

I refer to your consultation and would respond to your questions (as numbered in your paper):-

- 4A Are the five strategic priorities the correct focus for the organisation?
The strategic priorities are difficult to argue with but it is also difficult to see how they translate into action. They are largely aspirational. In my view, the major priority should be to deal efficiently and fairly with complaints within a reasonable timescale.
- 4B Does the strategy appropriately balance consumer interest and the legitimate needs of the sector?
Consumers and lawyers should have “equality of arms”.
- 4C Do you think our values and customer service focus are appropriate?
Again, difficult to argue against but difficult to work out what this actually means.
- 4D Is there anything from your strategy and planning work we should take account of?
No comment.
- 5E What do you think are the most important projects for us to pursue?
Dealing with complaints timeously.
- 5F Where may you be able to work with us?
No comment.
- 5G Does our operating plan for 2016/17 set out an appropriate first year of activity, helping us to work towards our longer term strategic goals?
No comment.
- 6H Are the proposed levy fees appropriate to allow delivery of our statutory role?
Without any detailed breakdown it is impossible to comment in any meaningful way.
- 6I Do you agree that it is appropriate to keep in-house and advocates fees static?
Yes. A reduction is possibly in order for in-house. However, without statistics to base this on it is difficult to comment in any meaningful way.
- 6J Are The fees around the new “Approved Regulators” and “Licensed Providers” appropriate?
No. There seems little scientific basis on which the proposed fees are to be based. To take the example of the Law Society if a levy is imposed on the Law Society then it in turn will be passed on to the individual lawyers in their annual fees to that body resulting in a “double whammy”.
- 6K Do you have any other comments on the budget?
No.
- 7L What equality, diversity and inclusivity issues might arise?
No comment.
- 7M Do you have any other comments to add?
No.

Regards

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