

Meeting of the SLCC Consumer Panel

Tuesday 7 August 2018

Venue: The Stamp Office, 10 – 14 Waterloo Place, Edinburgh, EH1 3EG

Present: Carol Brennan (CB) [Chair], Queen Margaret University Consumer Dispute Resolution Centre
Paul Bradley (PB) Scottish Council of Voluntary Organisations

Ruth Morgan, Marketing and Special Projects Officer (MaSPO), SLCC

Apologies: Shaben Begum (SB), Scottish Independent Advocacy Alliance
Sheila Scobie (SS), Competition & Markets Authority
Louise Johnson (LJ) Scottish Women's Aid

David Buchanan-Cook, Head of Oversight & Communications (HoO)

In attendance: Alison Marron, Oversight Manager (OM)
Michael Shaw, Communication and Information Officer (CIO)

- 1. Welcome**
The Chair welcomed all present to the meeting of the Panel.
- 2. Apologies**
Apologies were received from LJ, SB and SS.
- 3. Declarations of interest**
There were no declarations of interest.
- 4. Approval of previous Minute**
The Minute of the previous Panel meeting was approved.
- 5. Actions**
The Chair requested that two additional items be added to the actions register. Firstly, that the Panel have sight of the SLCC's 'long term trends paper' previously mentioned by Neil Stevenson; and secondly, that a guest speaker (from an organisation with a similar remit to the SLCC) be invited to attend a panel meeting to discuss how they dealt with customer feedback.
- 6. LSS Price Transparency Consultation**
The CIO joined the discussion to give Panel members a brief overview of the price transparency consultation and the key points from the SLCC's perspective. He then left the meeting.

Panel members raised the following points for inclusion in their formal response:

6.1	Scotland does not want to be left behind England and Wales where regulated firms will soon be required to publish information on price within certain areas of law.
6.2	What is the argument against being more transparent? Surely this is a positive move and difficult to see sound reasons for Scotland not acting on this.
6.3	There are a whole range of issues currently causing problems for consumers in terms of pricing and price transparency – lack of transparency around who might be doing the work, practice of charging for a breakdown of fees, unit charging, not giving the consumer the option for completing simple tasks themselves instead of being charged for that.
6.4	Price is important, but information is also key – clear communication and description of costs is really important too - for example, helping consumers to understand that there are certain things (like going to court) that can result in costs spiralling out of control.
6.5	Important that the legal sector receives support in implementing price transparency – firms shouldn't just be left on their own to deal with this. The LSS could support the sector through things like creating templates that firms can use.
6.6	In terms of enforcement, it's important that this is proactively enforced. It shouldn't be dealt with only if issues come to light via the SLCC.
6.7	Scenario based costings can be very useful for consumers – this would help consumers build up a realistic picture of what they could end up paying in a range of different scenarios.
6.8	Panel members felt that they wanted to respond with a strong response to this consultation – the importance of not being left behind England and Wales and the importance of enforcement.
6.9	It was noted as very positive that the transparency consultation references the panel's consumer principles document. As part of the Panel's response, they would like to welcome the positive engagement between LSS and the Panel on consumer principles so far.

7. SG Consumer Scotland Consultation

The Chair outlined the background to this consultation and the key elements of it. The Panel members raised the following points for inclusion in their formal response:

7.1	The Panel welcomed the consultation
7.2	There is considerable scope for greater consumer focus and research in Scotland.
7.3	Welcome the fact that this is an independent, statutory body – this should help the status of the organisation

7.4	Welcome the fact that it will be staffed by policy experts – the Panel felt that this was the right approach.
7.5	Acknowledge that there is a different legal landscape in Scotland.
7.6	There may be advantages in a single point of entry for consumer issues in Scotland – the provision of a consumer gateway could be an attractive addition to these proposals. The complaints would then be triaged to the relevant organisations.

8. **ABS Consultation**

The OM joined the meeting to give the Panel some background on ABS generally as well as the specifics of this consultation. She advised the Panel that the consultation related only to the process for making a complaint about an Alternative Business Structure.

The OM left the meeting and Panel members noted several points for inclusion in their formal response to the consultation:

8.1	The legal complaints landscape is already very complicated for consumers and the Panel would welcome the ABS complaints process being as straightforward and accessible as possible.
8.2	The language used in the guidance document isn't appropriate for consumers – examples include 'timeously' and 'vexatious'. Suggest a modern and accessible approach to language.
8.3	Early resolution as part of the ABS complaint process is something that the Panel would support.
8.4	The Panel would welcome the ABS complaints process being as flexible as possible – particularly given the problems that have arisen in the legal complaints system as a result of the level of detail in the 2007 Act.
8.5	The Panel welcomes the fact that we're putting Scottish legal consumers on the same footing as those in England and Wales.

9. **SLCC Quarterly Statistics and Quarterly Feedback**

The MaSPO gave an overview of the quarterly statistics and feedback.

In relation to the customer feedback, the Panel noted that similar themes were recurring. The Panel members queried what happens to this feedback and suggested that it would seem to be a wasted opportunity not to follow up on some of the detailed feedback.

It was agreed that this subject – follow up with people who have written detailed responses on the feedback form - should be added to the agenda at the Panel's next meeting.

10. **Vulnerable consumers**

The Panel requested that a draft of a Vulnerable Consumers publication – similar in length

and style to the Consumer Principles publication – be provided to the Panel for the next meeting in November.

It was also suggested that the letter received by the Panel from Carole Ford would feed into this publication, along with reflections from those who attended the roundtable. The Panel also noted that individual members wanted to contribute on different aspects of vulnerability within the publication.

11. Date of next meeting

The next meeting is at 2 pm on 6th November, at the SLCC.

12. AOB

There being no further business, the Chair drew the meeting to a close.