

## To whom it may concern,

I write in response to your consultation on the Welsh justice system.

### Resolver

Resolver is the leading free and independent support service for UK consumers.

We work with consumer advocacy groups across the UK to develop an integrated approach towards consumer support. Resolver strives to enable self-support for consumers, but also guides those that need additional assistance into the correct channels.

We welcome this consultation and are grateful for the opportunity to comment.

### [Resolver.co.uk](https://www.resolver.co.uk)

Our first service was Resolver.co.uk, a website designed to support consumers as they navigate the UK's complaint resolution processes. Resolver does this by explaining the consumer's rights, providing email templates, guiding them as they prepare their submissions, recording all communication on the matter at hand, keeping all relevant information within an electronic case file, and reminding them to escalate their case at the appropriate time to the appropriate ombudsman or regulator. If a consumer chooses to escalate their case, Resolver packs it up and sends it for independent assessment by the appropriate adjudicatory organisation.

We do not act on behalf of the consumer. Instead, we provide them with the tools they need to handle their case themselves. Resolver learns from the collective experience our users to deliver a better consumer experience and more appropriate outcomes. By empowering the consumer, one Resolver customer service agent can support 250,000 live consumer cases.

Our service key statistics

- 19 million consumers have been provided with advice and guidance.
- Resolved 3.8 million issues including 162,583 in Wales.
- £2 billion of issues have been resolved.
- 17% of UK adults know about Resolver (according to YouGov survey March 2018).

Market engagement

- Resolver is engaged with the consumer market, Ofgem, Ofcom and Gambling Commission link to Resolver providing an independent channel for consumers.
- The Gambling Commission requires gambling firms to work with Resolver to ensure consumers have a supported independent channel for raising and resolving issues online.
- Resolver data is currently used by BEIS and the CAA. Other government departments are currently in discussion.
- Resolver has partnered with the Consumer Council for Northern Ireland to build specific processes for Northern Ireland with a joint referral approach to deliver an integrated offline/online approach to supporting consumers.
- Resolver has integrated with Advice Direct Scotland (contracted consumer phone support in Scotland), allowing agents to raise cases for consumers.
- HMCTS uses Resolver as its main and electronic submission channel for consumers to raise issues with the Courts and Tribunals.
- Resolver will be directing a marketing campaign with the CMA to help promote consumer rights.

- Resolver and Transport Focus are collaborating in the travel sector and are focused on supporting train companies to deliver better services.
- Resolver is engaged with the Scottish Government, CCNI and the CMA looking at postal charge mapping.
- Resolver is the only third party able to use the Moneysavingexpert brand and we are linked to them from a number of points from their website and help their users to resolve issues.

### Ethics

We're conscious that we're delivering a public service and that consumers are placing their trust in us. As such we take our role very seriously. We do not sell the consumer's data, market to them or display adverts. Our services will always put consumers first.

### Revenue model

Resolver is a free service for consumers. It doesn't cost businesses anything to receive cases from Resolver. Our commercial revenue comes from the following services:

- Decider – a software as a service resolution platform, an online court or Ombudsman platform. The infrastructure supports resolution of appeals and unresolved issues within a tribunal, Ombudsman and advocacy firms in the UK.
  - o Decider is operating in Tribunals, energy, telecoms, parking, shortly rail and finance.
- Analytics – Resolver provides anonymised benchmarking and insight data to government, regulators and other organisations. Resolver helps them understand the root cause of issues and trends. We provide insight into the quality of an organisation's service, offering the capacity for benchmarking against their peers.
- Prediction – Resolver has developed a service that automatically identifies markers of vulnerability so that consumers can be offered the appropriate support and guidance.

### The delivery of justice in Wales

Wales, as with other parts of the UK, is negatively impacted by a confusing system of consumer redress outside of the courts. People facing issues are often poorly informed as to their immediate rights and often view the justice system as being a costly last recourse. The justice system would be well served by a reformed adjudicatory landscape, offering consumers better access to redress for common issues that need not necessitate legal proceedings.

The current network of ombudsmen, regulators and independent adjudicators is difficult to navigate. Varying timeframes for submission, different requirements for eligibility and the wildly different powers granted to adjudicatory bodies make for an inconsistent consumer experience.

Resolver believes that Wales would benefit from a reformed system of consumer redress that integrates with the justice system. We envision a single, unbroken consumer experience that starts with an issue and ends with a resolution, regardless of the complexity of the issue and the number of organisations involved in delivering the outcome.

In the past, Resolver has worked with the Traffic Penalty Tribunal to develop the UK's most efficient tribunal. The majority of consumers interact with the TPT online, yet the traditional paper or phone consumer journey is also supported. TPT has increased workload without increasing the demand for resource with personalised support for vulnerable consumers.

Resolver believes that an attainable objective for Wales should be the swift resolution of issues and the provision of transparent justice, open to all through whatever channel they wish to use.

Wales has a centralised population, but the delivery of redress nonetheless faces significant geographical barriers. This means that technology that delivers resolution over long distances is key.

At the moment, the consumer landscape is fragmented. The infrastructure does not deliver an equal experience for consumers across the country. Consumers often have to choose between pursuing redress

via physical or electronic means, and there is little to no interaction between the different mediums of resolution. This means that consumers in remote areas who face distinct local issues can feel stranded.

We believe that devolution will improve the degree to which these local issues can be addressed. We would stress, however, that improvements need to be made to the infrastructure available to consumers in remote areas to give them access to a consistent system of redress, independent of location.

We would be eager to discuss this with you in greater detail.

Yours faithfully,

**James Walker, Founder and Group CEO**