whom an authorised business is providing a regulated claims management service;

‘Regulated claims management service’ means the prescribed services set out in Article 4 of the Compensation (Regulated Claims Management Services) Order 2006;

‘Turnover’ means the sum of the amounts paid to, or received by, an authorised business in respect of regulated claims management services, including:

- a) charges, commission, the share of any compensation, fees and subscriptions, and
- b) the monetary value of any services received by the authorised business where it makes no payment for those services or where the payment received is worth less than the monetary value of the services, and
- c) the monetary value of any advertising in respect of the authorised business that it has not paid for out of funds referred to in sub-paragraphs (a) and (b).

‘Annual turnover’ means

- a) The authorised business's or applicant's turnover for the 12 months to 30 November 2013.
- b) If the business or applicant did not trade for the full 12 months to 30 November 2013, the estimated turnover for the 12 months to 30 November 2014.

- c) Where the application for authorisation is made on or after 30 November 2013, the estimated turnover for the 12 months to 30 November 2014.

Application of this determination

2. This fees determination applies to fees for all applications for authorisation made on or after 1 April 2014 and sets the annual fees for all businesses authorised at and after that date to the end of March 2015.

Application fee

3. An applicant seeking authorisation to provide regulated claims management services must submit an application fee of £1,400.00 with the application form.

Annual Fee

4. Authorised businesses will pay an annual fee. This fee will be equal to the sum of the amounts payable in relation to regulation and the financial products and services uplift, as set out by this determination.

Amount payable in relation to regulation

5. (1) Subject to sub-paragraphs (2) and (3), authorised businesses shall pay an amount equal to 0.500% of annual turnover up to £1 million, plus 0.360% of annual turnover between £1 million and £5 million, plus 0.260% of annual turnover above £5 million.

(2) The fee under sub-paragraph (1) shall be no more than £55,000.

(3) Where the annual turnover of a business is £142,000 or less, then the amount payable will be a fixed fee of –

Annual Turnover of Authorised Business	Annual Fee Payable
Under £5,000	£200
£5,000 - £14,999	£300
£15,000 - £24,999	£440
£25,000 - £74,999	£550
£75,000 - £142,000	£710

Pro rata calculation of amount payable in relation to regulation

6. Where an authorisation is given which has effect from a date on or after 1 April 2014, the fee shall be one twelfth of the sum calculated in accordance with paragraph 5 for each month or part of a month for which the Regulator has indicated that he is minded to authorise the business under the Act. This paragraph does not apply to any person who the Regulator is satisfied has been providing regulated claims management services prior to being authorised.

7. Where the Regulator is satisfied that the business or those who control the business have previously had control of another authorised business then the Regulator may require the business to pay an annual fee calculated by reference to the annual turnover of all of those authorised businesses.

Adjustments

8. Where an applicant has reported an annual turnover figure based on estimated turnover to 30 November 2014 and the actual annual turnover is more than the estimated turnover, an additional charge shall be levied based on actual annual turnover to 30 November 2014.

Financial products and services uplift

9. (1) Subject to sub-paragraph (2), authorised businesses shall pay an amount equal to 0.145% of annual turnover they received from regulated claims management services in relation to financial products and services.
(2) The fee under sub-paragraph (1) shall be no more than £55,000.

Pro rata calculation of financial products and services uplift

10. Where an authorisation is given which has effect from a date on or after 1 April 2014 or an authorised business begins to carry out regulated activities in relation to financial products and services, from a date on or after 1 April 2014, the fee shall be one twelfth of the sum calculated in accordance with paragraph 9 for each month or part of a month for which the Regulator has indicated that he is minded to authorise the business under the Act. This paragraph does not apply to any person who the Regulator is satisfied has been providing regulated claims management services prior to being authorised.
11. Where the Regulator is satisfied that the business or those who control the business have previously had control of another authorised business then the Regulator may require the business to pay an annual fee calculated by reference to the annual turnover in relation to financial products and services of all those authorised businesses.

Adjustments

12. Where an applicant has reported an annual turnover figure in relation to financial products or services based on estimated turnover to 30 November 2014 and the actual annual turnover in relation to financial products or services is more than the estimated turnover, an additional charge shall be levied based on actual annual turnover to 30 November 2014.

Compliance

13. Where the authorised business does not provide the annual turnover figures requested, the Regulator may use the previous year's actual or estimated annual turnover figure to calculate and issue an invoice pending the information required being supplied.

Kevin Rousell



(Head of Claims Management Regulation)

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