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THE
INSTITUTE OF
CHARTERED
ACCOUNTANTS
OF SCOTLAND



Mahtab Grant
Legal Services board
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Email: consultations@legalservicesboard.org.uk

10 February 2010

Dear Sir/Madam

**Alternative Business Structures: Approaches to Licensing
Consultation paper on draft guidance to licensing authorities on the content of
licensing rules**

The consultation paper 'Alternative Business Structures: Approaches to Licensing' has been considered by The Institute of Chartered Accountants of Scotland.

As the Institute's Charter requires, we act in the public interest, and our proactive projects, responses to consultation documents etc. are therefore intended to place the general public interest first, notwithstanding our charter requirements to represent and protect our members' interests.

We consider the public interest in this instance to be the availability of legal, and other professional, services of a high quality that provide value for money. High quality in this instance reflects expertise, independence, competence, and client confidentiality.

We welcome the proposal in the consultation paper that the regulatory policy regarding Alternative Business Structures will be based on core principles with a focus on outcomes, and permitting the more detailed regulation to be tailored by Licensing Authorities to meet specific requirements. In an outcomes based regime we would also hope that there is scope for this to evolve on a pragmatic basis as the new regulation is put in place and becomes operative.

We look forward to continuing to work with the Legal Services Board.

Yours faithfully

Vivienne Muir
Executive Director, Regulation and Compliance