



CLAIMS STANDARDS COUNCIL

**RESPONSE TO THE
BOLEAT REPORT**

JANUARY 2006

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Introduction

1. At the request of the Department of Constitutional Affairs, the Claims Standards Council (CSC) has prepared this written response to the Boleat Report. It should be noted immediately that the response goes beyond issues raised by Boleat and is based not only upon our detailed knowledge of the market but also some recurring issues revealed by our discussions with other Regulators. This latter aspect is important given also intimate involvement with the development of another regulatory regime - the Security Industry Authority – supplemented by concerns raised during consideration of the Compensation Bill in the House of Lords.
2. In short, this CSC response focuses upon the structural and organizational changes it has to undertake as an organization to demonstrate that it is 'fit for purpose' to be a front line regulator. As a thread of equal importance, the response also identifies the types of issues that have to be dealt with effectively and simultaneously as the CSC begins to develop and implement that regulatory framework.
3. The response proceeds by defining the challenges facing any attempt at regulating those who handle claims for compensation; reviews the key elements in the two dimensions in which the CSC would be required to manage change; describes some preferred options for managing such change and finally provides a matrix that identifies at summary level a proposed a timescale and sequential approach by which activities in relation to them would be completed.

The Claims Handlers Environment

4. Boleat is very clear – and this mirrors our own direct experience – that *'establishing a new regulatory body is a complex process'*¹. The Report goes on to describe some of the unique features of the environment in which the CSC has operated and which raise very difficult issues for any regulatory body to both confront and to overcome. Without dwelling too much on this aspect of Boleat's accurate (if understated) analysis, four key points need to be made to emphasize the nature of the challenge already faced by the CSC during the last year or so.
 - a) Deep rooted opposition to any form of regulation and accountability has led to CSC staff being threatened and assaulted and writs have been served in an effort to stifle CSC effectiveness. Nevertheless without adequate funding and resources, the CSC has prevailed to become a visible rallying point for those stakeholders who support regulation. Retaining the active participation of this small but broad base of support will be critical to developing a regulatory framework
 - b) No previous attempt has been made to introduce a regulatory regime into such a hostile environment and one that will strongly resist change. Once again the unique standing of the CSC; its achievements and knowledge of abuses and abusers provides a robust base upon which to create a bespoke regulatory model
 - c) The under funded CSC has achieved a considerable track record of deliverables in many regulatory dimensions not least in commanding

¹ Boleat Report 2005 Page 1

respect and active support from consumers and consumer organizations. In this sense a properly resourced CSC offers the best opportunity for speedily and effectively implementing robust regulation of the form demanded by consumers requiring protection

- d) Those who comprise the CSC organization (Board members and Advisory Council) are wholly independent and have no commercial interests within the industry. It is important to record that despite the difficult conditions in which they have operated, each unequivocally has stated a firm intention to continuing the work they have already started.

Dimensions of 'change'

5. In the situation graphically described by Boleat - *absence of best practices or readily available models for introducing a regulator; widespread ignorance of the size and nature of the business or way in which claims management companies operate*² - a robust approach to managing change is required. By this is meant a process of developing and then implementing a planned approach to change in:
 - a) The CSC structure and the way it operates
 - b) as well as those individuals and entities who will be affected by Regulation
6. Apart from being an all inclusive plan it is important to maximize and retain the collective efforts of all people involved in the change.
7. Put another way, this response by the CSC focuses on the **processes** for change as well as the **outputs or results** of managed change as it is recognized that the goal is to bring about fundamental changes to behaviour and operational practices within both individuals and entities, many of whom have long eschewed any accountability for their actions. Furthermore, once appropriate changes have been implemented the aim is that they become internalized by those regulated and are daily evidence in the quality of services delivered as well as the manner in which they go about their business.
8. The conclusion here then is that the CSC has to change in the way in which it is structured and operates as well as simultaneously to act as an agent for change in those it could be invited to regulate. An ancillary goal is to affect the manner in which individual consumers and their advisors approach claims for compensation in terms of individual responsibility for their actions in the events leading-up to a potential claim.

Change and the CSC

9. The first dimension of change is those activities already underway and planned that could be clustered as '**organizational**' such as:
 - a) Attaining sufficient financial/other resources/providing stewardship of them
 - b) Divestment of 'trade association' activities
 - c) Extending Independence and Governance structure to include experts and lay members

² Boleat op cit page 11

- d) Fine-tuning the Company and Legal structure
 - e) Withdrawing from commercial sponsorship activities
 - f) Operating rigorous and effective 'back-office' support
10. The second aspect of programmed change relates to a cluster of what might be termed '**regulatory**' activities whilst the CSC seeks to demonstrate 'fitness for purpose' as it transforms from a voluntary regulator to one operating within a statutory framework. The more important elements here (in alphabetical rather than priority order) include:
- a) Advising the trade association on accreditation and training requirements
 - b) Delineating boundaries with other regulators/addressing any gaps
 - c) Delivering public education strategy and material
 - d) Developing 'professionalism' standards
 - e) Effectively monitoring and auditing companies and approved individuals
 - f) Gaining OFT and Stakeholder support for the Code of Practice
 - g) Introducing Disciplinary Procedures
 - h) Implementing Complaints and Redress Arrangements
 - i) Launching initiatives to place the consumer at the heart of the claims process
 - j) Operating within Accountability Protocols to the Secretary of State
 - k) Providing Professional Indemnity and possible Compensation Arrangements
 - l) Scoping the regulatory framework, particularly in terms of who is and is not to be regulated and to 'future-proof' the controls
11. There are clearly a number of direct links and inter-relationships between these two change dimensions but importantly for delivering the changes successfully there are a number of distinctions. The most important of these are the level and nature of skills or resources required to complete the change process as well as the time taken to do so.

List 1 – '*Organizational*' changes

12. Thus points (b) to (f) inclusive of the first list – organizational changes – are comparatively easy to achieve and work on them has already commenced. For the record the current situation is as below:
- Divestment of 'trade association' activities
 - A new entity – the Claims Standards Institute (CSI) – has been formed and a date announced for the transfer to it of all trade association activities. It will operate wholly independently of the CSC which will cease to have 'Members'
 - Extending Independence and Governance structure to include experts and lay members
 - There are a number of interesting best practices here – such as that recently adopted by the Law Society and other regulators – which are being reviewed in conjunction with stakeholders (particularly consumer organizations) so that formal recommendations can speedily be placed before the Secretary of State. The form of structure to be recommended is directly related to 'accountability protocols' as a regulator (see item (j) of the second list)

- Fine-tuning the Legal structure
 - The original legal and company structure reflected an intention to act as a voluntary regulator and lawyers are currently redefining both elements in view of the Boleat recommendations as well as best practice identified within the structures of other regulators.

- Withdrawing from commercial sponsorship activities
 - The term 'commercial sponsorship activities' is something of a misnomer. Simply put, five founder members were provided an opportunity to make significant financial contributions to kick start and to support the on-going costs of the CSC. This was publicly acknowledged in three ways, namely appearance on the CSC website; banners at CSC events and an entry on CSC publications. No commercial advantage was ever offered or sought and such support from a critical core of influential companies reflecting each category of stakeholder was essential both to survive and to attach credibility.
 - The five founders have now provided sufficient funds to cover running costs for the next two months and at the end of that time all references to them on the website will cease. Logos on Banners and paucity Publications has already ended.
 - To further counteract any perception that the CSC has commercial interests, Andy Wigmore has resigned as a Director (which leaves only those independent of any commercial interest) and options are being explored to move the location of the registered office

- More effective back-office support
 - The recent increase in funds has enabled the development and implementation of more effective administrative; financial and IT systems with which to support all activities of the CSC. At the same time the enhanced support has provided a springboard for a more proactive rather than reactive organization.
 - The most significant feature of this revival has been the ability to successfully encourage new members (including some of those identified by Boleat) and more easily to cope with weekly bulletin. Membership has fluctuated during the last year but generally upwards and currently stands at 114 plus 20 being processed (See list at Appendix 'A'); the weekly bulletin is forwarded to 7113 individuals - 512 different organizations
 - Traffic on the website is significant -
 - Nov - 1809 unique visitors - 132026 hits
 - Dec - 1453 unique visitors - 95722 hits

13. The most difficult aspect of the first list relates to funding and this was recognized by Boleat as a key issue both in terms of the low level of financial support from the industry since the CSC was formed and the extreme difficulties for 'self-funding' as part of a statutory framework³. Even with the generosity of founder members and key staff working on a *pro-bono* basis, membership fees do not meet even the most basic costs for operating as a regulator.

Delivering on List 1

14. Against such background the ability of the CSC is severely handicapped should it seek to transform itself into an effective regulator or even to act as an Adviser to some other regulatory structure in the timescale envisaged in the Compensation Bill. More than that, even the most optimistic scenario relating to the impact of regulation on the industry points to a significant fall in the number of entities and individuals from which fees could be drawn.
15. Boleat again describes similar problems faced during the introduction of regulation in other areas⁴ and this complements our direct experience of the Security Industry Authority where calculations were made on a potential population to be licensed of over 600,000. Given the failure to attract sufficient funds in the last year and the expectation that there will be an exodus from the industry, the CSC identifies no other viable option than pump-priming regulatory development by resources being made available from Government.
16. Finally in respect of List one – structural changes – as described above much work capable of being addressed from within our existing merge funds and specialist support has already been set in train. Those items together with the time that will be taken to complete the work are shown in summary form as the yellow and green objects on the matrix at Appendix 'C'.

List 2 – 'Regulatory' changes

17. As mentioned earlier, this response distinguishes the ***processual*** elements of managing change from the ***outcomes***. Whilst both are self-evidently important in the development of a regulatory framework, the main focus is essentially upon process rather than what is delivered. There are two reasons for this. First unless sufficient thought and resource is given to the ***means*** and the way in which the process will be ***planned and managed*** there are severe risks that the ***ends or outcomes*** will meet what is desired or envisaged in the Compensation Bill.
18. Second, given the cautions often repeated in the Boleat report about *absence of best practices or readily available models for introducing a regulator; widespread ignorance of the size and nature of the business or way in which claims management companies operate* – a focus upon processes that harnesses the experience; knowledge; motivation and network encompassed within the CSC is essential.

Processes for managing 'regulatory' changes

³ Boleat op cit, pages 29 – 33 inclusive

⁴ Page 31

19. From this standpoint it appears that any evaluation of the degree to which the CSC is 'fit for purpose' needs to understand its ability to manage the following key processual issues, namely:

- a) Credibility as an organization deputed to project manage or to be engaged in the development of a regulatory framework and potentially to act as a regulator during such process
- b) Identification of best practices and evaluation of their relevance to the regulatory framework as well as defining proposals of how and when they could be implemented
- c) Mechanisms to:
 - Engage with and sustain the support and active participation of other stakeholders
 - Continually monitor and evaluate potential blockages to progress and to implement strategies to overcome them
 - Identify and harness a variety of resources and interest groups
 - Provide regular, accurate and targeted briefings to interested stakeholders
- d) Perceptions of the integrity and inclusiveness of the process and willingness to be accountable
- e) Competence at managing any resources made available from official and other sources

Delivering on List 2

20. This section addresses the five aspects of the process for handling **regulatory change** in a manner that allows further assessment of the degree to which the CSC is fit for purpose. Once again the discussion around each point is grounded in real achievements before moving on to deal with proposals to manage the process of developing an effective regulatory framework rather than defining the final content of that framework. By its very nature the outputs of managing the process of creating a regulatory framework cannot yet be specified.

a) Credibility

21. Initially the CSC struggled against considerable odds to carve-out credibility as a regulator and a force for positive change within a diverse range of stakeholders, despite the **reputation, independence and integrity** of its Advisory Council. However the situation improved in February 2005 when we recommended that voluntary regulation had failed and that statutory regulation was the only viable option. Indicators of the 'improvement' included an **increase in membership** spread more widely amongst all stakeholder groups; the number of invitations for the CSC to act as 'honest broker' in resolving intractable problems (the most recent being endowment mis-selling) and the increase in active support for a variety of initiatives ranging from rehabilitation to fast track.

22. The second major element of credibility is the degree to which increasing numbers of ***influential organizations supported, contributed to and echoed the message*** that we were spreading – particularly once we started publicly to ‘out’ malpractice and took the first tentative steps at creating a regulatory framework. Such instances are well document and need no further elaboration here.
23. The third major element of credibility we believe is the ***consumer response*** where we have seen a significant and sustained increase in written and electronic traffic where individuals and their advisers either seek impartial and objective advice; wish to complain or identify malpractice. The media have been very supportive of the manner in which we have laid out an implemented the CSC strategy to attain the ethical high ground.
24. We believe that this provides a sound base for the Secretary of State to have the confidence to appoint the CSC as a credible option to develop the regulatory framework and simultaneously to act as a regulator. Indeed in many ways such ***public endorsement by the Secretary of State will resolve questions about CSC credibility***. That said, if appointed it would be a driving principle that the entire manner in which the CSC conducted itself as well as its team, enhanced rather than detracted from credibility.
- b) Identification of best practices/evaluation of relevance
25. The brief history of the CSC is replete with examples of identifying; evaluating and implementing best practices and other techniques for managing regulation and placing the consumer at the heart of the claims process. The skills required here are ‘bread and butter ***research skills***’ importantly tempered by our ***triple unique insights***: knowledge of the market and players in it; detailed understanding of consumer expectations and heightened awareness of the realistic aims and objectives of regulation.
26. In summary members of the CSC have a long experience of evaluating best practices and tempering their introduction to challenging practical environments – including regulation – and many more opportunities to identify relevant practices have recently been opened.
- c) Mechanisms to engage stakeholders; continually monitor/evaluate potential blockages; to identify/harness resources and provide regular briefings
27. These four elements of project management will be addressed at the same time as they are all closely interlinked. The first two elements are also directly related to the discussion on points (a) and (b) above.
28. As previously mentioned, the CSC is largely ***aware of all relevant stakeholders*** that would be involved in the various stages of developing and then ‘buying into’ a regulatory framework and to a large extent already has a ***positive relationship with most of them***. Even those who have been most hostile to the CSC have begun publicly to change their stance largely as a result of ‘behind the scenes’ discussions we have initiated. That is not to suggest that engaging with all stakeholders and sustaining their active support is necessarily plain sailing; quite the contrary as given the numbers involved; their various and often competing agendas and history of their relationship to the CSC; such relationships will require sensitive handling.

29. That said, the position is somewhat eased by the Compensation Bill and the debates surrounding it which have **clarified the general shape and form of regulation required** as well as some of the **major issues to be confronted**. In other words there is generally a common agenda about what needs to be done and the various shades of opinion from stakeholders are evident from their current stances. The CSC has visibly its prowess at engaging with and then managing stakeholders from a wide spectrum of the industry.
30. In a similar way such recent experience has amply demonstrated skills at environmental scanning to identify both treats and opportunities to CSC strategy and then to either deflect the problems or to harness fully the opportunities. The ability to rise above the detail and daily minutiae of acting as the CSC and to take an objective, emotionless view of progress; direction and failings is second nature to those involved in managing or advising the CSC.
31. That said, it would be our intention immediately we are told publicly that we are fit for purpose to **invite key stakeholders** to do the following:
- a) Assist us to reinforce membership of the Advisory Council by ensuring appropriate membership from each stakeholder sector
 - b) Nominate representatives to act as a Steering Committee for the project of developing all elements of the regulatory framework
 - c) Second key staff to the CSC for delivering on at least the issues in Lists 1 and 2
 - d) Assist in an audit of back-office staff, IT and processes to ensure that they are suitable for supporting the project
32. This approach as the response would be then publicly announced together with clear **facilities for other individuals and bodies** to submit recommendations and offers of resources or other assistance, as well as to be update on progress. In addition the process will allow identification at an early stage of the nature; location and skills base of any other resources available. There are a number of best practices here where other bodies, including regulators, have involved stakeholders and particularly consumers or their representatives and have effectively managed sustained productive engagement.
33. Such best practices also provide the basis for **targeted briefings and information exchanges**. This is something CSC recent history has demonstrated a particular flair for; in terms of communication medium; timing; content and objectives attained as well as an ability to reciprocate effectively to feedback. We envisage continuing to use such techniques as focus groups; regional and functional briefings; brochures, leaflets and other written publicity as well as the visual media; websites; surveys and telephone uses.
- d) Perceptions of the integrity/inclusiveness and accountability
34. Whilst we believe that the Boleat report is positive about the integrity of the process that the CSC has utilized to inform others about the nature of regulation required, it is recognized that more needs to be delivered. In particular the CSC needs to be seen to be accountable to the Secretary of

State for its processes and outcomes and the inclusiveness of the developmental process.

35. There are a number of existing best practices here supplemented by CSC experiences in other area and some broad 'pointers' enshrined in the Compensation Bill. They need no further elaboration here; suffice it so say that there are some practical options to be brought forward at the appropriate time.

e) Competence at managing resources

36. In our experience there are many well established techniques (many of which we have used) for **maximizing the output from diverse resources; acting as effective steward of those made available from other sources and for being accountable**. Such techniques are the embodiment of the process whereby complex projects such as that envisaged are managed. The CSC is prepared to demonstrate its familiarity and use of such skills and methods should the occasion arise.

Conclusions

37. The current staff and Advisory Council of the CSC unequivocally and publicly avow their intention of seeking to become a front-line regulator and do so in full knowledge of what is entailed. In that sense their achievements in the last year or so against a particularly hostile environment and one where no ready signposts existed, has indicated two important elements of fitness for purpose: **willingness and ability**. To survive the organization and its managers had to be **singularly determined; able to implement a strategy that delivered consumer interests and skilled at judiciously balancing competing demands from other stakeholders**.

38. In this response the CSC has added further important features of its claim to be found fit for purpose. They include but are not limited to **work already achieved or under way in respect of the structural changes comprising List 1 and the recommended process for delivering List 2**

39. Finally, the largely unpaid 'hobby' of the last fifteen months has culminated in an **unrivalled degree of expertise and knowledge essential to the development of a regulatory framework**. If the CSC is not found fit for purpose then we would be very reluctant to sever any relationship in future developments and would offer-up options for continued involvement.

APPENDIX 'A'

MEMBERSHIP LIST

List of paying members at £60 per month + VAT	
<ol style="list-style-type: none"> 1. 1 Legal LLP Solicitors 2. 1st Class Legal Ltd 3. Accident Advice Helpline 4. Accident Angels (UK) Ltd 5. Accident Claim Help Line Ltd 6. Accident Claims 24-7 7. Accident Compensation 8. Accident Injury Claims Ltd 9. Accident Logistics Ltd 10. ACR Car Hire 11. Adeva Claims (UK) Ltd 12. ALA Ltd 13. Alexander Samuel and Co 14. Anderson Eden 15. Assert Personal Injury Advisers 16. ATB Enterprises (UK) Limited 17. Audit Marketing Ltd 18. Automobile Association 19. Barber & Co Solicitors 20. Beresfords Solicitors 21. BOE Group 22. Britannia Accident Assist 23. Brunel Franklin & Company Limited 24. Call 24-7 Ltd 25. Causa Limited 26. Claim Assist (UK) Ltd 27. Claim2Day Ltd 28. Claims Assist UK Ltd 29. Claims Direct 30. Claims Exchange 31. Claims4Free 32. College of Personal Injury Investigation 33. Complain2us Limited 34. Consultant Medical Reports 35. Countrywide Legal LLP 36. Crashcare 37. Crosse and Crosse Solicitors 38. David Gist Solicitors 39. Duncan Sanderson Associates 40. Eaton Legal Services 41. Elision 42. Emsleys Solicitors 43. Endowment Claims LLP 44. Endowment Compensation Recovery Unit 45. Endowment Justice Ltd 46. Endowment Misselling Services Ltd 47. Endowment Redress Limited 48. Entitlement Limited 49. Evolution Legal Service Ltd 50. Expert Witness (Care) 51. Express Claims UK 52. Ezee Legal Services Ltd (Ezee Claim) 53. F&I Solutions Ltd 	<ol style="list-style-type: none"> 62. Health & Case Management Ltd 63. HewittMrozek Investigations Ltd/ FastClaim Ltd 64. Hinchliffes Solicitors 65. Independent Case Management Consultancy Ltd 66. Injury Bureau Ltd 67. Injury Claims Solutions 68. IOMA Insurance 69. Keypoint IMS Ltd 70. Legal Advice Bureau Limited 71. Legal And Court Services Ltd 72. Legal Claims Bureau 73. Legal Disbursement Funding Limited 74. Legal Reports & Services 75. LitAid Ltd 76. LoanCheck Legal Services Ltd 77. London Claims Management Ltd 78. Magnus Insurance 79. MDH Marketing Ltd 80. medi-fiche 81. Metis 82. MGN Limited 83. Moore and Blatch 84. NWA Claims Management 85. Paul Rooney Partnership 86. Personal Injury Careline 87. Phoenix Accident Investigation 88. Pics Ltd 89. Premex 90. Premier Accident Management UK (Yorkshire) Ltd 91. Principal Claims 92. Progress Vehicle Management Limited 93. Qdos Accident Assistance Limited 94. Quality Rating 95. Right2claim.co.uk 96. Road Traffic Accident Law Ltd 97. Ross Aldridge Solicitors 98. Russell Jones & Walker 99. Saltire Compensation Claims Service Legal Ltd 100. Service Legal Ltd 101. Simple Claims 102. SLS Accident Management Ltd 103. Solutions Group 104. Speed Medical Examination Services Limited 105. The 100% Compensation Company 106. The Claims Company 107. The Endowment Partnership 108. TJ Legal Solicitors 109. Trauma Claims Consultancy Ltd 110. UK Independent Medical Services

<ul style="list-style-type: none"> 54. Fast Track Legal 55. Fast rack Claims Ltd 56. First4claimsuk.com 57. Fox Indemnity Limited 58. Free claim IDC Plc 59. Goodmans Solicitors 60. Graham M Riley & Co 61. Greene Wood & McLean LLP 	<ul style="list-style-type: none"> 111. Umbrella Claims 112. Ward Hadaway 113. Wheels at Once 114. Whitehall Randall & Associates Limited 115. Wirral Claims 116. Woskow Brown Solicitors
List of applications currently being processed	
<p>Accidental claims</p> <ul style="list-style-type: none"> 1. Industrial Diseases & Injuries Claims Limited (ID& 2. The Financial Reclaims Company Limited 3. legalwatch.co.uk 4. FCR UK Limited 5. Claimsmastergroup.com 6. Investor Compensation Plc 7. Leapfrog Accident Management 8. Lawyers 4 All Ltd 9. Inter Resolve Holdings Ltd 10. Stirling Financial Services Limited 11. Keystone Legal Benefits 	<ul style="list-style-type: none"> 12. Claims Master UK 13. Proddow Mackay 14. Yorkshire Claims 15. Accidents Direct 16. Sky Accident Claims ltd 17. Accident Claims UK Ltd 18. Pennington Marketing 19. Avalon Solicitors 20. - Applegate Claims Ltd

‘FIT FOR PURPOSE’ ACTIVITIES AND DRAFT TIMETABLE

Element	Item	2005/2006										
		Dec	Jan	Feb	March	April	May	June	July	Aug	Sept	
Administration	Refine text on Website	♦	♦									
	Publish Annual Report		♦									
	Redraft Members' Rules		♦	♦								
	Assess Funding Requirement		♦									
	Define Staffing Needs		♦									
	Define Accommodation Need		♦									
	Clarify Fee Arrangements		♦	♦								
	Issue Business Plan		♦	♦								
	Hold AGM		♦									
	Announce CSI Formation		♦									
Form CSI								♦	♦			
Scoping	Define scope of regulation		♦	♦	♦							
	Form Steering Group			♦	♦							
	Define scope by activity			♦	♦							
Codes	Redraft following Feedback	♦	♦	♦								
	Stakeholder Consultation		♦	♦	♦							
	Attain Member Endorsement		♦	♦	♦							
	OFT Application and Approval			♦	♦		♦	♦	♦			
	Launch Consumer Publicity				♦							
Structure	Refine Arts and Memos		♦									
	Accept Arts and Memos		♦									
	Appoint Board		♦									
	Appoint Governing Council			♦	♦							
	Initiate Committees etc			♦	♦							
	Make Case to be Regulator			♦	♦	♦	♦	♦	♦			
Membership	Target major new members	♦	♦	♦	♦							
	Develop Accreditation Rules		♦	♦	♦							

	Members Ratify											
	Implement Accreditation											
Compliance	Develop Monitoring Process											
	Develop Monitoring IT											
	Introduce Self-Audit											
	Initiate Targeted Policing											
Complaints	Develop Investigative System											
	Ratify System											
	Appoint Independent Panel											
	Launch and Publicize											
Discipline	Develop System											
	Ratify System											
	Appoint Independent Panel											
	Launch and Publicize											
Consumers	Create/use Focus groups											
	Develop Satisfaction Tools											
	Pilot Tools											
Support	Deliver case to DCA for help											
	Identify Members to assist											
	Identify Stakeholders											
	Identify Other specialists											
	Draw-in all support											