

Riliance: response to the LSB's consultation on the Draft Business Plan

Although I attended your consultation meeting on 15 January 2019, and provided my thoughts on the plan, here is confirmation of those thoughts:

- Question 1 - the plan makes no reference to the demise of the LSB and the introduction of a new single legal services regulator. What is the current position in relation to this?
- Question 2
 - Ongoing competence - it will be key that regulators monitor this area as many law firms have still not turned their minds properly to it and see it as a 'tick-box' exercise. Competence and the planning/recording of appropriate training needs to be tested.
 - Public legal education - data suggests that between 50% - 75% of firms are not currently complying with the new transparency requirements, which if allowed to remain the same, could severely impact on achieving this objective. Many firms believe that the publication of prices does not achieve anything as they are only able to show a range of fees or average prices that are subject to confirmation once they have met the consumer and found out exactly what their circumstances/needs are; such a position does not allow consumers to shop around as they don't have an exact cost to compare against others.
 - Technology - there needs to be more clarity in relation to how regulation works alongside technology, for example, is it in the best interests of clients to do everything from a distance over the web/email, where it is difficult to assess/understand the vulnerability of clients (learning disabilities, reading problems, etc)?
- Question 3 - No
- Question 4 - we advise firms in the regulated sector, mainly legal, so are able to provide insights from the coalface into the issues covered by the plan, for example, we are regularly asked to advise on transparency, competency, AML, regulation, etc.
- Question 5 - the increased use of technology to provide legal services may negatively impact on vulnerable consumers and those where English is not their first language, especially where this is internet-based and the firm does not get to meet them. Technology is aimed at making processes more efficient but due to cost pressures firms could be driven to sideline the vulnerable who may have difficulties using it.

I would welcome working with the LSB as part of any Working Groups where insight from the coalface would be beneficial.