

The following is intended as a non-exhaustive example of an agenda to enable parties to get the most out of route planning meetings. We encourage all those attending route planning meetings to familiarise themselves with all aspects of the [Guide](#). Specifically, please remind yourselves of the position on:



- **Part 36/Calderbank offers: Objective VII**
- **Prompt disclosure of documents: Objective VIII**
- **Dispute resolution mechanisms: Paragraph 8**

## **EXAMPLE AGENDA FOR PLANNING MEETING**

**Route planning is the means by which the parties try to navigate the case to promote dialogue and negotiation issue to reach issue-based agreements. Topics that can be considered in a route mapping meeting agenda are detailed below, but these are not an exhaustive list. Route mapping meetings should be tailored to the primary issues at hand. Agendas should not be used to introduce barriers to discussion.**

### **Indemnity**

1. (For non-RTA cases) Limit of indemnity and does it include costs?
2. (For RTA cases) – is the insurer Article 75 etc, are there any issues around indemnity?

### **Liability**

3. **Liability:** Initial views, can there be an early admission, potentially without prejudice or just primary liability
4. **Liability discussion and evidence being gathered**
  - police report, plans, photographs
  - Defendant engineering evidence
  - Claimant engineering evidence
  - Dashcam or CCTV footage?
5. Both parties to discuss and agree whether **reconstruction expert reports** are necessary. Consideration to be given to a joint expert if appropriate.

### **Current claimant position**

6. **Injuries** – Are the hospital discharge notes available? Discuss ongoing recovery and present position of rehabilitation to include whether there are additional rehabilitation requirements. What are the claimant's and their family's main concerns at this stage? If rehabilitation has not started yet, what is the plan in this regard (Rehab code)
7. **Loss of earnings** – Will an interim payment assist to ease family concerns, discuss and provide details of earnings and plan earnings disclosure
8. **Case Manager** - will there be single or joint instruction. If single, can there be agreement that the case manager sends reports to the insurer at the same time as the claimant rep. Open book rehab as per appendix to Serious Injury Guide. If possible, it is helpful for the claimant rep to have CVs of case managers they intend to instruct unilaterally, at the meeting. How often will reports be prepared – bimonthly, quarterly, etc?

9. **Form of award** – Form of award. Early indication and clarification as to whether PPOS can be provided, if possible, on both sides.
10. **Quantum disclosure** -
  - GP records
  - Air / Ambulance records
  - Hospital records
  - Employment records including occupational health
  - DWP records
  - HMRC records
11. **Expert Medical Evidence** - Both parties to discuss and agree part 35 experts, confirmation of core and potential secondary disciplines. What reports have been obtained or examinations scheduled. Consideration to be given to joint experts if appropriate.
12. Next meeting

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