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By email only

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Dear Matthew

LSB Draft Statement of policy: empowering consumers

Thank you for the opportunity to respond to this consultation.

We note that paragraph 2 of the draft statement states that the expectations set out in the draft statement “are expressed as general expectations, principles and specific expectations”. We welcome the approach of setting out outcomes that regulators should pursue and the principles to which the LSB will have regard. However, there are a significant number of “specific expectations” which are, in effect, requirements to implement or do certain things. The draft statement (paragraph 12(b)) recognises that regulators “may adopt different approaches to meeting the general expectations and so pursuing the outcomes”, but it appears to give no room for flexibility in the way the regulators can implement the “specific expectations” in order to take account of consumers’ needs in the market(s) they regulate. We therefore urge the LSB to be less prescriptive in its approach.

We would encourage the LSB to assess (and publish) the likely cost of implementing the measures, in particular the “specific expectations”. The cost should be assessed for providers of legal services as well as the additional resources that the frontline regulators may need (including changes to their online registers).

It would be helpful if the LSB would confirm its definition of “small businesses”.

We note that the LSB’s statutory [rules on registers of licensed bodies](#) (made under Legal Services Act section 87(4)) set out the information that licensing authorities must display on their registers about ABS licensed by them. However, paragraph 23 of the draft Statement of Policy sets out a much wider range of information that regulators are “expected to take steps to ensure [is] available in at least one single location online” which may include the regulator’s register. It would be helpful to understand how the LSB will interpret the different obligations that accompany these two different requirements (statutory rules and statement of policy).

Yours sincerely



Fran Gillon
Chief Executive