

Title: To require consideration of revision before appeal Lead department or agency: Other departments or agencies: Ministry of Justice Tribunals Service Her Majesty's Revenue and Customs	Impact Assessment (IA)
	IA No:
	Date: October 2011
	Stage: Final
	Source of intervention: Domestic
	Type of measure: Primary Legislation
Contact for enquiries: Darrell Smith 020 7962 8502	

Summary: Intervention and Options

What is the problem under consideration? Why is government intervention necessary?

An increase in the volume of appeals has led to a substantial increase in the Tribunals Service's caseload and longer waiting times for appeals to be heard. Future welfare reforms that have already been announced, such as reforms of Disability Living Allowance, are likely to further impact upon the volume of appeals. Reform is necessary to deliver timely, proportionate and efficient justice for claimants and to reduce unnecessary demands on the Tribunals Service.

What are the policy objectives and the intended effects?

The policy change is to introduce a power so that claimants can be required to apply for a disputed decision to be revised before being able to appeal to the First-tier Tribunal. The application for a revision triggers a process known in DWP as "reconsideration".

The power would be capable of being exercised in relation to all major social security benefits (working and pension age and benefits recovery); Housing Benefit and Council Tax Benefit; child support; and other payments administered by DWP, e.g., for mesothelioma and vaccine damage. The regulations could apply to some or all of these, or to some at first and others later.

The objective of this policy is to help to ensure that there is a proportionate dispute resolution procedure for social security decisions - so that as far as is reasonably possible, disputes between customers and the relevant administering body regarding its decisions are resolved through internal processes. The claimant will only be able to make an appeal after receiving the outcome of the reconsideration process, so that the appeal is only made after there has been a chance to fully consider the case and notify the claimant of the outcome. The intended effect is that this would lead to more disputes with claimants being resolved through the internal reconsideration process, rather than resulting in an appeal to the First-tier Tribunal - because some claimants would conclude that the outcome of the reconsideration process was fair and therefore decide not to appeal, and because fewer appeals would proceed to the tribunal as a result of customers not taking action to withdraw appeals which they no longer considered necessary.

The policy change creates an enabling power which will come into effect through regulations. The detail of how it will be applied will depend on those regulations. This impact assessment therefore provides an overview; more detailed impact assessment will be required at the regulation making stage.

What policy options have been considered? Please justify preferred option (further details in Evidence Base)

DWP is currently implementing a number of procedural changes to help cope with the increased numbers of appeals, e.g., Jobcentre Plus is currently strengthening its reconsideration process for Employment and Support Allowance through increased telephone contact with the claimant and by proactively seeking additional evidence to ensure the decision is sound. A number of other changes to the appeals system have also been implemented, or are being planned, by the Tribunals Service which will increase its capacity and help to manage the future appeals caseload.

The specific measure to require the claimant to go through the reconsideration process prior to appealing is therefore part of a package of complementary initiatives. The use of the power would be linked to improvements to the reconsideration process, to ensure that the process was timely and robust.

Not reforming the system would lead to a significant risk that upcoming benefit reforms will result in substantially increased workload pressure on the appeals system and longer waiting times for appellants at the tribunal stage.

The preferred option is to make this legislative change, to complement the other changes taking place.

When will the policy be reviewed to establish its impact and the extent to which the policy objectives have been achieved?

**It will be reviewed
Six months after
implementation**

Are there arrangements in place that will allow a systematic collection of monitoring information for future policy review?

Yes, see Annex 1

Summary: Analysis and Evidence

Price Base Year	PV Base Year	Time Period Years	Net Benefit (Present Value (PV)) (£m)		
			Low:	High:	Best Estimate:
COSTS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)		Total Cost (Present Value)
Low					
High					
Best Estimate					
Description and scale of key monetised costs by 'main affected groups'					
Other key non-monetised costs by 'main affected groups'					
<p>There will be costs associated with changing the processes for notifying claimants of decisions and resolving disputes for the affected benefits and payments. This will include costs of changing IT systems, developing new decision notices and developing business guidance. These costs will be incurred by each of the organisations administering the affected benefits and payments; these could include DWP, CMEC, Local Authorities and HMRC. There will also be costs incurred in preparing the regulations.</p> <p>There will be costs of time to appellants of having to apply separately for a revision and subsequently to make an appeal, if they wish to do so.</p> <p>Potentially it could take longer for final decisions to be determined through the appeals system, as appeals will not be made until after the revision application has been considered, in which case there would be costs for some claimants of receiving lower or no benefit income for longer; payment would be backdated if the appeal was successful. Any such delay would be mitigated by operational measures to ensure timely delivery of the reconsideration process; it is also anticipated that a reduction in the volume of appeals would contribute to efforts to reduce waiting times at the appeal stage.</p>					
BENEFITS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)		Total Benefit (Present Value)
Low					
High					
Best Estimate					
Description and scale of key monetised benefits by 'main affected groups'					
Other key non-monetised benefits by 'main affected groups'					
Reduction in the costs of administering appeals, as fewer cases go to appeal, compared to the expected future volume.					
Key assumptions/sensitivities/risks					Discount rate
<p>It is not possible to quantify the on-going costs and benefits of the policy to any degree of certainty at this stage. The changes would work in combination with a number of other process changes, such as improved reconsideration processes, so it may not be possible to isolate the effect of the changes even after they are implemented. More detailed analysis of the costs and benefits for individual benefits and payments will be carried out when determining the detail of how the power will be applied through regulations.</p>					3.5%
Impact on admin burden (AB) (£m):			Impact on policy cost savings		
New AB: 0	AB savings: 0	Net: 0	Policy cost savings: 0	In	

Enforcement, Implementation and Wider Impacts

What is the geographic coverage of the policy/option?	Great Britain				
From what date will the policy be implemented?	2012				
Which organisation(s) will enforce the policy?	DWP, CMEC, Local Authorities, HMRC				
What is the annual change in enforcement cost (£m)?	NIL				
Does enforcement comply with Hampton principles?	Yes				
Does implementation go beyond minimum EU requirements?	No				
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)	Traded: NIL		Non-traded: NIL		
Does the proposal have an impact on competition?					
What proportion (%) of Total PV costs/benefits is directly attributable to primary legislation, if applicable?	Costs: 100%		Benefits: 100%		
Annual cost (£m) per organisation (excl. Transition) (Constant Price)	Micro NIL	< 20 NIL	Small NIL	Medium	Large NIL
Are any of these organisations exempt?	N/A	N/A	N/A	N/A	N/A

Specific Impact Tests: Checklist

Set out in the table below where information on any SITs undertaken as part of the analysis of the policy options can be found in the evidence base. For guidance on how to complete each test, double-click on the link for the guidance provided by the relevant department.

Please note this checklist is not intended to list each and every statutory consideration that departments should take into account when deciding which policy option to follow. It is the responsibility of departments to make sure that their duties are complied with.

Does your policy option/proposal have an impact on...?	Impact	Page ref within IA
Statutory equality duties ¹	YES	Separate publication
Economic impacts		
Competition	NO	
Small firms	NO	
Environmental impacts		
Greenhouse gas assessment	NO	
Wider environmental issues	NO	
Social impacts		
Health and well-being	NO	
Human rights	NO	
Justice system	NO	
Rural proofing	NO	
Sustainable development	NO	

¹ Race, disability and gender Impact assessments are statutory requirements for relevant policies. Equality statutory requirements will be expanded 2011, once the Equality Bill comes into force. Statutory equality duties part of the Equality Bill apply to GB only. The Toolkit provides advice on statutory equality duties for public authorities with a remit in Northern Ireland.

Evidence Base

Volume of Appeals

1. The Social Entitlement Chamber of the First-tier Tribunal hears appeals for Social Security and Child Support (SSCS), Criminal Injuries Compensation and Asylum Support. The SSCS appeals are made against decisions made by DWP, the Child Maintenance Enforcement Commission (CMEC), other Government departments, such as Her Majesty's Revenue and Customs (HMRC), and Local Authorities. Most of the SSCS appeals could potentially be affected by the measure to require claimants to seek a revision prior to making an appeal.
2. In 2009/10 there were 339,200 SSCS appeals received by the Tribunals Service, an increase of 40 per cent on 2008/09. This has led to a large increase in the SSCS live caseload; at the end of 2008/09 there were 66,400 appeals waiting to be heard but that had more than doubled to 138,800 by the end of 2009/10.
3. The number of SSCS appeals submitted to the First-tier Tribunal in 2009/10 is given in the following table, together with the appeals heard and the proportion found in favour of the appellants, for each of the SSCS benefits/schemes. The figures show that three-quarters of the SSCS appeals submitted were for one of Incapacity Benefit (IB), Employment and Support Allowance (ESA), Attendance Allowance (AA) or Disability Living Allowance (DLA).
4. The vast majority of the SSCS appeals are for benefits administered by DWP, but in 2009/10 there were 12,500 appeals for Housing Benefit or Council Tax Benefit, administered by Local Authorities, 4,200 appeals relating to Child Support, administered by CMEC, and 1,600 for each of Tax Credits and Child Benefit, administered by HMRC. There were six appeals submitted for Vaccine Damage Payments in 2009/10.

	Number of appeals submitted	Percentage of appeals submitted	Cases cleared at hearing	% found in favour of appellant
Employment and Support Allowance	126,800	37.4%	50,800	37.4%
Attendance Allowance / Disability Living Allowance	75,600	22.3%	54,600	41.0%
Incapacity Benefit	52,200	15.4%	47,200	51.1%
Jobseeker's Allowance	31,100	9.2%	17,500	17.7%
Income Support	16,000	4.7%	11,800	28.8%
Housing Benefit / Council Tax Benefit	12,500	3.7%	8,600	24.4%
Industrial Injuries Disablement Benefit	7,300	2.2%	4,900	38.8%
Social Fund	4,700	1.4%	3,400	12.1%
Child Support	4,200	1.2%	3,200	43.8%
Pension Credit	1,700	0.5%	990	23.2%
Tax Credits	1,600	0.5%	870	14.9%
Child Benefit	1,600	0.5%	1,100	10.9%
Carer's Allowance	1,100	0.3%	760	13.2%
Retirement Pension	800	0.2%	610	5.9%
Other	2,000	0.6%	770	25.8%
Total	339,200		207,300	37.9%

5. ESA was introduced in October 2008, replacing IB and other benefits awarded on the basis of incapacity for new claimants. The introduction of ESA has led to much of the increase in appeals as more claimants are found ineligible for the benefit when assessed, compared to the predecessor benefits; ESA statistics show that currently almost two-thirds of people assessed for the benefit are

found to be fit for work and therefore ineligible for ESA and around 40 per cent of these people are having an appeal against this decision heard. As a result, in 2009/10 the total number of IB/ESA appeals received was double that in 2008/09.

6. The result of these changes is that there has been a large increase in the workload of the First-tier Tribunal and a rise in the time taken to hear appeals. For example, in 2008/09 78 per cent of SSCS appeals had their first hearing within 14 weeks of the appeal being received by the Tribunals Service, but this decreased to 59 per cent in 2009/10. This has meant that it is taking longer for appellants to have their cases resolved, which can lead to financial hardship while awaiting the decision.
7. The table above also shows that, in total, 38 per cent of appeals heard were found in favour of the appellant; in 127,000 cases (just over three in five of the cases heard), the original decision was upheld on appeal. The disability and incapacity benefits, together with child support, tend to have the highest rates of tribunal findings in favour of the appellant; over half of IB cases heard in 2009/10 resulted in the decision being overturned.

Reconsideration

8. When a claimant is unhappy with a decision they are able to apply for a revision of the decision; this triggers a process known in DWP as "reconsideration". The reconsideration process that begins with this application is important for reducing the number of cases which go to appeal, by providing an additional opportunity to correct decisions.
9. The power to revise decisions on DWP benefits and payments and Child Support was introduced by the Social Security Act 1998, as part of a number of reforms to the decision making and appeals process.² The National Audit Office calculated that these reforms led to a reduction in appeals of around 15 to 20 per cent³. Some of the reasons for this reduction were: better explanation of decisions; and using opportunities such as the reconsideration process to correct decisions prior to an appeal being heard by the tribunal.
10. Jobcentre Plus has recently trialled a scheme to telephone claimants who had made an appeal against their ESA decision. The original decision was explained to the individual; if they still had reasons to disagree, additional information or evidence was obtained and the case was reconsidered. Following this intervention, 15 per cent of claimants who had appealed either withdrew their appeal or had their initial decision revised by the Decision Maker. This illustrates the potential effect of improvements to the reconsideration process on the number of appeals and on the number of claimants getting their case quickly resolved, without the need to go to appeal.

² The legislation to introduce revisions for Housing Benefit and Council Tax Benefit was introduced in 2001

³ "Getting it Right, Putting it Right", National Audit Office, 2003

Introduction

Policy Rationale

What is the current policy?

11. Currently, if a person is unhappy with a decision for most SSCS benefits and payments, they can request a written explanation or apply for a revision of the decision within one month, triggering a process internally referred to as reconsideration⁴. The body that makes the decision reconsiders the decision and issues a decision notice that either revises the original decision or refuses to revise. If the decision is not revised in the claimant's favour, the claimant has a further month in which to appeal the original decision.
12. Alternatively, the claimant can simply appeal the decision within a month, without requesting a revision. When this happens, the original decision is reconsidered in order to ensure the decision is corrected, if necessary, at the earliest possible opportunity.

What is the change in policy?

13. The policy change is to introduce a power so that claimants can be required to apply for a disputed decision to be revised before being able to appeal to the First-tier Tribunal. The power would be capable of being exercised in relation to all major social security benefits (working and pension age and benefits recovery); Housing Benefit and Council Tax Benefit; child support; and other payments administered by DWP, e.g., for mesothelioma and vaccine damage. The regulations could apply to some or all of these, or to some at first and others later.
14. The effect of the change is that decisions will go through a robust reconsideration process before an appeal can be made. This ensures that the decision has been checked thoroughly and the reasons for the decision are explained to the claimant before the case goes to appeal. It also allows an opportunity to proactively seek further evidence from the claimant about the disputed decision before the claimant makes an appeal.

Reason for change in policy?

15. There have been large increases in the numbers of SSCS appeals largely as a result of the introduction of ESA, leading to increases in the numbers of appeals waiting to be heard. Future welfare reforms being introduced in the Welfare Reform Bill, e.g., reforms of Disability Living Allowance, are likely to impact further upon the volumes of appeals.
16. Currently many people make an appeal on receiving an adverse decision, without first requesting a revision. A reconsideration of the case is routinely carried out when an appeal is made, and the appeal lapses if the decision is revised to the claimant's advantage. If the decision is not revised or the revision is unfavourable

⁴For Vaccine Damage Payments a claimant has six years from the date of the decision notification to seek a revision of the decision; there is no time limit for submitting an appeal, which can be made without seeking a revision.

to the claimant then the appeal continues against the original decision, unless the appellant withdraws it.

17. This means that in some cases, the appeal proceeds without claimants being aware that their case has been through the internal reconsideration process. In other cases, where the customer is aware that reconsideration has taken place and the original decision has not been revised, inaction on the part of the customer will result in the appeal proceeding, even if the customer considers that the outcome of the reconsideration process was fair or that their appeal is no longer necessary for some other reason. The customer is not required to consider at that point whether the outcome of the reconsideration was reasonable, before deciding whether they wish to appeal.
18. Parts of DWP have recently made improvements to their reconsideration processes and DWP is actively considering the potential to improve the reconsideration process further. Improvements of this kind strengthen the argument for requiring customers to go through the reconsideration process, before making a decision to make an appeal, if they still perceive that they have not received a fair decision after this stage

Impacts of the Changes

19. The proposed changes would require the claimant to have requested a revision and to have received the outcome of this revision, before an appeal may be made. The policy change creates an enabling power which will come into effect through regulations. The detail of how it will be applied - and the impacts - will therefore depend on those regulations.
20. Many claimants awaiting the outcome of the reconsideration and, if necessary, the appeal, will receive no or reduced payments while waiting for the outcome of their case to be determined, e.g., a DLA claimant who has been found to be ineligible for the benefit will not receive any DLA payments while waiting for their reconsideration or appeal.
21. If requiring the claimant to apply for the revision prior to being allowed to make an appeal delays claimants in getting benefit payments to which they are entitled, then this would have an adverse financial impact on them. Payment would, however, be backdated if the decision was overturned in their favour. Any such delay in payment of benefits would be mitigated by operational measures to ensure timely delivery of the reconsideration process. It is also anticipated that a reduction in the volume of appeals would contribute to efforts to reduce waiting times at the appeal stage.
22. Claimants will have to apply separately for a revision and subsequently to make an appeal, if they wish to do so; the processes for applying for a revision and for appealing will need to be designed to be accessible, to minimise (so far as practicable) the extent to which the processes themselves might deter or inhibit their use. It is possible that there could be increases in the number of reconsiderations having to be carried out, if claimants feel that they are encouraged to request a revision and find that this is more accessible than the appeals system. It is anticipated that the changes will have an impact on the justice system, by reducing the numbers of cases taken to appeal.

DWP

23. Currently, for DWP benefits and payments, if the claimant asks for a revision of a disputed decision, they need to subsequently make an appeal before their case can be heard by the First-tier Tribunal. These cases will be unaffected by the proposed legislation changes.
24. Alternatively, the claimant may make an appeal, without requesting a revision. In this case the decision will still be subject to the internal reconsideration process and will only be submitted to the First-tier Tribunal if no change benefiting the claimant is found. Business processes and systems in DWP are set up to allow the appeal to continue to the First-tier Tribunal if there are no changes in the claimant's favour.
25. Significant operational changes would be necessary in the DWP businesses administering the affected benefits and payments, if the claimant could only make an appeal after being notified of the outcome of the reconsideration process. IT systems would need to be changed to handle the new processes, and these changes would have the biggest financial cost. Decision notices would need to be changed to explain to customers that they needed to request a revision and be informed of the outcome before being able to appeal. Other leaflets describing the appeals process would also need to be changed. There would also be a cost to amending guidance for decision makers.
26. Some business processes would also need to be changed, so that the process for handling an appeal would only start once the customer made the appeal. In some cases, the appeal is currently written straight after the reconsideration process, if the decision is not revised in the claimant's favour. This would not be possible, if the claimant could not make the appeal until after the receipt of the result of the reconsideration. This would result in a break in the process for handling the case, and would be likely to increase the cost of processing each appeal.

CMEC

27. Where a decision is made in regards of the assessment of a liability on a child support case, that decision normally carries the right of appeal. Either parent may choose to dispute that decision with CMEC, or may choose to appeal at that point.
28. A dispute is an informal way of reconsidering a decision on a case and, usually, the quickest way to resolve a client's issues. It is carried out by a caseworker in CMEC. If there are errors found in the decision when disputed, they can be corrected relatively quickly and if no errors are found, the client is issued with a Refusal to Revise (RTR) notification, which extends their right of appeal by a further month. There is no legal requirement for a decision to be disputed before an appeal can be brought.
29. In the region of 40 per cent of appeals made to CMEC's Central Appeals Unit have been disputed and over the last 18 months this dispute activity has been actively promoted within the business. Volumes of disputed and undisputed appeals are reported internally to highlight the importance of this process and encourage its use.

30. Once an appeal has been made the case is reconsidered by response writers as part of the appeal process, whether the case has previously been disputed or otherwise. If errors are found in the calculations the decision is revised and if found to be correct the appellant is given the opportunity to withdraw their appeal. Therefore all appeals presented to the First-tier Tribunal from CMEC have been reconsidered.
31. The current dispute process in CMEC is an existing framework which could be adapted for the proposed process under which claimants would apply for a revision before appealing. The proposal would require amendments to existing letters, intranet content and appeals booklets and the creation of a new letter informing clients that they would need to apply for their decision to be reconsidered by CMEC before appealing. The additional letter and amended communications would need to be added to existing IT systems and intranet facilities at a small cost to CMEC.
32. For the cases which already use the dispute process there would be no impact on the current costs and benefits to clients, CMEC or the Tribunals Service. For the remaining cases there would be additional costs arising from notifying the claimant of the outcome of the reconsideration and a break in the process for handling the case at that point. It is likely, however, that there would be a reduction in the costs of appeal processing, as a result of a reduction in the volume of appeals.

Local Authorities

33. Local Authorities would be affected by the changes, if the claimants were to be required to seek a revision of the decision before being allowed to make an appeal for Housing Benefit or Council Tax Benefit. Currently, a claimant is able to ask for a revision of a decision, or they can appeal directly, in which case the Local Authority will reconsider the decision prior to submitting the appeal to the First-tier Tribunal. The proposed changes would only affect the cases which are currently appealed directly, without first seeking a revision.
34. The impact on Local Authorities would be that decision letters would need to be changed, together with business processes, guidance for decision makers and other information and leaflets given to claimants. Changes to IT systems would be required in order to change system generated notifications. Although these changes are not expected to have large financial costs, sufficient lead-in time would need to be given to Local Authorities to allow them to make the relevant changes: typically, a six months lead-in time before the regulations came into effect.
35. Each Local Authority has its own processes and forms, so there would be significant work involved in making the changes in all 380 Local Authorities administering Housing Benefit and Council Tax Benefit. Funding for the changes would need to come from DWP.

HMRC

36. There would be effects on HMRC if Child Benefit and Guardian's Allowance are included in regulation changes. If these regulation changes are made, HMRC will undertake an impact assessment of the changes.

Tribunals Service

37. The changes requiring claimants to seek a revision prior to making an appeal would impact on the Tribunals Service. Depending on the implementation, these could include changes to business processes, legislation, letters and the IT database.

Estimating Costs and Benefits

Estimated Costs

38. There will be costs of time to appellants of having to apply separately for a revision and subsequently to make an appeal, if they wish to do so.
39. Potentially it could take longer for final decisions to be determined through the appeals system, as appeals will not be made until after the revision application has been considered, in which case there would be costs for some claimants of receiving lower or no benefit income for longer; payment would be backdated if the appeal was successful. Some disputed decisions, however, could be settled more quickly at the reconsideration stage, and the change could contribute to decreased time waiting for appeals to be heard, by helping to reduce the caseload of appeals.
40. Cases are currently reconsidered prior to going to appeal, but some additional on-going costs would be introduced as a result of creating additional steps in the reconsideration and appeal handling process; these should be mitigated through careful process design. There may also be some additional costs incurred as a result of efforts to carry out the reconsideration process more quickly, to ensure that the claimant has timely access to the tribunal, if they still require the appeal to be heard.
41. There would be significant implementation costs for DWP associated with changing the processes for administering affected benefits and payments. The majority of the costs would relate to changes to IT systems.
42. There would be smaller, but significant effects on Local Authorities, CMEC and HMRC if the legislation changes affected the benefits and payments they administer. These are only expected to require a relatively small upfront implementation cost. There would also be some costs to the Tribunals Service.

Estimated Benefits

43. The cost effectiveness of the changes would depend on the impact on the volume of appeals. A reduction in the volume of appeals would reduce certain costs in DWP and other affected agencies, by reducing the resource required to support the appeal process, e.g., appeal writing. Reducing the number of appeals would also create savings for the Tribunals Service. The effect of the change on the number of appeals heard is not currently known and would depend on the impact on claimant decisions to appeal or not. We are not currently able to estimate this behavioural effect.

Annex 1: Post Implementation Review (PIR) Plan

A PIR should be undertaken, usually three to five years after implementation of the policy, but exceptionally a longer period may be more appropriate. A PIR should examine the extent to which the implemented regulations have achieved their objectives, assess their costs and benefits and identify whether they are having any unintended consequences. Please set out the PIR Plan as detailed below. If there is no plan to do a PIR please provide reasons below.

Basis of the review
The impact of the policy changes will be regularly monitored during the implementation and in the following years, to assess the cost-effectiveness of the policy and the impact of the change on outcomes for affected groups.
Review objective:
The aim of the review is to assess the cost-effectiveness of the policy and the impacts (positive or negative) on claimants.
Review approach and rationale
The review will use DWP data and data from the Tribunals Service and any other affected agencies to assess the cost-effectiveness of the policy. Further work will also involve stakeholder consultation, in particular to check for any adverse effects on vulnerable groups. Bespoke research may be carried out to address any issues arising from this consultation.
Baseline:
The baseline position is the current cost of administering the appeals system, the current proportion of decisions which are appealed and the current proportion of appealed decisions which are overturned on appeal.
Success criteria:
The policy will achieve its objectives if: <ul style="list-style-type: none">• more disputes about social security and child support decisions are resolved at an earlier stage• the overall cost-effectiveness of the appeal process is improved• there is no negative effect of the changes on vulnerable groups
Monitoring information arrangements:
The review will use management information on the costs of administering the appeals system and quarterly statistics on appeals volumes, to determine cost-effectiveness. Management information on dispute resolution within the administering bodies will be used to assess the effect on the number of disputes resolved at an early stage.
Reasons for not planning a PIR:
Not applicable