

Citizens Advice consumer service

Report on planned changes to consumer service
codes - July 2015



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Introduction

The consumer landscape is changing. Both the goods and services bought and sold and the methods by which consumers purchase them has changed dramatically over the past ten years and continues to evolve. The consumer service takes a million calls a year. Consumers' issues, problems and complaints are coded in order to run reports and analyse consumer trends and detriment, share with stakeholders, develop policy, challenge bad practice and enforce regulation.

The consumer codes have remained largely unchanged for the past decade. They are falling out of date with the current consumer landscape and are proving to be less useful to stakeholders, regulators and Trading Standards services.

The Department for Business Innovation and Skills has asked and funded Citizens Advice to review the consumer codes, so that they better reflect the consumer landscape.

We have undertaken a comprehensive review of the codes, held a consultation and, as result plan to make a number of changes.

When these changes are implemented, we anticipate that they will give better intelligence to Citizens Advice and its partners, on emerging issues and consumer detriment. This will facilitate the better targeting of resources for policy, enforcement, education and campaign work.

We have set out the structural changes first and then provided an overview of the changes to the codes. In doing so we have reflected the separate structures for post, energy and general consumer related issues.

The document gives an overview of our original recommendations, the feedback that we have received, and our final recommendations. The planned codes are in a separate [document](#).

Executive Summary

This report provides an overview of the final recommendations to update the consumer codes used by the Citizens Advice consumer service. These recommendations follow the consultation period which ended on 12 June 2015.

This report describes the recommendations we proposed on 30th March, the feedback we have received through the consultation and the changes we now plan to make. It also includes an overview of how we envisage these changes will be implemented. To keep this report concise, we have not included the final set of codes. These are contained in the accompanying technical [document](#) published alongside this report. Those seeking a full understanding of the changes we are making should study both documents

Throughout the consultation process we have engaged numerous stakeholders. In particular we have discussed the recommendations with Trading Standards services, regulators, industry representatives (for energy and post changes), colleagues at Citizens Advice and Citizens Advice Scotland, and consumer advisers.

The consultation document sets out five key recommendations, namely;

1. Introduction of a Scam code field
2. Introduction of a detriment code field
3. Multiple coding to one case
4. Specific changes to the current set of codes
5. Integration of post related codes into the general consumer code system

The vast majority of respondents to the consultation were favourable to the recommendations we made. However, there were many specific comments around the detail.

Following consultation, we plan to proceed with items 1-4 above, however we will not be integrating post related codes into the general consumer code system at this time. This is because a more detailed analysis showed the disruption of making this change outweighed the potential benefits. We also found that the current code structure for post is well understood by the advisers and useful to key stakeholders including the regulator and industry bodies.

We also recommended, in our consultation, the introduction of a regular review of the codes. We will do this and have provided more details of this at the end of this document

We envisage that, subject to confirmation that the necessary changes can be implemented internally and with our referral partners, the new codes and structure will be operational in April 2016.

Consultation

The consultation period commenced on 30 March 2015 and ended on 12 June 2015. Its purpose was for the project team to seek views from interested stakeholders on the recommendations that we made in our consultation document.

We engaged with a number of relevant groups. For general consumer codes we had discussions with members and affiliates of the Consumer Protection Partnership, particularly Trading Standards services, Competition and Markets Authority (CMA), Financial Conduct Authority (FCA) and the Office of Communications (OFCOM). For energy and post we contacted relevant stakeholders, particularly the Office of Gas and Electricity Markets (OFGEM), OFCOM and Royal Mail. We received some form of written response from all of these bodies and also from Consumer Council for Northern Ireland and the British Standards Institution.

In total, we received 39 separate responses. Most respondents were from Trading Standards services. Some of these provided a response on behalf of their region rather than their individual authority. 31 of the responses came via the questionnaire that was provided and 8 provided a response by correspondence.

General consumer

At the consumer service Trading Standards Working Group meeting, on 31 March, we proposed to meet with Trading Standards services throughout Britain. It was agreed that we use the existing Trading Standards regional groups for this purpose. As a result of this, we have held surgeries with 10 out of the 11 regional groups where we discussed our proposals. In addition, we held an in depth meeting with a local authority Trading Standards team to understand how it receives information from the consumer service.

Energy

We sought views of Energy suppliers, OFGEM, Ombudsman Services: Energy, and Energy UK, the trade association for the UK Energy. The Extra Help Unit in Citizens Advice Scotland was also a key feedback partner, given their regular use of the energy codes.

Post

We engaged with front line staff at the consumer service together with other

internal colleagues. We also held meetings with OFCOM and received feedback from Royal Mail and the Consumer Council for Northern Ireland.

Operational impact

We also used this period to gain a more detailed understanding of the operational impact of the changes proposed. To this end, we have engaged with colleagues at the consumer service and with our information system providers and other providers who operate in this market.

Scam code field

Recommendation from consultation

In our consultation we recommended the introduction of a scam code field. We said that that this would enable the quick identification of a scam for those using consumer service data, better analysis of trends and would replace the need for advisers to write 'hallmarks of a scam' or similar in the case notes.

We also provided a suggested list of scam types that could be selected if necessary with a default of 'not scam'.

Feedback from consultation and analysis

Feedback from the consultation was overwhelmingly supportive of the recommendation to create a scam code field. 30 out of 31 respondents (97%) answered 'yes' to the question; **Do you agree with the creation of the scam code family and the scam types listed within it?** The other respondent did not offer an opinion on this question.

The feedback we received showed that there was of a variety of opinions on how scams should be coded. Some preferred a detailed list of products, others were more interested in the method used to perpetrate the scam.

There was also a concern that listing a product in the scam code field, e.g. parking scams, may lead some users to conclude that all complaints relating to that product should be classed as a scam. This is clearly not the case and was never the intention.

In creating a scam code field there was also a concern that doorstep crime may be overlooked. This is an area found to be a priority concern for many Trading Standards services.

We have concluded that a long list of scam types, be they categorised by product or method, risks duplicating information provided in the product/services and purchase method sections and therefore could cause confusion. Furthermore, as there are a multitude of scam types, which continuously evolve, a detailed list will become very quickly out of date.

Final recommendation

We will proceed with a scam code field but the field will not be coded, as put forward for consultation. We have decided to introduce a singular check box to denote any case perceived to relate to scam or rogue trader activity.

Where this check box is selected, users can refer to other coded fields to identify the type of scam. For example, use of the purchase method will help determine how the incident occurred e.g doorstep or email and the issue code can help to identify the mode of operation. Similarly, the detriment and payment method fields will help to ascertain whether the customer has lost any money.

This information will be made available in referrals and notifications, where appropriate, and it is recommended that a report is developed on the Consumer Data Warehouse, so that enforcement partners can report against cases that have been flagged as being a potential scam.

Affected area

This field will be implemented in the general consumer section only. Post and energy sections are excluded, because potential offences identified in the excluded areas, are passed over to and captured in the general consumer section, for the purpose of sending enforcement referrals to partners.

Detriment field

Recommendation from consultation

We recommended the introduction of a detriment field. We stated that this would be used to enter, and view, a financial value for perceived detriment to the consumer. The field could be used to help with analysis of trends in consumer detriment and with the prioritisation of enforcement and education activities. We also stated that this field was intended for the general consumer section only.

Feedback from consultation and analysis

Feedback from the consultation was overwhelmingly supportive of the recommendation to create a detriment field. 30 out of 31 respondents (97%) answered 'yes' to the question; **Do you agree with the creation of a detriment field?** The other respondent did not offer an opinion on this question.

Many respondents questioned the accuracy of a financial detriment figure based on information volunteered by the consumer. Risks of both exaggeration and understatement were cited. Many felt that firm definitions would be needed in order to draw robust conclusions from any data contained in this field. Countering this were concerns that anything requiring a detailed script to elicit an accurate answer would be unduly burdensome to advisers.

A significant number of respondents raised the importance of non financial detriment, in particular physical and emotional harm. And, in terms of scope, OFGEM has requested that the energy section also has a detriment field.

Whilst we recognise the concerns regarding accuracy of information, at this stage, we do not believe that it would be viable to create a hard definition that would cover all circumstances as we think such a definition would be complex and add significant time to the length of the call.

It may be the case that definitions of detriment could be created and used in specific circumstances. An example of this could be a project to understand consumer detriment within the second hand car market. In these circumstances it is possible that a script could be created, for use during the project, to accommodate the value of such variables as; the value of the car when bought, the cost of repairs, the value assigned for the loss of use of the car and the value for time the caller has spent on resolving the issue. However, in most circumstances we expect the financial detriment box to contain the answer to the question 'how

much do you think have you lost?' We recognise that detriment can take many forms and agree that there is value in capturing and coding more detriment related information.

Final Recommendation

We will create one financial field to capture the perceived monetary value of detriment. At this point it is worth highlighting that there is already a field to capture the actual cost of the goods/service. The purpose of the new field is to capture perceived financial loss, which will often be different.

Code	Value of Financial Detriment (pounds sterling)	New
01	£_____	New

We will also create a further field to capture qualitative information regarding detriment. This will be a multi-select box and will capture different types of financial detriment as well as non financial detriment.

Code	Detriment	New
00	Not part of discussion/no detriment	New
01	Out of pocket expenses/ inconvenience	New
02	Reduced value of goods	New
03	Time off work required/loss of earnings	New
04	Issue led to or increased financial difficulty	New
05	Other financial detriment	New
06	Issue led to/increased anxiety, stress, or depression	New
07	Issue required medical treatment	New

At this stage, we will not create definitions or scripts to accompany these detriment fields. However, we will provide examples for advisers, keep the need for definitions under review, and make any necessary changes.

The selection box field will be an optional field for advisers., based on the information **volunteered** to them by the caller and will replace the need to enter this information in the case notes. Therefore, we do not envisage the need for the

adviser to ask specific questions in order to populate this field. We will test and review how this field operates for both analysis and in referral.

We will look to allow the selection of as many of these options as appropriate but we will need to balance this with the technical and operational impact of doing so. We will assess this fully during the implementation phase of this project.

The information coded here will be part of any referrals or notifications, where appropriate. The Consumer Data Warehouse and the data extracts (for energy and post sections) will need to be amended to make information provided here viewable. We will consider the merits of creating new reports that focus on detriment.

Affected area

This will apply to all sections, general consumer, energy and post.

Multiple coding

Recommendation from consultation

We recommended the introduction of a facility to code more than one issue to a case. We recommended that numerous code families should have this facility, particularly product/services, purchase method, payment type and complaint type.

Feedback from consultation and analysis

Feedback from the consultation was overwhelmingly supportive of the recommendation to enable multiple coding to a single case. 32 out of 33 respondents (97%) answered 'yes' to the question; **Do you agree with the recommendation to allow more than one code within a code family to be assigned to a case?** One respondent did not agree.

There were many comments that expressed support for this proposal. A number have expressed concerns about how this would work without adding undue complexity to the system and burdens to Trading Standards services. There was also a variety of views as to which code families should have a multiple facility.

Final Recommendation

We agree that an uncontrolled facility to code multiple issues to a case risks adding a lot of complexity that could be counter-productive. We have therefore taken steps to avoid this.

Multiple coding will therefore be restricted to Complaint Type, Detriment field and Trader details. There will be the facility to code a maximum of two complaints types. We will also enable two trader names to be recorded in the appropriate field. Any further details on cases where a number of issues are relevant should be recorded in the case notes.

To ensure clarity, where applicable, the two complaint types will be noted as primary and secondary issue, with the issue considered by the adviser to be the most egregious assigned as the primary issue. Both issues will be itemised and detailed on any referral or notification.

The Consumer Data Warehouse (for general consumer) and data extracts (for energy and post) will need to include the ability to allow searches by primary issue, secondary issue and both.

Affected area

This will apply to all sections; general consumer, energy and post.

Post

Integration of post section into general consumer section

Recommendation from consultation

We recommended that the post section be integrated into the general consumer section. We made this recommendation in order to speed up analysis, reduce the risk of duplication and to provide efficiency savings. We also wanted postal issues to benefit from the same structural changes that we proposed for the general consumer section. However we noted the significant operational impact that these changes might have.

Feedback from consultation and analysis

Because of the particularity of postal issues and the consumer service's function in its regulation, we were primarily interested in the comments from regulators and industry.

Whilst OFCOM were supportive of the proposal to integrate post, it was not their main concern as it was less concerned with its location and more with detail of the information that it could use. Royal Mail were similar focused on other areas and were particularly keen to ensure that the system reflected the greater diversity of market participants.

We carried out further analysis of how the current post system works in the consumer service and found that it works well for advisers and that integration would lead to significant implementation and ongoing operational challenges, which outweigh the benefits of integration.

Final recommendation

We have therefore decided not to proceed with the proposal to integrate the post section into the general consumer section. However, two of the structural changes that we are making in the general consumer section will be made available in the post section, namely multi coding to one case and detriment.

Changes to codes in the post section

Recommendation from consultation

Aside from integrating the codes, we recommended significantly reducing the number of codes for non regulated services, whilst maintaining the same codes for regulated business.

Feedback from consultation and analysis

The main feedback was that we should maintain our ability to report accurately to OFCOM, and that the information we send to OFCOM should require minimal recoding when it arrives. OFCOM have also provided a full list of recommended codes. Consumer Council for Northern Ireland support a streamlined set of codes but want the system to be able to capture and code complex issues, particularly for non regulated business. Royal Mail want to ensure that the codes reflect the changes to the market, particularly the emergence of new operators.

Our decision to not proceed with integration of the post section into the general consumer section has had a significant effect on the codes. This is particularly apparent with the issue/complaint codes. The integrated model enabled use of all the complaint codes in the general consumer section as well as those that were only applicable to post.

Final recommendation

We have made significant changes from the recommendations. We are reverting to the existing code identifiers system and to many of the existing issue/complaint codes. We have accommodated as many of OFCOM's specific requests as possible. Whilst there are now more codes than we recommended in our consultation, we have consolidated a number of codes, and this has enabled an overall reduction in number compared to the existing set.

As mentioned previously we will introduce the facility to code two issues on one case to the post section. This should help capture complex cases more accurately.

Energy

Recommendation from consultation

We recommended that energy codes remain separate in structure from the main consumer codes and a reduction in the number of high level codes. We recommended the deletion of the marketing, metering and pre payment meters code groups and, given the expected increased use of smart meters, a new code group for them. We also proposed that the facility to assign multiple codes to a case apply to the energy section as well as the general consumer section.

Feedback from consultation and analysis

In the survey we asked **Do you agree with the addition of the new tier 2 code Smart Meters?** There was overwhelming support for this section with 21 out of 22 respondents (95%) answering yes to this question. Some respondents also provided suggestions for further codes for this code group.

There were also individual comments regarding the codes and code groups, particularly regarding billing, debt and disconnection and, metering. For billing, further changes to the existing and proposed set were suggested as respondents agreed that there was insufficient clarity between some of the codes and overlap between others. Feedback on debt and disconnection codes provided useful suggestions on how unsuitable payment methods and schemes are defined. The response to the consultation demonstrated the need to maintain the metering code group, rather than merge the associated codes into other code groups.

In addition, we have decided that information regarding detriment is at least as relevant for energy issues as it is for general consumer issues.

Final recommendation

The energy section will remain separate and we will proceed with the facility to code multiple issues to a case (see multiple coding section). The metering and prepayment meter code groups will remain and new codes have been added to to prepayments code group.

We have made substantial changes to the codes in the billing code group. We will use the suggestions for definitions to help advisers code issues more accurately.

We will also apply the new detriment fields to the energy section.

General Consumer Codes

Products and Services

Recommendation from consultation

We made numerous proposals for new codes to allow greater granularity and to reflect the modern consumer landscape. We also recommended the removal of the Broadcasting group and the creation of a Communications and Technology group.

Feedback from consultation and analysis

This area is by far the biggest area of change as it holds the largest volumes of codes. Because of these large volumes we did not ask a catch all 'do you agree' type question. Instead we invited respondents to comment on the specific recommendations.

Most of the comments concerning specific codes were unique to each respondent and therefore there was little groundswell of opinion on any particular code or code family. We have therefore tried to accommodate all reasonable suggestions.

One area where which attracted several similar views was our use of the term 'legal highs'. In light of this feedback and in response to Government plans, we have renamed this to 'psychoactive substances'.

At a more general level, some feedback suggested the need to provide greater granularity, while others expressed a concern that we were creating too many codes some of which were very specific.

OFCOM provided quite detailed feedback and suggestions in respect communication and technology related products and services.

Final Recommendations

We accept that in some cases we unnecessarily recommended separate codes to similar products and have made some changes accordingly. An example of this can be found in AG codes for Fires, Heating and Renewables where we have consolidated into one code some of the types of renewable energy systems previously separately coded. This should go some way to mitigate the risk of obsolescence incurred by using very low level code descriptions.

We have re-examined our recommendations for vehicle purchases, which we had had coded by component parts and have decided that this does not fit with how customers present their issues. We have therefore made changes to those codes.

In light of feedback and our own analysis we have made significant changes to the following code families;

- AB (home maintenance and improvements)
- AG (Fires, Heating Renewables and Energy Saving devices)
- ED, EE (new and second hand cars and vehicles)
- All I codes (communications and technology)

Having reviewed the proposed codes with a view to better use of grouping we have substantially reduced the number of codes that we recommended in the consultation.

Complaint types

Recommendation from Consultation

We recommended greater granularity in the codes for a number of complaint code families, a new complaint code family for financial services and payments related complaints. We also recommended a number of moves of complaint types into different sections.

Feedback from consultation and analysis

Feedback from the consultation was overwhelmingly supportive of the recommendation of our recommendations. 29 out of 31 respondents (94%) answered 'yes' to the question; **Do you agree with the complaint type codes and structure?** The other respondents did not offer an opinion on this question.

Although there are fewer codes than in the product/service code field, the complaint types generated an almost equal amount of comments.

In the main the comments concerned suggestions for new codes and improving how codes were grouped together.

A number of respondents have requested additional complaint type codes for animal related issues.

A significant problem with identifying complaint types is the singular 'unknown' code. Any complaint that cannot be matched to a particular code is assigned this code. This differs from the product/services section where cases related to a particular area can be assigned the appropriate other code relevant to that area. This makes analysis of these unknown codes much harder.

Further analysis carried out has highlighted the operational impact of moving codes to another area.

Final Recommendation

We will keep the code group for payment and financial services. We will not be moving any existing complaint codes to different code groups.

For certain code groups we are introducing an 'other' code. So where the issue does not exactly fit a particular code but does belong to the code group it can be assigned to the 'other' for that group. Although this plan seems to run counter to the goal of reducing the use of 'other', we believe that this will facilitate faster searches and could be used to quickly identify new complaint types that need to be added in future.

We will not be adding the specific codes for animal related issues that were requested because the volumes of calls concerning animal issues is small. However, we will keep this under review as part of our regular evaluation of the codes (see regular reviews section).

Purchase method

Recommendation from Consultation

We made several changes (mostly additions) to purchase method codes and organised them so similar purchase methods were grouped together. We felt that 'trader premises' could be broken up and provided particular types of trader premises.

Feedback from consultation and analysis

Feedback from the consultation was overwhelmingly supportive of our recommendations. 27 out of 30 respondents (91%) answered 'yes' to the question;

Do you agree with our recommended purchase method codes and structure?

One responded disagreed and the other two offered no opinion.

When invited to provide more specific comments, we received a number of suggested new codes and some concerns were raised about some of our proposed codes as well as how we had grouped them. Most of these concerns were unique to each respondent but a number were concerned we were excluding the private sales and online codes for vehicle purchases. In addition, our proposed merging of 'boot sale' and one day sale/mock auctions was not popular with some respondents.

Final recommendation

The structure of the codes will remain as is and will not be grouped by type, as this caused confusion. We have added some suggested new codes including one for SMS purchases and simplified the internet purchases that we had recommended. We have also kept separate codes for boot sales and one day sales/mock auctions. This has limited the increase in the number of codes for this category to four.

Payment type codes

Recommendation from Consultation

We recommended a larger selection of payment types be available both to reflect the different legal basis for them and to include payments utilising technology.

Feedback from consultation and analysis

Feedback from the consultation was unanimously supportive of our recommendations. All 29 respondents answered 'yes' to the question; **Do you agree with the changes made to payment type codes?**

Most respondents did not provide further comments. Some of those that did, requested specific codes be either added (SMS) or retained (Postal Orders). Others commented that some of new codes for e-money and pre paid cards could be confusing and that the meaning of bankers draft is not well known.

Having further reviewed the codes we note that there was also potential for some confusion with the proposed codes for payments utilising technology.

Final recommendation

We have accommodated most requests coming from the consultation. We have decided against using specific codes for payments utilising technology to avoid confusion and built in obsolescence. We have also moved 'green deal' to payment type and renamed it 'green deal credit', as the green deal is a form of credit.

Implementation

The changes we are making will affect how information is recorded, referred, notified and analysed. Citizens Advice will begin an Implementation Project in Autumn/Winter 2015; the project will be responsible for enacting the final recommendations proposed in this report.

The consumer service case management system (Flare), the webforms (on the public website), and the Consumer Data Warehouse (CDW) will be updated to accommodate both the changes to the existing codes and the structural changes set out in this document.

Where applicable, referrals and notifications will include the new information described in this document. Some reports, in the CDW, will be upgraded to make this information available for analysis; in particular those reports that hold complete case information will be updated to hold additional fields and reports which use coded information will contain the new codes when they come into use. We envisage that some new reports may also be needed and we will be seeking views from users on the precise nature of these, during the implementation project.

Export reports, which hold energy and post data, will be upgraded to hold the new information.

In order to minimise disruption, we will aim to implement these changes at the beginning of the next financial year (April 2016). This will enable continuity for full financial year and annual reporting. However, we will ensure that we, and our referral partners, are able to implement the changes by this time before this date is set.

Organisations, such as Trading Standards services and energy and post partners, who receive referrals and notifications from the consumer service will be affected by this change. If these organisations want referrals and notifications to automatically populate their systems, we have been advised that they will need to upgrade those systems. This will normally involve Information System providers either upgrading or replacing connectors. Organisations who do not automatically populate local systems, with referrals and notifications, will continue to be able to receive and handle referrals and notifications in the usual way.

The Implementation project will provide referral partners with information about the new coded information in good time; and where appropriate will liaise with

local Information System providers to support the amending of their coded information e.g the schemer.

We understand that automatic connectors are utilised for the most part by Trading Standards services. We have had discussions with some of the local Information Systems providers, who provide Trading Standards service systems, and from these discussions it is clear that the cost of upgrading their systems will vary depending on who they are contracted with and the nature of those contracts.

We are in discussions with the Department for Business Innovation and Skills to agree how the costs to Trading Standards can be funded. Regardless of the outcome of these discussions, the implementation project will work with Information System providers to ensure, as far as possible, that costs to Trading Standards services are kept to a minimum.

The Information System providers who have engaged with us have advised that costs are likely to be 'one off' and that reasonable future changes will not incur additional cost (further details in Future Reviews section). We would encourage all referral partners to make the recommended upgrades, to connectors, and to take this opportunity to use the new codes rather than their own. This will facilitate much better information sharing across the landscape and make future updates easier to implement.

Future reviews

A key reason why we are making changes is to make sure that we can capture the modern consumer landscape. However, the consumer landscape continually evolves and it is therefore important to regularly assess the codes to ensure they remain relevant.

We will therefore introduce a regular review of the consumer codes. There will be an annual review, which will check that the existing codes are still fit for purpose and make any necessary changes. Every three years this review will be more in depth in nature and look at the overall structure e.g. code fields. We will also use these reviews to check whether we have the right processes in place for multiple coding. Stakeholders will be invited to feed into this process.

In deciding on new codes, we have tried to maintain a reasonable balance between the need for granularity and the need to keep the number of codes down to a manageable level. Following feedback from the consultation that we were creating too many codes, on occasions we have provided a code that is set at a slightly higher level than we originally recommended in the consultation. These future reviews can be used to check whether the level of granularity remains appropriate.

In order to minimise disruption, particularly to reports, future reviews will generally take place at the same time each year with implementation likely to be at the beginning of the new next new financial year. Changes to codes will be provided to information system providers three months prior to that date. Occasionally there may be a need to change codes mid-year e.g. following legislative change.

Referral partners should check with their information system providers to understand if there are any cost implications to them in implementing any future changes. As mentioned in the previous section, we have been advised by a number of providers that there should not be any additional costs beyond their set contract price provided that;

- changes are made in an organised and predictable way, and
- where necessary, they adopt the new connectors mentioned in the previous section.

We will establish a mechanism by which stakeholders can feed into future reviews by making suggested changes. We envisage that this mechanism will be active every November/December.