

# Strategy (one year extension) and Operating Plan 2024-25

Our **vision** is that **every client receives a professional service, and every lawyer adheres to professional standards.**

Our **mission** is to **resolve complaints, prevent the common causes of complaints, and enable quality improvement.**

**We have five strategic aims** to achieve our ambition to be an efficient and effective complaints, regulatory, and oversight body, delivering a quality service. Our aims are to:

<b>Deliver</b>	Deliver our functions as a high-quality service which is accessible and inclusive, has good customer service at its heart, is prompt, and proportionate, and which delivers fair resolutions.
<b>Innovate</b>	Innovate across our complaints, regulatory and oversight functions by working as a performance-focused, agile, change-confident and resilient team, delivering continuous quality improvement and best value in our work.
<b>Prevent</b>	Prevent the common causes of complaints through analysis, shared learning and improvement work.
<b>Influence</b>	Influence the evolution of the regulatory system across the legal services market through complaints learning and our regulatory and oversight functions.
<b>Transition</b>	Transition the organisation through a period of strategic change and expansion of functions and role, supporting our staff, and focusing on a service design approach.

**Our values are:**

<b>Fairness</b>	Our processes and outcomes can be trusted by all as fair, independent and impartial.
<b>Respect</b>	We understand and respect the diverse groups we work with, work inclusively, and offer a good customer experience to all.
<b>Impact</b>	Every element of our work will deliver a meaningful result.
<b>Learning</b>	We continuously learn and develop, and share that learning, so we all improve our processes and the quality of our work.
<b>Clarity</b>	Our decisions, explanations, communication, and services will be clear and accessible.

**Projects are cross referenced to our strategic aims. [D] = Deliver, [Iv] – Innovate, [P] = Prevent, [If] = Influence**

All timings are subject to change due to reform. As noted in our consultation on budget and operating plan, we face a period of unprecedented uncertainty and will adjust resource to meet the those pressing challenges and opportunities.

<b>A. STATUTORY COMPLAINTS SERVICE</b>
1. We will process an estimated 1,307 incoming complaints and maintain our performance and customer service on core processes including if we are starting to implement reform (designing and dual running a new system). [D, P]
2. We will continue our innovation and change programme, including our agile process improvement work, looking for new opportunities to work more efficiently, reduce the time it takes to handle complaints, and improve the quality of our work. The final programme will depend on whether reform is progressing, or we are working with the current system. [D, Iv, P, If]
3. We will process an estimated 11 incoming appeals, 22 FOI requests, and 20 GDPR requests. [D]
4. If required, we will implement the complaints system for Licensed Providers (ABS) under the Legal Services (Scotland) Act 2010. [D, Iv, P, If]
5. We will continue to review our approach to s17, including considering an updated detailed audit of compliance, re-contacting key stakeholders, and seeking to encourage a sector wide approach to tackling this issue. We will deliver a pilot where, when there is a failure to respond, we move to formally decide the complaint with the evidence available and on the basis that the firm has chosen not to present anything to counter the evidence from the complainer. We will also consider publishing these cases. [D, Iv, P, If]
6. Our Service Experience Team (SET) will identify new opportunities to improve customer service (either implementing reform, or for our existing process) and implement these within the year. This will include reviewing the implementation of the new customer feedback system (from 23/24 plan). It will also include work to further consider supporting complainers who have experienced trauma. [D, Iv, If]
7. With the initial four years of work to improve our 'clarity' of communication implemented and audited we will refresh training and awareness with our staff. We will plan and consider further opportunities to make our communication clearer and more accessible to practitioners and the public. [D, Iv, If]
<b>B. STATUTORY OVERSIGHT, TREND REPORTING AND OUR OUTREACH SERVICE</b>
1. We will continue work to deliver our statutory duties of oversight in relation to the Relevant Professional Organisations. We will: <ul style="list-style-type: none"><li>▪ follow-up on our review of Faculty of Advocates conduct complaints system,</li><li>▪ follow-up on our review of the Law Society of Scotland's conduct complaints process to assess progress with our recommendations,</li><li>▪ follow-up on our review of the Master Policy (building up to the next re-tendering) and assess progress with our recommendations, and</li><li>▪ start a review of our approach to the Client Protection Fund. [D, Iv, If]</li></ul>

2. We will process an estimated 11 incoming handling complaints and maintain our performance and customer service on core process including if we are starting to implement reform (designing and 'dual running' a new system, with only minor changes currently proposed but the legislation not yet finalised). [D, If]

3. We will deliver a programme of outreach to the profession through newsletters, videos, online content, events, meetings with senior stakeholders and roundtables. We will consider a pilot of 'drop in' complaints training and engagement for practitioners. [D, Iv, P, If]

4. We will use our complaints data and professional insight to develop an approach to scanning for and tracking regulatory risk factors to help identify potential consumer detriment. [Iv, P, If]

5. If required, we will review the approved regulator complaints system under the Legal Services (Scotland) Act 2010 to ensure it remains fit for purpose after the eventual launch of the licensed provider scheme and with associated communications and the training of staff (all needing updated, due to delays in the scheme being launched by other bodies). [D, Iv, P, If]

### **C. STATUTORY CONSUMER PANEL AND ALIGNED WORK**

1. The Consumer Panel will continue to contribute to the reform debate, ensuring a clear consumer voice influences both the SLCC's policy development and the parliamentary debate. They will provide a vital consultation and challenge role as the organisation moves to transition planning and implementation. [D, Iv, P, If]

2. Ensuring compliance with the new statutory consumer duty coming from the Consumer Scotland Act 2020. [D, Iv, If]

### **D. BUSINESS FUNCTIONS TO SUPPORT THE DELIVERY OUR STATUTORY FUNCTIONS**

1. We will scope an external review of our governance framework (including governance elements of complaints handling/oversight), ensuring our governance is up to date and fit for the future, taking account of best practice and the requirements of any reform implementation, with a view to obtaining recommendations for the short, medium, and long-term. We will explore further independent non-exec appointments to committees to support the development of diverse talent to support public Boards in Scotland. [D, Iv]

2. We will continue to improve our HR work including reviewing the progress we have made on improving diversity through our revised recruitment processes, starting to make use of data analytics in HR, and updating our approach to succession planning. [D, Iv]

3. We will develop our use of technology to deliver our role. This will include scoping a review of our IT support contract, and considering a tender process (this may be delayed to accommodate reform work). We will also undertake a five-year review of personal hardware needs (laptops etc) and plan a replacement cycle. [D, Iv]

4. We will scope a review of Internal Audit contract and consider a tender process (this may be delayed to accommodate reform work). [D, Iv]

5. We will finalise our data action plan and begin implementation. This work will include ensuring we are aware of relevant developments in the legal, regulatory and complaints sectors. [D, Iv, P, If]

6. We will start work to look at how our carbon footprint can be accurately calculated, and we will consider how our e-footprint for carbon can be reduced. We will encourage the use of volunteer days to support sustainability initiatives. [D, Iv]

7. We will review our equality statement and how we ensure that the 'general duty' under the Equality Act 2010 is given 'due regard' in all our work. We will perform a dip sample of reasonable adjustments we offer complainers to understand our users better. [D, Iv, P, If]

8. We will prepare for revalidation by the Ombudsman Association (due in September 2025) so that we can remain an active part of a community which shares best practice and provides the public an independent assurance on our process. [D, Iv]

9. We will work with Scottish Government on the appointment of one new lay member within 2024/25, and start discussions on the arrangements for a public appointments process to replace members demitting office in March 2026. [D]

## **E. ENGAGING IN REFORM AND IMPROVING THE PROCESS**

1. We will continue to engage in the progress of the Bill and will also liaise on enabling statutory instruments. We will continue to contribute to wider discussions (for example, responding to consultations from other bodies in the system as they implement reform, especially where their functions interface with ours). [D, Iv, P, If, T]

2. Once the legislation is finalised, we will need to review it and create costed implementation/transition plans to discuss with Government re transition funding. We will commission legal advice to support this. [D, Iv, P, If, T]

3. We will start work on an overarching statement on organisational purpose and regulatory approach based on the new Act (including consultation with stakeholders) as this will inform our approach to implementation (and therefore be required before we can submit a request for transition costs). [D, Iv, P, If, T]

## **F. POST REFORM AND UNCERTAINTY**

1. We face a period of unprecedented uncertainty. Part of our Operating Plan must address this, and we will continue to monitor likely scenarios and stay ready to adapt our approach (e.g. bringing forward or deprioritising projects) as required to ensure our resource is well deployed. [D, Iv, P, If, T]