

CAA Consumer Panel Annual Report 2018-2019



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About the CAA Consumer Panel

The CAA Consumer Panel (the Panel) is a non-statutory body providing expert advice to make sure that the consumer interest remains central to CAA policy development. The Panel acts as a critical friend helping the CAA to understand fully, and take account of, the interests of current and potential aviation consumers.

The Panel makes use of existing CAA research to understand the aviation consumer experience and may request that the CAA undertakes new targeted research and gathers specific intelligence. In addition, the Panel provides the CAA with feedback from a consumer perspective on the effectiveness of its policies and practices.

Chair's Foreword

In 2018-19 we welcomed a number of new members to the Panel who have brought a wide variety of expertise. We have been joined by Jacqueline Minor, David Thomas and Carol Brennan whose biographies are at the back of this report. Their expertise has enabled us to contribute to the CAA's work in areas including economic regulation of NATS, considering the impact of Brexit on passengers and the CAA's Aviation Consumer Survey.

We have continued to deliver our workplan, holding a successful complaint handling workshop with a large number of representatives from across the aviation sector, and we have continued to meet regularly with airlines, airports and other sector bodies to discuss a wide range of consumer issues.

We are proud of the role we have been able to play in contributing to the DfT's thinking on the consumer elements of the Aviation Strategy and we look forward to continuing this work to help ensure the success of the proposals contained in the green paper.

We have built constructive and positive relationships with industry, Government, the CAA and other Consumer Panels to inform our work and enable us to represent the interests of consumers in aviation. We look forward to continuing this work in the year to come.



Jenny Willott

CAA Consumer Panel Chair

Chapter 1

Aims and Ambition

The Panel believes strongly in an aviation market and regulatory regime that has the needs of consumers at its heart. This means:

- effective airline competition on price and service quality;
- airports providing an affordable, good quality and consumer focused service; and
- empowered consumers making informed decisions about which companies to use.

When things go wrong, or adjustments are needed, the industry also needs to respond to meet the needs of all users. This means:

- airline services and airport environments designed and delivered to ensure accessibility to everyone;
- people who may need extra help supported to make sure they can effectively access the market; and
- consumers having quick, fair and easy access to redress if and when things go wrong.

The work of the Panel is grouped under the following strategic themes, which capture what we believe consumers need from the aviation sector and its regulator.

Access: The experiences and needs of consumers at risk of vulnerability are well understood and taken into account in the design and delivery of services. Everybody who wants to do so is able to access the market and has a good experience when they do so.

Quality: Airlines compete on both price and service quality, and consumers are able to make easy and accurate comparisons. Airports provide transparency about service quality. Digital innovation is harnessed to positive effect for consumers. Information is transparent and easily available, including in formats that can be used by third parties to give effective advice and make accurate comparisons.

Redress: When things do go wrong consumers should have quick, fair and easy access to redress, with equitable outcomes. Both airlines and airports use consumer complaints to learn lessons and improve service quality and provision. This will make things better for everybody, including those who do not complain. Reform of airline insolvency arrangements should be cognisant of consumer needs and ensure consumers are adequately protected.

Through its role as the voice for consumers in aviation regulation the Panel aims to use its relationship with the CAA to forward this agenda, to encourage the CAA to be ambitious when addressing the needs of consumers and to ensure that the work of the Panel is focussed where it can have the greatest impact.

Chapter 2

How We Work

The Panel's relationship with the CAA is key for the promotion of the Panel's aims and ambitions. We believe that we have found a good balance between maintaining an open and collaborative dialogue and providing the challenge needed to push for better consumer outcomes. This has been achieved in part by developing two-way, constructive engagement at all levels with the CAA. The CAA Chair and Chief Executive attend two Panel meetings a year and Panel Members participate in working groups and joint initiatives across the CAA, combining Panel Members' expertise in consumer issues with CAA colleagues' expertise and experience.

We were pleased that the CAA Chief Executive accepted our invitation to attend the Panel away day in June 2018 and that the Panel Chair was able to reciprocate when invited to the CAA Board Awayday in June 2018. Shared engagement at events of this nature have helped ensure early Panel input into the strategic priorities of the CAA so that we can be assured that CAA priorities reflect the needs of consumers, both current and future.

Following the Panel's away day, a work programme was developed to cover the period up to March 2020. This was published in August 2018 and can be found on the Panel's pages of the CAA website¹. Taking the strategic themes of Access, Quality and Redress as the foundation for our plans, the work programme describes the evidence the Panel will use and the outputs and outcomes that we hope to achieve.

The workplan describes specific activities for the Panel, which run alongside a variety of 'business as usual' tasks. These include commenting on the development of CAA policy and enforcement work at key stages, pressing for research in relevant areas and providing input and advice where requested. We also actively engage with key stakeholders outside the CAA including airports, airlines, and consumer representatives to help inform our understanding of the key issues facing aviation consumers.

¹ <https://www.caa.co.uk/Our-work/About-us/CAA-consumer-panel/>

Chapter 3:

2018-19 Key Achievements

Over the last year, Panel Members have made a significant contribution to the work of the CAA. Early and targeted engagement has allowed the CAA access to Panel Members' expertise and experience and provided an opportunity for the Panel to promote its priorities.

The Panel continued its support of the delivery of the CAA's Aviation Consumer Survey, contributing to the consumer survey working group. This provides an opportunity to help shape the design of the survey and furthers the Panel's objective of ensuring that the CAA has an effective evidence base from which to develop policy and monitor the market.

To promote the needs of passengers with reduced mobility and other assistance needs, the Panel supported the CAA with its work on the DfT's Public Access Assessment and development of an Accessibility Framework providing a clear steer to think about surface access and vulnerability at various points in the journey.

The work of the CAA's economic team has far reaching consequences for consumers and the Panel has been interested in the development of the CAA's position on the regulatory framework to support capacity expansion at Heathrow Airport. The Panel collaborates with the Heathrow Consumer Challenge Board to ensure that all consumer issues are covered.

Panel members met with CAA staff working on NATS regulation in August and October 2018 to provide input on the consumer interest in NATS next regulatory framework. The Panel's views were reflected in the CAA's response to the NATS CEO and its recommendations for taking account of how operations might impact consumers, especially where consumers' interests and airlines' interests may diverge, was provided alongside the CAA response.

Airport security can be a stress point for many consumers and in November 2018 the Panel commented on the CAA's Aviation Security Business Plan, underlining the importance of ensuring consumers have access to clear and unambiguous information and offering support to the CAA in considering potential consumer communications.

A representative from the Panel contributed to the DfT's Airline Insolvency Review (AIR) and helped shape the recommendations on how to address the gap in financial protection for those affected when an airline goes out of business. The panel have also provided their views on the AIR recommendations as part of its response to the Aviation Strategy green paper.

In addition to these activities which have involved working alongside CAA colleagues, the Panel has also undertaken its own projects. The main objective in doing so has been to help understand key issues and provide intelligence led, evidence-based recommendations and taken a more prominent role seeking to influence CAA's policy development areas where we believe we can add value. Throughout the reporting year 2018/19, three key pieces of work were undertaken to promote access, quality and redress, as detailed below.

Access

Consumer Vulnerability

As detailed in the CAA Consumer Panel Work Programme, the CAA's Aviation Consumer Survey provides clear evidence that people at risk of vulnerability are less likely to have confidence in the safety of UK airports than the average passenger (66% vs. 74%), and only half enjoy travelling by air (50% vs. 58%). CAA intervention has had a significant, positive impact on the accessibility of air travel. Around three quarters of those who had booked assistance were satisfied with the process of booking and the assistance they received, and more people are booking assistance than at any other time. The CAA and the Panel believe however that more can be done to improve satisfaction and to increase confidence for all air travellers, whatever their individual requirements.

The Panel has been working closely with the CAA on proposals for an internal framework to be incorporated into CAA decision making processes to ensure that the needs of all passengers at risk of vulnerability are understood and met.

During 2018, the Panel began investigating the approach taken by other regulators and considering the unique aspects of air travel that may lead to a passenger experiencing vulnerability.

The Panel considered all aspects of air travel from selecting and booking a ticket, getting to and through the airport, the experience on-board the aircraft and when arriving at the destination, as well as any disruption experienced or attempt to complain after the journey, and found that there is potential for vulnerability at each step. The Panel concluded that vulnerability exists on a spectrum and that the actions of industry can cause it or exacerbate it.

As a result of this work the Panel has recommended that the CAA develop a framework to identify the potential for detriment in any given situation and prioritise actions to address it, to ensure that all consumers are able to access aviation services in a way that is safe, fit-for-purpose and value for money. The Panel has produced a definition of vulnerability in relation to aviation that can be adopted by the CAA and considered what language to adopt when discussing vulnerability with industry and consumers.

The Panel's report, with recommendations for the CAA, was delivered in December 2018. The Panel is pleased that the CAA has used this report as a starting point for discussions with colleagues around the organisation to learn about what is already done to support vulnerable consumers, and to find out what barriers and opportunities exist. The CAA has advised the Panel that it will follow this up with external engagement with other regulators and interested parties. With the foundation provided by the Panel's work and the lessons to be learnt from stakeholders, the Panel looks forward to seeing the CAA's conclusions later in the year.

Quality

Aviation Strategy

In December 2018, the DfT published a Green Paper "Aviation 2050 — the future of UK aviation". This outlines proposals for the new aviation strategy, which covers a range of significant consumer issues such as demand, connectivity and sustainability. There is also a clear focus in the strategy on "improving the passenger experience, including through technology and innovation, a new passenger charter and action to reduce delays at the border".

The focus for the Panel's work on quality has been on contributing to the DfT's development of this strategy and to the CAA's thinking on the key policy proposals, looking at how airlines compete on both price and service and how consumers can make easy and accurate comparisons.

Over the past year, the Panel has committed significant resource into considering the complaints and redress landscape in aviation. The outcomes of this were shared with the DfT and helped highlight the need for such issues to be addressed in the strategy. More details can be found below in the section on 'Redress'. The Panel also co-hosted a roundtable with the Aviation Minister in October 2018, which provided a valuable opportunity for the CAA, DfT, industry and consumer groups to discuss key issues around accessibility, information provision and empowered consumers, and again highlighted the need to improve access to redress.

The Panel has produced a response to the Green Paper on the proposals that will have the greatest direct impact on consumers. The proposal for a Passenger Charter, for example, is a key development that the Panel believes could bring improvements for consumers, if developed and delivered effectively.

As described in the Green Paper, the Charter would contain voluntary commitments from the aviation industry to adhere to best practice alongside existing legal consumer protection requirements and air passenger rights, providing a single place for consumers to be able to understand what they can expect from industry. Industry performance

against the best practice codes and compliance with legal requirements would then be published to drive improvements and so that consumers can find out how well various industry players are performing in key areas.

The Panel supports the use of best practice and compliance reporting as an effective tool to improve standards, as evidenced by the enforcement work undertaken by the CAA. Where the CAA is expected to have a role in enforcing the Charter, the Panel has pressed the DfT to commit to reviewing the CAA's information powers and ensuring the appropriate enforcement mechanisms are put in place to allow effective sanctions for non-compliance.

The Panel has also contributed to the CAA's thinking on the Charter contributing to the working group that helped define the consumer outcomes that the CAA would seek from this key initiative.

The extension of CAA powers in certain areas, proposed in the Green Paper was welcomed by the Panel, as were the proposals to improve accessibility and encourage sustainable surface access, and the plans to work with industry to develop resilience and contingency planning guidance and minimum standards. In line with the Panel's work plan, the Panel intends to explore disruption management further in 2020 and the proposals around data sharing also fit well with the Panel's priorities. The Panel's response highlighted the potential for digital innovation to be harnessed to positive effect for consumers and made clear that it is essential that information is transparent and easily available in formats that can be used by third parties, to enable the use of innovation to make information available in a range of user-friendly and easily accessible ways.

The Panel's response was submitted to DfT and is available on the Panel's pages of the CAA website.

Redress

Complaints Handling and Compensation Claims

Redress is one of the fundamental consumer principles. Without it, consumers are not able to enforce their rights and there is less incentive for businesses to follow the rules. The Panel is therefore deeply concerned that complaints are a key area of dissatisfaction in aviation and the lowest scoring headline measure in the CAA's Aviation Consumer Survey.

Fewer than half of respondents reported being satisfied in key measures such as speed of resolution, fair treatment, being kept informed of progress and redress offered. The high uphold rate of complaints escalated to ADR schemes for resolution (60% found in favour of the passenger) also indicates that there are shortcomings with industry complaints handling that must be addressed.

The Panel's work plan contained a commitment to focus the majority of the Panel's resource on complaints and redress in the second half of 2018. This involved an evidence-based review, providing clear, actionable recommendations for the CAA.

The Panel's review into complaints and redress began by determining whether the current landscape meets three main objectives:

- Consumers need to be able to access effective and free redress at both the first tier (when contacting the business directly) and second tiers (when escalating the complaint to an Alternative Dispute Resolution (ADR) bodies or CAA's Passenger Advice and Complaints Team(PACT)). Redress should be comprehensive in scope and easy to access.
- Businesses should view complaints data as a good way to learn and deliver improvements, in particular at the first tier, and be incentivised to follow the rules. Research has shown that good complaints handling can generate increased profits.²
- Regulators need to have a suitable framework, effective oversight and access to adequate sanctions. To further strengthen incentives, data should be transparently and easily available.

Given the results of the Aviation Consumer Survey, the Panel was not surprised to learn that these objectives were not being met or that, in many cases, there was no evidence to be able to judge. Lack of information is a particular problem when trying to assess complaints made directly to businesses, known as tier one complaints.

As well as demonstrating that passengers who make a complaint or seek redress are dissatisfied, the Aviation Consumer Survey shows that a significant number of consumers who have an issue that they would like to raise with the airline or airport do not do so because they believe that it is too onerous³. In the same way, many passengers who are due compensation following a long delay or cancellation see the claims process as too complicated or find it hard to establish whether the reason for the delay means that they are eligible for compensation. Many more simply do not know that they have the right to compensation at all.

In reviewing the complaints handling landscape, the Panel also considered the effectiveness of escalation options for consumers where they have been unable to resolve the complaint with the business. ADR can help resolve a complaint against an airline or airport that has signed up to one of the two ADR providers operating in the aviation market. The Panel recognises that the CAA has been successful in achieving widespread

² Economic Insight, *The Business Case for Good Complaints Handling in Legal Services, Report for the Legal Ombudsman*, November 2013.

³ According to the 2017 CAA Consumer Tracker for the Aviation Sector, 18% of those with grievances considered formally complaining, but almost half of these didn't end up bothering.
<http://publicapps.caa.co.uk/docs/33/15-081911-01%20CAA%20Consumer%20Tracker%20Wave%204%20Report%20FINAL1.pdf>

sign-up but are concerned that there are some consumers for whom a binding decision still means going to court.

The Panel considered whether the benefits of having more than one ADR provider and the need to charge consumers for unsuccessful claims outweighed the potential harm that these polices may cause. They also recognised the limitation in scope of the complaints that can be handled by ADR, as they are restricted to making judgments in relation to specific air passenger rights and unfair contract term issues. All these factors mean that the complaints landscape is confusing for consumers.

Following the review and based on the findings above, the Panel made the following recommendations to the CAA:

- Further research into the consumer experience of complaints handling at the first tier should be carried out in order to develop an evidence base to underpin any further policy work;
- First tier complaints data (both numbers and outcomes) and consumer satisfaction with complaints handling should be published by firm;
- An impact assessment, analysis and recommendations on the desirability and feasibility of the introduction of automated compensation should be carried out, including engagement with regulators who have recently introduced automatic compensation in their own sectors;
- The CAA should engage with HMT and the FCA to consider whether claims for compensation in aviation should become a regulated claims management activity;
- ADR in aviation should become mandatory rather than voluntary. Options for how this could best be done need to be developed carefully, including consideration of whether operating licence conditions could be amended to include use of ADR;
- Consideration should be given to whether there should continue to be multiple providers, with the Panel's preference a single ADR scheme to deal with all aviation complaints; and
- ADR schemes in aviation should no longer be able to charge consumers a fee.

The work carried out in this area has helped the Panel reach consensus on these key issues, which have been included in the Panel's response to the DfT's aviation strategy and have helped the CAA in considering its response.

The Panel hosted a Complaints Handling Workshop in February 2019 attended by the CAA, government agencies and industry representatives. The Panel took the opportunity to present its principles of good complaints handling (see Annex 1), and participants also heard strong messages on the business benefits of good complaints handling and the role the regulator can play in this area.

Chapter 4:

Priorities for 2019-20

The Panel published a work programme in August 2018 covering the priorities up to March 2020. In addition to pursuing outcomes from the work undertaken over the last year, the Panel is committed to pursuing improvements for consumers through the following initiatives:

Starting in mid-2019, the Panel will work with the CAA to explore how technology is changing the consumer experience, for example how data is aggregated and used, or how use of algorithms could impact on how consumers are presented with ticket options, as well as on how much they pay.

The Panel will also work with the CAA to map the data that is currently available to inform consumer choice, as well as providing recommendations on other data which could be made available. The Panel will consider how consumers make use of information and the role of third parties in increasing informed choice. This work is likely to take place in the second half of 2019.

In 2019 - 2020 the Panel will investigate available evidence and provide recommendations to explore differences between how passengers and industry perceive disruption and, recognising that disruption can occur, produce recommendations for how it might be handled better to mitigate effects on consumers, with particular focus on the interface between airlines and airports.

The Panel will also continue to work on the development of regulatory framework for Heathrow to ensure that the consumer interest is represented in policy development and with the CAA and DfT on the proposals in the Aviation Strategy as a key driver for improvements in access, quality and redress.

Chapter 5:

Transparency

Expenditure

The Panel cost the CAA £74,565.91 in Chair and Member fees and expenses in the year to 31 March 2019.

Panel meetings

In the year ended 31 March 2019, the Panel met formally 4 times. The minutes of these meetings are published on the CAA website (www.caa.co.uk/consumerpanel). In addition, various sub-groups of the Panel worked on individual work streams throughout the year.

Terms of Reference

The Panel's Terms of Reference are published on the CAA website (www.caa.co.uk/consumerpanel).

Working with stakeholders

The Panel primarily faces the CAA, providing advice and engaging with staff at all levels. In addition, in 2018-19, as part of its work with stakeholders the Panel engaged with:

- Airlines UK
- Airport Operators Association
- Chair of the Airline Insolvency Review
- Chair of the Communications Consumer Panel
- Chair of the Financial Services Consumer Panel
- Chair of the Legal Services Consumer Panel
- Department for Transport
- Heathrow Airport Limited
- Heathrow Consumer Challenge Board
- Transport Focus
- UK Airport Consultative Committees

Chapter 6:

Who we are

The CAA Consumer Panel membership brings together strategic thinking and outstanding analytical aptitude and the ability to apply these in a practical way to improve the experience for air passengers.

Rt Hon Jenny Willott OBE, Chair

Jenny was appointed to the Panel in January 2018. Jenny was Member of Parliament for Cardiff Central for ten years, serving as Consumer Affairs Minister, with responsibilities including consumer policy, competition policy and employment law, Women and Equalities Minister and as a Government Whip. She is now the Director of Enterprise and Innovation at St Mary's University, Twickenham, and a Non-Executive Director for the Independent Parliamentary Standards Authority. Prior to entering Parliament, she worked in the voluntary sector, including as Chief Executive of Victim Support South Wales and Head of Advocacy for UNICEF UK.

Carol Brennan

Carol was appointed to the Panel in October 2018. Carol is a Reader in Consumer Policy and Director of the Consumer Dispute Resolution Centre at Queen Margaret University, Edinburgh. Carol's research interests include consumer policy, complaint management, dispute resolution, consumer empowerment and customer experience. Carol is Chair of the Scottish Legal Complaints Commission Consumer Panel and is a member of the Office of Rail and Road Consumer Expert Panel. She is also Chair of the Qualifications and Awards Board for the Chartered Trading Standards Institute. Carol conducts research for consumer policy and dispute resolution organisations and publishes regularly in academic journals. Carol draws on her research to influence new developments in strategy, policy and practice. She recently produced reports on consumer representation, the outcome of complaints and using complaints to transform services.

Helen Dolphin MBE

Helen was appointed to the Panel in April 2018. Helen is a committed campaigner on improving transport for disabled people. After becoming disabled in her early twenties Helen trained as a journalist and worked for ITV Anglia News as a news reporter. She followed this by taking up the role of Director of Policy and Campaigns for a national disabled charity. Helen now works as an independent mobility specialist advising government, public, commercial and professional bodies on how to improve accessibility.

She recently gained a degree in law and carries out equality law work for Fry Law. Helen is a member of the Disabled Persons Transport Advisory Committee (DPTAC), Chair of the Joint Committee on the Mobility of Disabled People (JCMD) and Chair of her local mobility assessment centre East Anglia Driveability (EAD).

Trisha McAuley OBE

Trisha was appointed to the Panel in October 2015. Trisha is an independent consumer expert and an experienced Non-Executive Director. For over twenty years she was a senior executive in UK and Scottish consumer organisations and is the former Scottish Director of Consumer Futures. She was awarded an OBE for services to consumer affairs in 2015. Trisha is currently the Independent Chair of National Grid's RIIO2 Gas and Electricity Transmission Stakeholder Challenge Groups. She is also Independent Chair of two Electricity Code Governance Panels. She is a Board Member of Northern Ireland Water, a Member of the Institute of Chartered Accountants Scotland Discipline Board, a Member of the Ofgem Gas Network Innovation Competition Panel, a Member of the Office of Rail and Road Consumer Expert Panel, and a Member of the Heathrow Consumer Challenge Board.

Walter Merricks CBE

Walter was appointed to the Panel in April 2018. Walter's career over the past 20 years has involved work with ombudsman and complaint services, competition and consumer protection systems and regulatory bodies in the retail financial services, gambling, surveying and legal services, press, telecoms, energy, copyright licensing and ATOL protection sectors. He was the inaugural Financial Ombudsman and worked with the Financial Services Consumer Panel between 1999 and 2009. He recently served for six years on the board of the Gambling Commission, and now chairs the boards of IMPRESS (the Independent Monitor for the Press), and of JUSTICE, the law reform charity.

Jacqueline Minor

Jacqueline was appointed to the Panel in October 2018. Following a short period lecturing in law at the University of Leicester, Jacqueline Minor joined the European civil service, first at the Court of Justice and subsequently at the European Commission. After more than 20 years' working on Internal Market issues, including a period as Director responsible for Consumer Policy, she served as Head of the Commission's Representation in the UK from 2013 until retirement in 2017. She is a member of the Board of Governors of the University of Brighton, an Honorary Senior Fellow of Regent's University, London and a Governor of the National Institute for Economic and Social Research.

David Thomas

David was appointed to the Panel in October 2018. He is a chartered accountant and an economist. He was appointed a specialist panel member at the Competition and Markets Authority in 2017 and in December 2018 became a member of competition decision and enforcement decision committees at the Financial Conduct Authority and the Payment Systems Regulator. Since 2016 has run his own consulting practice focusing on economics, regulation and disputes in the communications sector. David was a director of competition and regulatory finance at Ofcom where he had responsibility for, among other things, price controls. After leaving Ofcom he established and led KPMG's global economics and regulation practice.

Claire Whyley

Claire was appointed to the Panel in October 2015. Claire Whyley is a professional researcher, policy analyst and consumer advocate, focusing on consumer behaviour and decision-making, consumer protection and consumer-focused regulation. She specialises in user-led, evidence-based and impact-focused policy development, across a range of markets, with a particular interest in vulnerable and excluded consumers. She has delivered a wide range of projects aiming to support organisations in putting consumers at the heart of their processes and business planning. Claire holds a number of non-executive roles including the Competition and Markets Authority Panel, Civil Aviation Authority Consumer Panel, the Advertising Advisory Committee, the Finance and Leasing Association Lending Code Board, the H7 Consumer Challenge Panel; the Office of Rail and the Pay.UK End User Advisory Council. She was previously Senior Research Fellow at the Personal Finance Research Centre, Head of Research and Policy at the Welsh Consumer Council and Deputy Director of Policy at the National Consumer Council.

Annex 1

Principles of good quality complaints handling and redress

Comprehensive

Redress should be comprehensive in scope. Issues should not fall between gaps, with businesses unwilling to take responsibility.

Accessible

It should be free and easy to make a complaint. Both businesses and ADR schemes should make sure the complaints process is accessible to all. This means making sure that complaints can be accepted and responded to in different formats and being sensitive to individual needs.

Clear

The process should be simple and easy to navigate. When consumers should move to the second tier this should be well signposted.

Proportionate

Complaints should be resolved as informally and easily as possible.

Fair and Consistent

Decision making should take into account what is fair and reasonable. Staff dealing with complaints should be adequately trained and resourced. Clear reasons should be given for each decision reached. Decisions on similar or identical issues should be consistent.

Independent

Decisions should be taken without actual or perceived conflicts of interest at all stages of the process. Re-contacts should always be reviewed by a member of staff with no previous interest in the case.

Timely

Complaints should be resolved in a timely manner. Businesses and ADR schemes should clearly set out timescales and record and publish information on adherence to these. It should be clear to consumers how long they have to submit a complaint.

Accountable

Service standards for complaints handling should be published along with information on how these standards are being met. ADR schemes should publish comprehensive data on complaints received and upheld in a format that can be used by consumers, regulators and third parties. ADR schemes and regulators need to have the tools/ability to enforce decisions once made.

Transparent

The governance and senior management of ADR provider schemes should be open and transparent. How schemes are funded, and the contractual arrangements between subscribers and schemes should be public.

Always improving

Systems should be in place to record, analyse and report on the learning from complaints at both the first and second tiers. At the second-tier information on trends and good practices should be shared.