

The Association of Consumer Support Organisations (ACSO) response to the Legal Services Board discussion paper 'Quality indicators in the legal services market'

The Association of Consumer Support Organisations (ACSO) welcomes the opportunity to respond to the Legal Services Board (LSB) [discussion paper](#) on quality indicators in the legal services market.

ACSO represents the interests of consumers in the civil justice system and the reputable, diverse range of organisations who are united in providing the highest standards of service in support of those consumers. Its role is to engage with policymakers, regulators, industry and the media to ensure there is a properly functioning, competitive and sustainable justice system.

As the Competition and Markets Authority (CMA) stated in its 2016 study of the legal services sector, it is important that consumers of legal services have access to information on price, service and quality before purchase so they can make informed choices.¹ Although notable progress has been made on improving transparency, there is a lack of information on the quality of legal services.² The Solicitors Regulation Authority (SRA) report, *Better information in the legal services market* found that 85 per cent of people want such information before choosing a legal services provider.³ Information provision has a positive effect on consumers and better-informed consumers generally experience better outcomes.⁴

Consumers often find it difficult to gauge the quality of a legal service provider. There are a number of reasons for this, including that individuals are unlikely to require legal services regularly, meaning they do not have a benchmark against which to judge service.⁵ The justice system is complex and difficult to navigate, and consumers may feel there is minimal public or regulatory information to refer to.⁶ Furthermore, owing to the reasons for requiring a legal service, consumers may fall into a 'vulnerable' category, which will limit their ability or willingness to make decisions or to represent their own interests.⁷ Measures that serve to ease the consumer experience, improve their confidence and ensure they are receiving the highest-quality service should be supported.

Without quality indicators, consumers must continue to rely on such factors as personal recommendations or using the first legal services provider they find (either on the internet or

¹ Competition and Markets Authority (CMA), [Legal services market study: final report](#), December 2016, p.8.

² Competition and Markets Authority (CMA), [Review of the legal services market study in England and Wales: An assessment of the implementation and impact of the CMA's market study](#), December 2020, p.7.

³ Economic Insight, [Better information in the legal services market: a report for the Solicitors Regulation Authority and the Legal Ombudsman](#), June 2018, p.50.

⁴ Economic Insight, [Better information in the legal services market: a report for the Solicitors Regulation Authority and the Legal Ombudsman](#), June 2018, p.51.

⁵ Legal Services Consumer Panel (LSCP) [Quality in Legal Services](#), September 2010, p.4.

⁶ Legal Services Consumer Panel (LSCP) [Quality in Legal Services](#), September 2010, p.4.

⁷ Financial Conduct Authority (FCA), [Guidance for firms on the fair treatment of vulnerable customers, February 2021](#), p.3.

near where they live).⁸ However, the indicators must be simple to understand, easy to locate, accessible and capable of straightforward comparison between legal services providers.

A cross-sector, collaborative approach is required to provide consumers (both individuals and small to medium-sized enterprises) with more comparable information on the quality of legal services. This includes determining what information is of the most value to consumers to enable them to make easy and informed decisions before they purchase. As well as the information needed for use by providers as a best-practice tool that will improve standards in the sector by focusing on the drivers of customer engagement and satisfaction. This will create the commercial imperative for legal services providers to attract new business by excelling in those selected quality indicators.

This can be done both directly with individual firms and through representative bodies such as ACSO. Moreover, the LSB should consider what learnings can be taken from quality indicators and transparency measures in other sectors, such as healthcare.

Question 1: We are proposing to think about quality in terms of these dimensions: technical quality, customer service and outcomes. What do you think about these elements and are there others we should consider?

The LSB's proposal to define the quality of a legal product/service based upon its technical quality, service quality and the outcome of the service appears sensible. There will be instances when the three dimensions may overlap, so clarity of the definitions and how to manage and report on areas of overlap is important.

Question 2: We are proposing to encourage use of these types of information: objective data, consumer feedback and general information about providers. What do you think about these types of information and are there others we should consider?

We support the LSB's proposal to encourage objective data, consumer feedback and general information about providers. The merits and drawbacks of each type of information is discussed in greater detail in our response to question 5.

It is the combination of a variety of different information sets and how they are aggregated, analysed and summarised that is essential. Quantitative data must be obtained across these areas, as well as the relevant contextual information for the data. The inclusion of consumer feedback alongside objective data and more generalised information is vitally important but choosing the right metrics (or combination of metrics) is key.

Question 3: Which groups of consumers and/or types of provider should action in this area focus on?

The legal services sector is not a homogenous block, therefore measures to improve transparency will inevitably have a different impact in different areas. For more commoditised legal services - such as conveyancing, wills and probate, low-value personal

⁸ Legal Services Consumer Panel (LSCP), [Tracker Survey 2018: How consumers are choosing legal services](#), August 2018, p.3.

injury and simple divorce or employment matters - certain measures may be more suitable than others. We suggest the LSB initially focus upon a select number of process-driven types of legal services, which are both commonly purchased and allow for easier comparisons, such as those listed above.

In making progress on quality indicators, it is important to ensure that consumers who face particular obstacles to engaging with online services, such as digital comparison tools (DCTs) or peer review sites, are not excluded. This includes individuals who are digitally illiterate, lack access to the internet or who lack confidence online due to fear of online crime or lack of trust. According to Lloyds Bank, an estimated 9 million people are unable to use the internet or their devices without assistance.⁹ We urge the LSB to consider ways to improve access to information on service quality for all consumers, with a particular focus upon the most vulnerable in our society. ACSO would be happy to provide further support and evidence as required by the LSB.

Question 4: Should there be a base level of transparency on quality across the market and enhanced transparency in priority service areas? What should a base level of transparency on quality consist of?

In principle, we agree with the creation of a base level of transparency on quality across the legal services market. However, this should be restricted to areas where there is a disparity between the power and knowledge of the provider and consumer. For example, sophisticated and regular purchasers of commercial legal services have little, and certainly far less, need for quality indicators compared to consumers or small or medium sized enterprises (SMEs). We would welcome further engagement with the LSB, other regulatory bodies, ombudsman services and leading stakeholders on the matter, to determine what information will most benefit consumers and how best to make this information accessible for them. Furthermore, this will enable an in-depth analysis of the information on quality that is readily available or relatively easy to collect and collate.

The LSB's proposal to enhance transparency in priority services areas where quality information is already available should not come at the cost of increasing transparency across the sector as a whole. However, we support the LSB addressing enhanced transparency indicators in the most commonly used consumer/SME legal services, such as those listed in our reply to Question 3. This step would allow the whole of the market (excluding where a sophisticated commercial purchaser engages with a provider) to be responsible for addressing the lack of competition in the legal services sector. At the same time, priority focus can be given to the more commoditised areas of law and where there is a common and high demand for such services.

Question 5: How useful could consumer feedback, objective data and general information about providers be in informing consumer choice? What are the benefits and drawbacks of these types of information?

To ensure consumers engage with and comprehend fully the information that is provided to them, it must be presented in a clear, accessible manner. Data that is obscure in any way, or

⁹ Lloyds Bank, [Lloyds Bank UK Consumer Digital Index 2020](#), May 2020, p.4.

which could be misunderstood, is unlikely to address information asymmetry within the sector. Moreover, it could easily be counterproductive and reinforce the impression consumers might have that legal services are exclusive and/or closed to public scrutiny.

There is benefit in identifying indicators on a range of key data sources across the three areas, that can be presented as a package of data points but also possibly aggregated in some way to provide an overall rating of the quality of the service which can readily be compared. No one data source will provide a meaningful insight and comparison on quality, which a consumer could meaningfully use.

As an example, ACSO has been working with Defaqto to improve their approach to rating legal expenses insurance (LEI) products, which will drive better standards of product and service across the LEI sector. It is the aggregation and scoring of a range of data points that is ultimately crystallised into a simple one-to-five-star rating.

At this time, Defaqto cannot access quality or service data. Yet, if they were able to do so and combined this with a rating of the quality of the product, the outcome would still be a simple star rating which would allow an easy comparison between different legal products. This is one example of how collecting various data points can benefit a consumer.

As recognised by the LSB, the contextualisation of data is crucial. For example, complaints data from the Legal Ombudsman Service (LeO) could be misleading for consumers as not all cases which reach the final decision stage are due to the fault of a service provider. Larger firms, which have a larger caseload, are likely to have a greater number of complaints set against them and therefore could find themselves unfairly penalised. Contextualising LeO decisions with firm-based data will enable consumers to gauge more accurately satisfaction with individual firms and legal services in general.

The LSB must consider how best to ensure consumers can locate objective data. Moreover, quality indicators must be standardised to ensure consistency across firms' data and to allow meaningful comparisons to be drawn. We note that the Legal Services Act 2007 placed limitations on what data LeO is able to publish and, whilst the government has acknowledged the case for reform, a review of this legislation has not taken place.¹⁰

On the publication of data on first-tier complaints, the SRA held a public consultation in 2017 which proposed to publish the data it already collects on first-tier complaints made against the firms it regulates and their area of practice.¹¹ A substantial number of respondents disagreed with the SRA's proposal, with concerns raised that providing appropriate context to the data would be difficult and that publishing complaints data would distort the behaviour of some firms and their employees when it came to reporting complaints. This could lead to complaints being hidden, thereby hampering a firm's ability to learn from complaints and improve its service.¹² As such, the SRA decided not to proceed with the publication of first-tier complaints information.

¹⁰ The Right Honourable Lord Keen of Elie QC, [Government response to CMA legal services market study](#), December 2017.

¹¹ Solicitors Regulation Authority (SRA), [Looking to the future: Better information, more choice](#), June 2018.

¹² Solicitors Regulation Authority (SRA), [Looking to the future: Better information, more choice](#), June 2018.

In light of these concerns, further research is required on the likely impact of the publication of first-tier complaints data. This should explore both the risks and benefits of providing this information, as well as how best to contextualise it. ACSO would be pleased to support the LSB in its approach to research of this nature and to provide additional advice or evidence as required.

Consumer feedback is a useful means of gauging the quality of a product or service before making a purchase. However, there are limits to consumer feedback as a sound indicator of quality. First, a consumer may not be satisfied with the legal advice they have been given, even if it was appropriate. This can often be the case where the consumer has a strong emotional attachment with the legal matter in question. As highlighted in the discussion paper, a good outcome may not meet the consumer's wishes but still serve the interests of justice.¹³ Similarly, poor advice may be delivered by a legal professional whom the consumer trusts and is satisfied with. Indeed, between lawyers there exists the oft-commented-upon distinction between poor-quality advice presented in a confident and exuberant way, and poorly presented advice of a high quality.

Second, large areas of legal competence remain invisible to consumers accessing legal services, such as the specific complexity of a legal matter and what constitutes a fair and reasonable settlement in a case.

Third, peer review sites such as Trustpilot are capable of being manipulated, as demonstrated following the High Court judgement in *Summerfield Browne v Waymouth*.¹⁴ The Court found that a review left by Mr Waymouth, a former client of Summerfield Browne Ltd, regarding the service he had received from the law firm was defamatory and ordered him to pay £25,000 in damages. Following coverage of the case in the national press, many unsolicited and unwarranted reviews for the firm appeared on Trustpilot and Google reviews, with individuals stating they were leaving negative feedback on the basis of the media's reporting of the litigation rather than their own experience of the law firm's services. At the time of writing, Trustpilot has temporarily closed the profile of Summerfield Browne for new reviews.¹⁵

Fourth, consumers appear unlikely to use either social media or online review/comparison sites to make a recommendation or post any comment about the legal services they have experienced. A survey conducted by IRN Research identified a few reasons for this lack of reviews, including that many consumers are cynical about the usefulness and/or credibility of reviews and therefore had no interest in submitting one.¹⁶

Finally, consumer satisfaction is likely to be easier to obtain when they hold low expectations. For example, the findings of the '*Legal needs of individuals in England and Wales*' survey

¹³ Legal Services Board (LSB), [Quality indicators in the legal services market: discussion paper](#), February 2021, p.11.

¹⁴ British and Irish Legal Information Institute (BAILII), [Summerfield Browne Limited -and- Philip James Waymouth](#), High Court of Justice, Queen's Bench Division, 18 January 2021.

¹⁵ Trustpilot, [Summerfield Browne Solicitors](#), [online] accessed 10 April 2021.

¹⁶ IRN Research; CILEx Regulation, [Legal services for consumers: qualitative research into client behaviour, use and satisfaction](#), October 2020, p.36.

(2020) found that 85 per cent of consumers have low or medium legal confidence, meaning they are unlikely to think they can achieve a fair and positive legal outcome in various scenarios.¹⁷ A consumer who is relieved or satisfied with receiving legal assistance when they had expected to receive little or none is not a reliable indicator of the quality of advice they have been given.

This is not to suggest that the LSB and other regulatory bodies should not encourage legal service providers to collect and publish consumer feedback. Despite having outlined the negatives of consumer feedback as a metric of quality, the benefits far outweigh the risks.

Returning to the survey published by IRN Research, only a few of those surveyed said they had been asked by their legal adviser to provide a review, offer a comment on a client legal form or add a comment to an online directory. Yet, of those who were asked, the majority did so. Moreover, as evidenced in the Community Research report commissioned by the LSB, consumers value customer reviews as a means to understanding more about a provider is like to work with, whether they offer value for money and whether they achieve good outcomes.¹⁸

Many major UK law firms already review regularly a range of quality indicators, such as complaint volumes and trends, customer satisfaction, customer effort, net promoter score and others. But this information is not currently accessible outside of the organisation.

There are other indicators and/or accreditations of quality which are externally verified and relate to a general indication on the standing of the firm, how it is managed and the manner in which it delivers its services to its customers, such as ISO, IIP, Lexcel, Cyber Essentials, Institute of Customer Service and so forth.

In regard to the collection of contextual information, some legal providers may be unwilling to make certain information (such as annual turnover, the number of fee earners or number of matters handled) publicly available. However, we note that many law firms already publish this information and it is not necessarily deemed confidential.

The LSB should consider seeking powers to impose requirements on firms and/or seek the support of regulators such as the SRA, to submit information of this kind in order for it to be published. As an alternative, or in addition to this, best practice should be encouraged by the LSB (and others, such as the SRA) to promote the voluntary provision of contextual data from firms.

Question 6: What role, if any, should success rates and complaints data have in informing consumer choice? Is there other quantitative data that would be helpful to inform consumer choice?

As mentioned in the response to question 5, complaints data and success rates are hollow unless contextual information is provided. Furthermore, there is a need for both the LSB and

¹⁷ YouGov; The Law Society; Legal Services Board (LSB), [Legal needs of individuals in England and Wales: Technical report 2019/20](#), January 2020, p.22.

¹⁸ Community Research, [Quality indicators in legal services](#), January 2021, p.4.

firms to communicate effectively to consumers what this information can and cannot guarantee about the quality of a service provider.

This information should be contextualised by providing the data in aggregate for the firm in addition to its practice area, which will highlight the standing of the firm relevant to a consumer's particular interest(s).

In our answer to question 5 above we provide examples of other data of potential relevance.

Question 7: Which of these different channels – law firms' websites, DCTs, a single digital register – do you think could be most effective in providing access to information on quality? Are there other channels we should consider?

Consumers will benefit from the provision of additional information on all three of the channels proposed by the LSB, although there are benefits and drawbacks to each. Our views on the development of a single digital register are outlined in our response to question 10.

In regard to law firms' websites, the provision of information in a standardised format, such as complaint data or error rates, will benefit consumers to an extent, provided it is contextualised appropriately. The consultation document references gender pay gap reporting as a practical example of how this works in a different context.

However, it is important to note that data on gender reporting is frequently misunderstood and misrepresented. As highlighted by the Office for National Statistics (ONS), "the gender pay gap figures... do not show differences in rates of pay of comparable jobs, as they are affected by factors such as the proportion of men and women working part-time or in different occupations".¹⁹ It is important that the LSB carefully considers the information it will require firms to publish in order to ensure it does not mislead consumers and does not unfairly disadvantage certain firms.

An additional drawback is that although the information on law firms' websites is standardised, it does not necessarily allow for consumers to easily compare the quality of providers and it may not be easy to locate on different websites without a standardised approach. Consumers will still need to search for information across a range of websites and like-for-like comparisons would remain difficult. At present, consumers typically compare three providers before purchase, and it does not seem likely that this will increase in the event that additional information is displayed on law firms' websites.²⁰

Digital comparison tools (DCTs) save consumers time and effort when searching for a product/service and increase competition between suppliers to provide lower prices and

¹⁹ Office for National Statistics (ONS), [Annual Survey of Hours and Earnings: 2017 provisional and 2016 revised results](#), 26 October 2017.

²⁰ Legal Services Consumer Panel (LSCP), [Tracker Survey 2020: How consumers are choosing legal services, August 2020](#), p.5.

better choices to consumers.²¹ As stated by the CMA, DCTs should result in lower prices and better choices, particularly in sectors where consumers often do not shop around.²²

At present, no large-scale DCTS operate within the legal services market and surveys show that consumers are using those available to them only to a limited extent. According to the *Legal needs of individuals in England and Wales* report, only 20 per cent of consumers search for reviews, use cost comparison sites, research specific services or ask for suggestions on which provider to use.²³ As DCTs are provided by commercial organisations, their lack of willingness to enter the legal services market to date reflects its perceived unattractiveness.

There are various reasons for this. First, legal services/ products are purchased infrequently compared to, for example, legally required insurance products that are typically purchased annually. Second, aggregators are unable to access data that would allow for a simple comparison of legal products and services in a meaningful manner. Third, legal services are less of a price-driven purchase than, for example, insurance.

If aggregators were able to access relevant and meaningful data, it would remove one of the barriers to DCTs becoming more prevalent in the sector. This is unlikely to happen in the short to medium term without some form of regulatory intervention.

It is worth noting that, as indicated by the LSCP research base, legal services are more likely to be purchased by older consumers. In the LSCP *Tracker Survey*, 63 per cent of respondents who had used legal services in the last two years were aged 55 or above, yet the median age of the UK population is 40.3 years.²⁴ This reflects the greater likelihood of older consumers to seek products such as wills and probate and power of attorney. This age group is also less likely to use the internet regularly than younger consumers (although this gap is closing) and be less familiar or comfortable with, for example, price aggregators which have existed for a relatively short period of time.²⁵

However, there is evidence of consumer willingness to engage with DCTs, with 45 per cent of consumers saying they would turn to online comparison tools to help them compare providers.²⁶ Facilitating the development of DCTs will necessitate improving the availability of data to allow consumers to compare legal services easily. As outlined in our response to question 10, we believe the development of a single digital register will help to support this initiative.

²¹ Competition and Markets Authority (CMA), [Digital comparison tools: summary of final report](#), September 2017.

²² Competition and Markets Authority (CMA), [Digital comparison tools: summary of final report](#), September 2017.

²³ YouGov, [Legal needs of individuals in England and Wales: technical report 2019/20](#), January 2020, p.51.

²⁴ Legal Services Consumer Panel (LSCP), [Tracker Survey 2020: How consumers are choosing legal services](#), August 2020, p.3.; Office for National Statistics (ONS), [Population estimates for the UK, England, Wales, Scotland and Northern Ireland: mid-2019](#), June 2020.

²⁵ Office for National Statistics (ONS), [Internet access – households and individuals, Great Britain: 2020](#), August 2020.

²⁶ IRN Research, [SRA Transparency Rules: Year One Evaluation](#), October 2020, p.69.

Question 8: Do you have evidence on current usage of DCTs not mentioned in the paper? How could we best encourage engagement by consumers and law firms with DCTs? What are your views on the specific potential solutions, such as requiring law firms to signpost to DCTs, embed ratings, or prompt consumers to leave a review?

ACSO is engaging with the SRA on its six-month pilot to improve the range and the accessibility of information available to consumers on the quality of legal services.²⁷ The pilot, which focuses initially on conveyancing and employment law, will examine opportunities for firms to seek feedback from their clients and to manage online customer reviews.

As mentioned above, DCTs are not being widely used at present. Unless DCTs can easily compare legal services/products they will be unable to support the work currently being undertaken by the LSB, regulatory bodies and others to improve competition and transparency, as there will be little commercial viability for their doing so.

The challenge is to ensure that DCTS are able to view the legal services sector as being commercially attractive. The sector remains considered in annual revenues, even discounting the commercial purchasers of commercial legal services, yet without being able to access standardised, reliable and meaningful data DCTS cannot compare legal services. The market tends to be slow to adapt without regulatory intervention.

As mentioned above, there is an overlap between the SRA's pilot scheme and ACSO's work with Defaqto on its star rating process for LEI products. A further output of this work aims to widen the remit of Defaqto's star rating process to include the rating of commercial LEI products, which play a critical role in ensuring access to justice for small businesses who are unlikely to be able to afford internal legal departments. As our work with the SRA and Defaqto progresses, ACSO will continue to share insights with relevant parties and convene industry discussions on quality indicators. We look forward to our continued engagement with the LSB on this matter.

Question 9: What, if any, steps should regulatory bodies take to help consumers and legal services engage with DCTs safely?

To date, some steps have already been taken by regulatory bodies to encourage the safe use of DCTs, notably the SRA's formulation of a voluntary code of conduct for DCTs in the legal services market.²⁸ The development of additional guidance for firms on how to respond to or handle negative consumer feedback on DCTs is likely to be beneficial, particularly given the *Summerfield Browne v Waymouth* case.

Question 10: What range of quality information, if any, would it be appropriate to hold on a single digital register?

We agree that the creation of a single digital register of regulated providers will encourage the growth of DCTs in the legal services sector through the greater provision of data. In line

²⁷ Solicitors Regulation Authority (SRA), [Quality indicators – join our pilot](#), 14 January 2021.

²⁸ Solicitors Regulation Authority (SRA), *Voluntary code of conduct for digital comparison tools operating in the legal services market*, February 2021.

with the findings of the CMA, a register would reduce the cost to intermediaries and firms of collecting and provide information that is already captured by regulators.²⁹ Moreover, increasing the quantity and quality of data about legal service delivery is likely to support progress in data analytics and technological innovations, which require high-quality input and output data.

It appears sensible to develop the single digital register on an incremental basis, starting with basic information about practitioners/entities and objective data generated by the regulatory bodies and LeO. Over time, and based upon the outcome of industry discussion and additional research, the register should develop to include further information that is pertinent to the consumer decision-making process.

The LSB will need to consider how to build public awareness of a single digital register and how they use it to determine the quality of a legal service. The consultation document suggests that consumers could access the register via the Legal Choices website and/or through regulatory bodies' websites. In regard to the former, we are sceptical that the current Legal Choices influences consumer behaviour and improves public knowledge of legal services.

Although Legal Choices exceeded its target number of visitors between 2017 and 2020, from a consumer perspective it still faces some challenges.³⁰ It is difficult to locate unless one is previously aware of its existence, which, as seems likely, few people are. If using the internet search term 'solicitors', for example, the Legal Choices website does not appear on the first ten pages of results. If using 'personal injury' – one of the common reasons consumers access legal services – the website is not in the top-100 hits and again does not feature on the first ten pages of results.

If consumers are to access the single digital register via Legal Choices, considerable investment is needed to raise the profile of the platform and to ensure it is a useful tool for consumers to assess the quality of legal service providers. We respectfully suggest that Legal Choices would benefit from further specialist expertise being applied to the task in hand.

We have commented above on the range of quality indicators that could be included on the register.

Question 11: What are your views on the relative merits of a market-led approach compared with a standardised regulator-led approach?

As stated previously, there has been only limited development in the legal services sector to date and we have no reason to believe this will materially change this decade without direct regulatory intervention.

However, if the regulatory bodies work to support the emergence of a DCT market which would sit alongside a regulator-led digital register, this would have the best chance of making

²⁹ Competition and Markets Authority (CMA), [Review of the legal services market study in England and Wales: An assessment of the implementation and impact of the CMA's market study](#), December 2020, p.86.

³⁰ Legal Choices, [Legal Choices summary report 2017- 2020](#), November 2020.

a material difference. In doing so, the market will respond to the commercial incentives that will be created to compete on the quality measures for new business. Again, there is evidence to show that a significant proportion of consumers are willing to engage with DCTs and this is likely to increase as higher-quality DCTs appear in the market.³¹

Question 12: Do you have any further comments on our analysis and approach to determining suitable quality indicators?

We look forward to the findings of the LSB's review on the ongoing competence of legal professionals. As the landscape of the legal sector continues to undergo considerable change – resulting from technological innovations, regulatory developments and shifting consumer habits – it is essential that legal professionals continue to deliver their services in a competent, efficient and ethical manner. The provision of greater quality indicators goes hand-in-hand with this review, not least as it will help to ensure that the marketplace will aid the regulation of the competence of legal services as consumers select and reject legal services accordingly.

To conclude, the matter of effectively communicating the quality of legal services to consumers is complex, as reflected in the lack of progress made since the CMA's recommendations in 2016. As such, it is necessary to convene discussion across the justice sector to determine what information is most beneficial to consumers and how best to ensure they are able to access it. ACSO welcomes the opportunity to further support the LSB by helping to facilitate these discussions and in providing further evidence and advice as required.

22 April 2021

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³¹ IRN Research, [SRA Transparency Rules: Year One Evaluation](#), October 2020, p.69.