



# Evaluation of the Impact of Business Rates Appeals Reform on Customer Experience

Final Report

29 September 2020

**Submitted to:**

The Valuation Office Agency

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# Document Control

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## Executive summary

This report presents the findings of an evaluation of the impact of business rates appeals reform on customer experience. It draws on quantitative and qualitative research that was carried out both before and after the introduction of the reformed business rates appeal system: Check, Challenge, Appeal (CCA). The key findings are summarised below.

- **CCA appears to be achieving its objective of providing customers with a quicker service.** This is primarily due to the introduction of the Check stage, which is helping to resolve simple, factual cases more quickly than under the pre-reform system, based on actual resolution times and feedback from customers and agents.
- **There is also evidence that CCA is making progress in terms of providing a service that is easier to use and understand.** Most customers reported that the CCA system is fairly easy to use and understand, while comparisons with customer surveys under the pre-reform system suggest that this has improved under CCA. However, many represented and unrepresented customers and agents reported that CCA is complex and difficult to use and the system could be further improved to make it simpler.
- **Numbers of submitted Checks and Challenges have been steadily increasing since CCA was introduced.** However, total submissions remain significantly lower than under the pre-reform system. The qualitative research suggests that this is partly due to a reduced number of speculative cases, while the low numbers of submissions from 2017-19 was also due to agents focusing on a backlog of cases from the previous rating list, and a lack of familiarity amongst customers and agents, who have waited for CCA to become more embedded before engaging.
- **Reduced levels of direct contact between customers (and agents) and the VOA have resulted in declining ratings of customer experiences of dealing with the VOA under CCA.** Common frustrations include: the lack of a named contact for customers to speak to about their case, which is resulting in customers feeling a lack of interaction and openness from the VOA; and a perceived lack of transparency from not being able to access VOA evidence. These issues are reported to be having a negative impact on customer perceptions of CCA and the VOA, including their trust of the system, and some customers and agents reported that this could act as a barrier to genuine appeals.
- **Most customers and agents ultimately trust the VOA to reach a fair outcome.** However, they also feel that more contact and openness from the VOA would help to improve perceptions of trust and fairness as well as support further reductions in resolution times and make the system easier to use and understand.
- **Customer and agent perceptions of the knowledge of VOA staff and the timeliness of their responses are mixed and appear to have fallen under CCA.** This is also linked to the reduced levels of direct contact under CCA but was also reported to be due to the use of less experienced staff, particularly at the Check stage. However, customers and agents continue to find VOA staff to be professional, polite and friendly with no significant changes to the pre-reform system.
- **Customers reported mixed views of the digital channel, although most customers reported being satisfied with the system.** Levels of customer satisfaction were generally highest for the Pre-Check stage, which was reported to be the easiest to use, and lowest for the Challenge stage, which some customers found difficult to use. Suggested improvements included: removing the requirement for personal information to register; providing a help desk for users; allowing agents to undertake more tasks on behalf of their clients; providing the ability for customers to opt-out of VOA

correspondence; the development of smarter / pre-populated registration forms; providing more guidance; providing a named caseworker for each case; sharing the VOA's evidence for each case; simplifying the process for customers with multiple properties; and encouraging greater use of the GPCR.

- **Most CCA customers are represented by agents but the use of agents has fallen slightly under CCA.** This is likely to reflect the reduced number of speculative cases but also suggests that a larger proportion of customers have felt able to represent themselves under CCA. The reasons for using or not using agents are unchanged under CCA but the research found an improved understanding of the process amongst represented customers relative to the pre-reform system. Those using agents tended to use them for the whole of the CCA process and generally preferred to have minimal involvement in their case. Customer satisfaction with agents was also reported to be fairly high and the research identified fewer examples of 'agent-related' issues under CCA (e.g. poor communication), relative to the pre-reform system.
- **Administrative burdens were reported to have increased and become front-loaded under CCA,** primarily due to increased requirements during the Pre-Check stage and the preparation and submission of Checks. Most agents reported a significant increase in administrative burdens under the CCA system due to the time taken to deal with the new front-loaded requirements, which are now incurred for all cases and not just those that would have reached the 'Statement of Case' stage under the pre-reform system. Many agents reported that this has, or is expected to, cause them to re-evaluate and amend their business models to move away from contingency fees (i.e. no win, no fee arrangements) towards the use of fixed fees or hourly rates. This is likely to increase costs for represented customers and could therefore act as a barrier to engagement in CCA for some customers.

# 1 Introduction

The Valuation Office Agency (VOA) commissioned ICF to undertake an evaluation of the impact of business rates appeals reform on customer experience. This report presents the results of the evaluation, which draws on quantitative and qualitative research that was carried out both before and after the introduction of the reformed business rates appeal system: Check, Challenge, Appeal (CCA).

## 1.1 Background to the evaluation

The VOA is an executive agency of HM Revenue and Customs (HMRC). One of its core functions is the valuation of non-domestic properties in England and Wales to determine their rateable values to support the collection of business rates.

Business rates are a national tax paid by businesses to support local services. They are paid by the occupier or owner of most non-domestic property based on its open market annual rental value. How much a business pays is dependent on the rateable value of the property, the multiplier set by central government, and what rate relief schemes the business may be eligible for. Rateable values are periodically reassessed and revalued by the VOA. The aim of each revaluation is to redistribute business rates based on the relative changes in property values since the last valuation date. All non-domestic properties are valued on the same date (the antecedent valuation date) to ensure valuations are fair and consistent. This date is set two years prior to the revaluation coming into effect to allow the VOA to collect information used to support valuations before publishing the rating list.

Representatives of businesses are able to query, propose changes to, and appeal against the rateable value set at revaluation. They can do this by themselves, or they can be represented by an agent. For the purposes of this research, those submitting a case by themselves are referred to as 'unrepresented customers', while those represented by agents are referred to as 'represented customers'.

### 1.1.1 The pre-reform business rates appeals process

The pre-reform appeals system was based around four key steps:

1. **Submitting a proposal form** to appeal their rateable value;
2. **Discussing the case with the VOA;**
3. If the case was not resolved after discussions with the VOA, **preparing a Statement of Case** (submitted six weeks before the Valuation Tribunal);
4. If the case was not resolved after preparing a Statement of Case, going to **a Valuation Tribunal**.

The need for reform was driven by a number of issues with the pre-reform system, which included:

- Large volumes of cases being submitted with little supporting evidence. The pre-reform system did not require a detailed 'rationale for cases' to be established at the outset. Speculative cases without a strong rationale were able to go a long way through the system before being identified. This created an unnecessary burden for the VOA, customers and agents and is likely to be a key reason for the relatively low number of successful cases (i.e. VOA data suggest only 30% of cases from the 2010 rating list resulted in a change in rateable value).

- The pre-reform process was lengthy and delays were common. For example, there could be significant time delays from the initial submission of cases to when the VOA looked at the case and the subsequent 'discussion period' when customers were invited to get in touch with the VOA to discuss the case.
- While the pre-reform system had an online facility for agents to submit appeals, the VOA felt there were opportunities to increase the use of digital/online channels to increase the speed of processes and reduce burdens for customers and the VOA.

### 1.1.2 Reforms to business rates appeals

The CCA system was introduced in April 2017 and has three core stages:

- The '**Check**' stage: to allow customers (or their agents) to confirm the facts about their property and update these facts if anything has changed (e.g. size of premises, number of floors/rooms, presence of air conditioning or other plant and machinery). This aims to ensure that cases where the dispute is about facts can be resolved quickly without needing to proceed further through the system.
- The '**Challenge**' stage: to allow customers (or their agents) to challenge the valuation elements of the assessment and/or challenge the VOA's Check decision if they feel the facts established at the Check stage are incorrect. They are able to set out in detail the grounds for the 'Challenge', an alternative rating list entry and supporting evidence. The VOA reviews the information and provides a response. If there is no agreement at this stage, customers can 'appeal' the decision.
- The '**Appeal**' stage: to allow customers who are unhappy with the outcome of their Challenge to have their case heard before a tribunal. The VOA is not responsible for this stage and it is not covered in this report.

CCA aims to address issues with the previous system and provide more timely and efficient outcomes, by providing customers with **a quicker service**, that is **easier to use** and **easier to understand**. A public consultation<sup>1</sup> also specified that the CCA system should: provide a system that is easier to navigate without the aid of professional representation; allow ratepayers to make more informed decisions about how to proceed through the appeals system; and increase confidence among businesses that: their valuations are correct; they are paying the right amount of business rates; and any refunds will be paid more quickly.

CCA has therefore introduced significant changes to the appeals system and caution is advised when making direct comparisons between different stages of the CCA and pre-reform processes. Broadly it can be said that:

- The 'Check' stage involves the confirmation of correct and up to date information about a property, which overlaps with customer driven maintenance cases under the pre-reform system.
- The 'Check' and 'Challenge' stages overlap with the discussion period and Statement of Case stages under the pre-reform system in terms of confirming the facts of a case and providing an opportunity for customers to discuss and challenge their valuation.

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<sup>1</sup> <https://www.gov.uk/government/consultations/reforming-business-rates-appeals-check-challenge-appeal>



- The Appeal stage of the CCA process is similar to the previous Valuation Tribunal, except that: fees have been introduced under CCA (to be refunded for successful cases); and the automatic commencement of Appeals has been removed so customers have to make an active decision to Appeal if they are unhappy with the outcome of their Challenge.

## 1.2 Objectives of the evaluation

The aim of this research is to evaluate the impact of the CCA system on customers' experiences of the business rates appeals process and their interactions with the VOA. The key research questions addressed by this study are:

1. Have customer objectives for the new appeals system been met?
2. Have customer metrics on interacting with the VOA changed with the new system, and how?
3. Have customer perceptions of VOA staff changed over time?
4. What are customers' experiences of the new digital channel, and how can it be further improved?
5. How do customers behave as they move through the system, and why?
6. How has the customer administrative burden changed and why? Are there ways to optimise this from a customer perspective?
7. Have there been any unintended consequences of the new system?

## 1.3 Methodology

The study approach was based on three core components:

- Component 1 – Research & analysis: pre-reform. This work was completed before the CCA system was introduced in April 2017. It provided a baseline measure of customer experience under the pre-reform appeals system.
- Component 2 – Research & analysis: post-reform. This work included qualitative research with customers and agents, undertaken in 2019, and a quantitative survey of customers, undertaken in 2020. This approach aimed to combine qualitative research around the process of delivering CCA with quantitative research of its impacts in order to create a measure of customer experience of CCA that could be compared to the baseline findings for the pre-reform system.
- Component 3 – Synthesis & evaluation. Component 3 involved comparing the research and analysis (from Components 1 and 2) to provide responses to the above research questions. The results are presented in this report.

## 1.4 Structure of this report

The remainder of this report describes the findings of the evaluation and is structured around the seven key research questions.

The report is also accompanied by a separate technical annex that:

- sets out the evaluation framework, including hypotheses and data sources, that have been used to answer each of the research questions; and
- provides a more detailed description of the methodology used for this study.

## 2 Research question 1: Have customer objectives for the new appeals system been met?

**Key findings**

- The CCA system appears to have achieved its objective of reducing average resolution times, particularly due to the introduction of the Check stage, which has been successful in resolving simple cases more quickly.
- Despite the reduced resolution times for the CCA system, there has been no significant change in levels of customer satisfaction with the duration of cases under each system.
- The research findings suggest customers find CCA easier to use and understand than the pre-reform system. However, there are still customers who reported finding the CCA system complex and difficult to use and understand.
- In contrast to customers, agents generally felt the CCA system is complex and difficult to use and understand and has not become any easier to use or understand compared to the pre-reform system. Issues include the difficult terminology, limited interactions with the VOA, the inability to access VOA evidence and a lack of clarity about the different stages of the CCA process.

### 2.1 Is the service quicker?

The introduction of the CCA system aimed to reduce resolution times and provide a quicker service for customers. This was expected to be achieved by introducing the Check stage to focus on resolving simple cases at an earlier stage of the process.

#### 2.1.1 Actual resolution times

Figure 2.1 summarises VOA data on average resolution times for Checks and Challenges processed through the CCA system. It shows that the large majority of Checks (94%) are resolved within three months while almost 40% are resolved within 30 days. The average resolution time is between one and two months with a mean duration of 54 days and a median duration of 44 days.

Figure 2.1 Average resolution times (in days) for Checks and Challenges



Source: VOA data (resolved Checks/Challenges registered between April 2017 and December 2019)

Resolution times for Challenges are typically longer than for Checks, due to the increased complexity of cases that proceed to the Challenge stage. The average resolution time is approximately six months, comprising a mean duration of 184 days and a median duration of 154 days, but is also highly variable with similar numbers of cases resolved within 30 days as those taking more than a year.

VOA data do not provide overall resolution times for cases that have progressed through Check and Challenge (and potentially Appeal) stages. It is possible to estimate an average duration for both Check and Challenge stages of between 198 and 238 days (based on the median and mean figures respectively), which equates to between six and a half and eight months. However, this is rather a crude estimate of overall case duration and is likely to underestimate the true value because:

- It is still relatively early in the life of CCA and the average duration is likely to increase over time as more complex (currently ongoing) cases are resolved. Resolution times may also be affected if there is a spike in cases at the end of the period as there was for the 2010 rating list; and
- It does not include time for registering to use the CCA system, assigning agents, claiming properties, undertaking tasks associated with the Appeal stage, and making decisions about whether or not to proceed to the next stage.

VOA data for the pre-reform system suggest an average duration of approximately 60 to 69 weeks per case (based on median and mean durations respectively), with individual examples ranging from less than a week to more than seven years<sup>2</sup>. These figures are approximately twice as long as the estimates presented above for CCA, although they are not directly comparable as the pre-reform figures cover a longer time period and include the whole appeals process (including Valuation Tribunals). However, the differences in average resolution times between the two systems are so significant that CCA does appear to be meeting its objective of providing a quicker service with reduced resolution times.

## 2.1.2 Perceived CCA resolution times

The survey of CCA customers found that most respondents who had received a response to their Check or Challenge (63%) reported that the whole process had taken less than six months (and less than two months for 22%). These results are broadly consistent with the actual resolution times based on VOA data. The survey responses also suggested significant differences in the duration of Checks between:

- Unrepresented customers, who reported much quicker resolution times (84% of Checks resolved within six months and 45% within two months); and
- Represented customers, who reported slower resolution times for Checks (63% resolved within six months and 16% within two months).

In contrast, resolution times for Challenges tended to be longer with greater consistency between the represented and unrepresented samples (in both cases, around half of respondents reported overall resolution times of less than 12 months). However, the represented sample included a larger proportion of customers who did not know how long it took to resolve their case, which is again likely to be due to these customers being less engaged in the process.

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<sup>2</sup> VOA data showing resolution times for pre-reform cases received in England between April 2010 and March 2015 (from VOA (2017) CCA evaluation: Baseline report)

The survey also asked customers about their satisfaction with CCA resolution times (see Figure 2.2). The responses suggested that around one in three CCA customers (33%) were satisfied with the time taken to resolve their case, while around half reported being dissatisfied (51%). The findings were broadly consistent across the different sub-groups, except for unrepresented Challenge customers who were much less satisfied with the duration of their case.

Figure 2.2 Satisfaction with CCA resolution times for Checks and Challenges



Source: CCA survey, 2020. Base (unweighted) = All 601 respondents.

The qualitative research also found variation in the duration of cases (ranging from a couple of weeks for the shortest Checks to more than a year for some Challenges) but did not find any differences between represented and unrepresented customers. The interviews also found that most customers and agents felt the process had taken too long. Most suggested that resolution times were likely to be due to a lack of resources within the VOA, a lack of direct contact with VOA case workers, in addition to the time involved in learning how to use the new system. Some customers felt it was unfair that they had to pay the (higher) contested business rates over this period as it could cause financial problems:

*“It was eventually about a 12 to 18 month process... but the reduction got backdated... but I was paying around triple of what it eventually got knocked down to, so that could cripple a small business overpaying by that much.”*  
 (Small business operating from a single office)

### 2.1.3 Comparing perceived resolution times with the pre-reform system

Figure 2.3 compares resolution times based on data from the CCA customer survey, undertaken in 2020, and data from the quarterly customer tracking survey (CTS) undertaken between 2016 and 2017 with customers of the pre-reform system.

Figure 2.3 Comparison of perceived resolution times



Sources: CCA survey, 2020. Base (unweighted) = All 601 respondents; CTS, years 4-5 (Q1-4), 2015-17. Base (unweighted) = 4,216 respondents

It provides further evidence that resolution times have fallen significantly under CCA:

- Only 39% of customers reported perceived resolution times of less than six months when using the pre-reform system, compared to 63% of CCA customers;
- 29% of pre-reform customers reported a resolution time of more than 12 months, compared to just 9% of CCA customers.

As stated above, to some extent this will be due to the relatively early stage of CCA and the inclusion of Appeal stage customers in the pre-reform numbers, although the significant differences suggest that average resolution times are likely to have fallen since the introduction of CCA. This was also reported in the qualitative interviews with agents, with many agents confirming that the introduction of the Check stage has helped to resolve a lot of simple cases more quickly than the pre-reform system. However, while the specified timings for specific stages of the CCA process were reported to be useful, there were also suggestions from agents that the duration of CCA cases can be inconsistent and difficult to predict:

*“There is no consistency. In quite a number of situations, I might issue a Check on, let’s say, five related properties, where the grounds are all exactly the same and, what happens is, we get an answer back on one but not on the others, and so, somehow, there is a disconnect within CCA.”*

*(A smaller agent)*

Comparing customer satisfaction with resolution times suggests very little difference between the CCA and pre-reform systems, despite reduced resolution times under CCA. Disaggregating these results further, shows that represented customers reported higher satisfaction with resolution times under CCA, while unrepresented customers reported greater satisfaction under the pre-reform system. The reasons for these trends are unclear but suggest that most customers remain dissatisfied with resolution times and would like to see further improvements under CCA.

## 2.2 Is it easier to use?

The introduction of CCA, including the digital channel for interacting with the VOA, aimed to make the process more transparent and easier to use. The introduction of the Check stage means that customers can check factual information before deciding whether to proceed to subsequent stages (i.e. to challenge, and potentially appeal, the VOA’s decision). The ease of using the system is important as it influences customer perceptions of their ability to deal with the process themselves, rather than needing to use an agent with specialist knowledge.

### 2.2.1 Perceptions of ease of use of the CCA system

The survey of CCA customers asked several questions about their perceived ease of using the CCA system. Figure 2.4 shows that most CCA customers agreed that overall, the CCA system was easy to use (53%). It also shows differences between stages of the process (with customers more likely to agree that the Check process was easy to use, compared to the Challenge process), while differences between represented and unrepresented customers were less significant.



Figure 2.4 Customer perceptions of the overall ease of using the CCA system



Source: CCA survey, 2020. Base (unweighted) = All 601 respondents.

The qualitative research delivered similar findings with most unrepresented customers reporting that CCA was fairly easy to use, although the process was also described by some as laborious:

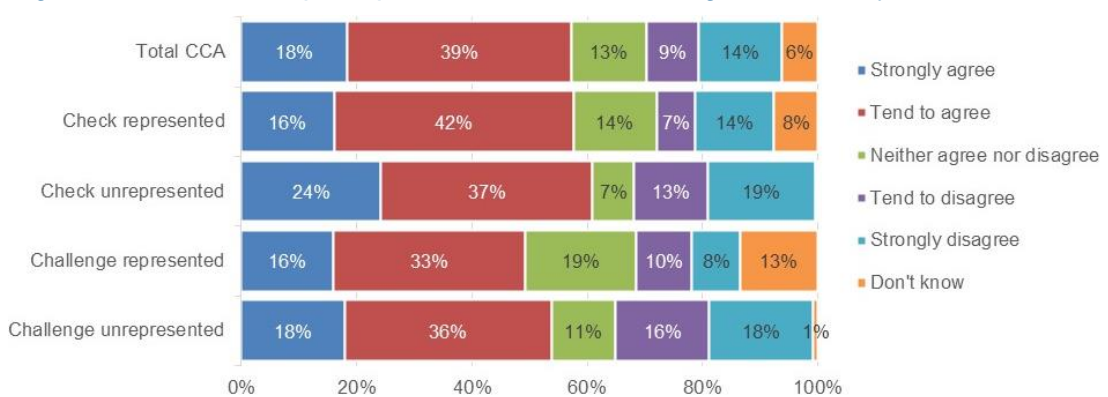
*“it’s hugely frustrating to have to continually fill in forms... it often feels like you’re duplicating information in the Challenge that you put forward in the Check.”*  
 (A nationwide operator of pubs and nightclubs)

Represented customers did not have much experience of using the system beyond the initial registration process, as their agents tended to use the system on their behalf. Some felt the system is straightforward and did not mention any issues, although others would have appreciated more guidance.

The survey also asked CCA customers about the ease of assembling information to support their Check or Challenge and found that most agreed that this part of the process was easy (56%). The results again show that customers felt it was slightly easier to assemble the information to support the submission of a Check than to support their Challenge, but also show a bigger difference between represented and unrepresented customers. A larger proportion of unrepresented customers reported finding this process easy, which is likely to reflect represented customers being more removed from the process and therefore finding it more difficult.

Figure 2.5 presents customer perceptions of the ease of using the online system and suggest that most CCA customers (57%) found the online system easy to use.

Figure 2.5 Customer perceptions of the ease of using the online system



Source: CCA survey, 2020. Base (unweighted) = All 601 respondents.

Again, the results suggest that a larger proportion of unrepresented customers reported finding this easy, with higher levels of uncertainty amongst represented

customers. The results also show that more customers felt the online system was easy to use at the Check stage relative to the Challenge stage.

In contrast, the qualitative research found that most agents feel the CCA system is not easy to use, mainly because it is very rigid and lacks flexibility. Agents with experience of the pre-reform system suggested that CCA is no easier to use and many agents suggested that it had become more complex. Agents also reported a large number of changes and updates to CCA over time, in response to various teething problems, and some questioned whether the system had been tested sufficiently prior to its launch. The constant changes had also created difficulties in terms of learning and using the new system but some agents agreed that CCA is now much improved after some of the issues have been resolved and the system has become more embedded and familiar:

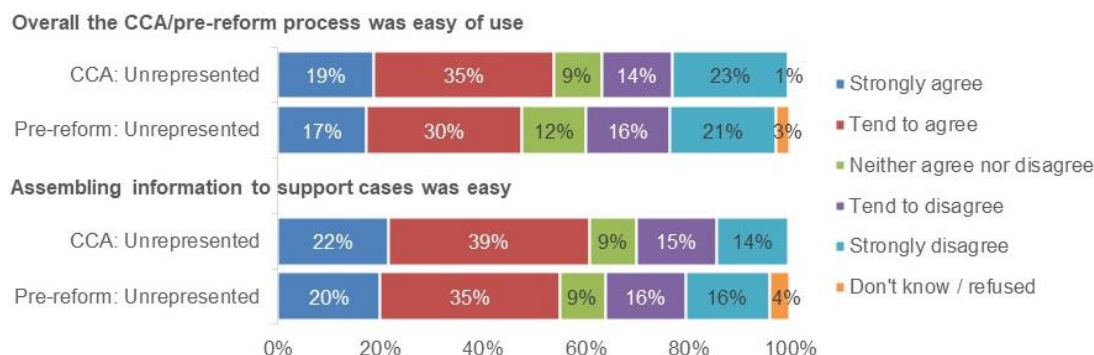
*“It is improving. It started out very clunky I’m afraid and not user-friendly but, like anything, with familiarity comes a speed in processing the submissions and we have now put in place our own internal aids so we can produce valuations that we can send across and include in the submissions.”*

*(One of the 40 largest agents)*

## 2.2.2 Comparisons between the CCA and pre-reform systems

Figure 2.6 provides a comparison of the ease of using the pre-reform and CCA systems. The results show that the proportion of unrepresented customers reporting that the appeals process was easy has increased from 47% for pre-reform customers to 54% for CCA customers. A similar increase is shown in terms of the ease of assembling information to support their cases.

Figure 2.6 Comparison of the ease of using the appeals process



Sources: CCA survey, 2020. Base (unweighted) = 327 unrepresented respondents; CTS, year 5 (Q3-4), 2016-17. Base (unweighted) = 980 unrepresented respondents.

The qualitative research also found that unrepresented customers had provided more positive views on the ease of using CCA compared to the pre-reform system. This was particularly due to the perceived ease of processes for registering and submitting Checks for most customers.

However, some difficulties and barriers that were identified in the pre-reform system appear to have persisted under CCA, such as a lack of meaningful discussions with the VOA at different stages of the process and the lack of access to data held by the VOA. The qualitative research with agents also suggested that agents did not feel the process had become any easier under CCA. Overall, however, the survey data and qualitative interviews show that customers perceive CCA to be slightly easier to use than the pre-reform system. The VOA therefore appears to be achieving its customer objective to provide a service that is easier for customers to use.

## 2.3 Is it easier to understand?

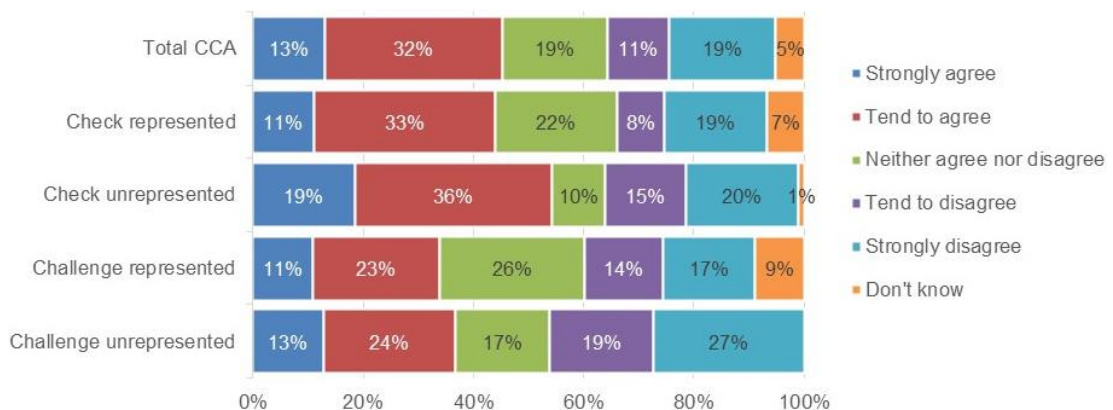
CCA aims to make the process more transparent and easier to understand by providing more information about: what determines a rateable value; the CCA process; and the reasons for outcomes.

Customer understanding of the process is important in terms of their experience of engaging with the process and their perceived ability to undertake the process themselves, rather than feeling they need to employ an agent.

### 2.3.1 Perceptions of the ease of understanding the CCA system

Figure 2.9 shows that 45% of CCA customers agreed that the CCA system as a whole was easy to understand, compared to 30% who disagreed. This was slightly lower than the percentage of customers who found CCA easy to use. The results also show greater variation between the four sub-groups, with customers at the Check stage more likely than those at the Challenge stage to agree that CCA is easy to understand. Again, unrepresented customers were also more likely to agree that CCA was easy to understand, due to higher levels of uncertainty (and more limited engagement) amongst represented customers.

Figure 2.7 Customer perceptions of the ease of understanding the CCA system



Source: CCA survey, 2020. Base (unweighted) = All 601 respondents.

The qualitative research provided similar results. While some unrepresented customers found the process complicated, most said they do understand it, at least to some extent, after having gone through the system:

*“I think I understand it quite well, now that I’ve been through the process. I think I’d be, kind of, confident to go back and do it again.”*

*(A small property management company responsible for approximately ten offices)*

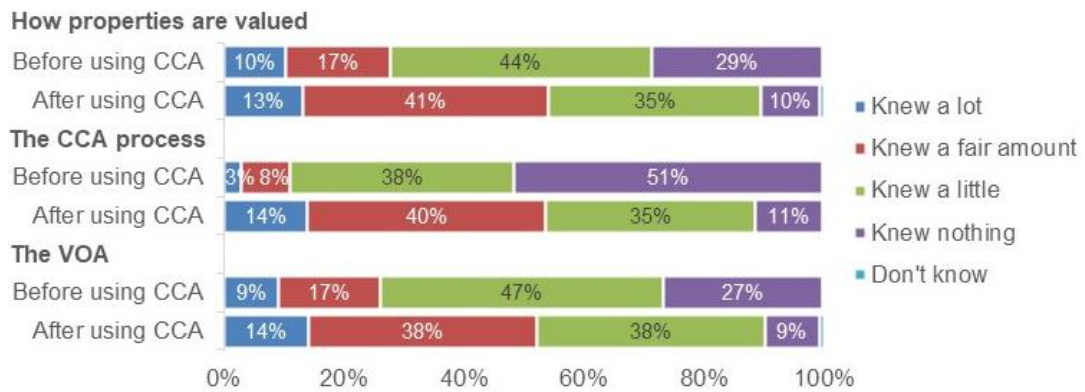
Represented customers expressed mixed views of their understanding of CCA. The majority felt they lacked a good understanding, but suggested that was one of the main reasons why they were using agents. The agents themselves reported a good understanding of CCA, although some suggested it had taken time to learn and fully understand the new processes.

Most CCA customers (66%) also felt they understood the reasons for the VOA's decision relating to their Check or Challenge. In contrast to the previous chart on overall understanding, the survey found that understanding of the VOA's decisions was slightly higher amongst customers at the Challenge stage, compared to those at the Check stage.



CCA customers were also asked about their understanding of how properties are valued by the VOA, the overall CCA process and the VOA as an organisation. Respondents were asked to compare their levels of understanding before engaging with CCA and since receiving an outcome to their Check or Challenge. The results are presented in Figure 2.8 and show significant increases in levels of understanding after customers have gone through the CCA process.

Figure 2.8 Customer understanding of how properties are valued, the CCA process and the VOA (before and after CCA involvement)

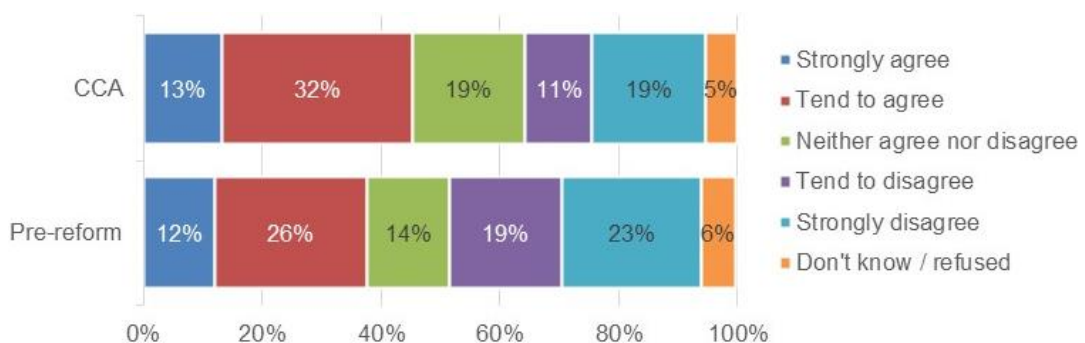


Source: CCA survey, 2020. Base (unweighted) = All 601 respondents.

### 2.3.2 Comparisons between the CCA and pre-reform systems

Figure 2.9 compares customer perceptions of the ease of understanding both the CCA and pre-reform systems. It shows improved levels of understanding under CCA with 45% of CCA customers agreeing that the process was easy to understand compared to 38% of pre-reform customers. Levels of understanding have increased for both represented and unrepresented customers, although the most significant changes appear to have been for represented customers. This could be a result of a reduced number of speculative cases under CCA, which has increased the extent of engagement and understanding of the average customer compared to the pre-reform system.

Figure 2.9 Comparison of the ease of understanding the appeals process (CCA and pre-reform systems)



Sources: CCA survey, 2020. Base (unweighted) = All 601 respondents; CTS, years 4-5 (Q1-4), 2015-17. Base (unweighted) = All 4,216 respondents.

A comparison of the ease of understanding the two systems shows that:

- Agents considered both systems complex and difficult for their clients to understand. Reasons included the difficult terminology, limited interactions with the VOA to discuss and explain their actions and decisions, the inability to

access VOA evidence and a lack of clarity about the different stages of the CCA process. When asked to compare the two systems, agents reported that CCA is more difficult to understand, although this is in contrast to the findings from the research with represented and unrepresented customers;

- Represented customers reported higher levels of understanding for CCA compared to the pre-reform system, which had been identified as a particular issue in the baseline research. However, CCA is still perceived by many represented customers as a complex process that is difficult to understand. Examples of issues included suggestions that the methodology used by the VOA to value properties is difficult to understand and the CCA system is not very clear in terms of the succession of steps;
- Unrepresented customers also reported improved levels of understanding of CCA compared to the pre-reform system. They generally reported a good level of understanding of the different aspects and stages of the CCA process.

Overall, the survey data and qualitative interviews show that CCA customers have reported that CCA is easier to understand than the pre-reform system. The VOA therefore appears to be achieving its customer objective to provide a service that is easier for customers to understand.

### 3 Research question 2: Have customer metrics on interacting with the VOA changed with the new system, and how?

#### Key findings

- Numbers of submitted Checks and Challenges have increased steadily over time since the introduction of CCA, although total submissions remain significantly lower than under the pre-reform system.
- Reduced levels of direct contact with the VOA and the lack of named caseworkers were reported by customers and agents to be the most significant issues with the CCA system and have negatively impacted on customer experiences of dealing with the VOA.
- Perceptions of trust have fallen slightly under CCA. Reported issues were similar to the pre-reform system and included perceptions that the VOA is too focused on defending the rating list rather than maintaining a fair list.
- Perceptions of fairness have remained stable but have been enhanced by reduced resolution times, while most agents and customers trust the CCA system to deliver fair outcomes.

#### 3.1 Total case numbers

Key changes introduced under CCA have included requirements for customers to:

- Register to use the CCA system, appoint agents and claim properties; and
- Confirm facts regarding their property at the Check stage.

One of the expected impacts of these new requirements was to reduce the number of speculative cases. It was hoped that this would free up resources within the VOA to focus on genuine cases, and further reduce average case resolution times.

##### 3.1.1 Numbers of Checks and Challenges under the CCA system

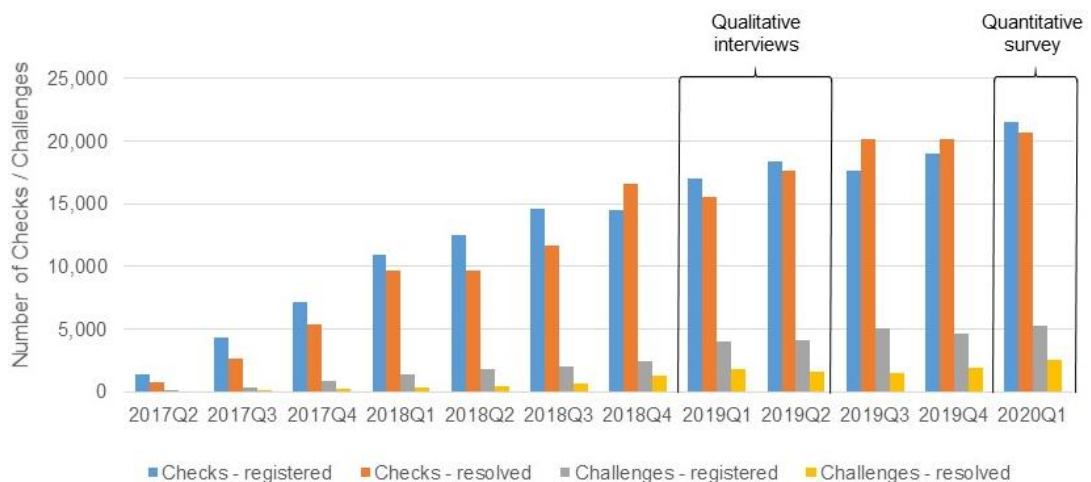
The latest VOA data show that numbers of Checks and Challenges have been increasing steadily over time since the introduction of the CCA system.

The total number of Checks registered under CCA reached approximately 160,000 at the end of March 2020, 95% of which have been resolved. The total number of Challenges registered under CCA was 32,000 at the end of March 2020, 38% of which have been resolved.

Figure 3.1 shows that numbers of registrations and resolutions have been increasing consistently in almost every quarter since CCA was introduced and continue to increase over time, resulting in exponential growth in the total numbers of registrations and resolved cases in England. The largest numbers were recorded in the latest quarter (2020 Q1) with:

- 21,550 Checks registered and 20,700 resolved in England in 2020 Q1; and
- 5,240 Challenges registered and 2,490 resolved in England in 2020 Q1.

Figure 3.1 Quarterly Checks and Challenges under CCA



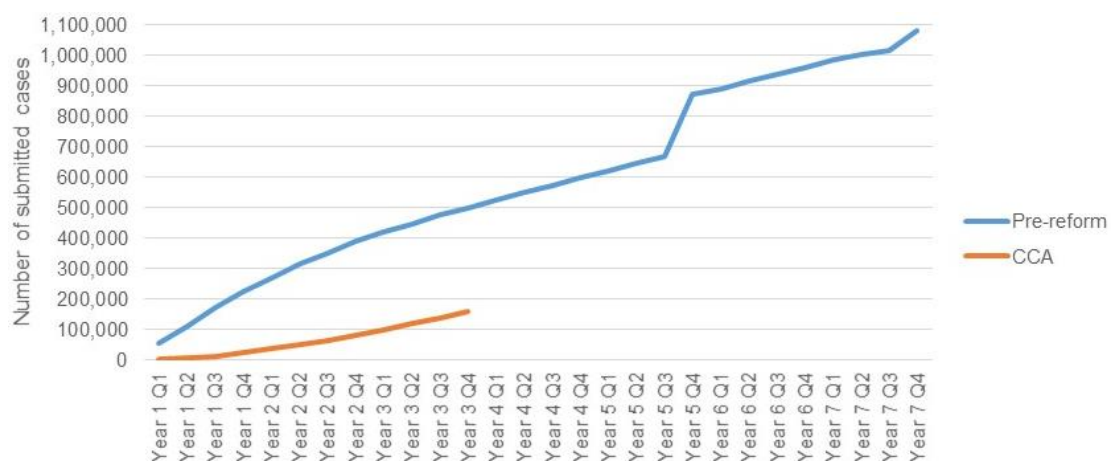
Source: VOA administrative data as at 31 March 2020

Note: The chart is annotated to show the dates when fieldwork was undertaken, including qualitative interviews with customers and agents, undertaken in the first half of 2019, and the quantitative survey of represented and unrepresented customers, undertaken in the first quarter of 2020.

### 3.1.2 Comparison of case numbers with the pre-reform system

Figure 3.2 shows that the total number of Checks submitted under CCA is significantly lower than the total number of cases submitted under the pre-reform system. For example, the 160,000 Checks submitted in the first three years of the CCA system are equivalent to only 32% of the 500,000 cases submitted in the first three years of the pre-reform system.

Figure 3.2 Cumulative numbers of cases submitted under the pre-reform system (2010 rating list) and CCA system (2017 rating list)



Source: VOA administrative data at 31 March 2020 (CCA) and at 31 March 2017 (Pre-reform system)

There are also significant differences in the profile of cases submitted under each system. The number of Checks submitted under CCA continues to increase and accelerate, whereas submissions under the pre-reform system started at a higher rate before declining steadily over time (with the exception of two spikes: one at the end of the initial five year period and another at the end of the two year extension).

The differences in the profile and number of cases under each system were discussed in qualitative interviews with agents. It was suggested that the low but increasing numbers of Check submissions was likely to be due to:

- **A lack of familiarity with the CCA system at the outset**, with customers and agents taking time to learn and get used to the new system. For example, some agents reported testing the new system with some more straightforward cases before moving on to more complex and substantive appeals.
- Customers and agents **waiting for the new system to become more stable and embedded** before submitting Checks. There were reported to be some teething problems with the CCA system at the beginning, while the VOA introduced a number of changes over time (such as the introduction of the digital Challenge system and Application Programme Interfaces [API] in early 2019). Several agents also reported a lack of compatibility between their own systems and the VOA IT systems, which was causing them to stockpile potential submissions while waiting for a solution.
- **Agents focusing on the backlog of cases from the 2010 rating list**. The backlog was significant for many of the agents in the sample, with one claiming to have 20,000 outstanding cases from the 2010 rating list. The agents reported spending up to 80% of their time dealing with these outstanding cases, at the time of interview (2019 Q1/Q2) but expected the number of CCA submissions to continue to increase gradually as their focus switches over time.

*“We’ve still got quite a few outstanding 2010 appeals, so we’re mainly working through that. We’ve dipped our toe in the water of CCA and submitted some Challenges but not many... there’s definitely going to be a big increase in Checks and Challenges this year.”*

*(One of the 40 largest agents)*

**There is also evidence to suggest that the CCA system has been successful in reducing numbers of speculative cases.** The agent interviews found that the CCA system had caused reduced numbers of speculative cases, both directly through the increased administration requirements at the outset of cases, but also indirectly due to more agents charging upfront fees (discussed in Section 9). However, some agents also reported that they felt this had gone beyond reducing the numbers of more speculative cases and is also creating barriers for genuine cases:

*“I think the CCA procedure is so incredibly time consuming and requires so much work upfront that quite honestly if the rateable value isn’t high enough it doesn’t justify wasting the time dealing with it. It’s making it too expensive to actually go through the procedure.”*

*(A smaller agent)*

It is also possible that some customers may have been discouraged from submitting genuine Checks and Challenges under CCA due to experiences of the pre-reform system. The baseline research found varied levels of satisfaction with the pre-reform system. Many customers (and agents) reported dissatisfaction with resolution times, administrative burdens, interactions with agents and VOA staff, and found it difficult to use and understand the pre-reform appeals process. It is possible that these previous experiences may have influenced decisions about whether to engage with CCA, although it was not possible to test this issue as part of this study.

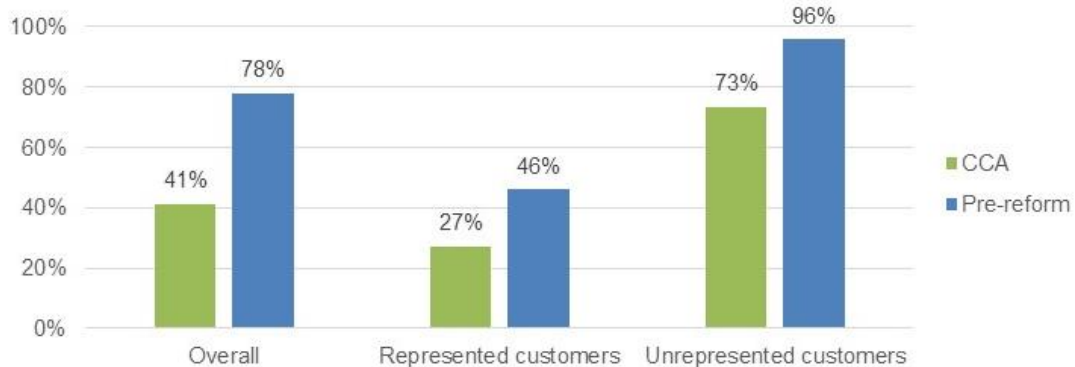
## 3.2 Customer interactions with the VOA

CCA aims to deliver improvements that will translate into increased satisfaction amongst customers and agents in terms of their overall experience of dealing with the VOA. However, the CCA system has also reduced the levels of direct contact between customers (and agents) and VOA staff, which also risks having a negative impact on customer perceptions and experiences of interacting with the VOA.

### 3.2.1 Nature of customer interactions with the VOA

Figure 3.3 shows the significant reduction in direct contact between customers and the VOA under CCA relative to the pre-reform system. Only 41% of CCA customers reported direct contact with the VOA during their Check or Challenge, compared to 78% of pre-reform customers. Levels of direct contact have fallen for represented and unrepresented customers.

Figure 3.3 Customers reporting direct contact with the VOA during their case



Sources: CCA survey, 2020. Base (unweighted) = All 601 respondents; CTS, years 4-5 (Q1-4), 2015-17. Base (unweighted) = 4,216 respondents

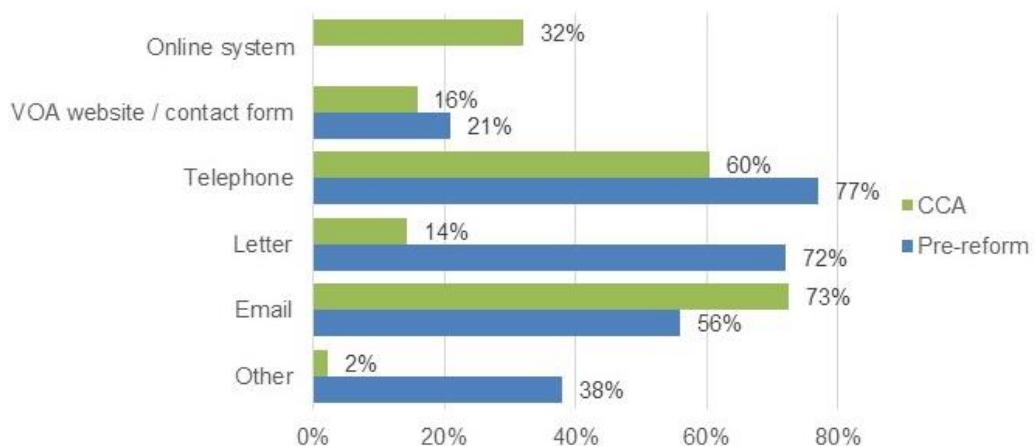
The CCA survey also found that unrepresented customers were more likely to have direct contact with the VOA during the Challenge stage (81% vs 72% at the Check stage). In contrast, represented customers were slightly less likely to have direct contact during the Challenge stage (24% vs 28% at the Check stage) as their agents were more likely to deal with the VOA on their behalf.

The reduction in direct contact follows the introduction of the digital channel as the primary means of communicating and exchanging information under CCA. This represents a significant change from the pre-reform system, in which most information and documents were exchanged via letter and email, and most discussions took place by telephone. A comparison of the changes in contact methods is presented in Figure 3.4, which shows:

- One in three CCA customers (32%) reported making direct contact with the VOA via the new online system (in addition to submitting Checks and Challenges);
- Most of the letter-based communications from the pre-reform system have been replaced by email under CCA;
- There has been a significant reduction in telephone communications since the introduction of CCA;
- The 'other' methods of communication, such as face to face contact to discuss valuations, have also fallen significantly since the introduction of CCA.



Figure 3.4 Direct contact methods used by CCA and pre-reform customers



Sources: CCA survey, 2020. Base (unweighted) = 279 respondents who directly contacted the VOA; CTS, years 4-5, 2015-17. Base (unweighted) = 3,297 respondents who directly contacted the VOA.

### 3.2.2 Experience of interacting with the VOA

The survey of CCA customers also asked about their perceptions of the ease of getting in touch with the VOA via different contact channels. Figure 3.5 shows that the same proportion of customers reported finding it easy to get in touch with the VOA (42% reported finding it very easy or fairly easy) compared to those reporting that it was difficult (42% reported finding it very difficult or fairly difficult). However, there are some significant differences between the different sub-groups, with represented customers generally reporting it was easier to get in touch with the VOA than unrepresented customers, at both Check and Challenge stages.

Figure 3.5 Customer perceptions of the overall ease of contacting the VOA



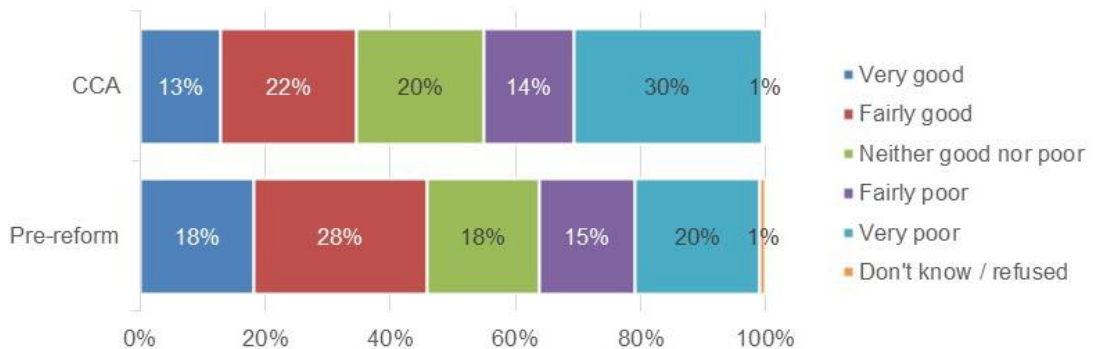
Source: CCA survey, 2020. Base (unweighted) = 279 respondents who directly contacted the VOA.

The survey also found some significant differences in the ease of CCA customers contacting the VOA via different contact channels. The easiest method of contact was reported to be via the online system, with 56% of CCA customers using this channel suggesting that it was easy. In contrast, CCA customers making contact via telephone tended to find this process a lot more difficult, with only 30% suggesting this was easy.

The earlier CTS did not ask pre-reform customers about the ease of making contact via the different channels, but it is possible to make comparisons between customer ratings of their overall experience of dealing with the VOA under each system.

Figure 3.6 shows that customer ratings of their experiences of dealing with the VOA have declined since the introduction of CCA. The proportion of customers reporting good experiences of dealing with the VOA has fallen from 46% under the pre-reform system to 35% under CCA. The corresponding proportion of customers reporting poor experiences has also increased from 35% for pre-reform customers to 44% for CCA customers. The survey responses suggest these results are fairly consistent across represented and unrepresented customers, although unrepresented customers at the Challenge stage were most likely to report poor experiences.

**Figure 3.6 Comparison of customer ratings of experiences of dealing with the VOA (CCA and pre-reform)**



Source: CCA survey, 2020. Base (unweighted) = 279 respondents who directly contacted the VOA; CTS, year 5 (Q3-4), 2016-17. Base (unweighted) = 1,122 respondents who directly contacted the VOA.

CCA customers were also asked whether they had experienced anything particularly pleasing, or any issues, in their dealings with the VOA. Of those who had direct contact with the VOA, 24% reported something positive, while 59% reported problems or issues. Again, unrepresented customers at the Challenge stage were most likely to report issues, with 74% suggesting they had experienced problems. The most common problems described by CCA customers included:

- The length of the process (26%);
- Poor communication (18%);
- The process not being user-friendly / difficult to navigate (17%);
- Dissatisfaction with the outcome of their Check/Challenge (15%);
- Difficulties making contact / getting hold of VOA staff (12%).

Similarly, the most common positive experiences related to:

- Good customer service (32%);
- Good communication (28%);
- A good outcome for their Check/Challenge (21%);
- An easy, efficient or smooth process (20%);
- Good explanations of processes and decisions (13%); and
- The speed of the process (6%).

This shows considerable overlap with communications, processes, resolution times and outcomes reported to be positive for some customers but causing problems for others. Furthermore, the qualitative research found that the reduced levels of direct contact with the VOA was the most significant and common issue with the CCA system and a considerable frustration for agents and customers.



Agents reported that all forms of direct contact with the VOA have decreased under CCA. While the baseline research also identified issues and delays with contacting the VOA under the pre-reform system, most agents said they could eventually engage in conversations and negotiations with case workers. This was no longer felt to be the case under CCA due to the lack of named case workers, which have been replaced with generic email addresses and telephone numbers. This was reported as a key barrier, preventing agents and customers from being able to contact someone at the VOA who can answer questions relating to their cases:

*“It’s just completely faceless. That’s part of the frustration. And if you get a decision notice on something you don’t like, you can’t phone up and speak to someone about it.”*

*(One of the 40 largest agents)*

The inability to identify and contact specific case workers was also reported to be a considerable barrier for unrepresented customers. One example concerns an unrepresented customer who suffers from dyslexia and struggled to use the online forms but was unable to gain additional support through any other channels of communication and felt the CCA system should be more flexible and make provisions for people in her situation. More broadly, many unrepresented customers claimed to have struggled to get issues resolved via the online system or email, due to a lack of response:

*“The VOA leave no phone number to call back... I could get quite angry about this process... I am not necessarily available at that immediate instant to pick up the phone and answer [calls] from the VOA... I think if the VOA ring somebody there needs to be a way of getting back to them. That is so irritating.”*

*(A large telecommunications company operating from a single office)*

This has caused considerable frustration for agents and customers and was reported as a barrier to being able to resolve cases more quickly and efficiently. Many agents and customers reported very long waiting times for responses and a lack of response in many cases. Some agents also reported that the lack of communication and engagement was having negative impacts on overall perceptions of the VOA and the CCA system:

*“We believe that the VOA is being deliberately obstructive and they’re trying to put people off appealing.”*

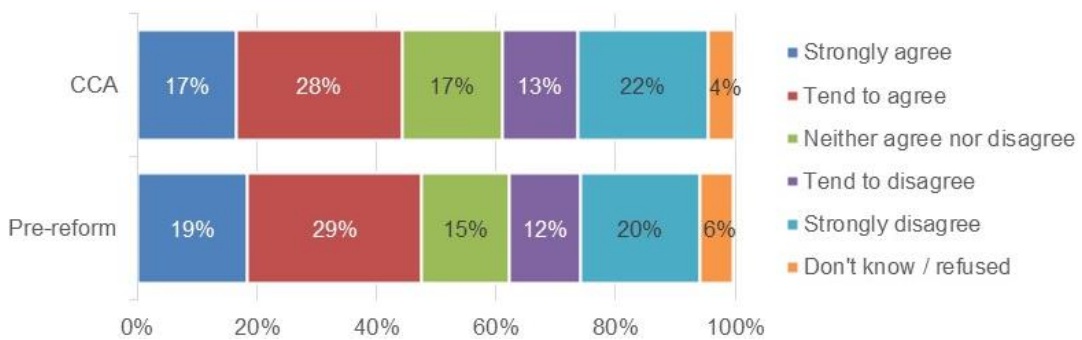
*(One of the 40 largest agents)*

### 3.3 Customer perceptions of trust in the CCA system

CCA and the digital channel were introduced to make the process more transparent and easier to use and were intended to deliver improvements in customer perceptions of trust in the VOA and the appeals system.

Figure 3.7 presents findings from the CCA survey on the extent to which CCA customers trust the VOA to reach the right outcome for their case. The findings show that slightly less than half (45%) said they trust the VOA to reach the right outcome. However, there was no significant difference from customer perceptions of trust under the pre-reform system and results were also consistent between represented and unrepresented customers. More detailed analysis shows that levels of trust are closely related to the outcome of cases, with those who achieve their desired outcome also more likely to trust the VOA to reach the right decision.

Figure 3.7 Comparison of customer perceptions of trusting the VOA to reach the right outcome for their case (CCA and pre-reform)



Sources: CCA survey, 2020. Base (unweighted) = All 601 respondents; CTS, years 4-5 (Q1-4), 2015-17. Base (unweighted) = 4,216 respondents.

The survey also found that a slightly higher proportion of CCA customers (55%) said they trust the advice and information provided by the VOA, although this had fallen from 61% under the pre-reform system. Again, results were consistent across represented and unrepresented customers.

The qualitative research also explored issues relating to levels of trust. It found that the majority of customers and agents trusted the VOA to ultimately make the right decisions. Most customers and agents believed that if they are willing to persevere, they do trust the VOA and the CCA system to come to a fair decision in the end.

However, there were also many examples of issues relating to trust amongst customers, and particularly amongst agents. One common issue related to agent perceptions that the primary objective of the VOA appears to be to defend the rating list, rather than maintain a fair list. This issue was also raised under the baseline research into the pre-reform system, so cannot be attributed to the introduction of CCA, but it appears that the CCA system has not yet been able to change those perceptions. Furthermore, some agents reported that perceptions of fairness and trust had deteriorated under CCA, which was mainly due to the reduced level of direct contact with the VOA under CCA:

*“I think some of these problems have always existed, but because you were [previously] able to communicate by picking up the phone and speaking to valuers... if there was a problem you could resolve it.”*

*(A smaller agent)*

Views on trust have also been negatively affected under CCA by a perceived lack of transparency from not having access to the VOA evidence related to cases. This was reported to restrict the ability for agents and customers to negotiate effectively with the VOA under CCA, which also affects perceptions of trust and fairness:

*“You have no ability to talk to the VOA over what evidence they have used, how they’ve analysed rents, what they’ve considered is relevant and what they’ve dismissed.”*

*(A smaller agent)*

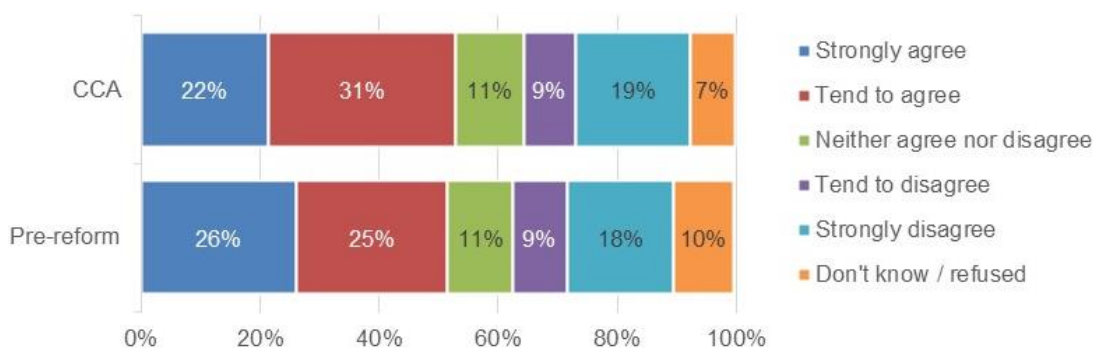
Overall, both agents and unrepresented customers reported slightly lower levels of trust in the VOA under CCA (compared to the pre-reform system). This was mainly due to a perceived lack of ability to contact and communicate with the VOA, and a perceived lack of transparency over information held by the VOA, both of which were felt to create an unnecessary barrier to identifying areas of disagreement, having effective discussions and negotiating a solution.

### 3.4 Customer perceptions of fairness of the CCA system

CCA aims to make the appeals process more transparent and easier to use, whilst also reducing resolution times. This is expected to deliver improvements in customer (and agent) perceptions of fairness of the CCA system and the resulting decisions.

Figure 3.8 shows that most CCA customers (53%) agreed that the VOA dealt fairly with their Checks and Challenges. While this is not statistically different from overall perceptions of fairness under the pre-reform system, the data suggest that perceptions of fairness have increased significantly under CCA for represented customers. This appears to be because understanding and awareness have increased for represented customers under CCA, thereby having a positive effect on perceptions of fairness. As described above, more detailed analysis shows that perceptions of fairness are closely related to case outcomes, with those achieving their desired outcome also likely to think the VOA has dealt with their case fairly.

Figure 3.8 Comparison of customer perceptions that their case was dealt with fairly by the VOA (CCA and pre-reform)



Sources: CCA survey, 2020. Base (unweighted) = All 601 respondents; CTS, years 4-5 (Q1-4), 2015-17. Base (unweighted) = 4,216 respondents.

The qualitative research explored issues relating to fairness in greater depth and found that the most customers and agents felt the CCA (and pre-reform) systems are ultimately fair processes because the Appeal stage of the CCA process (or valuation tribunal stage for the pre-reform process) means that all cases can be heard before an independent body if customers disagree with the VOA's decisions.

A few agents also suggested that aspects of the CCA system are now fairer than the pre-reform system. For example:

- It was suggested that the timescales are generally fairer under the CCA system:
 

*“I think the new process, with the strict timescales and deadlines for both sides, is a good thing. Under the old system.... you may not hear from the VO, because they were so busy.”*

*(A smaller agent)*
- It was reported that there have also been improvements to ensure customers are appealing the correct property:
 

*“With the older system, it was too easy for people to appeal the incorrect property. I think [CCA] is a much fairer system, and I think it's a lot better than the older system because when the clients go in to claim their property, obviously then they get the property linking reference... prior to 2017, anybody could've appealed a rateable value, it could've been a manager, it could've been anyone, but now it goes directly to the ratepayer, so I think it's a lot better.”*

*(One of the 40 largest agents)*

However, the qualitative research also identified issues relating to fairness. Many of these are similar to the issues relating to trust including: concerns about whether the VOA still aims to maintain a fair and accurate rating list; the reduced level of direct communications; and a perceived lack of transparency from not having access to the VOA evidence relating to cases. These issues were reported to be having negative impacts on customers' experiences of dealing with the VOA and perceptions of fairness.

The qualitative research also identified additional comments from represented and unrepresented customers relating to a perceived lack of fairness, due to: the complexity of the process; a perceived requirement to pay for an agent in order to achieve a positive outcome; the charging of fees before making an Appeal; and the excessive duration of the process and business impacts from paying incorrect business rates over that period.

Overall customer perceptions of fairness appear relatively unchanged since the introduction of the CCA system. Positive improvements in some areas, such as reduced resolution times and improved security checks, appear to have been offset by negative impacts in other areas, due to reduced levels of communication and transparency. However, most customers and agents ultimately regard the CCA system as providing a fair process for customers.

## 4 Research question 3: Have customer perceptions of VOA staff changed over time?

### Key findings

- Customers and agents reported VOA staff to be professional, polite and friendly with no significant issues or differences to the pre-reform system.
- However, perceptions of staff knowledge, expertise and timeliness of responses do appear to have worsened under CCA. This is reported to be due to:
  - reduced levels of direct contact with VOA staff; and
  - a perceived increase in the use of less experienced staff, particularly at the Check stage.

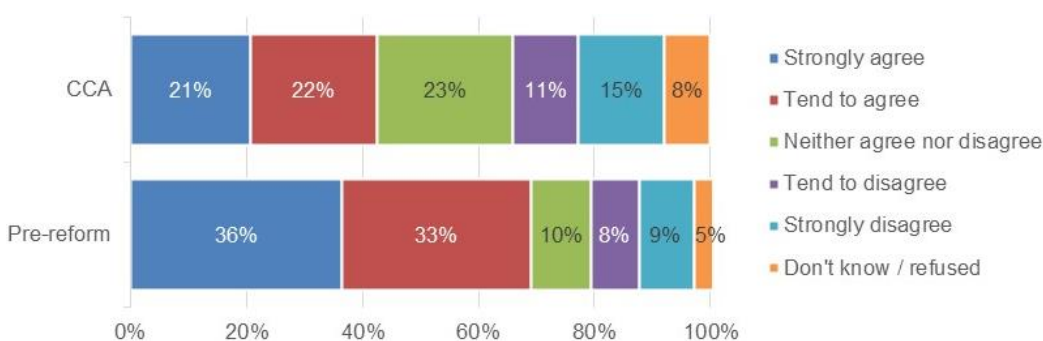
### 4.1 Perceptions of the knowledge and expertise of VOA staff

One of the consequences of introducing more digital communications is a reduced level of direct contact between customers and VOA staff under CCA. This risks having a negative impact on customer perceptions of VOA staff.

CCA customers reported mixed views of the knowledge and expertise of VOA staff under the CCA system, during both the qualitative and quantitative research:

- 43% of CCA customers strongly agreed or tended to agree that VOA staff had the knowledge and expertise to answer all questions, compared to 26% who disagreed. Agreement was slightly higher amongst unrepresented customers (49%) compared to represented customers (34%), although a relatively large proportion of represented customers were unable to answer, which is likely to be due to their limited direct involvement in their cases and dealing with the VOA. Interviews with unrepresented customers also found that VOA staff were generally helpful when they did manage to speak to someone.
- Comparisons with the pre-reform system show that customer perceptions of the knowledge and expertise of VOA staff have fallen significantly under CCA. Under the pre-reform system, most customers (69%) agreed that VOA staff have the knowledge and expertise needed to answer all questions, while only 17% disagreed. The results suggest that perceptions of the knowledge and expertise of VOA staff have fallen under CCA, particularly among represented customers.

Figure 4.1 Comparison of customer agreement that VOA staff had the knowledge and expertise needed to answer all questions (CCA and pre-reform)



Sources: CCA survey, 2020. Base (unweighted) = 279 respondents who directly contacted the VOA; CTS, years 4-5, 2015-17. Base (unweighted) = 3,297 respondents who directly contacted the VOA.



The qualitative research found that agents highlighted more issues regarding the knowledge and expertise of VOA staff, under both pre-reform and CCA systems. Under the pre-reform system, agents suggested there was significant variation between different VOA staff in terms of their knowledge, expertise and experience. Many agents reported that experienced staff at the VOA had been replaced with more junior, less knowledgeable and less experienced staff. Agents also suggested that it was sometimes difficult to engage in meaningful negotiations when VOA staff assigned to a particular case did not have sufficient local knowledge.

Agents tended to express even stronger views on the lack of knowledge and expertise of the VOA staff under CCA and suggested that the VOA had continued to replace experienced staff with more junior staff, particularly at the Check stage:

*“From experience of the Check stage it seems be dealt with from sort of admin teams, who don’t really have any knowledge of the rating system, or rating valuation. So they’re able to deal with fairly straightforward requests, but if it’s anything that’s anymore technical than that, then they just seem to come back and reject the Check, and push you in the direction of the Challenge stage, which obviously incurs a lot more additional time.”*

*(One of the 40 largest agents)*

Overall, while research into the pre-reform system had identified some concerns with the knowledge and expertise of VOA staff, it appears likely that the lack of direct contact between VOA staff and CCA customers, and perceptions of increasing responsibilities for more junior VOA staff, have negatively impacted on both customer and agent perceptions of whether they have the necessary knowledge and expertise to be able to answer customers' questions.

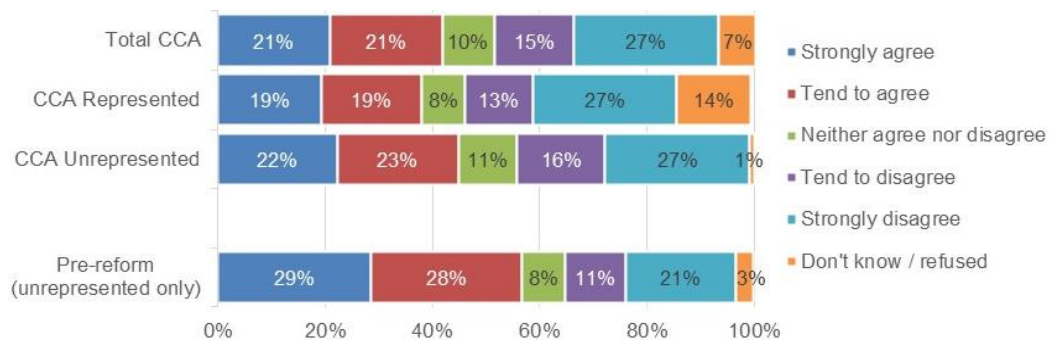
## 4.2 Perceptions of the timeliness of VOA staff responses

CCA aims to deliver a number of improvements to reduce pressure on VOA resources including: improving the ease of using and understanding the system; providing more online support and guidance; and introducing barriers to prevent the mass submission of speculative cases. This should help to reduce the number of queries that VOA staff need to deal with, and thereby support VOA staff to respond to queries in a more timely manner.

However, this objective does not appear to have been achieved based on the research evidence presented in Figure 4.2 which suggests:

- CCA customers were split evenly between those who agreed that VOA staff had responded to their queries in an appropriate timeframe (42% of customers who had direct contact with the VOA), and those who disagreed (also 42%). This was true for both represented and unrepresented customers, although 14% of represented customers were unable or unwilling to provide a response, which is possibly because they did not raise any queries.
- A significant fall in customer perceptions compared to the pre-reform system. Pre-reform customers (unrepresented customers only) were more likely to agree that VOA staff had responded within an appropriate timeframe (i.e. 57% of unrepresented customers from the pre-reform system agreed with this statement compared to 45% of CCA unrepresented customers).

Figure 4.2 Comparison of perceptions that VOA staff responded to queries within an appropriate timeframe



Sources: CCA survey, 2020. Base (unweighted) = 279 respondents who directly contacted the VOA; CTS, years 4-5, 2015-17. Base (unweighted) = 2,539 unrepresented respondents who directly contacted the VOA.

The qualitative research identified similar issues under both the pre-reform and CCA systems. Under the pre-reform system, many customers and agents raised issues of not being able to make contact with the VOA and not receiving responses to emails and telephone messages. This was a particular concern amongst agents, with many raising issues of slow and non-response to their queries.

Similar issues were identified in the CCA research, with agents and customers reporting long waiting times for responses and a lack of response in many cases. This has caused considerable frustration, particularly for agents, and is seen as a barrier to being able to resolve cases more quickly and efficiently. However, both customers and agents reported that VOA staff were generally helpful and able to solve issues quickly once they managed to speak to them, and found the Challenge stage to provide a more positive experience:

*“So once the Check had been done, and I’d started the Challenge, I then got hold of a human and that’s when life started becoming very easy. Once you deal with the VOA they are fantastic. It’s certainly back to how it used to be before [CCA], where you could actually speak to somebody.”*

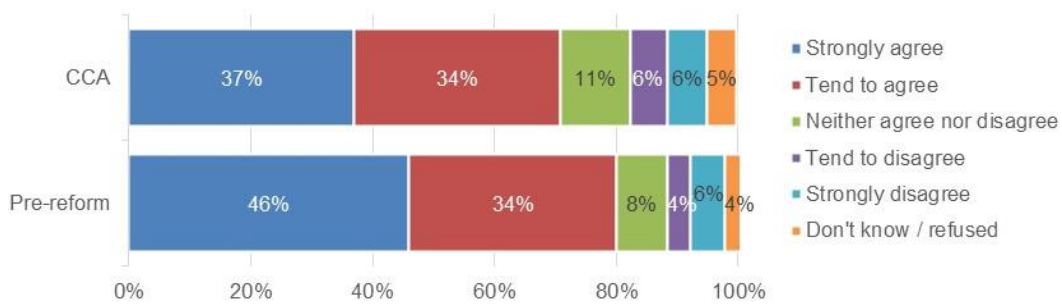
*A small retailer with two stores*

The research suggests that issues with the timeliness of responses were raised under both the pre-reform and CCA systems. There was already a negative trend regarding the timeliness of responses under the pre-reform system. It is therefore likely that customer and agent perceptions of the timeliness of VOA responses would have continued to decline, even in the absence of CCA, so we cannot attribute all of this change to the introduction of CCA. However, it is likely that customer and agent perceptions of the timeliness of VOA responses have been negatively impacted by the increased difficulty of identifying and contacting case workers under CCA, and perceptions that more junior staff are dealing with enquiries, particularly at the Check stage.

### 4.3 Perceptions of the professionalism of VOA staff

Another of the consequences of the reduced level of direct contact with the VOA is a risk that this may have a negative impact on perceptions of the professionalism of VOA staff. However, Figure 4.3 shows that most CCA customers (71%) agreed that VOA staff are professional (with only 12% disagreeing), with very little difference in perceptions of represented and unrepresented customers and no significant differences when compared to the pre-reform system.

Figure 4.3 Comparison of customer agreement that VOA staff were professional



Sources: CCA survey, 2020. Base (unweighted) = 279 respondents who directly contacted the VOA; CTS, years 4-5, 2015-17. Base (unweighted) = 3,297 respondents who directly contacted the VOA.

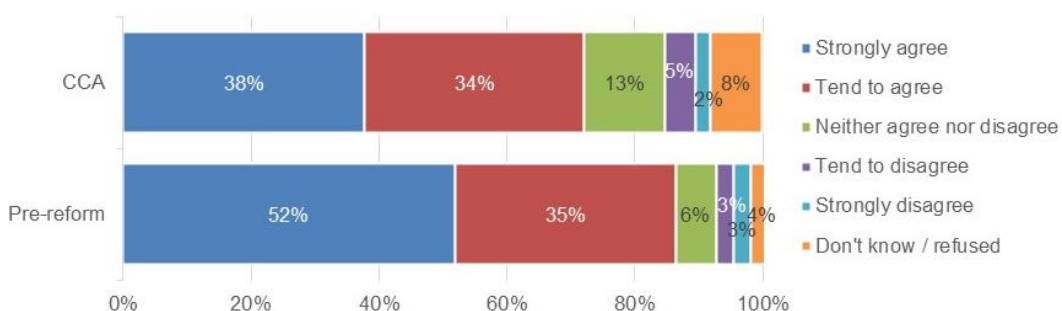
Furthermore, the qualitative research did not identify any issues relating to the professionalism of VOA staff, all of which suggests that this has not been affected by the introduction of CCA. Some agents considered the slow speed and lack of response to be unprofessional, but most were satisfied with the professionalism of VOA staff once they had made contact. Some had suggested that VOA staff have become less professional over time as a result of having to deal with large volumes of cases, although these were also consistent across the two systems and cannot therefore be solely attributed to the introduction of CCA.

Overall, the research shows that VOA staff have been perceived as professional under both CCA and pre-reform systems. Any negative views tend to be heavily influenced by other issues such as response times or staff knowledge and expertise.

#### 4.4 Perceptions of the politeness / friendliness of VOA staff

Figure 4.4 shows that most CCA customers (72%) agreed that VOA staff were polite and friendly. Levels of agreement were slightly higher amongst unrepresented CCA customers, although this is again likely to be due to reduced levels of contact amongst represented customers. However, comparisons with the pre-reform system suggest that perceptions of staff politeness and friendliness have declined slightly under CCA.

Figure 4.4 Comparison of perceptions that VOA staff were polite and friendly



Sources: CCA survey, 2020. Base (unweighted) = 279 respondents who directly contacted the VOA; CTS, years 4-5, 2015-17. Base (unweighted) = 3,297 respondents who directly contacted the VOA.

The qualitative research supported the perceptions that VOA staff were generally polite and friendly and did not identify any issues under either system. It is therefore assumed that perceptions of the politeness and friendliness of VOA staff have not changed significantly under the CCA system, but might have been influenced slightly by the reduced levels of direct contact and increased difficulties of identifying and contacting caseworkers compared to the pre-reform system.



## 5 Research question 4: What are customers' experiences of the new digital channel, and how can it be further improved?

### Key findings

- CCA customers were generally satisfied with the 'Pre-Check' stage and found it easy to use.
- Represented customers typically had limited involvement but generally found the Check process easy, while unrepresented customers expressed mixed views about the ease of using the Check stage.
- All customers found the Challenge stage the most difficult to use, although many unrepresented customers were still satisfied with the Challenge process.
- Overall, around half of all CCA customers reported being satisfied with the digital channel (45%), compared to 26% who said they were dissatisfied.
- Most agents reported dissatisfaction with the digital channel, and each individual stage, primarily due to the lack of interaction with the VOA, the inability to access VOA evidence, and the increased administrative burden.

### 5.1 Customer experiences of the CCA process

This section explores customer and agent experiences of the different steps of the CCA process including their perceptions of:

- the ease of using the system and navigating through each stage;
- any issues and barriers encountered; and
- suggested improvements.

#### 5.1.1 'Pre-Check' stage

The 'Pre-Check' stage involves a series of tasks that need to be undertaken before a customer (or agent) is able to use the CCA system to submit Checks and Challenges. The key tasks include:

- Customers (and agents) registering to use the CCA service;
- Using the digital system to 'claim' properties associated with the customer; and
- Customers appointing agents to act on their behalf (for represented customers).

##### 5.1.1.1 Ease of using the digital channel for the 'Pre-Check' stage

The qualitative research found that most represented customers were satisfied with the 'Pre-Check' process and reported no difficulties with registering, claiming properties or appointing agents. However, some suggested that they would have preferred if their agent could have taken over parts of the registration process. Most unrepresented customers were also satisfied with the 'Pre-Check' process and considered the registration and property claiming processes to be straightforward.

The CCA survey found that most represented and unrepresented customers felt it was easy to use the digital channel to undertake the Pre-Check tasks:

- 56% of unrepresented customers and 53% of represented customers reported the registration process to be easy;
- 72% of represented customers found it easy to appoint agents; and
- 63% of unrepresented customers and 59% of represented customers reported that claiming properties was easy.

In contrast, most agents said they were dissatisfied with the registration process. The need for clients to register themselves was a key issue for agents because of the problems it causes for customers and the agent time required to help them:

*“Now that they’re obliged to engage with the registration process, it’s a disaster. Some of them do it straight out, but that is rare. More often than not, we have to go and sit down with the client to get them through the registration process which is just ridiculous.”*

*(One of the 40 largest agents)*

#### 5.1.1.2 Problems or issues at the 'Pre-Check' stage

The research also identified a number of issues with the Pre-Check stage including:

- The need to register using personal information, which can create issues and barriers for some customers;

*“One of the biggest frustrations is the necessity for ‘business’ customers who want to deal with a ‘business’ tax to have to provide their ‘personal’ details... there is a lot of resistance on the part of people, particularly in the age of GDPR.”*

*(One of the 40 largest agents)*

- The requirement for bills to be submitted as evidence when 'claiming' properties:

*“I’m not too sure why you have to upload a bill [to claim properties] and if you don’t have a bill, you can’t go any further... I had some properties where I hadn’t received the bill, so I couldn’t continue because it doesn’t let you go any further if you don’t have a copy of the bill.”*

*(A large retailer with more than 500 properties)*

- A lack of understanding of the process for some customers:

*“The first time I saw the instructions it looked like a whole page of instructions, I’m like ‘Wow’... I did not understand that this was a first stage that had to be completed, and then you wait whilst you are approved. It wasn’t clear to me... and that was a bit frustrating at the beginning.”*

*(A small property management company for office and retail premises)*

- A lack of guidance on how to register:

*“We fumbled a bit but eventually got it to work, but it wasn’t straightforward because there was very little guidance given. I think the system is now slightly better compared to two years ago, but [having registered] at that early stage it was not straightforward.”*

*(One of the 40 largest agents)*

- Issues with account passwords and problems accessing the system if passwords are forgotten or if the individual who set up the account leaves the company.
- The time-consuming approach for claiming multiple properties, where information must be entered and uploaded for each individual property.
- A lack of clarity around rejections of property claims.

### 5.1.1.3 Suggested improvements to the 'Pre-Check' stage

The research identified some suggestions for improvements to the Pre-Check process based on some of the above issues, including:

- Removing the need to provide personal information to register and rates bills to claim properties; and
- Providing help desk functions to help users to address issues.
- Allowing agents to undertake more 'Pre-Check' tasks on behalf of their clients:  
*“There are parts of the registration process, which could easily be handled by agents that don't actually need my input.”*  
(A large marketing business with approximately 20 offices)
- The ability to opt-out of receiving emails and calls:  
*“If we said ‘this [agent] is our responsible person’, why do we need to get any [correspondence] because our agent would be getting it all.”*  
(A large property management company)
- 'Smarter' registration forms that are pre-populated using existing information that the VOA holds relating to properties.
- Guidance to explain the differences between Pre-Check and Check stages.
- Improving the process for resetting passwords.

### 5.1.2 Check stage

The 'Check' stage was introduced to confirm the facts at the outset of each case and ensure the correct information is submitted. Facts include: size of premises, number of floors, number of rooms, presence of air conditioning, and presence of plant / machinery. The Check stage also aims to quickly resolve simple cases, where the dispute is purely about facts, without needing to proceed further through the CCA process. If there is no agreement at this stage, customers are able to 'Challenge' the VOA's decision.

#### 5.1.2.1 Ease of using the digital channel for the 'Check' stage

The CCA survey found that most represented customers (59%) had found it easy to use the digital channel for the Check stage, although the qualitative interviews suggested that the process tends to be managed by their agents, such that the involvement of represented customers is usually minimal. A slightly smaller percentage of unrepresented customers (46%) reported finding the Check process easy. This was mirrored in the qualitative interviews, which found mixed views of the Check process and these issues are discussed in the following section.

The agent sample also had mixed views on the Check process, but most understood the VOA's reasons for introducing Checks to reduce speculative appeals and provide a means of addressing factual issues more quickly. For example, one agent felt that the Check process was an improvement over the pre-reform system:

*“The best benefit is the acceptance at Check on any factual discrepancies... that is dealt with significantly quicker than it would have been in a traditional proposal, prior to the CCA procedure.”*

(One of the 40 largest agents)

### 5.1.2.2 Problems or issues with the 'Check' stage

The qualitative interviews showed that many unrepresented customers reported finding the Check process straightforward but also rather laborious:

*"It was all pretty easy and straightforward. Just a lot of it. So, you know, it's just the volume of information that we have to enter is quite high."*

*(A small property management company in the South East)*

The biggest frustration for unrepresented customers was the lack of an assigned VOA case worker and inability to discuss Checks with the VOA. Other issues included: a lack of flexibility in the forms to allow users to add comments to help describe responses to the standard questions; and concerns about the ease of missing key information and thereby invalidating the Check.

Represented customers were generally satisfied with the Check process and identified very few issues. However, one customer who had previously tried to submit their own Check felt there was a lack of guidance on the process:

*"We didn't find it an easy process. You know, there wasn't any guidance to what we should be doing, or we didn't find any, anyway. All information was like, secret, it wasn't readily available, it wasn't easy to find."*

*(A charity operating from several offices across the UK)*

Another represented customer raised an issue that the Check process can be overly repetitive and time-consuming:

*"One of our buildings has got about 150 different assessments, all of which we think are overvalued, and subject to certain allowances, which haven't been applied, so we're submitting the same argument for each individual assessment within that one building, which is very time-consuming."*

*(A large property management company with more than 30 office developments)*

The qualitative research with agents suggested that agents generally found the Check process to be straightforward and effective, particularly for 'basic' Checks. However, others highlighted issues including:

- The large amount of work needed to prepare a Check:

*"It's very onerous from my point of view, having to do all that upfront... I think it's probably very good and efficient for the valuer at the VOA who is going to be dealing with the case... it's just the time involved in going through everything in such depth from the outset."*

*(A smaller agent)*

- An inability to discuss Checks with the VOA:

*"I've been doing this for 30 years and... [previously] you discussed the facts, you discussed the issues with the property, you discussed the valuation, you discussed the evidence. So actually it was all taken in a proper negotiation in advance. Here everything's broken down."*

*(One of the 40 largest agents)*

- A perceived lack of value in the process, which can feel like a waste of time for cases that are expected to proceed to the Challenge stage.
- A very complex, time-consuming system for customers with multiple properties.

### 5.1.2.3 Suggested improvements to the 'Check' stage

Suggested improvements to the Check stage are summarised below:

- Allowing customers and agents to discuss Checks with the VOA: Many customers and agents felt this could resolve more cases at the Check stage and help to reduce resolution times:

*“A simple phone call at the Check stage could help resolve it.”*

*(A smaller agent)*

- Employing trained caseworkers to deal with Checks, in order to support increased resolution of (more complex) cases during the Check stage:

*“[The VOA] need to have qualified and trained caseworkers working on Checks, as well as Challenges, which would prevent quite a number of Challenges going in if results could be realised at the Check stage.”*

*(One of the 40 largest agents)*

- Increasing transparency by sharing the VOA’s evidence for each case, to facilitate an open and fair discussion of the information held by both the VOA and the customer, in order to resolve cases more effectively and efficiently:

*“You scabble about trying to find rules to prove [the valuation] is wrong and [the VOA] may well have got wrong information to begin with.”*

*(One of the 40 largest agents)*

- Simplifying the Check process for submissions involving multiple properties; and
- Improving the functionality of the online system by: providing summaries of each Check for users to confirm before submitting; allowing users to scroll back and forwards to different pages of the Check; allowing users to upload multiple documents and in formats other than pdf; and providing comment boxes for users to describe attachments and responses.

## 5.1.3 Challenge stage

The ‘Challenge’ stage provides opportunity for customers to set out in detail the grounds for their Challenge, an alternative rating list entry and supporting evidence. The VOA reviews the information and provides a response. If there is no agreement at this stage, customers are able to ‘Appeal’ the VOA’s decision.

### 5.1.3.1 Ease of using the digital channel for the 'Challenge' stage

In contrast to the other stages, the CCA survey found that only 31% of unrepresented customers felt it was easy to submit Challenges. Similarly, only 38% of represented customers (with some involvement in Challenges) reported finding it easy to submit Challenges. However, the qualitative interviews with unrepresented customers found that many were satisfied with the Challenge process and generally found the process of submitting Challenges to be straightforward.

In contrast, the qualitative research with agents found that most were dissatisfied with the Challenge process and did not find it easy. However, some agents reported that the Challenge system has been improving and resolving issues over time. For example, the GPCR process, which enables groups of properties to be considered at the same time and for agents and customers to have discussions with the VOA before lodging a Challenge, is seen as a great improvement and something that will significantly reduce burdens for relevant agents and customers.



### 5.1.3.2 Problems or issues encountered with the 'Challenge' stage

The CCA survey found that half of unrepresented customers had experienced some type of issue with the Challenge process. The most frequent related to a lack of understanding of what evidence to provide, problems navigating the system and not understanding the questions being asked. The qualitative research identified some additional issues including: confusion over different categories of business and property uses; and a lack of guidance on how to move through the process:

*“I couldn’t actually find out how to make a Challenge because when you go on to the website, under the Challenge bit, it doesn’t tell you what to do.”*

*(A small tourism business with approximately 25 holiday lets)*

While represented customers usually have limited involvement in the Challenge stage, some expressed concern at the lack of communication and negotiations taking place between their agent and the VOA. The qualitative interviews with agents also identified several issues with the Challenge process including:

- Frustrations with limited discussions with the VOA during the Challenge stage:

*“The VO refused point blank to talk to us during the Challenge process. All the correspondence came back anonymised. There was no one to talk to, there was no contact details, they refused to answer any requests for a discussion and all we got was a decision letter saying ‘no’.”*

*(One of the 40 largest agents)*

- A lack of transparency and sharing of VOA evidence:

*“It’s very difficult to find the required evidence when the valuation officer does not provide the evidence on how he’s got to his valuation... So we’ve lost the ability to interrogate his evidence which was always central to the old process.”*

*(One of the 40 largest agents)*

- Not being able to add evidence after a Challenge has been submitted, which increases the burden of making sure everything has been included the first time.

- Having to upload all the information from Checks again at the Challenge stage:

*“When you come to the Challenge, you’ve got to upload all the documents again, so why on earth aren’t the Check documents linked to the Challenge?”*

*(A smaller agent)*

- Receiving notices of refusal of incomplete Challenges with a short time to resubmit:

*“I got an email on Friday saying ‘notice of refusal’ and that we have until today to resubmit our full Challenge but it’s impossible for us to do that because we need to speak to the CCA team.”*

*(One of the 40 largest agents)*

### 5.1.3.3 Suggested improvements to the 'Challenge' stage

Suggested improvements to the Challenge stage included:

- Increasing discussions and negotiations with the VOA in order to resolve Challenges more effectively and efficiently and at an earlier stage:

*“Sometimes a five-minute conversation can resolve that case rather than an interchange of emails that may go on indefinitely. So, a face and a contact name can, in some cases, resolve a Challenge very quickly.”*

*(One of the 40 largest agents)*

- Encouraging greater use of the GPCR to facilitate discussions with the VOA:  
*“[The GPCR] enables discussions to take place before getting to the Challenge stage, so potentially that can work really well and hopefully it will... it just needs to be adopted more widely.”*  
*(One of the 40 largest agents)*
- Allowing Challenges to be amended if new information comes to light after submission. It was reported that this would help to speed up the submission of Challenges and prevent agents (and potentially unrepresented customers) from waiting until they are certain they have all the relevant information.

## 5.2 Overall satisfaction with digital channel

The CCA survey also asked customers about their overall satisfaction with the CCA digital channel. Figure 5.1 presents the results, which show that 45% of respondents reported being very or fairly satisfied with the digital channel, compared to 26% who reported being dissatisfied. The results were fairly consistent across all represented customers (at the Check and Challenge stages) and unrepresented customers at the Check stage, but levels of satisfaction were slightly lower amongst unrepresented customers at the Challenge stage.

Figure 5.1 Customer satisfaction with the CCA digital channel



Sources: CCA survey, 2020. Base (unweighted) = All 601 respondents

Customers were also asked what they thought was the best thing about the digital channel. The most common responses related to the following categories:

- User friendly / convenient and easy to use / navigate;
- A straightforward / logical process;
- Being able to access information about your own and other businesses; and
- The speed of the digital channel.

## 6 Research question 5: How do customers behave as they move through the system and why?

### Key findings

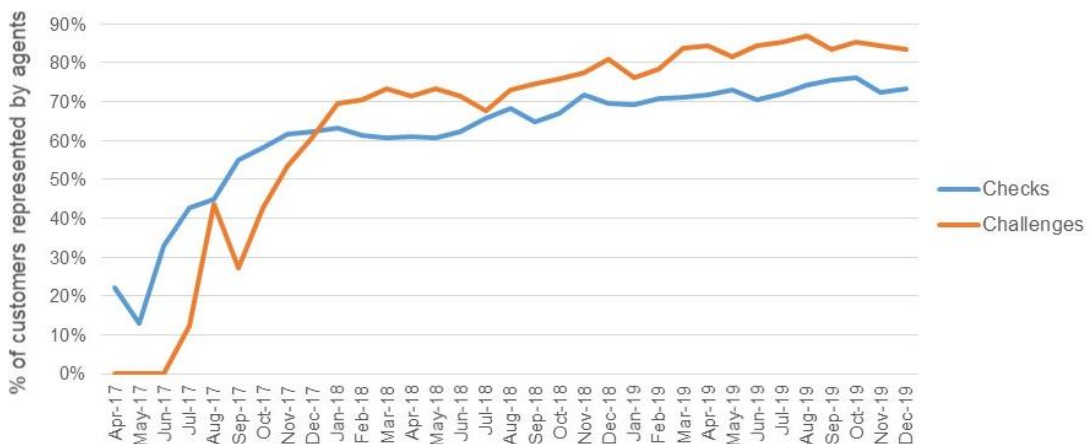
- Most CCA customers are represented by agents: represented customers account for 68% of Checks and 79% of Challenges submitted to date. This has fallen from around 85% of cases under the pre-reform system, suggesting that a larger proportion of CCA customers are choosing to represent themselves.
- The number of speculative cases appears to have fallen under CCA. CCA customers are more likely to have had a previous relationship with their agent and to have initiated contact with their agent, compared to pre-reform customers.
- Customers' reasons for using agents are unchanged under CCA and focus on: increasing the perceived likelihood of a successful outcome; not having enough time and resources; and a lack of understanding of the system and processes.
- Most represented customers prefer to have minimal involvement and agents tend to be used for the whole CCA process. Client involvement in decisions is varied and depends on the nature of the decision and impacts for the customer.
- The CCA system received 78,000 users per month in 2019, including 6,400 new registrations and submissions of 4,100 Checks and 650 Challenges. Completion rates for initiated Challenges (61%) are slightly lower than for Checks (74%), suggesting that customers are more likely to drop out at the Challenge stage.

### 6.1 Use of agents

CCA does not aim to influence customers' use of agents, although it may have indirect effects. For example, the use of agents may increase in the short term due to a lack of familiarity of the new system. Alternatively, use of agents could decrease if CCA is easier for customers to use and understand. This section describes the use of agents under CCA, reasons for any changes in agent use, relationships between customers and agents and the extent of customer involvement in cases.

Figure 6.1 shows that the majority of CCA customers are represented by agents. At the end of 2019, represented customers accounted for 68% of Checks and 79% of Challenges submitted under CCA.

Figure 6.1 Represented customers as a share of all Checks and Challenges



Source: VOA data (at December 2019)

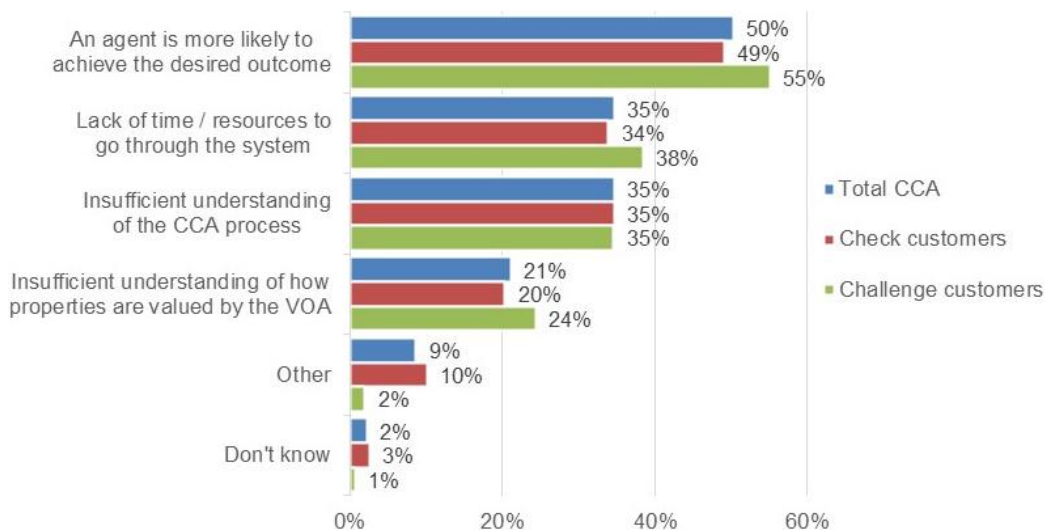


This suggests that the proportion of represented customers has fallen under CCA, compared to the 85% of cases submitted by agents under the pre-reform system<sup>3</sup>. While this may be a consequence of agents focusing on the backlog of cases from the 2010 rating list, particularly as Figure 6.1 shows the share of represented customers has been increasing over time. However, the current share of represented customers remains lower than the pre-reform system and suggests that a higher proportion of customers have chosen to represent themselves under CCA.

### 6.1.2 Reasons for using agents

Figure 6.2 presents survey evidence on CCA customers' reasons for using agents. The findings are consistent with the qualitative research with customers and agents.

Figure 6.2 Reasons for using agents under the CCA system



Source: CCA survey, 2020. Base (unweighted) = 274 represented customers

The research found the main reasons for using an agent under CCA were:

- **To increase the likelihood of achieving the desired outcome.** This was the most common reason for using an agent.
- **A lack of time and resources for customers to undertake the work themselves.** The qualitative interviews also found that appealing business rates is perceived as a time-consuming exercise with agents offering an easier and more convenient option for many customers.
- **A lack of understanding of the CCA process and/or how properties are valued.** For example, the qualitative interviews found examples of customers starting the CCA process by themselves before deciding to use an agent:

*“We were trying to do it ourselves and we weren’t successful, but in the process of doing it ourselves, we didn’t find it an easy process ... [Agents] do it all the time. We obviously don’t.”*

*(A charity operating from several offices across the UK)*

Figure 6.2 also shows that these reasons were fairly consistent across Check and Challenge stages, although Challenge customers were slightly more likely to report each reason, particularly using agents to help them achieve their desired outcome.

<sup>3</sup> VOA (2017) CCA evaluation: Baseline report

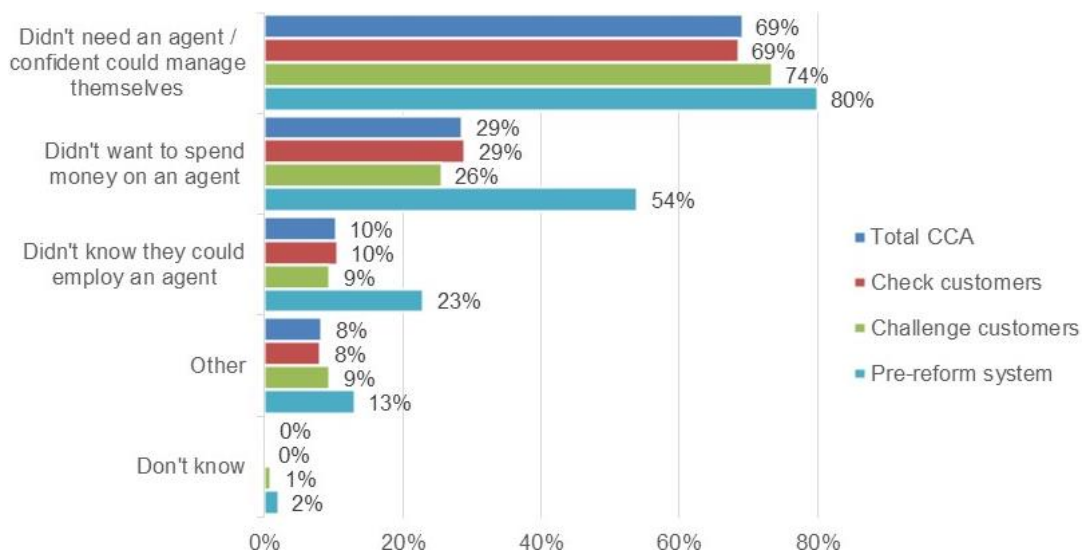
Comparisons with the pre-reform system suggest that the reasons for using agents have not changed under CCA. However, the survey responses did highlight some differences in the relative importance of different reasons:

- The use of agents to increase the perceived likelihood of a successful outcome was more common amongst CCA customers, while CCA customers were less likely to say they used agents simply because an agent had approached them. This may be the result of changes in the way agents are marketing and engaging with clients under CCA, particularly while focusing on the backlog of 2010 cases, as well as a reduced number of speculative cases.
- CCA customers were much less likely to state that they did not know they could appeal themselves, which implies an improved understanding of the CCA process. This may be due to improved communications and guidance from the VOA or may also be due to agents focusing on the 2010 backlog, which means customers engaging with CCA have tended to be more proactive and/or have been made aware of the CCA process by other (non-agent) sources.

### 6.1.3 Reasons for not using agents

Figure 6.3 shows the main reasons that unrepresented CCA customers felt it was not necessary to use an agent for their Check or Challenge. In most cases customers simply felt confident that they could manage the process themselves. Other common reasons included not wanting to spend money on an agent, or not knowing they could use an agent. Again, the results are consistent across Check and Challenge customers.

Figure 6.3 Reasons for not using agents under the CCA system



Sources: CCA survey, 2020. Base (unweighted) = 327 unrepresented customers; CTS, year 5 (Q3-4), 2016-17. Base (unweighted) = 1,098 unrepresented customers.

The reasons for not using agents are also consistent with those reported by customers of the pre-reform system and have not been affected by the introduction of CCA. Respondents of the pre-reform surveys were more likely to select multiple reasons, which explains the higher percentages for the pre-reform system. The differences are most significant for those not wanting to spend money on an agent, or not knowing they could use an agent, which suggests that CCA customers might have been less concerned about the cost of using agents, on average, and may have a better understanding of their ability to use agents.

Some unrepresented customers also reported that they had decided not to use an agent because of a lack of trust, sometimes based on previous poor experiences or feedback from others. These issues were only raised by a minority of customers and the research identified fewer examples of poor experiences under CCA than the baseline research into the pre-reform system. One example is provided below:

*“It was expensive last time, using an agency. They took a very long time as well to be honest and then I researched that agency and they had very poor reviews.”  
(A small business with three employees operating from a single office)*

The unrepresented CCA customers were also asked if they felt the process would have been easier if they had used an agent. The responses were split evenly between those who felt it would have been easier with an agent (43%) and those who said it would not (45%). Challenge customers were slightly more likely to feel that the process would have been easier with an agent but the difference was not statistically significant. A similar question was asked of represented CCA customers and found that the majority of represented customers (79%) said they would use an agent again if submitting another Check or Challenge. This figure was also higher amongst Challenge customers (88%) compared to Check customers (77%).

#### 6.1.4 Customer engagement with agents

The research also explored the approaches used by agents to engage clients and the fee structures that had been agreed. The key findings are set out below:

- **Most represented CCA customers (67%) were working with their agent for the first time.** One in three (32%) had previously worked with their agent (slightly higher for Challenge customers) and these tended to be long term relationships, with most suggesting a period of more than five years. CCA customers were slightly more likely to have a previous relationship with their agent, compared to the pre-reform system, which may be a direct result of the reduction of speculative cases submitted under CCA.
- **Half of represented CCA customers (52%) reported that their agent had approached them in the first instance,** with Challenge customers the most likely to have initiated contact with their agent. This represents a significant difference to the 75% of represented customers who reported being approached by their agent under the pre-reform system. This could also be the result of fewer speculative cases under CCA, which tend to be initiated by agents.
- **Around half of represented customers (52%) reported agreeing a 'no win, no fee' payment structure, while 27% had paid an upfront fee.** These were slightly lower than for the pre-reform system, while there had been an increase in the proportion of customers with an existing contract or retainer with their agent (11%). However, this conflicts with feedback from some agents that they were moving away from 'no-win, no-fee' arrangements, due to the additional and front-loaded administrative burden introduced by CCA. Others were also thinking about making these changes, so it might be that this will affect future payment structures. The VOA should continue to monitor the use of upfront fees, which could act as a barrier to engagement with CCA for some customers.
- **Represented customers were generally satisfied with the information provided by their agent at the outset,** with 70% suggesting they had been provided with all or most of the information that they had needed.

### 6.1.5 Relationships between agents and clients

The research also explored the nature of relationships between agents and their clients. It confirmed that agents were nearly always appointed before customers had registered with CCA and tended to be used throughout the whole process (87% of represented customers said they used their agent for the whole CCA process). Agents also confirmed that, in nearly all cases, they are appointed at (or before) the beginning of the CCA process. Only a couple of agents mentioned receiving enquiries from clients that had already commenced the CCA process on their own:

*“We do get enquiries from new clients who don’t know how to start an appeal, and people who have had problems with the system or were wanting to do it themselves but have ended up frustrated and have come to someone like us.”*  
(One of the 40 largest agents)

Furthermore, nearly all represented customers in the survey sample (94%) stated it was mainly their agent who dealt with the VOA and the CCA system, while the others felt that responsibilities were split evenly between them and their agent.

One issue identified in the baseline research was that many agents were failing to keep customers updated on progress and developments with their case. The survey evidence suggests this is less of an issue under CCA. Most represented customers (69%) agreed that their agent had kept them up to date on progress under CCA, with half (49%) reporting updates from their agent on at least a monthly basis. Agents described their processes for updating clients, which included a combination of reports, meetings, emails and calls, while some had developed other approaches:

*“We have our own software where we log all of the clients’ details... and can produce reports that we send on to clients, depending on their needs, monthly or quarterly reports to update them on progress. We’ll send reports after Checks and/or Challenges have been concluded as well, to give them an overview of the negotiations and to inform them of the changing rateable value.”*  
(One of the 40 largest agents)

Other customers felt they should have had more communication from their agent, including 13% who had not heard from their agent for four months or more. Some agents suggested that it was difficult to keep clients updated on progress due to:

- A lack of information and updates from the VOA:

*“There is no current status of a Check or Challenge. It just disappears into the ‘black hole’ and, until someone contacts you, that’s the last you know about it... so it is exceedingly difficult to keep clients up to date with what’s happening.”*  
(A smaller agent)

- Clients being copied on all VOA correspondence. Agents expressed mixed views with some feeling this was useful for keeping clients updated, while others felt this was too much information for their clients to process and understand:

*“Everything is copied to them, so they end up being flooded by emails... and don’t understand what they are getting.”*  
(One of the 40 largest agents)

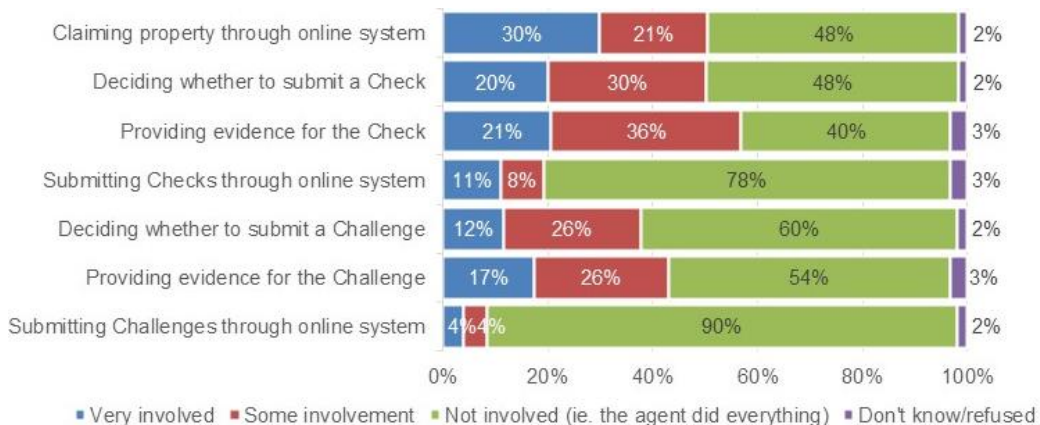
Overall levels of satisfaction with agents were relatively high under CCA (71% of CCA customers were satisfied with their agent). Responses were closely associated with case outcomes as 89% of those who were satisfied with the outcome of their Check or Challenge, were also satisfied with their agent, compared to only 53% of those who did not get the outcome they wanted. The most common issues with

agents included: poor communications (e.g. not updating clients on progress, not explaining things well enough, being slow or not responding to queries); poor management of the Check / Challenge (e.g. lacking focus, interest, commitment to their case), or just not delivering the outcome that the customer had wanted.

### 6.1.6 Involvement of represented customers in cases / decision-making

This section describes the extent to which represented CCA customers are involved in their cases. Most represented customers (67%) reported that they had been involved in making decisions about their case, although Figure 6.4 shows that agents generally undertake or lead on most of the tasks on behalf of their clients. Represented customers are most likely to be involved in initial pre-check and check tasks with around half reporting some involvement in: providing evidence for Checks; claiming properties; and deciding whether to submit a Check. The survey findings suggest lower levels of involvement in deciding whether to submit Challenges and providing the necessary evidence, while agents were much more likely to undertake the submission of the Check or Challenge without any client involvement (i.e. for 78% of Checks and 90% of Challenges).

Figure 6.4 Involvement of represented customers in their Check / Challenge



Source: CCA survey, 2020. Base (unweighted) = 274 represented customers.

The qualitative research found that most represented customers had minimal involvement in their Checks and Challenges, which reflected their preferences in most cases. While some customers reported a collaborative approach “to build the case together” (including one who undertook Checks themselves before using agents for any Challenges), most represented customers appeared to have fairly low levels of awareness of the progress of their Check or Challenge. For example, most of those who had proceeded to the Challenge stage were unable to explain why and how this decision had been made.

Agents also confirmed that their clients usually prefer to have minimal involvement. Agents typically provide an initial briefing to clients to explain the process but subsequent client involvement tends to be very low, although it depends on the nature of the case and the decisions that need to be made:

*“We wouldn’t initiate a Check without thinking we had a case to reduce the rateable value. If a Check comes back completely negative then of course we’ll go to the next stage. If it comes back that there is partial agreement, we will discuss that with the client and take clients’ instructions as to whether we go to the Challenge stage or not.”*

*(One of the 40 largest agents)*



Agents also reported greater client involvement when deciding whether to appeal due to the additional costs that will be incurred by clients if a case goes to Appeal:

*“I would set out to the client the pros and cons of going, plus the cost of going and the likely outcome of an Appeal.”*

*(One of the 40 largest agents)*

Overall, the research suggests that the involvement of represented customers in the CCA process is variable, but a lack of involvement is usually the preference of the client and the research identified very few examples of represented customers who wanted greater involvement in their Check or Challenge.

## 6.2 How do customers move through the system and why?

This section describes the behaviour of customers and the decisions they make as they progress through the CCA process.

### 6.2.1 Customer motivations for submitting Checks and Challenges

The survey of CCA customers found that the large majority of Checks and Challenges had been submitted because either:

- The customer (or agent) felt that the rateable value was wrong (65% of cases)
- The customer wanted to split or merge properties (17%); or
- The customer wanted to delete a property from the rating list (8%).

Other reasons included: changing the use of the property; properties being refurbished or undergoing work; and derelict, abandoned or unused properties. The survey also found that 38% of customers had submitted their Check after receiving a letter from the VOA notifying them of a change to their rateable value.

The VOA also collects data on customer referrals, which shows the large majority of customers access CCA via a few key referral routes. Of the 386,000 users of the online CCA system in 2019: 83% were referred from another site (mainly gov.uk or access.service.gov.uk); 16% accessed the CCA system directly; 1.1% used organic searches; and 0.2% were referred from social media.

### 6.2.2 Progress through the digital system

The VOA also collects data on the number of users progressing through the various stages of the CCA process, as shown in Table 6.1 below.

Table 6.1 Monthly users at each stage of the CCA process (2019 data)

Stage of CCA process	Average number of monthly users (2019)*
Search for property	77,961
Registration	6,365
Claiming a property	3,588
Appointing an agent	1,798
Submit a Check	4,072
Submit a Challenge	643

Sources: VOA data (as at 31 December 2019)

Note: \*Figures are slightly under-represented due to a fault with data from 23 July to 9 September 2019



The VOA data summarised in Table 6.1 relate to the average number of users of the CCA system for each month in 2019. It suggests that:

- The total number of CCA users in 2019 was approximately 78,000 per month. These were users who used the system to search for a property.
- Of these, approximately 8% (6,365 users) registered to use CCA. The other 92% of users either did not proceed to register or had already registered.
- Of those who registered, 56% (3,588 users) continued to claim a property. This suggests at least 44% of users registered but did not claim a property in 2019.
- Half of those who claimed a property in 2019 (50%) proceeded to appoint an agent. The other half of users is expected to include: unrepresented customers who proceed to submit a Check; represented customers that have already appointed an agent through the system; and users who are content with the valuation or decide not to proceed for other reasons. However, it is not possible to determine the relative sizes of these different groups.
- An average of more than 4,000 users per month submitted Checks in 2019. This figure represents 64% of the number of registrations, although some Checks will have been submitted by users that have already registered, which suggests that at least 36% of users who registered in 2019, did not go on to submit a Check.
- An average of almost 650 users per month submitted Challenges in 2019, which represents 16% of the average number of Checks submitted each month.

Completion rates for Checks and Challenges (based on numbers of submitted Checks and Challenges as a proportion of those that were recorded on the CCA system) suggest the average monthly completion rates for 2019 were:

- 74% for Checks (ranging from 70% to 78% per month); and
- 61% for Challenges (ranging from 56% to 66% per month).

This suggests that CCA users are more likely to drop out of the Challenge stage before submitting their Challenge (39% of recorded Challenges are not submitted), than at the Check stage (only 26% of recorded Checks are not submitted).

### 6.2.3 Case outcomes

Table 6.2 compares VOA data on the outcomes of all Checks and Challenges resolved before the end of 2019 with the outcomes reported in the CCA survey. The data show consistency between in the Check outcomes of both sources, with approximately 60% of resolved Checks having been agreed, 10% partially agreed, and just over 30% disagreed. Both sources were also consistent in estimating that two in three Checks had resulted in a change in rateable value. However, as only 57% of the Check sample received the outcome they wanted, it is likely that some of the changes in rateable value were smaller than customers had wanted.

There were larger differences between the VOA data and survey responses for the Challenge sample. The survey sample included a larger proportion of customers who had their Challenge agreed (78%), compared to the actual number of agreed Challenges (61%). This was partly due to the survey sample focusing on resolved Challenges and excluding cases that had been withdrawn. The data also suggest a high incidence of changes in rateable value for 80% of all resolved Challenges and 78% for the survey sample. This is also reflected in the high proportion (71%) of customers in the survey sample who received the Challenge outcome they wanted.

Table 6.2 Outcomes of resolved Checks and Challenges

Outcome	Checks		Challenges	
	MI data	CCA Survey	MI data	CCA survey
Agreed	59%	59%	61%	78%
Partially agreed	9%	10%		
Disagreed	33%	31%	32%	22%
Withdrawn			8%	
Change in rateable value	68%	66%	80%	78%
No change	32%	31%	20%	21%
Don't know		2%		1%
Outcome wanted		57%		71%
Not outcome wanted		42%		28%

Sources: VOA data (at 31 December 2019); CCA survey, 2020. Base (unweighted) = 476 customers who had received a decision.

### 6.2.4 How do customers decide to proceed to the next stage?

Figure 6.5 presents survey evidence on the likelihood of customers proceeding to the next stage of the CCA process. On average, 29% of respondents had decided to proceed, while a further 6% were still deciding what to do. The responses suggest that Check customers are most likely to move to the next stage, with represented customers more likely than unrepresented customers to be planning to proceed. The opposite was reported for Challenges, with unrepresented customers reporting that they were more likely to proceed to the Appeal stage than represented customers.

Figure 6.5 Likelihood of customers proceeding to the next stage



Source: CCA survey, 2020. Base (unweighted) = 476 customers who had received a decision.

For customers who have decided not to proceed to the next stage, the majority said this was because they agreed with the VOA's decision (84%). However, other reasons included: not expecting to get the decision the customer wanted (5%); and not having the time or resources to proceed to the next stage (6%).

The qualitative research also discussed processes for deciding whether to proceed to the next stage. Agents and customers agreed that decisions to proceed to

Challenge are usually relatively straightforward and depend on their satisfaction with the outcome of a Check and the strength of evidence showing that the valuation is excessive. Agents will commonly make this decision on behalf of their clients, based on initial discussions regarding the case and the client's objectives, but will involve clients if there are other factors to consider (such as a partial agreement):

*“We look at an assessment in the first instance and decide whether there’s a Challenge there and we see Check very much as just a pre-requisite to the Challenge process.”*

*(One of the 40 largest agents)*

The research identified very few examples of cases that had progressed to the Appeal stage, although agents suggested that these decisions typically include:

- A review of the Challenge outcome:
- Agent and client confidence in the case:
- The client’s willingness to proceed to an Appeal; and
- An assessment of the potential costs and benefits:

*“It will depend partly on the economics, how much further benefit is there likely to be for the client versus the costs involved in going to tribunal.”*

*(One of the 40 largest agents)*

### 6.3 Does the VOA provide sufficient support?

CCA aims to provide customers with online support, information and guidance, thereby reducing the need for direct contact with the VOA. Online guidance is provided to help customers to claim properties and submit Checks. VOA data for 2019 suggests that an average of 319 users per month have accessed the guidance on claiming properties (representing 9% of all users reaching that stage of the CCA process), while 449 users have accessed the guidance on submitting Checks (representing 11% of all users who submitted Checks).

Table 6.3 Use of online guidance and support (2019 data)

Online guidance	Average monthly users	Average page views per user	% of all monthly users
Claiming a property	319	2.6	9% of users claiming properties
Submitting a Check	449	2.8	11% of users submitting Checks

Source: VOA data (as at December 2019)

The CCA survey asked customers whether the VOA provides sufficient guidance. It found that customers were split fairly evenly between: those who agree the VOA provides sufficient guidance (35%), those who disagree (31%) and those who neither agree nor disagree or don't know (33%). A similar question was asked of unrepresented customers under the pre-reform system and the results suggest CCA customers are less likely to agree that the VOA provides sufficient guidance (42% of unrepresented CCA customers disagreed that the VOA provides sufficient guidance, compared to 35% of pre-reform customers).

There may therefore be opportunities for the VOA to provide further guidance to customers. The survey found that Challenge customers were most likely to feel the VOA should provide more guidance and support, so the greatest need for additional guidance may be to support customers through the Challenge stage.

## 7 Research question 6: How has the customer administrative burden changed and why?

### Key findings

- Most represented customers reported spending less than seven hours working on their case and usually had very little involvement after registering with CCA and briefing their agent.
- Most unrepresented customers also reported spending less than seven hours on the Check stage, although time inputs were more varied and were found to increase significantly at the Challenge stage.
- Administrative burdens were reported to have become front-loaded under CCA due to increased requirements at the Pre-Check and Check stages.
- Most agents also reported increased administrative burdens due to additional front-loaded requirements, which now apply to all cases submitted under CCA.

### 7.1 Have administrative burdens changed under CCA?

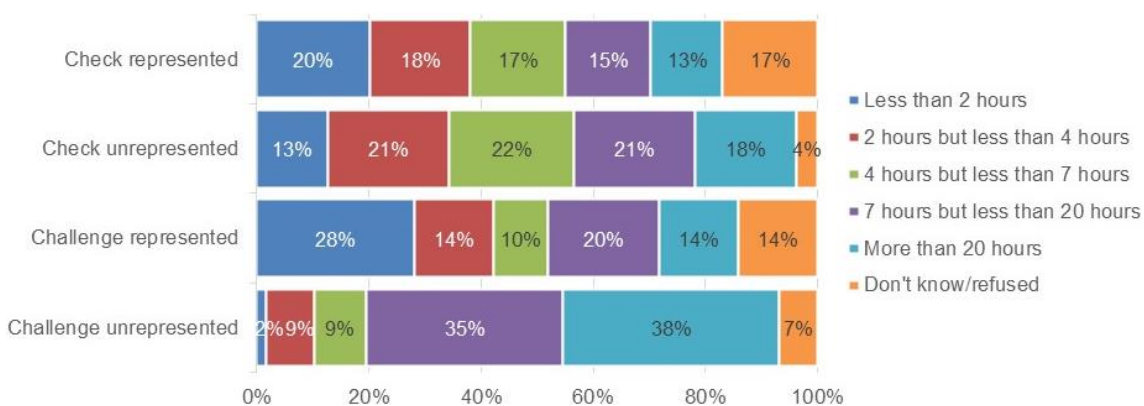
CCA aims to reduce overall administrative burdens by resolving cases more quickly. However, this is likely to be offset by an increase in administrative requirements at the beginning of the process, due to the time spent registering to use the system and submitting more robust and evidenced cases at the Check stage.

In comparison, the pre-reform system had a lighter-touch process for registrations and initial submissions, but a longer overall duration with a relatively large proportion of cases progressing to the later stages of the process and incurring additional burdens associated with submitting Statements of Case and attending tribunals.

#### 7.1.1 Total administrative burdens

Figure 7.1 presents estimates of the overall time spent on all tasks associated with the preparation and submission of Checks and Challenges (including Pre-Check tasks) based on responses to the survey of CCA customers.

Figure 7.1 Total time spent dealing with the CCA to complete the Pre-Check, Check and Challenge stages



Source: CCA survey, 2020. Base (unweighted) = All 601 respondents.

Note: Time for Check customers includes all time associated with Pre-Check and Check stages. Time for Challenge customers includes all time associated with Pre-Check, Check and Challenge stages.

Represented customers reported similar estimates of administrative burdens for both the Check and Challenge stages with most customers spending fewer than seven hours on their case. This suggests that administrative burdens for represented customers tend to be concentrated at the beginning of the process and provides further evidence that represented customers have minimal involvement in their case after the initial registration and provision of information to their agent.

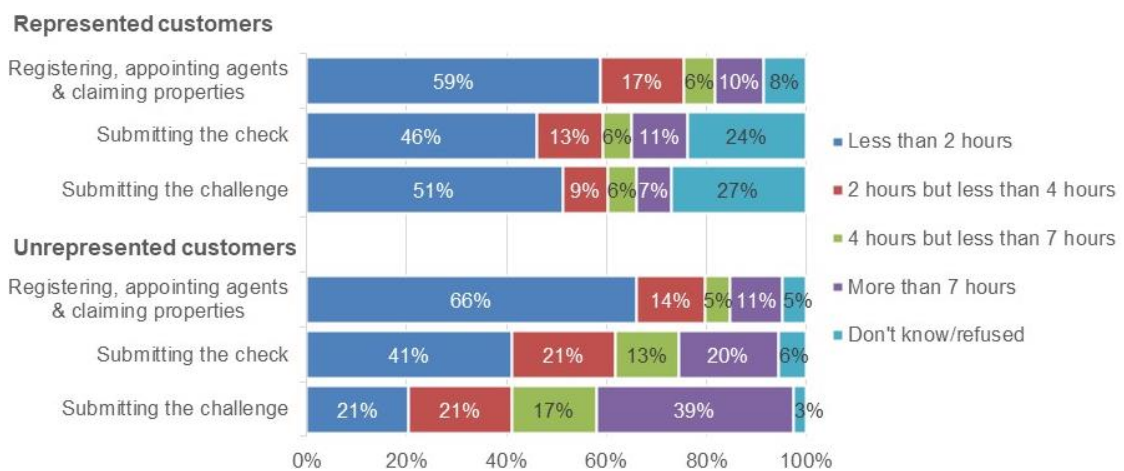
The findings also show a high level of consistency between administrative burdens of represented and unrepresented customers at the Check stage. This suggests that most time inputs at the Check stage are associated with registering and preparing information (i.e. tasks that are likely to be undertaken by all customers) and relatively little time is associated with actually submitting the Check (i.e. tasks that are only likely to be undertaken by unrepresented customers).

However, the final sub-group (unrepresented Challenge customers) provided very different results and much higher estimates of administrative burdens. Almost 75% of these customers reported spending more than seven hours on their Check and Challenge, including 38% who reported spending more than 20 hours. This suggests that the time involved in preparing and submitting Challenges is likely to be much more significant for most unrepresented customers.

### 7.1.2 Administrative burdens by stage

Figure 7.2 provides more detailed estimates of administrative burdens for CCA customers and disaggregates the overall estimates between the three key tasks associated with the Pre-Check, Check and Challenge stages (for both represented and unrepresented customers).

Figure 7.2 Time to complete the Pre-Check, Check and Challenge stages



Source: CCA survey, 2020. Base (unweighted) = All 601 respondents.

The survey results suggest that the **time spent on the Pre-Check tasks** of registering, appointing agents and claiming properties is similar for both represented and unrepresented customers. This is due to the relatively short time spent on these tasks (less than two hours in most cases) and because most of these tasks need to be undertaken by represented customers as well as unrepresented customers. The survey responses are also consistent with VOA estimates that the average user spends 38.5 minutes searching for properties and 15 minutes appointing agents<sup>4</sup>.

<sup>4</sup> VOA data (as at 31 December 2019)



The **time spent submitting Checks** was found to be slightly longer for unrepresented customers compared to represented customers. As stated above, this is likely to suggest limited additional time is spent actually submitting a Check (a task often undertaken by agents), over and above preparing background information for the Check (which is usually undertaken by both represented and unrepresented customers). The corresponding VOA data also confirm that the average user spends only around 29 minutes submitting a Check through the online CCA system.

As suggested above, there is a more significant difference in the **time spent submitting Challenges**, with unrepresented customers reporting much longer time inputs than represented customers. However, much of this time is likely to relate to the preparation of information as VOA data suggest that the average user spends only 21.5 minutes submitting a Challenge through the online CCA system.

The qualitative interviews also found that the administrative burdens for represented customers were concentrated on the Pre-Check tasks as agents undertake the bulk of work associated with the Check and Challenge stages. The represented customers reported:

- taking a few minutes to a couple of days to register to use the CCA system;
- taking a few minutes to a few days to claim properties (depending on the number of properties); and
- the time taken to appoint agents was more consistent, taking just a few minutes in most cases.

The administrative burdens estimated by unrepresented customers within the qualitative interviews were found to be relatively low. This may reflect the simplified nature of cases that unrepresented customers feel confident taking on without additional support. The estimates provided by the sample suggested that the registration process typically takes up to an hour, while claiming properties can vary between a few minutes for a single property up to several hours for multiple properties. The time taken to produce Checks was reported to typically be less than an hour, while Challenges can take less than an hour in some cases but can also take a few days for others.

The interviews with agents found a wide range of estimates of the time spent on the different stages of the CCA process:

- The Pre-Check stage was estimated to take between a few minutes and a couple of hours to register with the CCA system, or even longer depending on the number of people being registered and when issues or delays have been encountered.
- Estimates of the time taken to claim properties also varied across the sample from five minutes to a few hours for multiple properties.
- The Check process was estimated to take less than an hour for straightforward Checks, to a few hours or days in more complex cases or cases with multiple properties.
- The Challenge process was estimated to involve between a few hours of agents' time and a few days, depending on the complexity of the Challenge.

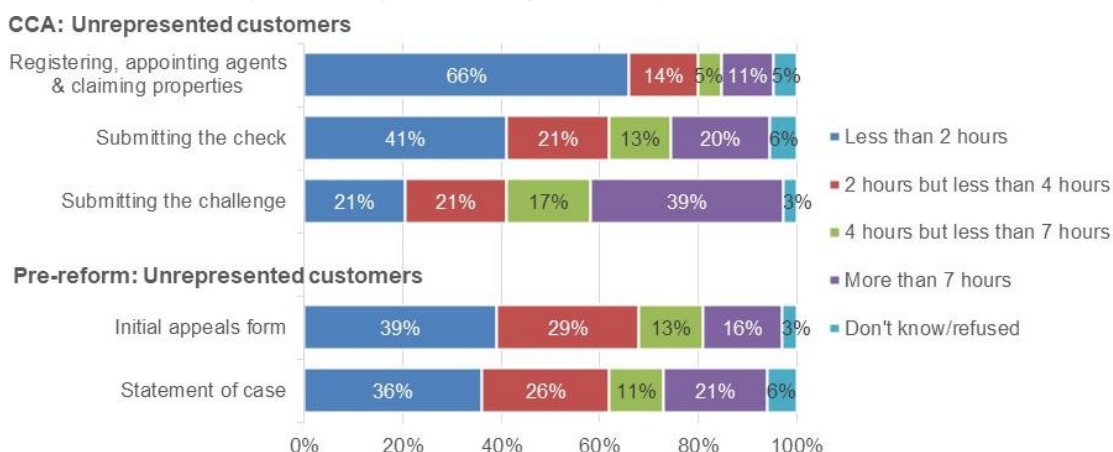


### 7.1.3 Comparisons with the pre-reform system

Figure 7.3 compares estimates of the time taken by unrepresented customers to undertake various tasks under the CCA and pre-reform processes. These estimates are based on customer responses to both the survey of CCA customers and the pre-reform CTS. As stated above, there are clear differences in the various stages and tasks associated with the CCA and pre-reform processes, which make it difficult to make direct comparisons. However, it is possible to draw some broad comparisons between the administrative burdens of some tasks. For example:

- The responses suggest that the Pre-Check tasks (of registering, appointing agents and claiming properties) took the shortest amount of time to complete. In two-thirds of cases (66%) these tasks took less than two hours for unrepresented customers to complete. This is considerably less time than it took unrepresented customers to prepare and complete the initial appeals form as part of the pre-reform process.
- The preparation and submission of Challenges were estimated to take the longest time, with 39% of unrepresented CCA customers reporting that the task took longer than seven hours. This was considerably higher than the 21% of unrepresented customers who reported that the Statement of Case took longer than seven hours to prepare and submit (the most similar task under the pre-reform system).

Figure 7.3 Comparison of time spent by unrepresented customers on different tasks (CCA and pre-reform processes)



Sources: CCA survey, 2020. Base (unweighted) = All 327 unrepresented respondents; CTS, year 4 (Q3/4) and year 5 (Q1-4), 2015-17. Base (unweighted) = 1,602 unrepresented respondents.

It is not possible to compare the overall time associated with each system, as this question was not asked as part of the CTS, and the above estimates do not include time spent in discussions with the VOA, making decisions about whether to proceed to the next stage, etc. However, the evidence from the surveys and qualitative interviews suggests that the overall administrative requirements for customers are likely to have increased under CCA. This was reported by customers to be primarily due to the increased burden at the beginning of the process, in terms of the Pre-Check and Check stages, which must now be completed for all cases. It may also be due, in part, to the additional burden of learning and getting up to speed with new processes. It will therefore be important for the VOA to track changes in administrative burdens over time as CCA becomes more embedded.

The agent interviews also discussed the average length of time they spend dealing with cases under both the CCA and pre-reform systems. Agents reported that administrative burdens have increased significantly under CCA and have become front-loaded due to the new registration requirements and information requirements associated with Checks. This means that the time taken to deal with these requirements is now incurred for all cases and not just those that reached the 'Statement of Case' stage under the pre-reform system. While this is expected to have reduced the number of speculative cases that caused issues under the pre-reform system, it has also increased the burden associated with genuine cases that would have been resolved before reaching the 'Statement of Case' stage under the previous system. This has resulted in increased resource and cost requirements for agents:

*“You’ve literally got to prepare your case for an Appeal, whereas previously you did it at the Appeal stage before a valuation tribunal, now you’ve got to do it at the beginning, which is very, very time consuming.”*

*(A smaller agent)*

## 7.2 How can administrative burdens be reduced?

The qualitative research identified some suggested improvements CCA processes that may help to reduce administrative burdens, including:

- Facilitating opportunities for agents and customers to **discuss cases with case-workers**, and make the process more efficient;
- **Increasing transparency** by allowing agents and customers to access valuation evidence relating to their case, which should reduce the time associated with preparing Checks and Challenges;
- **Encouraging greater use of the GPCR process** to increase the efficiency of processes for cases involving multiple properties;
- **Improving the functionality and flexibility of the online system** to provide a more efficient user experience and reduce associated burdens (e.g. time spent converting documents to pdf format);
- **Allowing key information to be added to Challenges after submission**, if such information becomes available after the original submission; and
- **Providing an effective help-desk function** for those facing issues with the online system to reduce the time taken to resolve issues and gain access.

## 8 Research question 7: Have there been any unintended consequences resulting from CCA?

### Key findings

- Agents reported replacing contingency fees (i.e. no win, no fee arrangements) with fixed fees or hourly rates due to increased burdens under CCA. This could add costs and act as a barrier to engagement with CCA for some customers.
- Some of the changes introduced under CCA could act as a barrier to genuine appeals and are reported to have had a negative impact on perceptions of fairness and trust for some agents and customers.

### 8.1 Changes to agent business models and fees

While the survey evidence suggested minimal changes in the payment structures reported by customers, some agents stated that increased administrative burdens under CCA had caused them to switch, or consider switching, from a 'no win, no fee' structure to charging clients a fixed fee, or hourly rate. There is a risk that this could increase fees as agents pass on the higher costs to their clients and could add barriers to engagement with CCA for some customers:

*"[Customers] are less likely to use agents because there would be a cost involved upfront now, whereas previously I operated a 'no win, no fee'."*

*(A smaller agent)*

### 8.2 Some of the changes risk acting as a barrier to genuine appeals and negatively impacting perceptions of fairness

The research also found that the perceived complexity and increased burden of CCA can act as a barrier to genuine appeals and the accuracy of the rating list:

*"The complexity of the system puts people off using it... I'd love to appeal... but frankly, with this new way of checking and challenging, there's no point."*

*(A small retailer with several stores in the south of England)*

There is a risk that this may result in businesses paying excessive business rates. This is particularly important for smaller businesses for whom the rateable values and potential gains are likely to be less significant, relative to the costs of appealing:

*"People with big pockets will be able to go through the whole CCA system and potentially win, where weaker businesses that might indeed need the help, won't be able to."*

*(A smaller agent)*

Furthermore, the reported lack of dialogue with the VOA has also increased perceptions of unfairness and a one-sided approach. Several interviewees reported that the role of the VOA is increasingly perceived to be the defence of the rating list, rather than helping to maintain a fair and accurate rating list:

*"[The VOA previously] had a culture of trying to get it right. I don't think that culture exists anymore. The culture at the moment is defend. Defend, defend, defend, and only concede when you're forced to."*

*(One of the 40 largest agents)*