

Sent by email only to
schedule4approval@legalservicesboard.org.uk

30 July 2021

Dear Sir/Madam,

The Legal Services Consumer Panel (Panel) welcomes the opportunity to respond to the Legal Services Board's (LSB) consultation on applications to alter regulatory arrangements.

The Panel fully supports the substance of the proposals. We particularly welcome the emphasis on ensuring that Approved Regulators demonstrate that their proposals explicitly and demonstrably focus on the regulatory objectives, including making changes that are in the public interest.

In the Panel's experience, Approved Regulators have not always demonstrated these crucial points, especially when proposals require a fine balancing act or when there may be tensions between regulatory objectives. Therefore, we welcome this unambiguous guidance to the Approved Regulators.

We are also hopeful that this strong steer will lead to improvements in the quality of evidence and analysis required to satisfy the LSB. Moreover, the emphasis on regulatory objectives will help to facilitate meaningful engagement and input from other stakeholders, like the Panel, who may struggle, without robust or demonstrable evidence from the Approved Regulators, to engage with the crux or merit of regulatory changes. For too long the Panel has found itself arguing against proposals that we sometimes support in principle because of scant evidence or focus on how these proposals align with the regulatory objectives.

We also support the proposal that specific emphasis should be placed on the impact on diversity and inclusion, including assessing the impact of proposals on persons with protected characteristics.

Yours sincerely
Sarah Chambers

A handwritten signature in black ink that reads "S Chambers".

Chair
Legal Services Consumer Panel