Tribunal Procedure Committee

Consultation on possible amendments to the Tribunal Procedure (First-tier Tribunal) (War Pensions and Armed Forces Compensation Chamber) Rules 2008 to accommodate the introduction of Direct lodgement

Introduction

1. The Tribunal Procedure Committee (TPC) is responsible for making Tribunal Procedure Rules for the First-tier Tribunal and the Upper Tribunal, each of which is divided into Chambers. The First-tier Tribunal replaced a number of tribunals in 2008 including the Pensions Appeal Tribunal (PAT). The PAT was abolished in November 2008 and its functions transferred to the First-tier Tribunal (War Pensions and Armed Forces Compensation Chamber) (WPAFCC). Further information on the Tribunals can be found on the HMCTS website: http://www.gov.uk/government/organisations/hm-courts-and-Tribunals-service/about#ourTribunals

2. Specifically, section 22(4) of the Tribunals, Courts and Enforcement Act 2007 (TCEA) requires that the TPC's rule-making powers be exercised with a view to securing: (a) that, in proceedings before the First-tier Tribunal and Upper Tribunal, justice is done; (b) that the Tribunal system is accessible and fair; (c) that proceedings before the First-tier Tribunal or Upper Tribunal are handled quickly and efficiently, (d) that the rules are both simple and simply expressed; and (e) that the rules where appropriate confer on members of the First-tier Tribunal, or Upper Tribunal, responsibility for ensuring the proceedings before the Tribunal are handled quickly and efficiently. Further information on the TPC can be found at our website: http://www.gov.uk/government/organisations/Tribunal-procedure-committee

3. The TPC also has due regard to the public-sector equality duty contained in section 149 of the Equality Act 2010 when making rules.

4. This consultation seeks views on a proposal to change the way that appeals to the WPAFCC are lodged, namely that Notices of Appeal are lodged directly with the Tribunal, which is thereafter responsible for all case management.

Background to the Proposed Changes

5. The WPAFCC is responsible for handling appeals by current and former servicemen or women in England and Wales against decisions by Veterans UK in relation to pensions, compensation, allowances etc. Like all administrative tribunals it is wholly independent of the decision-making body, Veterans UK. However, the existing position where appeals against decisions taken by Veterans UK are made to them and then sent to the WPAFCC gives the appearance that the Chamber is not wholly independent and is contrary to principles of natural justice.

The War Pensions Scheme (WPS)

6. This started in 1916 and continues to provide compensation for disablement or death due to service before 5 April 2005. Appeals can, for example, be about:
   - entitlement to a War Pension;
   - the percentage at which Veterans UK has assessed the disablement;
   - entitlement to allowances (e.g. for mobility needs) and the rates at which these are awarded; and
   - the date from which the pension is paid.

The Armed Forces Compensation Scheme (AFCS)

7. AFCS applies for injuries or death caused on or after 6 April 2005. Appeals can, for example, be about:
   - entitlement to an award; and
   - the tariff level of the award.

Current Process and timelines

8. Applications under both schemes are in the first instance made to Veterans UK. If a claimant is unhappy with a decision, they have 12 months from the date of the decision letter to appeal the decision, this can be done by completing the appeal form, or by letter outlining their intent to appeal, to Veterans UK.

9. Veterans UK caseworkers scrutinise the appeals to assess whether the appellant has raised any new issues, whether the appeal is in time and whether the appeal is being made against an appealable decision prior to a statutory reconsideration under AFCS

or potentially a review under WPS. If the decision on reconsideration/review is revised favourably, Veterans UK will approach the Tribunal to ask if the appeal can be lapsed if the appellant does not send objections (to Veterans UK) in response to the revised decision within 42 days of the date on which the revised decision was sent. If the decision is maintained, a response setting out the decision and the evidence relied upon is prepared and sent to the appellant and the Tribunal.

10. Veterans UK must submit their response to the Tribunal "as soon as reasonably practicable". In practice there can often be lengthy delays between receipt of an appeal and the sending of the response.

11. At this point the appeal is listed for a hearing. Up to this point appellants are encouraged to send any new evidence to Veterans UK before the hearing to give them an opportunity to consider making any comment and producing Supplementary Responses to all parties. The appellant has the right to withdraw their appeal at any stage in the process.

12. The WPAFCC has jurisdiction over appeals lodged under either scheme in England & Wales. There are separate devolved tribunals for Scotland, which has already implemented direct lodgement (i.e. the appeal is lodged directly with the tribunal) and Northern Ireland, which is committed to implementing direct lodgement.

<u>New Process for England and Wales</u>

13. It is envisaged that at this stage the new process for England and Wales will initially be the same as that which operates in Scotland (see Para 12. above). This is because changes to the mandatory reconsideration mechanism, which it is envisaged will move in the process to before appeals are lodged with the Chamber, will require Primary Legislation. As it currently stands this change could potentially be taken forward as part of the Armed Forces Bill, but this is not due until 2026, and to those ends the Tribunal is exploring if there might be an earlier, alternative, legislative vehicle available. The Working Group involved has therefore limited itself to considering what business design and IT changes are needed to introduce this type of direct lodgement to the Tribunal.

14. HMCTS is aiming to introduce the new direct lodgement process in the WPAFCC in April 2023, subject to the timetable for implementing the necessary rule changes.

The arguments for direct lodgement to the War Pension and Armed Forces Compensation Chamber as put to the TPC by the MOJ, HMCTS and the Chamber President

15. There is the mismatch between the principles laid down in the Armed Forces Covenant and the enduring practice in the WP&AFCS appeals system. The Covenant's two guiding principles are that:

    - the Armed Forces community should not face disadvantage compared to other citizens in the provision of public and commercial services;
    - special consideration is appropriate in some cases, especially for those who have given most, such as the injured and the bereaved.

16. As long ago as 2015 the Armed Forces Covenant Annual Report which was laid before Parliament reported "Some concerns were raised in last year's Report over the administration of the War Pensions and Armed Forces Compensation Schemes across the UK, including in the devolved tribunals in Scotland and Northern Ireland. It is a source of major concern that appeals are not directly lodged with the Tribunals. They are now the only ones throughout HMCTS which require appeals to be lodged with the Respondent organisation, in this case the MoD, rather than directly with the Court or Tribunal. Not only does this cause inevitable delay in dealing with cases, but it also creates a perception that the Tribunal lacks independence" (Armed Forces Covenant Annual Report 2015, p.20).

17. Second, there is the issue of constitutional propriety. Arguably it cannot be right as a matter of principle that an Appellant seeking to challenge a decision of a Government agency should not only have to lodge his or her appeal with that very agency, but that same agency moreover then continues to have a large measure of effective day-to-day control over the conduct of the appeal. In the context of the ECHR there is at least a real question mark as to whether the existing system both of direct lodgement and the central role of Veterans UK in the onward administration of appeals is Article 6-compliant. The administrative process for direct lodgement of appeals to the Tribunal is already in operation in all other administrative Tribunals.

18. Thirdly, arguably the existing arrangements are completely inconsistent with the Leggatt principles that underpinned the TCEA reforms. A fundamental principle of the Leggatt reforms in terms of the access to justice arguments was that Tribunals should not only be independent of government departments but be seen to be so

independent. This undoubtedly causes real confusion for appellants and is compounded by the practice of Veterans UK issuing submissions in the form of supplementary responses as it gives the real impression that the Tribunal process is not impartial.

19. Additionally, arguably the existing arrangements are a recipe for procedural confusion and administrative inefficiency. Currently the judiciary have very little case management control of the case before the Chamber receives the appeal Response, and this can lead to very lengthy delays in progressing appeals and cumbersome mechanisms for Veterans UK seeking approval of withdrawals or jurisdictional issues before a Response is prepared.

Cost/benefit issues

20. The costs are yet to be worked through. These are not anticipated to be significant and HMCTS are committed to funding it. The administrative move to Arnhem House in Leicester was predicated on direct lodgement being brought in. The benefits are said to be fundamental - it provides direct access to justice/securing the independence of the Tribunal and improving case management and efficiencies in the delivery of justice.

Consequence if the proposal is not taken forward

21. If the Tribunal Rules are not amended, then the implementation of direct lodgement to the WPAFCC cannot be made.

Proposed Rule Changes

22. The TPC considers the following amendments to the rules to be appropriate to implement direct lodgement.

Rule 21: Notice of Appeal

23. Rule 21 of Tribunal Procedure (First-tier Tribunal) (War Pension and Armed Forces Compensation Chamber) Rules 2008 provides:

Notice of appeal

21.—*(1) An appellant must start proceedings by sending or delivering a notice of appeal to the decision maker so that it is received within 12 months after the date on which written notice of the decision being challenged was sent to the appellant.*

(2) If the appellant provides the notice of appeal to the decision maker later than the time required by paragraph (1) the notice of appeal must include the reason why the notice of appeal was not provided in time.

(3) Subject to paragraph (4), where an appeal is not made within the time specified in paragraph (1), it will be treated as having been made in time if the decision maker does not object.

(4) No appeal may be made more than 12 months after the end of the 12-month period provided for in paragraph (1).

(5) The notice of appeal must be in English or Welsh, must be signed by the appellant and must state—

- *(a) the name and address of the appellant;*
- *(b) the name and address of the appellant's representative (if any);*
- *(c) an address where documents for the appellant may be sent or delivered;*
- *(d) details (including the full reference) of the decision being appealed; and*
- *(e) the grounds on which the appellant relies.*

(6) The decision maker must refer the case to the Tribunal immediately if—

- *(a) the appeal has been made after the time specified in paragraph (1) and the decision maker objects to it being treated as having been made in time; or*
- *(b) the decision maker considers that the appeal has been made more than 12 months after the end of the 12-month period provided for in paragraph (1).*

(7) Notwithstanding rule 5(3)(a) (case management powers) and rule 7(2) (failure to comply with rules etc.), the Tribunal must not extend the time limit in paragraph (4).

24. It is proposed that Rule 21 is amended to reflect that the notice of appeal in respect of the initial decision made by the Respondent should be directed to the Tribunal instead of the original decision maker.

25. Rule 21 would therefore read as follows: -

Notice of appeal

21.—*(1) An appellant must start proceedings by sending or delivering a notice of appeal to the* ***Tribunal*** *so that it is received within 12 months after the date on which written notice of the decision being challenged was sent to the appellant.*

(2) If the appellant provides the notice of appeal to the ***Tribunal*** *later than the time required by paragraph (1) the notice of appeal must include the reason why the notice of appeal was not provided in time.*

(3) Subject to paragraph (4), where an appeal is not made within the time specified in paragraph (1), it will be treated as having been made in time if the decision maker does not object.

(4) No appeal may be made more than 12 months after the end of the 12-month period provided for in paragraph (1).

(5) The notice of appeal must be in English or Welsh, must be signed by the appellant and must state—

(a) the name and address of the appellant;
(b) the name and address of the appellant's representative (if any);
(c) an address where documents for the appellant may be sent or delivered;
(d) details (including the full reference) of the decision being appealed; and
(e) the grounds on which the appellant relies.

(5A) The Tribunal must send a copy of the notice of appeal to the decision maker.

(6) Upon receipt of a copy of the notice of appeal the decision maker must notify the Tribunal within 24 hours if—

(a) the appeal has been made after the time specified in paragraph (1) and the decision maker objects to it being treated as having been made in time; or
(b) the decision maker considers that the appeal has been made more than 12 months after the end of the 12-month period provided for in paragraph (1).

(7) Notwithstanding rule 5(3)(a) (case management powers) and rule 7(2) (failure to comply with rules etc.), the Tribunal must not extend the time limit in paragraph (4).

Rule 22: Lapse of Cases

26. Rule 22 currently provides as follows:

Lapse of Cases

22.—*(1) If the decision maker revises the decision challenged—*

(a) the appeal shall proceed, subject to paragraph (2), as if it had been brought in relation to the revised decision; and
(b) the notice of the revised decision sent by the decision maker to the appellant must include a statement of the action that the appellant must take under paragraph (2) in order to prevent the appeal from lapsing.

(2) The appeal against the revised decision shall lapse if, within 42 days of the date on which the decision maker sends notice of the revised decision to the appellant, the appellant does not provide to the decision maker—

(a) representations in writing in relation to the revised decision; or
(b) a statement in writing that the appellant wishes the appeal to proceed but has no additional representations to make in relation to the revised decision.

(3) If the decision maker has already sent or delivered a response to the Tribunal under rule 23 (responses and replies), any document which must be provided under this rule (including notice of the revised decision) must also be provided by the decision maker to the Tribunal.

27. Rule 22 would therefore read as follows: -

Lapse of Cases

22.—*(1) If the decision maker revises the decision challenged—*

(a) *the appeal shall proceed, subject to paragraph (2), as if it had been brought in relation to the revised decision; and*
(b) *the notice of the revised decision sent by the decision maker to the appellant must include a statement of the action that the appellant must take under paragraph (2) in order to prevent the appeal from lapsing.*

(2) The appeal against the revised decision shall lapse if, within 42 days of the date on which the decision maker sends notice of the revised decision to the appellant, the appellant does not provide to the ***Tribunal***—

(a) *representations in writing in relation to the revised decision; or*
(b) *a statement in writing that the appellant wishes the appeal to proceed but has no additional representations to make in relation to the revised decision.*

(2A) The Tribunal must send a copy of the appellant's representations or written statement provided under paragraph (2) (if any) to the decision maker

(3) Any document which must be provided under this rule by the decision maker to the appellant (including notice of the revised decision) must also be provided by the decision maker to the Tribunal.

Rule 23: Responses and Replies

28. Rule 23 currently provides as follows: -

Responses and replies

23.—*(1) When a decision maker receives the notice of appeal or a copy of it, the decision maker must send or deliver a response to the Tribunal as soon as reasonably practicable after the decision maker received the notice of appeal.*

(2) The response must state—

(a) *the name and address of the decision maker;*
(b) *the name and address of the decision maker's representative (if any);*
(c) *an address where documents for the decision maker may be sent or delivered;*
(d) *the names and addresses of any other respondents and their representatives (if any);*
(e) *whether the decision maker opposes the appellant's case and, if so, the grounds for such opposition; and*
(f) *any further information or documents required by a practice direction or direction.*

(3) The response may include a submission as to whether it would be appropriate for the case to be dealt with without a hearing.

(4) The decision maker must provide with the response—

(a) *a copy of any written record of the decision under challenge, and any statement of reasons for that decision;*

(b) copies of all documents relevant to the case in the decision maker's possession, unless a practice direction or direction states otherwise; and
(c) a copy of the notice of appeal, any documents provided by the appellant with the notice of appeal and, unless stated in the notice of appeal, the name and address of the appellant's representative (if any).

(5) The decision maker must provide a copy of the response and any accompanying documents to each other party at the same time as it provides the response to the Tribunal.

(6) The appellant and any other respondent may make a written submission and supply further documents in reply to the decision maker's response.

(7) Any submission or further documents under paragraph (6) must be provided to the Tribunal and to each other party within 1 month after the date on which the decision maker sent the response to the party providing the reply.

29. Rule 23(1) requires the decision maker to respond to the Tribunal as soon as reasonably practicable following receipt of the notice of appeal, or a copy of it. It is proposed that in relation to Rule 23 a specific time period be introduced for the preparation of a Response to avoid the lengthy delays which currently occur as follows:

Responses and replies

23.—(1) When a decision maker receives a copy of the notice of appeal, the decision maker must send or deliver a response to the Tribunal—

(a) where the decision being challenged on appeal is subject to mandatory reconsideration, within 28 days of—
   i. if following reconsideration, the decision maker maintains the decision being challenged, the date on which the decision maker sends the appellant notice that the decision under challenge has been maintained; or

   ii. if following reconsideration, the decision maker revises the decision being challenged, the date on which the decision maker receives a copy of the appellant's representations or written statement provided under rule 22(2A) (lapse of cases); or

(b) in any other case, within 56 days from the date that the respondent receives a copy of the notice of appeal.

(2) The response must state—

(c) the name and address of the decision maker;
(d) the name and address of the decision maker's representative (if any);
(e) an address where documents for the decision maker may be sent or delivered;
(f) the names and addresses of any other respondents and their representatives (if any);
(g) whether the decision maker opposes the appellant's case and, if so, the grounds for such opposition; and

(h) any further information or documents required by a practice direction or direction.

(3) The response may include a submission as to whether it would be appropriate for the case to be dealt with without a hearing.

(4) The decision maker must provide with the response—

(a) a copy of any written record of the decision under challenge, and any statement of reasons for that decision;
(b) copies of all documents relevant to the case in the decision maker's possession, unless a practice direction or direction states otherwise; and
(c) a copy of the notice of appeal, any documents provided by the appellant with the notice of appeal and, unless stated in the notice of appeal, the name and address of the appellant's representative (if any).

(5) The decision maker must provide a copy of the response and any accompanying documents to each other party at the same time as it provides the response to the Tribunal.

(6) The appellant and any other respondent may make a written submission and supply further documents in reply to the decision maker's response.

(7) Any submission or further documents under paragraph (6) must be provided to the Tribunal and to each other party within 1 month after the date on which the decision maker sent the response to the party providing the reply.

(8) In this rule, a decision is "subject to mandatory reconsideration" where—

(a) an application for reconsideration has been made under Article 53(1) of the Armed Forces and Reserve Forces (Compensation Scheme) Order 2011 (the 2011 Order) and the application has not yet been determined; or

(b) the decision maker is required under Article 53(5) of the 2011 Order to reconsider the decision being challenged.

30. The periods are expressed in periods amounting to days, rather than months, on the basis that the date of receipt will always be a working day and therefore the date when the document must be sent or delivered will also be a working day (barring the effect of public holidays or overtime working).

31. In an AFCS case where there must be a reconsideration, the time limit does not attempt to estimate how long the reconsideration will take but imposes a four-week (28 days) time limit from the end of reconsideration (in a case that does not lapse) on the basis that all that is required by way of a response is a justification for a decision that has only recently been made. It would be open to the Tribunal to enquire about progress of the reconsideration at any time. Although it may appear cumbersome,

the point of subparagraph (a) is that it avoids the necessity for any application for an extension of time in cases where it is clear one would otherwise be required. It is a provision that has to be operated by Veterans UK rather than by the Appellants.

32. Eight weeks (56 days) is taken as the default position in subparagraph (b) on the basis that it should be long enough to enable Veterans UK to decide whether further work is required in a war pensions case and to provide an explanation for the decision already given in cases where no review or reconsideration is required. It is longer than the six weeks originally suggested but that gives a bit more time for the documents to be collected where the decision was made some months earlier and also for the correctness of a decision to be considered on the existing documents. The expectation will be that, if Veterans UK requires more time to consider the case, it will ask for an extension of time (sending a copy of the application to the Appellant). Therefore, in any case to which subparagraph (b) applies, the Tribunal within the eight-week (56 days) period should receive either a Response or an application for more time.

33. With direct lodgement, time would still run from the date Veterans UK received the notice of appeal from the Tribunal. It would not be necessary for Veterans UK to send any document before sending the Response or request for an extension of time, except in a case to which subparagraph (a) applied. In such a case, it would be expected immediately upon receipt of the notice of appeal to inform the Tribunal (and the Appellant) that reconsideration was required and that therefore a response to the appeal would follow reconsideration if the appeal did not lapse.

Other changes

34. Additionally, the TPC is taking the opportunity to consult on possible rule changes that are unrelated to direct lodgement, as indicated below.

Rule 6: Procedure for applying and giving directions

35. Rule 6 currently provides as follows:

Procedure for applying and giving directions

6.—*(1) The Tribunal may give a direction on the application of one or more of the parties or on its own initiative.*

(2) An application for a direction may be made—

(a) by sending or delivering a written application to the Tribunal; or
(b) orally during the course of a hearing.

(3) An application for a direction must include the reason for making that application.
(4) Unless the Tribunal considers that there is good reason not to do so, the Tribunal must send written notice of any direction to every party to the proceedings and to any other person affected by the direction.

(5) If a party or any other person sent notice of the direction under paragraph (4) wishes to challenge a direction which the Tribunal has given, they may do so by applying for another direction which amends, suspends or sets aside the first direction.

36. The TPC proposes that Rule 6 is amended to make it clear that any application should be copied to the other party by the person making the application for a direction (in-line with the recent Presidential Guidance on this, please see link: Presidential Guidance on the making of applications to the Tribunal | Courts and Tribunals Judiciary). Rule 6 would read as follows: -

Procedure for applying and giving directions

6.—*(1) The Tribunal may give a direction on the application of one or more of the parties or on its own initiative.*

(2) An application for a direction may be made—

(a) by sending or delivering a written application to the Tribunal; or
(b) orally during the course of a hearing.

(3) An application for a direction must include the reason for making that application.

(3A) A party making a written application must send a copy of the application to every other party to the proceedings and to any other person that may be affected by the direction applied for and request that any comments on the application should be sent to the Tribunal within 7 days or such earlier period as the Tribunal directs.

(4) Unless the Tribunal considers that there is good reason not to do so, the Tribunal must send written notice of any direction to every party to the proceedings and to any other person affected by the direction.

(5) If a party or any other person sent notice of the direction under paragraph (4) wishes to challenge a direction which the Tribunal has given, they may do so by applying for another direction which amends, suspends or sets aside the first direction.

Rule 24: Medical Examination and commissioning of medical evidence etc.

37. The TPC proposes to amend Rule 24 to remove the power for a Tribunal member to undertake a medical examination as the Tribunal no longer carries out medical examinations and does not have the facilities to do so. Currently, rule 24 provides:

Medical examinations and commissioning of medical evidence etc.

24.—*(1) An appropriate member of the Tribunal may make a medical examination of the appellant if—*

> *(a) the proceedings relate to the appellant's disablement or incapacity for work; and*
> *(b) the appellant consents.*

(2) If the appellant lives outside the United Kingdom, the Tribunal may arrange a medical examination of the appellant.

(3) If a medical or other technical question arises in a case the Tribunal may—
> *(a) request a medical or other technical specialist to provide a report in relation to the question; and*
> *(b) if the question is a medical one, arrange for the appellant to be examined for the purposes of the preparation of such a report.*

(4) Subject to rule 14(2) (withholding documents or information likely to cause harm) the Tribunal must provide to each party a copy of any report obtained under this rule.

(5) If the Tribunal arranges a medical examination under paragraph (2) or requests a report under paragraph (3) the Tribunal may pay a fee to the medical or other technical specialist.

(6) Any fee paid under paragraph (5) must not exceed the maximum fee determined by the Lord Chancellor from time to time.

38. It is proposed that the amended rule 24 will read as follows:

Medical examinations and commissioning of medical evidence etc.

24.—

[paragraphs (1) and (2) deleted]

(3) If a medical or other technical question arises in a case the Tribunal may—
> *(a) request a medical or other technical specialist to provide a report in relation to the question; and*

(b) if the question is a medical one, arrange for the appellant to be examined for the purposes of the preparation of such a report.

(4) Subject to rule 14(2) (withholding documents or information likely to cause harm) the Tribunal must provide to each party a copy of any report obtained under this rule.

(5) If the Tribunal requests a report under paragraph (3) the Tribunal may pay a fee to the medical or other technical specialist.

(6) Any fee paid under paragraph (5) must not exceed the maximum fee determined by the Lord Chancellor from time to time.

39. The TPC welcomes the views on these proposals by those with a stake in the WPAFCC appeals process.

The Consultation Questions

40. The TPC is interested in receiving your views on possible changes to Rules 21, 22, 23, 6 and 24, to accommodate direct lodgement (amongst other things). When responding, please keep in mind that the rules should be simple and easy to follow. They should not impose unnecessary requirements or unnecessarily repeat requirements that are contained elsewhere. The TPC must secure the objectives set out in section 22(4) of the TCEA and it aims to do so in a consistent manner across all jurisdictions. Where your views are based upon practical problems which do or could arise, the TPC would be assisted by reference to relevant evidence.

41. In general, the TPC regards consultation responses as public documents. They may be published by the TPC and referred to in its Reply to the Consultation.

42. If you would prefer your response to be kept confidential, you should be aware that information you provide, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes. These are primarily the Freedom of Information Act 2000 and the Data Protection Act 2018.

43. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic

confidentiality disclaimer generated by your IT system will not, by itself, be regarded as binding on the TPC.

44. The questions raised are as follows:

Question 1: Do you agree in principle that direct lodgement is desirable and thus agree to the proposed change to Rule 21? If not, why not?

Question 2: Do you agree to the proposed change to Rule 22? If not, why not?

Question 3: Do you agree the timescales in the proposed Rule 23? If not, why not?

Question 4: Do you agree to the proposed change to Rule 6? If not, why not?

Question: 5: Do you agree to the proposed change to Rule 24? If not, why not?

Question 6: Do you have any other comments on these proposals?

How to Respond

Contact Details

Please reply using the response questionnaire template.

Please send your response by **22 September 2022** to:

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Extra copies of this consultation document can be obtained using the above contact details or online at: http://www.justice.gov.uk/about/moj/advisory-groups/Tribunal-procedure-committee/ts-committee-open-consultations