Some Failings of Consumer ADR Policy

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Abstract

The promotion of consumer alternative dispute resolution (ADR) has been a consistent policy of the UK Government and appears to be well used. This article addresses two issues. The first is institutional arrangements for consumer ADR policy. The second is the availability of information about the performance of consumer ADR schemes. The argument is that the current institutional arrangements are flawed and that although there is some useful information publicly available to assess the performance of consumer ADR as a whole, it is not easily accessible and has not been used very much. Until these matters are addressed, it is not possible to evaluate the performance of consumer ADR properly and to develop appropriate policies.

Keywords: consumer; alternative dispute resolution; Ombudsman; information; complaints.

[A] INTRODUCTION

Promoting or encouraging alternative dispute resolution (ADR) for consumer disputes with businesses has been a long-running policy of UK Government and has survived numerous changes of government (Department for Business, Enterprise, Innovation and Skills (BEIS) 2022). There are lots of consumer ADR schemes and, in the form of the Financial Ombudsman Service (FOS), the United Kingdom (UK) is home to the largest consumer ADR scheme in the world dealing with up to half a million cases a year at its peak. Not only has the number of schemes grown, but the techniques used have seemingly had an influence on reforms to the small claims procedure in the county court and the creation of Money Claims Online (Ministry of Justice 2021). Why, then, am I talking about some failings of consumer ADR?

Research and evaluation of consumer ADR schemes in the UK has been patchy and the results have not always been positive. Consumer activists have produced very negative evaluations of consumer ADR (Dewdney & Williamson 2016; 2018; Lewis & Ors 2017). FOS has been subject to critical commentary and evaluation (Hunt 2007; Lloyd 2018; Treasury Committee 2022). The limited research evidence that is available suggests that the users of consumer ADR are not representative of the population as a whole, being largely older white males, well-educated and more affluent (BEIS 2018: 14-15). There has also been a long-standing criticism of consumer ADR for providing second-class justice as opposed to the courts (Genn 2009: ch 3). This essay does not explore these lines of criticism but takes a different angle. It focuses on two issues: the institutional arrangements for consumer ADR policy and the information that is available about the performance of consumer ADR schemes. The argument is that the institutional arrangements are flawed and that, although there is some useful information publicly available to assess the performance of consumer ADR as a whole, it is not easily accessible and has not been used very much. Until these matters are addressed, it is not possible to evaluate the performance of consumer ADR properly and to develop appropriate policies.

[B] THE INSTITUTIONS OF CONSUMER ADR

Consumer ADR is seen as part of consumer policy, and so responsibility is vested in BEIS. Given that ADR is about the resolution of disputes, it is surprising that this is not part of the brief of the Ministry of Justice or His Majesty's Courts and Tribunal Service (HMCTS). This has, however, always been the position. The result is that whatever expertise in dispute resolution that the Ministry of Justice or HMCTS has because of their roles in relation to the courts and tribunal system, this is not readily available to BEIS, and *vice versa*, although the Government has said that BEIS will work with the Ministry of Justice to help and support their policy analysis (BEIS 2022). There is apparently no forum where lessons can be learned across courts, tribunals and ADR systems.

The framework within which consumer ADR works is provided by the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 (the ADR Regulation) which have their origin in the European Union (EU) ADR Directive (Directive 2013/11/EU). These regulations do not make it compulsory for sectors of the economy to establish consumer ADR schemes, nor do they make it compulsory for traders to join a consumer ADR scheme. Nor is it compulsory for an ADR scheme to seek approval under these

regulations. The result is a wide variety of arrangements existing in the UK. Not all sectors have ADR schemes and not all traders are members of ADR schemes. Since each consumer ADR scheme is based in a sector, they each have their own rules and jurisdiction which limit their activities. Whether or not these legal rules will remain in place after 2023 is currently an open question because the Retained EU Law (Revocation and Reform) Bill which is currently before Parliament envisages the revocation of regulations such as the ADR Regulation by the end of 2023, unless time is extended by a ministerial decision. The Bill also gives power to ministers to replace such regulations. Regardless of the future of these legal rules, the argument in this article still holds because the existing arrangements will not cease to function at the end of 2023. Certain schemes, notably financial services but also energy, have independent statutory backing which is not going to disappear while there would seem to be no incentive for the voluntary schemes to cease operating.

In order to be approved as an ADR scheme, an organization has to meet the criteria set out in the ADR Regulation which cover issues such as accessibility, impartiality, transparency, fairness, legality and effectiveness (ADR Regulation, sch 3). The decision is made by a competent authority, and there are currently eight; seven covering certain regulated sectors and one, the Chartered Trading Standards Institute (CTSI), acting as a delegate of the Secretary of State covering all the rest. Regulated industries means financial services, energy, gambling, airlines, telecommunications, legal services and estate agents (ADR Regulation, sch 1). This list is odd because it omits two other regulated sectors: water and rail. Arguably, buses and post could also be considered regulated sectors. These sectors have their own ADR schemes, although water sits outside the usual arrangements as customers do not have a contractual relationship with water companies. Everything else is referred to as a non-regulated sector.

As mentioned, the functions of the Secretary of State under the ADR Regulation have been delegated to the CTSI. The CTSI is largely a professional membership body for trading standards professionals, but it also undertakes related work. This includes acting as a competent authority to approve ADR schemes in industries which are not regulated and keeping a list of approved ADR schemes which can be found on its website. The ADR Regulation also provided that there should be a report on the development and functioning of ADR entities by July 2022 which identifies best practices, shortcomings and provides recommendations to improve the functioning of ADR entities (ADR Regulation, para 18). I do not think that this report has yet been done.

As an aside, there is an elephant which is not in the room. The body with overall responsibility for the enforcement of consumer law in the UK, the Competition and Markets Authority (CMA), has no oversight or responsibility for consumer ADR. Its focus is on the enforcement of consumer protection law, as well as having significant other responsibilities in competition law and related fields. This is an odd omission given that, at least, consumer ADR schemes might have some information about potential enforcement issues.

There are currently 60 approved ADR entities in the UK according to the CTSI website.[1] This is not a complete list as it does not include the Legal Ombudsman nor the water redress scheme which is operated by the Centre for Effective Dispute Resolution (CEDR). CEDR operates a number of ADR schemes, some approved under the ADR Regulation and some are not. CEDR's website lists 18 different industries that it covers, and in 2021 it estimated that it ran over one hundred consumer dispute schemes used by about 30,000 consumers. CEDR is a non-profit organization and a registered charity which provides a range of related services in addition to operating ADR schemes, such as training. Two of the biggest schemes, energy and telecommunications,[2] are run by Ombudsman Services,[3] another non-profit provider which also administers parking on private land appeals for the British Parking Association, as well as operating a scheme for sectors where there is no existing provision for redress.

An important difference between the regulated and non-regulated sectors is that there is a regulatory body in the regulated sectors which acts as a competent authority. Compared to the CTSI, the regulators have more resources, even if only a small amount of those resources are applied to the ADR schemes that they have responsibility for. This does not mean that there is any consistent pattern. In financial services, energy and legal services, there is one consumer ADR scheme. In relation to telecommunications and estate agents, there are two schemes. The Civil Aviation Authority lists five consumer ADR providers. The Gambling Commission has approved eight schemes.

One of the more developed arrangements is that between Ofgem and Ombudsman Services: Energy (OSE). OSE has been handling complaints against energy companies for some time. In addition to the work of OSE, Citizens Advice also operates the Extra Help Unit, a UK-wide service, based in Scotland, which deals with more difficult cases referred to it by

1 See Chartered Trading Standards Institute: ADR Competent Authority, ADR Approved Bodies.

2 Although note that there is another telecommunications ADR scheme run by CEDR.

3 Soon to be the Trust Alliance Group.

advisers, in other words, the public has no direct access (Citizens Advice Extra Help Unit). Since 2017, OSE has been part of a tripartite group with Ofgem and Citizens Advice which involves bimonthly meetings with the aim of, among other things, identifying emerging trends.[4] This is a relatively new role for OSE that has arisen in part as a response to a critical report commissioned by Ofgem which found that, although OSE agreed it had a wider role than just complaint handling, it had not focused on the wider role, was unsure about it and had limited systems and processes to support it (Lucerna Partners 2015; Ombudsman Services 2016). This also makes the point that Ofgem has regularly reviewed the performance of OSE, as required under the ADR Regulation.

There are also structured arrangements in relation to FOS, which has memoranda of understanding with the FCA and the Prudential Regulation Authority, as well as working with other partners in the Wider Implications Framework.[5]

These institutional arrangements make no sense. At the highest level, separating responsibility for consumer ADR from the wider justice system is counter-productive. Consumer ADR is an alternative to the court system because at least some consumer ADR claims could be heard by the small claims court. It would make logical sense to have one body with overall responsibility for both the small claims courts and consumer ADR. This seems particularly relevant given that some of the procedures and approaches found in consumer ADR have been influential in the reform of the courts and tribunals.

Even if that is not accepted, the current arrangements sitting under BEIS are inadequate. There are currently eight competent authorities, of which the CTSI has the biggest remit covering 60 schemes. There is a case for distinguishing between sectors with a regulator and those without, on the grounds that there could be useful communication of information between the ADR scheme and the regulator as regards general trends in the industry and concerns about specific providers. It is not clear that this works effectively, but there is a good argument for it in principle. There is no forum in which the regulators discuss their experiences of the consumer ADR schemes for which they are competent authorities. Leaving responsibility for 60 schemes to the under-resourced CTSI does not seem a sensible arrangement. That the top-level consumer enforcement body, the CMA, has no role or communication, seemingly, with consumer

[4] See Tripartite Group Engagement Diagram 21 March 2019.

[5] Respectively available at: Financial Conduct Authority/FOS; Financial Conduct Authority/Prudential Regulation Authority; and Financial Conduct Authority, Wider Implications Framework.

ADR bodies seems bizarre. Overall, the competent authorities have no institution where they can learn lessons from each other.

Nor is there any forum where consumer ADR schemes can come together and share their experiences. Those that are members of the Ombudsman Association can participate in the work of that Association and its annual conferences, but not all consumer ADR schemes are eligible for membership. There is no equivalent of the Administrative Justice Council (AJC) which takes an overall view of the workings of administrative justice in the UK.[6] This would be a difficult enterprise, given the number of schemes and the difficulty in obtaining basic information, discussed below, but if consumer ADR is seen as an important policy, a systematic attempt to assess what is happening would seem to be the bare minimum and a starting point for trying to improve the arrangements.

[C] INFORMATION

In order to begin to assess the performance of consumer ADR schemes basic information is needed on all the schemes. The ADR Regulation sets out in schedule 5 certain information that must be included in an ADR entity's annual activity report which at least imposes a common format on these reports. The information required includes: number of disputes; types of disputes; the number of disputes that the ADR entity has refused to deal with and the grounds for so doing; the percentage of disputes that were discontinued for operational reasons; the average time taken; and the rate of compliance, if known. To this bare minimum should be added the outcomes of disputes, sometimes referred to as the uphold rate, and also at what stage did disputes reach, as most consumer ADR schemes attempt to settle disputes before a formal investigation.

It would also be sensible to have information on industry and company complaint handling, as the general rule is that the ADR entity will not become involved unless the company has had an opportunity to deal with the dispute. It is important to have an idea of the number of disputes dealt with by companies which then migrate to the ADR scheme as it is well known that ADR schemes are only the tip of the iceberg. It would also be helpful to know how many disputes individual companies were dealing with. It would be useful to know who the users of an ADR scheme are, but, with the exception of FOS, there are no schemes which regularly collect data on this, although there is collection of customer satisfaction data.

[6] See the ACJ website. The AJC is a private sector replacement for the Administrative Justice Forum which was abolished in 2017 and which replaced the Council on Tribunals.

Sector	Complaints received	Notes
ABTA	15,988	
Airlines	26,737	Aviation Disputes and CEDR
Buses	556	Outside London only
Communications	44,862	Communications Ombudsman and CISAS
Energy	71,282	
Financial Services	235,507	
Legal Services	4,573	Accepted for investigation
Property and Estate Agents	21,696	Property Ombudsman and Property Redress Scheme
Railroads	2,052	
Total	**423,253**	

Table 1: Disputes received 2020-2021

The ADR Regulation also requires ADR entities to identify systematic or significant problems that they have become aware of and any recommendations that they might make as to how those problems should be resolved. In addition, every two years they should communicate their assessment of their own effectiveness and how it might be improved (sch 6). These are sensible provisions.

A starting point for understanding how ADR works is to know how many cases are dealt with by ADR schemes. This has to be done on a scheme-by-scheme basis, using the ADR entity reports under the regulations as there is no one body which collates the statistics and publishes them. Table 1 provides information on the number of complaints received by a selection of ADR schemes in 2020-2021 which was the latest date at which comparable information was available. The total is 423,253 disputes which gives an idea of the scale of activity in this sector. This is, however, an underestimate of the number of disputes. The property side does not include disputes about tenancy deposit schemes, which are in the order of 30,000 a year, and Table 1 does not include disputes with water companies, as that information is not readily available, although the Consumer Council for Water publishes an annual complaints report. The non-regulated sector is largely excluded, with the exception of ABTA.

For comparison, over the same time period there were 974,497 money claims in the county courts.[7] We also know that, for all county court claims, only 243,250 were defended. It also seems to be the case that most of these claims are not consumers suing businesses, but businesses pursuing consumers. In the period 2019-2020, Iain Ramsay identified that 80% of money claims were issued by ten legal firms.[8] If that proportion

[7] Civil Justice Statistics 2021.

[8] Credit Debt and Insolvency, Assembly-Line Debt Collection and the International Overindebtedness Industry.

Name of scheme	Days	Notes
Aviation ADR	73.00	
Aviation – CEDR	39.00	
Buses	24.00	
CISAS	37.00	
Communications Ombudsman	80.00	
Energy Ombudsman	41.00	
Financial Ombudsman	58.47	
Legal Services	542.00	Calculated simple average of range from 356-745 depending on complexity
Property Ombudsman	52.70	Calculated weighted average
Property Redress Scheme	36.20	Calculated simple average of range from 33-39 depending on subject
Railroads	31.25	Calculated simple average of range from 13.2-40.6 depending on complexity

Table 2: Average time to resolve dispute in days 2020-2021

is applied to 2020-2021, then the potential figure for consumer claims comes to just under 200,000. This is likely to be an overestimate, as Ramsay's figures relate only to the top ten issuers of bulk claims. In 2021, Money Claims Online is reported to have issued 81,715 claims and settled 26,082.[9] The point is that the majority of consumer claims are being heard through ADR schemes, not the courts.

The second comment is that this information is not easy to obtain, although it can be found online. The Energy Ombudsman's website provides an interesting example. At the time of writing (November 2022), there is a section of the website called 'Annual Reports'. The latest Annual Report is for Ombudsman Services, the umbrella provider for the Energy and Communications Ombudsman, but only for 2020, and it does not provide meaningful statistics. There is a section on ADR entity reporting which provides information up to 2021 and another section on complaints data which is divided up into energy and communications complaints and goes into 2022, which are reported on in different formats. For the Property Redress Scheme, the information is contained in the 'Resources' section under the title of ADR Regulation 2015 Appendix D Report – hardly the clearest description.

Table 2 shows the average times to resolve disputes that are reported by the ADR entities. This ranges from 24 to 542 days. Here the outlier is the Legal Services Ombudsman which takes between 365 and 745 days to resolve complaints, depending on their complexity. This seems simply too slow. But also striking are the differences between schemes

9 Fact Sheet: Online Civil Money Claims Gov.uk.

Name of scheme	Number	% (rounded)
Aviation ADR	1,806	8
Aviation – CEDR	91	3
Buses	570	102
CISAS	1,131	5
Communications Ombudsman	10,957	28
Energy Ombudsman	31,107	44
Legal Services	NA	
Financial Ombudsman	2,913	1
Property Ombudsman	10,786	55
Property Redress Scheme	1,628	83
Railroads	875	42

Table 3: Disputes rejected 2020-2021

within sectors. The Communications Ombudsman takes 80 days while the Communication and Internet Services Adjudication Scheme (CISAS) takes 37. Similarly, Aviation ADR takes 73 days while CEDR takes 39. On the face of it, this takes some explanation, as it would be expected that the range of disputes within the sector is the same for both ADR entities. Although it is possible that the types of disputes are different, and it is also possible that they may compile their statistics differently.

Table 3 looks at the number of disputes rejected by ADR schemes, which is an often-neglected issue. One of the problems with having a variety of schemes which apply to different companies with different rules is that consumers will go to the wrong scheme at the wrong time and will be, correctly, directed elsewhere by those operating the scheme. We do not know what happens to these consumer complaints; there has been no research done on this issue and the ADR entities do not follow up complaints which have been rejected. Some of these complainants presumably go back to the correct scheme or the supplier and have their complaints dealt with. Others presumably simply abandon their complaint. There are some high numbers and some low numbers. It is striking that the biggest scheme, FOS, has the lowest percentage of rejections, followed by the two aviation schemes. It is puzzling that CISAS rejects very few cases, but the Communications Ombudsman rejects around 28%. The high rejection rates that are seen indicate, at the least, a failure on the part of the ADR schemes to communicate their rules to complainants.

Finally, it is worth looking briefly at information on compliance. With the exception of the Property Redress Scheme, two approaches are found in the reports. The first is to report close to one hundred per cent compliance and the second is to either not report or say that they do

not know (FOS, CISAS, Aviation ADR, Rail Ombudsman, Legal Services Ombudsman). Without knowing how the information is compiled, it is difficult to see this as useful.

At this point, it is worth moving to additional information that it would be useful to have. The starting point is FOS because it is the largest of the schemes. FOS publishes its uphold rates as part of its complaints data, also splitting this out into uphold rates depending on the subject matter of the complaint. The full dataset also divides cases into those resolved by the Ombudsman and those not resolved by the Ombudsman. This is also divided into the subject matter of complaints. In addition, FOS publishes all its final Ombudsman decisions and provides a searchable database.

FOS provides data on complaints against named businesses in its half-yearly data reports, while the Financial Conduct Authority provides industry-level data on complaint handling, as well as firm-specific data.[10] It is easy to understand the volume of complaints received by financial services firms and how few, relatively, reach FOS.

The next most active area for consumer ADR is energy. The first problem is that the last report by Ombudsman Services specifically on energy was for 2019; there are no reports for the last two years. The 2019 report provides percentages of disputes that were upheld, not upheld, settled or maintained (where the company had made a fair and reasonable offer). As regards company performance, the website publishes overall industry data for complaints submitted to the Ombudsman on a quarterly basis and individual data for the top seven suppliers. Ofgem provides information on complaints received by all suppliers per 100,000 accounts, splitting that down into all large and medium-sized suppliers and a selection of small suppliers.[11] Additional information is provided on how long it takes suppliers to resolve complaints, again with supplier-specific information. The absolute numbers of complaints dealt with by energy suppliers are provided on the company websites as part of their complaints reports although not all of them provide an archive. Quite why Ofgem does not provide absolute numbers is a mystery.

The position in communications is different. Here data is provided by Ombudsman Services and CISAS, as mandated by Ofcom. Again, the last communications sector report by Ombudsman Services was in 2019, although the ADR entity report covers 2021. This data gives the percentage outcome of cases, upheld, settled or not upheld, divided into

[10] Financial Conduct Authority, Complaints Data, 20 October 2022.

[11] Ofgem, Customer Service Data, November 2022.

broadband, landline or mobile and split up by provider. It also breaks out issues, on a percentage basis, by broadband, landline and mobile and by provider. It can be seen, for example, what percentage of broadband issues involving BT are concerned with service as opposed to billing. Ofcom publishes data on the number of complaints that it receives per 100,000 subscribers for individual companies, but no data on outcomes. Nor are absolute numbers given.

One of the advantages of consumer ADR schemes is supposed to be that they offer an insight into systemic problems or problems a particular trader might have, for example, as happened with Extra Energy,[12] and can therefore bring about improvements in practice, unlike courts who will focus on the dispute in front of them. This is not to argue that court decisions do not have wider implications, they frequently do. An ADR scheme can, however, look at trends in the cases before it and identify issues which are of concern to consumers. Given the connection an ADR scheme should have with its membership, in principle this should facilitate a discussion of the issues.

The ADR Regulation recognizes this and requires ADR schemes to address systematic or significant problems in their annual reports and provide suggestions for improvement. The required ADR entity reports are disappointing here, dealing with the issue in one or at most two paragraphs with a distinct lack of detail. It may be that these discussions are taking place elsewhere, as explained above in relation to the Energy Ombudsman and FOS, but there does not seem to be any explanation in the public domain, even after the fact.

[D] CONCLUSIONS

The first point is that, as far as consumer disputes are concerned, the courts have been sidelined. This is now the business of multiple ADR schemes in the UK. It might be argued that this is a bad development, but I think that ship has sailed. It is not possible to reverse the growth of consumer ADR and replace it with an efficient and effective court process, especially in the current economic climate. The way forward is to try and improve consumer ADR as was recognized in the most recent government paper (BEIS 2022).

The starting point must be a coherent policy structure. ADR policy at the moment appears to be homeless, being located as a subset of consumer

[12] Extra Energy was a small supplier which ceased trading in 2018. In June 2017, Citizens Advice reported that it had the worst score for complaint handling between January and March: 'Extra Energy Bottom of Customer Service Rating Again'.

policy within BEIS. An initial decision has to be made as to whether ADR is located within consumer policy or within justice policy. Although logic suggests the Ministry of Justice, given that department's record and the need for both business and consumer buy-in to any arrangements, BEIS is better placed to continue looking after the policy.

Certain aspects of the ADR Regulation are sensible, and the wheel does not need reinventing, even though it originates from a piece of EU law. There needs to be an approval process for ADR schemes run by an independent authority, and there need to be criteria for approval. The criteria in the ADR Regulation are a good starting point and the Government has said that it is committed to strengthening them (BEIS 2022). The operation of ADR schemes needs to be reviewed on a regular basis, again an idea seen in the regulations. All of this needs to be done by a properly resourced competent authority. As currently constituted, that cannot be the CTSI.

The choice for a lead competent authority rests between BEIS and the CMA, given the current arrangements. The CMA as the lead consumer enforcement body would seem a better choice than a government department, although this will require proper resourcing. Approving, monitoring and encouraging best practice for consumer ADR schemes is not a resource-light set of activities. Or, if it is conceived of as resource-light, it is likely to lead to problems. This is one issue with choosing the CMA because the CMA has had a number of new jobs dumped on it recently, for example, digital markets and subsidy control.

If there is a top competent authority, the question then arises if the current arrangements, where there are eight competent authorities, should be retained. It is tempting to suggest that there should be one and that it should be the CMA. The difficulty here is whether it is worth unpicking current arrangements where sectoral regulators approve the ADR schemes in their sectors. It is important that sector regulators are happy with their ADR schemes, but it is equally important that they do not get 'captured' by them and industry and push them to improve. It is probably more realistic to leave the regulators as the competent authorities in their sectors and leave the CMA to deal with the unregulated sectors as there seems to be an acceptance that this is the area in greater need of improvement.

Whatever body serves as the competent authority, there needs to be a forum where consumer ADR schemes can meet and try and learn from their experiences. There is a UK Regulators Network, so why should there

not be a UK ADR network? There is a resourcing issue here, given that ADR schemes are voluntary and generate their own income, even though they are typically not for profit. If it is a case of organizing one meeting a year, this cannot be an insoluble problem.

There is also an important role to be played in monitoring the performance of ADR schemes and in collating and disseminating information as well as ensuring schemes provide information in comparable formats based on common definitions. In terms of information, the ADR regulation lays down a baseline which can be built on. Regardless of what information is thought to be useful, it is important that there is a central point which collates the information and publishes it, rather than just relying on each scheme to publish its own data. If we publish basic information for tribunals, why not do this for ADR schemes? Whoever is responsible for collecting the information should ensure that it is done on a comparable basis.

There are also many of what I would call substantive questions. These range from practical ones such as how to make the public more aware of ADR schemes and guide them to the right places, to bigger issues of principle. For example, to what extent should membership of an ADR scheme be compulsory for traders? Is it sensible to have more than one ADR scheme in a given sector? There are many more questions to be addressed but addressing them effectively requires a sensible set of institutions for policy design and better availability of information on how ADR schemes are performing.

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Directive 2013/11/EU of the European Parliament and of the Council of 21 May 2013 on alternative dispute resolution for consumer disputes

Retained EU Law (Revocation and Reform) Bill, Bill 204 2022-23

Data Sources for Tables

Aviation ADR

Aviation CEDR

Buses

Communication and Internet Services Adjudication Scheme (CISAS)

Communications Ombudsman

Energy Ombudsman

Financial Ombudsman Service (FOS)

Legal Services: Complaints Data and Annual Report and Accounts

Property Ombudsman

Property Redress Scheme

Rail Quarterly Statistical Reports