

Draft Business Plan 2010/11

Summary of all responses to the December 2009 consultation paper and the LSB's response

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Introduction

1. On 16 December, the Legal Services Board (LSB) published its draft Business Plan for 2010/11 for consultation. The document was sent to all approved regulators (ARs), consumer and citizen groups, professional/representative groups, other regulators, Ministers, Government departments, a variety of Parliamentarians and other interested individuals. We distributed circa 500 copies of the document during the consultation period. In consulting, we were seeking the views of all parties with an interest in the effective regulation of legal services on the LSB's workplan and approach.

The responses

2. The consultation closed on 5 March 2010 by which time we had received 14 responses. We received one further response after the consultation deadline. In addition to the written responses, we supplemented the consultation process by holding two workshops aimed at the generality of stakeholders. We invited 80 individuals and organisations of which 24 attended the workshops, held in February. We also held an additional consultation workshop that gave a greater focus to the draft Equality Scheme, but which also discussed the draft Plan.
3. **Annex A** lists the respondents and workshop attendees. All of the responses and summaries of the workshops are published on our website at www.legalservicesboard.org.uk.

General themes of responses

4. The draft Business Plan 2010/11 consultation document did not ask any specific questions – rather it welcomed views and comments on all aspects of the draft Plan. In their replies, respondents therefore tended to focus on the areas of most interest to them. The overall tone of responses was welcoming of the Board's approach to its work, in particular the emphasis on partnership working. No one response could be categorised as a negative response or unduly critical. The following analysis reflects comments made in both the written responses and in the workshops.
5. A small number of general themes emerged which were:
 - 1) **The LSB must recognise that its role is as a supervisory regulator not a direct regulator.** This was a point made by The Bar Council, The Law Society and an individual solicitor (JW). Specifically, The Bar Council stressed that that it would be looking to see that the LSB demonstrated recognition of this in:
 - its response to professions' efforts to create new business models;

- its research programme, ie that the LSB should not ‘reinvent the wheel’ or do what ARs/others do;
- the work programme of the Consumer Panel.

The Law Society commented that the draft Plan did not always respect the principle that the LSB is an oversight regulator, rather than a frontline one. And that the LSB should only use its powers if it judges that an AR has made a decision that is clearly unreasonable in relation to the regulatory objectives as a whole – not just because LSB disagrees.

An individual solicitor (JW) suggested that the LSB’s vision as stated in the draft Plan went beyond the role set out for it in the Legal Services Act 2007 (the Act). He suggested that an alternative view would be for LSB to see its role as setting up the framework for regulation – then sitting back and making sure things are ticking over and, occasionally, if requested, to help and co-ordinate AR activities. He commented that the LSB appeared to have a dogmatic attitude – that in a number of areas the Board appeared to have made up its mind both on what the problems are that need to be solved and the solutions that need to be delivered and that it would drive the agenda until that was achieved. His concern was not so much the issues being addressed, as the LSB’s attitude in addressing them.

Response – The Board is clear that its role is to be responsible for overseeing legal regulators in England and Wales. Our mandate, from the Act, is to ensure that regulation in the legal services sector is carried out in the public interest and that the interests of consumers are placed at the heart of the system. The Act gives the LSB and the ARs the same regulatory objectives and a requirement to have regard to the Better Regulation Principles. All of the work proposed in the Business Plan is designed to deliver those objectives and principles in a way that is commensurate with our role as regulator with oversight responsibilities. As regards exercising our powers, we published our Compliance and Enforcement: Statement of Policy, after consultation, in December 2009¹.

On the question of business models, while we will not prescribe new business models ourselves, we will be robust in challenging activity by ARs that appears to be restrictive or prescriptive in intent or effect.

We were concerned that an individual commentator regarded the LSB as ‘dogmatic’. We can only reiterate the message we have given consistently throughout our existence so far: that we are

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http://www.legalservicesboard.org.uk/can_we_help/lwb_policies_procedures/pdf/enforcement_policy_statement.pdf

committed to open and frank engagement and are willing to rethink and adopt good ideas put to us in debate.

- 2) **The LSB must set out clearly its own performance evaluation framework.** This was a point made by The Bar Council and in slightly differing contexts by the Bar Standards Board (BSB) and Solicitors Regulation Authority (SRA). Specifically, The Bar Council expressed disappointment that the LSB had still not published Key Performance Indicators (KPIs) which, it pointed out, were important as both accountability and value for money tools. It commented that their continuing absence contrasted with the LSB's desire elsewhere in the draft Plan to set challenging KPIs for ARs.

The BSB supported the need for clear measurement of effectiveness for AR and LSB performance and welcomed the LSB taking the lead in developing appropriate measures. They pointed out that they recognised that hard targets would not always be sufficient.

The SRA requested ongoing reporting by the LSB of progress against milestones. Linked to this, they sought greater clarity on how the LSB would report, on an on-going basis, its assessment of the impact that regulatory reform measures were having on the legal services market.

Response – We agree that this is a fair challenge. Where we can develop hard performance indicators, we will do so. We have made a start by including in our final Business Plan for 2010/11 performance indicators for the timeliness of dealing with requests for alterations to regulatory arrangements. We do also want to develop our public reporting more widely. We will increasingly spell out how we will measure and evaluate the impact of the activities we have undertaken directly or inspired to ensure that we can judge ourselves – and indeed be judged by others – in the same way that we seek to evaluate those we regulate.

Comments on resources and future planning

6. Only the BSB made any specific reference to the costs of the LSB, stating that they expect to see LSB reduce in size once appropriate frameworks are in place and the Board is satisfied that the regulatory objectives are being achieved by all ARs. They also observed that as the LSB does not expect its budget to decrease in the next three years, they assume this to mean that the Board considers that the current pace and level of work will continue. They suggested that the Board should reflect on this and consider future cost projections based on a reduction ie assuming frameworks are put in place. The Legal Complaints Service (LCS) also queried whether the Board should now be looking to develop a three-year plan and observed the need to factor in time for reactive work, as well as proactive.

Response – As this is the first year in which we are operating with our full powers and have yet to form an assessment of the effectiveness of ARs as a group or individually, we have taken the view that it would be premature to commit firmly to disinvestment at this stage. Whilst we therefore acknowledge that the BSB argument has some force, we are clear that any disinvestment can only occur in the light of proven achievement by ARs having a demonstrable and sustainable impact on the achievement of the regulatory objectives.

Comments on the Board’s approach to legal aid funding

7. The Bar Council, BSB, The Law Society and an individual solicitor (LSM) all, to a degree, suggested that the Board needed to both understand, appreciate and take a view on the impact of public funding on the legal profession. Specifically, the BSB felt that the Board should use its role as a regulator with oversight responsibilities to understand the impact of changes for everyone. The Bar Council advised that the Board needed to recognise that Government policy on legal aid was frustrating the regulatory objective of ensuring an independent, strong, diverse profession – suggesting that the Board draws attention to the problems that the claimed funding gap is causing for access to justice and diversity.

Response – In Annex One of our draft Business Plan, we set out our analysis of what the regulatory objectives mean in the context of the LSB. In that, we took a conservative approach to the operation of courts, tribunals and legal aid but, on reflection, it is right that we reserve the right to comment on their operation in so far as they interact with regulation and the regulatory objectives. So, for example, we are unlikely to comment on the pay rates of legal aid lawyers but may comment on the role of a competitive market in driving innovation and better value for legal aid. Similarly, we are unlikely to comment on courts’ budgets but may comment on tribunal rules that affect the need for a lawyer or on civil procedure rules.

Comments on individual work streams

8. The seven individual work streams attracted the majority of comments. These are set out below.

A: Putting consumer and public interest at the heart of regulation

9. Three areas for comment emerged in relation to this work stream:
 - 1) **Terminology – eg use of terms, consumer, client, citizen.** The BSB, The Law Society and an individual solicitor (LSM) all commented on aspects of the LSB’s terminology. The BSB stressed that it was vital for the LSB to understand the needs of all consumers, clients and intermediaries.

The Law Society advised that a lawyer's duty to a client is different in kind to a duty to a customer. In their view, the LSB has yet to make the distinction and, until the distinction is fully understood, the LSB will find it difficult to judge success of delivering the regulatory objectives. An individual solicitor (LSM), suggested that the LSB might usefully use the term 'legitimate interests of consumers' – noting that, as consumers occasionally have unreasonable expectations, it would not be appropriate to enforce regulatory standards against unreasonable expectations. Some workshop attendees also suggested that there should be a greater clarity about which work addressed the public interest and which the consumer interest.

LSM said that it would be helpful to have some definition of terms used, noting that legal services market/sector/industry were used interchangeably in the Plan and that it was unclear as to whether any distinction was being made between the terms. Additionally, she expressed concern about the use of the term 'citizen', noting that the justice system needs to serve non-citizens, ie people without citizenship status too.

Response – In delivering our work programme we will take steps to more clearly articulate our regulatory response to consumer as opposed to public interest issues. We will also reflect on the suggestion regarding 'legitimate' consumer expectations. With regard to a glossary of terms, we will produce one and publish on our website in due course. For the avoidance of doubt, in the context of the Business Plan, there is no intention to ascribe any particular differential to the individual terms sector/market/industry although we appreciate that in some contexts and for some readers terms may have specific meanings.

The point about the term 'citizen' is well made and we have added an explanatory sentence to the Plan to ensure that there is no misunderstanding about our need to ensure the justice systems serves all in society with a legitimate need, and to clarify this point where we use the term in future.

- 2) **The LSB's research programme.** The SRA and BSB requested more visibility of the Board's research programme: the SRA so that they could plan their own research; the BSB as they believed the £300,000 budget was significant and without sight of the programme they could not comment on whether the budget was appropriate. The SRA also requested greater emphasis on the LSB's role in bringing together research and sharing of best practice. The SRA suggested this might be through a regular forum or central database. Both stressed the need for a partnership approach to research.

Response – We will shortly be publishing our Research Strategy, which will provide more detail about our proposed programme. We also make clear throughout the Plan that we are resolutely committed to partnership working in research. This does of course require reciprocal sharing of research plans, as it will be difficult for us to avoid duplicating activity if we are not made aware of its existence; we will continue to seek constructive dialogue.

- 3) **The work of the Legal Services Consumer Panel.** A number of responses made reference to the Consumer Panel. The Council for Licensed Conveyancers (CLC) expressed hope that the Panel would consult on its own work priorities, a point echoed by the SRA. The Fellowship of Professional Willwriters and Probate Practitioners (FPWPP) suggested that the Panel would need to consider how to communicate its existence to consumers. The SRA requested greater clarity about the way in which the Panel and LSB would work together and asked for more detail about the Panel's role in reviewing consumer research.

Response – The LSB and the Legal Services Consumer Panel have agreed a Memorandum of Understanding (MoU) which describes the way in which the two bodies will work together. This can be found on both the LSB's website and the Consumer Panel's website (www.legalservicesconsumerpanel.org.uk). The Panel has also published its Terms of Reference² (which have been endorsed by the LSB). We have passed the comments made to us about the way in which the Panel itself will work to the independent Panel to consider.

10. One final general comment on this work stream came from the Legal Services Commission (LSC) who sought more information about the way in which the LSB intends to measure ARs in respect of putting consumer and public interest at the heart of regulation. We will address this in the course of establishing the methodology for regulatory reviews.

B: Widening access to the legal services market

11. In addition to a general welcome to the passing of the baton of implementation activity to the ARs (The Law Society), this work stream attracted two themes of comments:

- 1) **Timetable.** The CLC, The Law Society and an individual solicitor (JW) all raised comments relating to the timetable set for the introduction of Alternative Business Structures (ABS). The CLC sought reassurance that meeting the target date would not compromise the need to solve difficult related issues such as indemnity and compensation arrangements.

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http://www.legalservicesconsumerpanel.org.uk/publications/corporate_documents/documents/Terms_of_Reference.pdf

The Law Society and individual solicitor (JW) sounded similar notes of caution, warning that the pace must allow for the significant amount of work required to ensure appropriate safeguards are put in place – the regulatory framework needs to be right more than it needs to meet an arbitrary timescale. The LSC also commented that competition alone would not protect consumers ie that there would need to be a balance with consumer protection measures. It was also suggested that the LSB should postpone planning to become a Licensing Authority (LA) until it was transparently clear that an application by a major potential LA would be substantially delayed or not possible.

Response – The target date for the introduction of ABS was identified through joint planning with ARs, and is not an arbitrary date. We certainly have no intention of making ABS a ‘consumer protection-lite’ regime. In meeting the October 2011 date, we will not compromise on consumer protection, or allow LAs or ABS that fall short of delivering agreed outcomes. As regards planning for the LSB to licence directly, this is purely a contingency activity at this stage, but one that it would be wrong to delay as to do so could leave potential firms unlicensed and/or their customers unprotected.

- 2) **Regulatory consistency and overlap** – Both individual solicitors who responded to the consultation (LSM and JW) raised the need for regulatory consistency. Specifically, that the LSB should see that ABS firms are regulated to current standards, not have reduced standards because they are judged, for whatever reason, to be difficult for new entities to comply with. Proper regulation is not easy regulation.

Further, the LSB was urged to take a fresh look at regulatory privileges enjoyed by in-house lawyers and the entities for whom they work, in particular Government Legal Service, in the light of ABS - specifically, whether all entities that provide legal services be brought within ambit of regulation. Further comments related to the development of a MoU and whether the LSB was planning to investigate and address any regulatory overlap issues that may have emerged from the experiences of Legal Disciplinary Practices (LDPs).

The LSC welcomed the provisions for the regulation of special bodies. With regard to complaint handling for ABS firms, the workshops raised the need for the LSB to work closely with the Legal Ombudsman before ABS firms ‘go live’ to ensure that complaints about ABS firms were handled adequately.

Response – We can offer strong reassurance on these points. In all of our work to date on widening access to the legal services market, we have emphasised the need for consistent treatment of ABS and mainstream firms. We are clear however that this does not

simply mean existing requirements all being placed on new entrants. The points made regarding MoUs, overlap and on close working with the Legal Ombudsman are explored in the recently published guidance on licensing authority rules³.

- 3) **Competition concerns.** The BSB warned that there might be unintended consequences in moving to a single market where all lawyers compete on an equal basis as this may risk losing existing benefits of market segmentation ie any current pockets of highly competitive activity.

Response – We do not speculate about the way in which the market will develop as regulation changes and the market opens further. However, it is important that the risks and concerns are well mapped and that current performance of the market is base lined so that changes in access to justice and other areas can be mapped. The LSB is driving an evidence-based approach to this through its research programme and work with ARs on data collection.

C: Improving service by resolving complaints effectively

12. It was noted in the workshops that the Board retains a role in overseeing conduct complaint arrangements within ARs. Both the workshops, and the LCS in its response, noted that consumers should not experience a diminished service in complaint handling during the period in which the Legal Ombudsman is preparing to open and the Legal Complaints Service is preparing to close. Further comments were received in relation to the LSB's relationship with the Legal Ombudsman, and the LSB's work on first-tier complaints.

- 1) **Performance indicators for the Legal Ombudsman.** Both the LCS and SRA commented that the draft Plan was unclear about whether the Board was setting targets for the Legal Ombudsman or the Legal Ombudsman was setting its own. The LCS observed that if the Board did not set targets it could leave the Legal Ombudsman open to criticism.

The LCS offered advice based on their experience of setting targets and KPIs, noting that the Board would need to develop a mix of measures and indicators for effective oversight and an appropriate monitoring and audit regime.

Response – We will oversee the Office for Legal Complaints (OLC) as it develops performance metrics for the Legal Ombudsman service, mindful both of the uncertainties facing a new scheme, but also of the need to be able to demonstrate clear consumer benefit as early as possible. If these do not address all of the areas

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http://www.legalservicesboard.org.uk/news_publications/press_releases/2010/26_03_2010_ext_stage_guidance_on_abs_released.htm

required by the LSB, or are insufficiently stretching, the LSB will impose measures/targets.

- 2) **Data and feedback.** The LCS suggested that the LSB would need to do a degree of quality assurance of the work of the Legal Ombudsman and the ARs (in respect of first-tier complaints) and ensure that appropriate feedback was given to service providers. The LSC confirmed that it would hope to receive appropriate data about publicly funded practitioner complaints. The CLC hoped that the LSB would take a proportionate approach to data collection to avoid imposing a data burden.

Response – These comments will be fed into the work on first-tier complaints rather than addressed in the Plan.

13. More generally, we will also work to ensure that second-tier complaints handling organisations provide responsive service to the public. This will be challenging for all concerned in the course of 2010/11. The LCS and analogous parts of the other approved regulators will need to work hard to maintain performance as they work towards the change of remit that comes with the opening of the new Ombudsman scheme. We will support and challenge them in that role, mindful of the fact that complaints handling is a key regulatory function.
14. The Office of Fair Trading (OFT) also urged the LSB to work with the SRA and BSB to increase the robustness of the consumer protection regime suggesting this was likely to include:
 - 1) the complaints handling body being given broad discretion to act in consumer interest;
 - 2) proactive monitoring of service providers; and
 - 3) a regime able to impose, sometimes, severe punishment and sanctions so as to prevent it becoming little more than a redress mechanism

Response – We will continue to work with the OFT to ensure that best practice from other regulatory regimes is incorporated into the regulation of legal services. With regard to the Legal Ombudsman, we recognise that this has a different type of role – dispute resolution – to other complaints-handling bodies.

D: Developing excellence in legal services regulation

15. The Bar Council welcomed the clarification that the LSB's aim was to achieve 'gold-standard' not 'gold-plating'. We also received a number of specific comments.
 - 1) **Balance of work.** Views were expressed in the workshops that the LSB had not placed sufficient emphasis on the core business of regulation (business as usual).

Response – Experience since the start of 2010 suggests that there should be a greater emphasis on the resources that are required to undertake business as usual activities such as alterations to regulatory arrangements. We have reviewed the Plan to ensure that the importance of this activity is clearly signalled.

- 2) **Engagement with ARs (including applications to become an AR or extension of remit).** In relation to applications to become a new AR or for an existing AR to expand their regulatory remit, the CLC warned that the LSB would need to be proportionate, taking care not to be so burdensome in what is required to make an application that bodies are prevented from applying. It was suggested that this might have the inadvertent consequence of reducing access to justice. The FPWPP commented that the rules governing applications need to be supported by firmer guidelines and procedures. The need to consider how best to engage with smaller ARs was also raised in the workshops, along with a desire for sharing of good practice.

The Law Society questioned whether an assumption that competition between regulators drives up standards of regulation is well founded, suggesting that a real risk that ‘bad’ regulation might force ‘good’ regulation out.

Response – We will actively learn from our initial experience of handling applications for new ARs and extension of remit. The approval regime and common criteria for recognition should obviate the potential danger perceived by The Law Society.

- 3) **Process for regulatory reviews.** There was a general sense in the workshops that much more information was needed about the process for conducting these reviews. The LSC said that they would be concerned if the LSB placed too much reliance on self-assessment; in their view, self-assessment must be backed up with direct independent oversight. In addition, they advised that the LSB would need to make regulatory performance information available to consumers, those who are regulated and to procurers of legal services. The SRA requested more information on the concept of thematic reviews.

Response – We are committed to developing a broad and deep understanding of the regulatory performance of the ARs. We consider that a self-assessment process will deepen our knowledge of their current performance, help focus future regulatory interventions by the LSB and, in all probability help ARs step and back and reassess their own capacity and direction. We are clear that no one tool will give perfect assurance of regulatory success so are developing a broad toolkit of which self-assessment, thematic reviews, and our enforcement policy are but three.

E: Securing independent regulation

16. Comments centred on embedding independence and practicalities of practising certificate fee (PCF) approvals.

- 1) **Regulatory independence.** Whilst the LCS commented that 2013 was too far into the future for embedding independence, prolonging an unsatisfactory situation, the LSC wondered whether the LSB's expectations for its work in 2010/11 were realistically achievable bearing in mind their view that full separation has not yet been achieved.

The SRA requested greater clarity on the way work streams 2D and 2E overlapped.

Response – The comments on timetable will be reflected in the work going on to ensure that the LSB's Internal Governance Rules are implemented. Work stream 2E focuses on implementing independence whereas work stream 2D will focus on future reviews of the success of that implementation. From 2011/12 we expect that implementation of regulatory independence will no longer require a specific work stream and will become 'business as usual' activity within the 'developing excellence in legal services regulation' work stream 2D.

- 2) **PCF approvals.** The FPWPP commented that ARs would need support in making PCF applications, whilst the SRA sought greater clarity on type of information required in yearly application cycles.

Response – The LSB will set out the criteria it expects to use in assessing a PCF application after discussion with existing ARs. This will be made available to all potential ARs via our website.

F: Developing a workforce for a changing market

17. The following comments were received.

- 1) **The LSB's role in quality assurance for advocates (QAA).** The CPS looked forward to continuing engagement on this work. An individual solicitor (JW) observed that the LSB appeared to have jumped straight from an anecdotal view that a minority of advocates are not up to standard, to deciding that a compulsory QAA scheme was the answer. Whilst QAA was clearly a subject the LSB should be concerned with, he suggested that the approach being taken – leading, setting deadlines, rather than assisting – appeared to be outside of the LSB's remit. He suggested that the LSB should move at the pace of the SRA/BSB and ILEX Professional Standards (ILEX PS). This view was shared by the BSB, which commented that the language of the Plan should be changed to make clear that the LSB was supporting SRA/BSB/ILEX PS work rather than leading or driving forward. The Bar Council commented that it looked forward to the outcome of the SRA/BSB/ ILEX PS work.

Response – We welcome the coming together of regulators through the Joint Advocacy Group of ILEX PS/BSB/SRA, to deliver a scheme for criminal advocacy by mid 2011. Their ownership of the scheme is central to its success but we will continue to spur all stakeholders to support urgent progress. We note that stakeholders in the senior judiciary have welcomed the clear approach taken by the LSB in galvanising the process through the setting of clear deadlines.

- 2) **Workforce diversity.** Reiterating broader comments made by others on the LSB's approach to work generally, The Bar Council stressed that the LSB must build on work done by others and take care not to duplicate effort. The BSB suggested that the LSB could add benefit by providing specialist advice, knowledge and experience to supplement considerable work already undertaken by ARs. The Lawyers with Disabilities Division stated that it was pleased to note the LSB's commitment to enhancing and improving diversity needs. A sentiment shared by the Welsh Assembly Government. Finally, the Society of Legal Scholars (SLS) commented on the difficulty in established how far changes in practice in education bring about changes in workforce.

Response – As with other areas of the Plan, we reiterate our commitment to working in partnership and avoiding duplications.

- 3) **Qualifications route-map.** The SLS sought more information about the mechanism that will be employed to produce the single route map of qualification routes.

Response – We will engage directly with the SLS on this piece of work.

G: Improving access to justice

18. This work stream attracted somewhat more comment than others and was the only area where our explanation of what the regulatory objective means for us was commented upon.

- 1) **LSB definition of access to justice.** The Law Society commented that the LSB interpretation of what access to justice means appears to lay blame for non-delivery at feet of lawyers. They stated that 'access' should be driven by what each client needs not by LSB's model of what the public ought to want. This might include the provision of face-to-face advice.

An individual solicitor (LSM) expressed concern that the LSB had not considered the requirements of Article 6 of the European Convention on Human Rights as regards 'equality of arms'. Phone advice may be acceptable in some circumstances, but the LSB needs to recognise that it might not be sufficient or appropriate

when facing someone represented in person by an expert advisor. She sought more information on how the LSB would assess whether any reduction in availability does or does not amount to a reduction in access to justice.

The LSC agreed that access to justice is wider than access to traditional advice provision.

Response – We will reflect these comments as appropriate in our Approach to Access to Justice document being considered separately by the Board. For the most part, they seem to reflect a misunderstanding that, in suggesting that services will develop and transform, existing patterns of provision will disappear in their entirety. We have never asserted this and, indeed, would argue that the provision of face-to-face advice may increase, but be better targeted on those who actually need it, rather than being the default mode for all activity.

- 2) **Reserved and non-reserved activities.** The CLC commented that the LSB should take a broad perspective when considering the scope of reserved and non-reserved activities, and should review whether it remained correct for the regulation of lawyers to centre on definitions of reserved legal activities which have arguably now become outdated. The LSC urged the LSB to prioritise this area of activity, noting that there are risks to consumers where areas of law fall outside of the reserved definition.

Response – These comments will be fed into the work programme as it commences. The themes are, to some extent, also picked up in the forthcoming Approach to Access to Justice document.

- 3) **Scope of research.** The CLC warned that the LSB's research should not be too narrowly focussed. For instance, work on referral fees should not be confined to civil litigation but must also consider non-contentious areas, like conveyancing. The FPWPP commented that it did not think comparison websites are a correct vehicle to help consumers decide from whom they require legal services.

Response – We will carefully consider the scope of research activity. The comments on comparison websites will be fed into the work programme.

Annex A - Respondents and workshop attendees

Written responses received from:

The Bar Council
Bar Standards Board (BSB)
Council for Licensed Conveyancers (CLC)
Crown Prosecution Service (CPS)
Fellowship of Professional Willwriters and Probate Practitioners (FPWPP)
The Law Society
Lawyers with Disabilities Division
Legal Complaints Service (LCS)
Legal Services Commission (LSC)
Office of Fair Trading (OFT)
Lucy Scott-Moncrieff – solicitor (LSM)
Society of Legal Scholars (SLS)
Solicitors Regulation Authority (SRA)
John Weaver –solicitor (JW)
Welsh Assembly Government

Workshop attendees:

Better Regulation Executive (BRE)
Ministry of Justice (MoJ)
The Law Society
Legal Services Consumer Panel
Institute of Chartered Accountants in England and Wales (ICAEW)
Legal Complaints Service (LCS)
Institute of Barristers Clerks (IBC)
Office of Fair Trading (OFT)
Legal Services Commission (LSC)
Institute of Trade Mark Attorneys (ITMA)
Commercial Bar Association Equality and Diversity Committee
The Bar Council
Claims Management Regulator
Association of Law Costs Draftsmen (ALCD)
Solicitors Regulation Authority (SRA)
National Association of Paralegals
Society of Scrivener Notaries
Institute of Professional Willwriters (IPW)
John Flood (University of Westminster)
Fellowship of Professional Willwriters and Probate Practitioners (FPWPP)
Commercial Bar Association
Committee of Heads of University Law Schools (CHULS)
Bar Standards Board (BSB)
Professor Stephen Mayson (Legal Services Policy Institute)