

## Annex A – Responses to our April Consultation

The purpose of the April Consultation Paper, *Outcomes-focused regulation - transforming the SRA's regulation of legal services* (the April Consultation) was to seek the views of our stakeholders on our proposals to transform our regulation.

We received 62 written responses and our roadshows and workshops were well attended. We thank those who took time to write a response or attend an event.

Many responses were from representative groups; accordingly it is not appropriate to present a statistical analysis. The analysis below presents the key themes arising in response to each question.

Some responses were more relevant to the Handbook consultation. These have been noted and will inform the development of the Handbook. To join the discussion about Handbook, visit [www.sra.org.uk/sra/consultations/OFR-handbook-October.page](http://www.sra.org.uk/sra/consultations/OFR-handbook-October.page).

Question 1 of the April Consultation asked:

### **Do you have any comments on our goals and vision for OFR?**

The majority of respondents supported the broad vision for OFR.

*“..the aims of goals and visions of OFR are appropriate and necessary to put the consumer first and target the few lawyers and firms who taint the profession's reputation.” – Bristol Risk Managers Group*

A number of those respondents also expressed concerns about implementation including:

- The SRA's ability to deliver, whether as a result of the current calibre of staff or the “ambitious” timescale.
- The change to Principles-based regulation. Some respondents felt the lack of prescriptive rules was a particular problem for lawyers.
- The timescale for implementation. A few respondents felt this would disadvantage firms without current risk management systems in place.
- The cost of change.

### **Our response**

As set out in the Policy Statement, all elements of the transformation programme are on track and the timetable has been maintained. In the Policy Statement we explain why we remain of the view that Principles-based regulation will be more effective for consumers, regulated firms and the SRA. We believe that firms which do not currently have effective risk management systems in place should address this issue immediately (under the current regulatory requirements) and have sufficient time before the implementation of OFR to establish the necessary systems.

# Questions 2, 3 and 19 of the April Consultation asked:

**Are there any particular things we should consider to ensure that consumer protection remains central to our regulatory approach?**

**How do you think we should work with consumers to help them to understand our role as a regulator for the wider benefit of consumers as distinct from the Legal Ombudsman's (LeO's) role in facilitating individual redress where appropriate?**

**Do you have any comments on our proposed approach to consumer education? Are there particular initiatives we could consider?**

Views expressed included:

- Support for placing consumer protection at the heart of a regulatory system. Suggestions for consumer protection included prescriptive rules in high risk areas and research into what consumers require from legal services.
- Emphasis of the difference between public interest and consumer interest. Practitioners noted that consumers' interests would always be subject to the rule of law.
- Confusion about whether the definition of consumers encompassed private clients and businesses.
- Concern that consumer education was for LeO and undertaking an education programme would be costly. Respondents' suggestions for consumer education included developing the SRA's use of new media.

There was also a misunderstanding that in referring to outcomes we mean whether a consumer wins a case, rather than the quality of advice offered.

## **Our response**

Our planned approach to building the input of consumers into our work is set out in Section 3 of the Policy Statement. We are enhancing our consumer research capability as part of our work in introducing an approach toward Consumer Affairs. Our focus is on consumer protection, education and support. Details of our full consumer research programme will be available during the first quarter of 2011.

The 'outcomes' in Outcomes-focused regulation are not about whether the client wins or loses a case. They are about the standard of the professional service delivered to the client.

We have retained detailed rules in the Handbook in a number of areas. Further detail can be found in our [Handbook Consultation](#).

# Questions 4 and 5 of the April Consultation asked:

### **Are there any other implications we need to consider?**

### **Do you have any other comments on the key implications for firms as set out above?**

Many respondents were concerned about the impact of outcomes-focused, risk-based regulation.

Concerns included:

- Firms would find implementation expensive, in part due to reporting and notification requirements.
- Smaller or less sophisticated firms would find implementation difficult and guidance would help.
- A number of respondents emphasised the need for flexibility in our approach, to recognise that decisions made by firms are often made in good faith.

### **Our response**

The SRA's response to these points is addressed in the Policy Statement and in the response to the other questions.

Questions 6 and 21 of the April Consultation asked:

### **Do you have any comments on how the SRA and firms can work together to build the necessary degree of trust and confidence for the move to OFR?**

### **Are there other ways we can engage with our stakeholders in our move to OFR?**

Respondents generally requested more information from the SRA.

Many respondents felt the SRA needed to work hard to engage with firms. The SRA's roadshows attracted a lot of support. Some representative organisations offered their support.

*"As an organisation dealing with specialist conveyancers we would welcome some ongoing dialogue with you on behalf of our firms as we believe that this would build a genuine constructive dialogue for you to understand us better and for us to understand your perception of issues". – Conveyancing Association*

### **Our response**

The SRA will continue to arrange face to face events, and we have recently launched webinars, enabling firms to access information at a convenient time.

We have provided further information about the important role of representative bodies in response to question 13.

Questions 7 and 8 of the April Consultation asked:

**Do you have any comments on the central role of the Risk Centre in our move to OFR?**

**Do you have any other suggestions for the activities the Risk Centre will undertake?**

Respondents' views about the Risk Centre were mixed. Some respondents were unclear how it would be structured and questioned how much it would cost. Other respondents felt the Risk Centre was a good idea but commented on the size of the challenge ahead.

*"In practical terms, we strongly believe that the Risk Centre should start with a relatively modest aims and then grow incrementally as its knowledge and experience increases....It would be a real shame for the potential for the Risk Centre to be respected and trusted central part of the SRA to be compromised by overreaching in the early days, before it has the chance to gain the experience required." – Bristol Risk Managers Group.*

Some of the suggestions for the activities of the Risk Centre were:

*The LSB Consumer Panel suggested severity of impact on consumers and vulnerability of consumers as two other risk indicators.*

*Stephensons solicitors and other respondents suggested we measure positive indicators such as Lexcel.*

*Allen & Overy and other respondents suggested the Risk Centre publish regular lists of frequent risk indicators.*

### **Our response**

We have explained the risk assessment model in Section 1 and Annex B of the Policy Statement. We have provided information about our organisational transformation in Section 2.

We will consider the use of positive probability indicators, such as Lexcel accreditation, alongside other positive and negative probability indicators.

We will publish regular risk outlooks to assist the the regulated community.

Question 9 of the April Consultation asked

**Will firms understand our need to receive information from them in order to undertake high quality risk assessment?**

Responses were mixed. Respondents:

- Understood the need to collect more data than at present; however such requests would need to be justified and clearly explained.
- Expressed concern about commercially sensitive or confidential information being released.
- Expressed concern about gathering the information and suggested that data could be gathered from other sources if firms had provided it previously.

## **Our response**

We received similar responses to our May Consultation where we also asked about information and reporting requirements. We recognise the concerns of firms in this area and have set out further information about reporting and notification requirements in this Policy Statement and in the October Handbook consultation.

Question 10 asked:

### **Do you have any comments on our proposed approach to authorisation?**

Responses to question 10 were mixed. Some respondents were interested in whether the approach to authorisation would be the same for ABS and non-ABS firms.

*“Our only concern is that authorisation is done on a consistent basis. Businesses providing legal services whether to consumers or on a business to business basis must have the ability to operate within a single clear framework of regulation. There cannot be one rule for one and one for another”. – Horwich Farrelly*

Other responses included:

- Requests for more information about due diligence checks
- Discussion about initial authorisation and reauthorisation. Some respondents thought initial authorisation would deter those wishing to start new firms.
- Requests for the SRA to consult on the scope and nature of reporting and notification requirements.

## **Our response**

The SRA's position in relation to authorisation for new and existing firms, including ABS, is detailed in Section 2 of the Policy Statement.

Question 11 asked:

### **Do you have any comments on our proposed approach to supervision?**

Of those respondents that expressed a clear opinion either way, the majority supported the approach to supervision.

*“...the Group are encouraged by the proposal that the SRA should engage with solicitors not from a confrontational third-party approach, but from a collaborative approach to achieving the right outcomes both for the solicitor and the clients” - Sole Practitioners Group*

Most respondents felt supervision should be consistently applied. Some respondents questioned whether the SRA had the calibre of staff to deliver the approach required. Respondents also raised doubts about whether visiting firms once every five years was necessary.

*“We suspect that having sector expertise is the way forward. Your team of advisors need to be familiar with the different types of practices, for example those specialising in M&A, insurance litigation, conveyancing etc as good working*

*knowledge of basic issues within those sectors will undoubtedly speed up an understanding of whether a firm is compliant” – Parabis Law LLP*

Some respondents were concerned about the cost implications for firms if a supervisor was appointed.

*“The approach is intended to be supportive but could have ramifications which impact adversely. For example, if a temporary relationship management system is in place, it may well have pejorative overtones with banks and insurers and may have ramifications for premium calculation etc.” - Nottingham Law School*

### **Our response**

We are pleased with the positive response to our proposals. The SRA is developing a tailored, consistent approach to supervision. We are piloting our approach. We have provided further information in Section 2 of the Policy Statement.

The SRA is undergoing a transformation which includes developing staff as explained in Section 2 the Policy Statement.

We have conducted a Cost Benefit Analysis of OFR which is set out at Annex [ ] to the Policy Statement.

Question 12 asked:

### **What are the issues for small firms and how could we address them?**

Not all respondents answered this question. Those that did respond raised resources, lack of management systems and personal stress as concerns.

*“Smaller firms often have limited IT systems and thus may not have the information for the annual report, required by the SRA, readily available or be able to obtain that data easily. For this reason the SRA should consult widely on whether the data it requires is obtainable from firms and provide firms with information on the data it plans to collect early on. The SRA may also need to consider in what format it will accept data and whether firms will be able to provide data in the format required.” - The Law Society*

### **Our response**

The SRA is developing a tailored system of supervision as set out in Section 2 of this paper. We will risk assess all firms using the risk assessment model explained in Section 1. Our view is that the approach will not impact adversely on small firms.

Question 13 asked

### **Are there other regulatory tools we could consider?**

Respondents requested guidance to support the high level principles in the Handbook.

A number of other suggestions were made. These included:

- Self assessment of compliance for firms
- Help to wind down firms instead of intervention

- Traffic light indicators for firms
- Benchmarking / Baselineing
- Compliance plans

The Law Society and Nottingham Law School commented on the proposal for mystery shoppers.

*“We are concerned about the SRA’s proposal to use mystery shopping as a regulatory tool...If mystery shoppers are not requiring real work to be carried out it is difficult to see how they can assess the competence of the work a client might receive. If they are merely considering the client experience then we would argue that this is outside the regulator’s remit and therefore inappropriate.” – The Law Society*

### **Our response**

We have now launched our consultation *The Architecture of Change Part 2 – the new SRA Handbook* in October, which addresses the issue of guidance. To take part in the second consultation, visit [www.sra.org.uk/sra/consultations/OFR-handbook-October.page](http://www.sra.org.uk/sra/consultations/OFR-handbook-October.page).

We will always consider alternatives to intervention. As an example, we have recently engaged with a number of firms in the Assigned Risks Pool to achieve orderly closure rather than intervention. However, we will continue to intervene where it is necessary to do so in the public interest and in the interests of clients.

We are undertaking a baselining exercise at the moment as a part of our development of our new approach to Supervision. We have provided further details on this in Section 2 of the Policy Statement.

We will continue to seek improvements in firms through compliance plans where this is the appropriate regulatory response to issues identified. Compliance plans provide clear direction for firms and a means to progress change for the benefit of consumers.

We are currently testing mystery shopping methodology through a joint exercise with the Legal Services Board and the Office of Fair Trading. We believe that mystery shopping could be a useful approach to understanding the consumer experience of legal services. We are also looking at shadow shopping, which involves real life clients reporting their experiences. We would not rule out using either of these approaches to assess business to business work however this is not planned at present. Our intention is to use any results of mystery shopping to inform the work of our Risk Centre, rather than to measure individual firms’ performance.

Question 14 asked

### **Is there a role for representative bodies in supporting their members' compliance with the principles and outcomes in the Handbook?**

Most representative groups were willing to offer assistance. There was some debate as to whether the SRA would endorse guidance.

*“Yes but whether these should fall in the compulsory or non compulsory areas will need to be considered carefully. Usually they should be within the guidance only sections.” – Leicestershire Law Society*

Other suggestions made included:

- sector specific guidance
- sharing individual best practice
- three respondents (Devon and Somerset Law Society, Austins and the Association of Women Solicitors) suggested there was a role for Lexcel in supporting members' compliance.

### **Our response**

Representative bodies' support for their members is very important. The SRA recognise that this support can assist compliance and promote best practice.

Outcomes-focused regulation allows a firm freedom to practice in a way that suits them, provided they meet the required outcomes. Firms have responsibility for their decisions as outlined in the Policy Statement. Each sector can use the freedom to find best practice to suit them.

We are considering Lexcel accreditation as a positive probability indicator as explained in response to Questions 7 and 8.

Questions 15, 16 and 17 of the April Consultation asked:

### **Do you agree with our approach to formal investigations?**

**If not, please explain why?**

### **Do you have any comments or feedback on our draft enforcement strategy?**

Of the respondents who expressed an opinion, the majority agreed with our approach to formal investigations.

*“It is vital for the standing of the legal services industry that serious breaches are identified and dealt with.” – Co-operative Legal Services*

Many respondents asked for further detail or expressed concern about how a firm might progress from supervision to formal investigation and then enforcement.

*“The strategy seems clear and this is one that we support. However, we were concerned to understand whether an enforcement team would include a firm supervisor as we understand the supervisor would have the relevant knowledge to direct enforcement appropriately.” – Tunbridge Wells, Tonbridge & District Law Society*

*“Although we have answered yes to your approach to formal investigations, we would welcome further information as to the criteria to be used before a formal investigation is instigated for example gross misconduct, negligence or a long history of client complaints.” – Association of Women Solicitors*



Publication of investigation outcomes was another discussion point. Some respondents argued for extensive publication as part of the credible deterrent. Other respondents suggested that publication should only take place once the outcome of prosecution was known. This debate is mirrored in the section on consumer protection.

*“The proposal to publicise enforcement action on priority issues to improve standards is welcome. In addition to seeking publicity on some issues, details of all concluded enforcement action should continue to be published. This is an essential part of creating a credible deterrence, maintaining public confidence in regulation and providing a predictable environment in which legitimate firms can know what is acceptable behaviour.” - Legal Services Consumer Panel*

Other points of note were:

- Some respondents saw the benefit of an Enforcement function separate from other parts of the SRA. Other respondents questioned whether consistency could be maintained as cases progressed between functions.
- Some respondents noted that the draft enforcement strategy did not mention persistent offenders.
- The Law Society supported the principle of RSAs. However they argued that the process was bureaucratic and did not involve the required staff at an early stage.

### **Our response**

Our risk-based, outcomes-focused approach means our enforcement action will be targeted where it really matters.

We will not hesitate to take action where it is necessary. We believe our strategy of aiming for credible deterrence will reduce the risk of non compliance for the benefit of consumers and compliant firms.

Publication of regulatory decisions ensures we are transparent, provides relevant information to the public and other interested parties and enables our stakeholders to hold us accountable.

We publish decisions on our website when we consider that it is in the public interest that we do so, for example decisions to close down firms, to impose a fine or when the SDT agrees that a prosecution should be brought before it. We have successfully published such decisions since January 2008. We do not at present plan to change our policy on publication although the extent of decisions we intend to publish if they fulfil the relevant criteria will expand due to the new decisions that we will make for example in relation to ABS. We do not intend to publish as previously, internal regulatory decisions dealing with minor regulatory breaches. Sometimes we may publicise our ongoing investigations where it is in the public interest to do so.

A persistent breach is a risk as persistence would be an indicator of probability. We may instigate thematic risk projects as a result of persistent breaches.

Regulatory Settlement Agreements are a proportionate and transparent means to settle an investigation which reflects our view of the appropriate outcome, agreed by the firm. They give certainty to each party, limit costs and have been highly effective

to date. This is still however a relatively new process for us, meaning the way it operates is under continuous review. Any changes as a result of the feedback, for example the level of delegation required, will feature in our future updates. It is possible that other functions, for example Supervision, may consider use of Settlement agreements in appropriate cases. An example could be to record and publish an agreed course of remedial action in conjunction with other tools such as an agreed compliance plan.

Question 18 of the April Consultation asked:

**Do you have any comments on our proposed approach to making new Handbook provisions?**

In the April Consultation we explained we would continually review the Handbook, providing advice internally and externally on its provisions. We committed to consulting on proposed changes.

Comments included:

- Support for consultation about changes
- Frequency of change should be limited in light of the required changes by legal services providers and the cost of the handbook.
- Requests for automatic updates by email

*“Whilst we do have our concerns that often there is too much documentation and too many consultations conducted at any one time, we do think that new Handbook provisions should be consulted upon by the profession, and look forward to doing so.” - Tunbridge Wells, Tonbridge & District Law Society Regulatory Committee*

Our response:

We note the requests for limited future updates. We anticipate less formal change in the future as the handbook is based on high level principles.

We provide email updates and notifications to all individuals on our mailing list through our ‘SRA Update’ service. We operate separate services for regulated and non regulated persons. To sign up, please visit [www.sra.org.uk/sra/news/update.page](http://www.sra.org.uk/sra/news/update.page)

Please ensure your email filter allows the update to reach your inbox.

Question 20 of the April Consultation asked:

**Do you have any comments on the SRA’s current approach to formal education and training for the profession? Are there additional approaches we could take to improving pre and post qualification training?**

Of those who responded to question 20, most agreed that the SRA’s outcomes-focused approach should begin early in education and training.

*“We agree that change needs to be embedded from pre-qualification stages onwards” – Nottingham Law School*

However, respondents had differing views on how initial education and training should evolve under OFR. Responses ranged from including more formal business education, whether around management skills or risk analysis, to taking a vocational approach.

*“The inclusion of initial and on-going management training would be helpful” – SIFA Ltd.*

*“The current approach is almost exclusively classroom based – the SRA might consider ways in which organisations might become more involved in practical training which would meet the formal requirements of the SRA.” – Peninsula Business Services Ltd.*

A number of comments related to how best to improve Continuing Professional Development. Again, similar suggestions around business education and a tailored approach were made, but some respondents warned against over-burdening the profession.

*“In terms of compulsory CPD courses, there is the need for flexibility and common sense” - Skadden, Arps, Slate, Meagher & Flom*

*“The use of formal education and training, for example workshops and roadshows to support supervision activity is a good idea. However, the SRA needs to bear in mind that firms may be reluctant to release practitioners during fee earning time. The provision of CPD hours for such workshops may assist, together with in-house training.” – ILEX*

Other points of note included:

- Suggestion by the Legal Complaints Service to highlight the importance of customer service within education and training programmes.
- Suggestion that ongoing training is more useful if it concentrates on the specific areas of practice that individuals specialise in.
- Concern that the focus on CPD has been an improvement, but there is more work to be done to make education and training fit for purpose.
- Both firms and the SRA need to make sure they have the right skills to deliver an improved education and training framework.

**Our response:**

Working with other regulators we are undertaking a review of education and training and details of this are set out in Section 3 of the Policy Statement.

Question 22 of the April Consultation asked:

**Do you have any comments on any aspect of our approach and how it may affect equality in relation to gender, ethnicity, disability, age and religion or belief? Are there additional equality issues that we need to consider at this early stage?**

There were a relatively low number of responses to this question, but of those who did respond, some remarked on the importance of diversity and equality in the profession.

*“We absolutely endorse the SRA’s greater focus on diversity and welcome the positive recognition of our own equality and diversity strategy at our recent Practice Standards Unit visit.” – Irwin Mitchell*

Others expressed concerns regarding the burden they perceived OFR may have on small firms and therefore certain groups of practitioners concentrated in these areas.

*“The OFR approach will address the quality assurance of the firm’s own risk management systems and assess whether or not firms are delivering the principles and achieving the right outcomes. This will place a greater burden on smaller firms and as such Black Asian and Minority (BAME) and smaller firms may be disproportionately affected.” – ILEX*

Other views of note expressed in the responses were:

- Concern about the equality and diversity implications of having firms regulated by the SRA, and firms for whom other regulators are appointed.
- Particularly in light of the upcoming introduction of ABS, the SRA should ensure guidance is available in other languages, to ensure smooth transition into the profession (whether as a solicitor, or non-solicitor member/investor of an ABS) for those from outside the UK.
- The SRA should particularly consider the equality and diversity issues around the continually increasing competition for training contracts.

**Our response**

Further information about the SRA’s commitment to equality and diversity is set out throughout the Policy Statement. We will consider all responses to this question in conducting Impact assessments.

Questions 23, 24, 25 and 26 of the April Consultation asked:

**Do you have any comments about the risks arising from the current financial management of firms?**

**Do you have any comments regarding the SRA's responsibilities for addressing the financial stability of firms and its proposed desired outcomes?**

**To what extent do you consider the proposed response outlined in this section meets the objectives of outcome focussed regulation?**

**Do you have any suggestions regarding what information may be requested of firms and how frequently it may be requested?**

Of the respondents who expressed an opinion, a majority agreed that poor financial management in law firms is a significant risk to the profession and to consumers.

*"We agree that the SRA has no direct responsibility for a firm's inability to make its business viable, the SRA do however have a responsibility for ensuring that clients and the profession are not adversely affected by a firm's failure." – The Law Society*

*"It is perhaps obvious but the better managed a law firm is financially then in general terms the lesser the risks." – Devon and Somerset Law Society*

Many respondents agreed that the SRA is right to give increased regulatory focus to financial management in law firms in order to mitigate this risk. Respondents also felt many firms had good practices in place and early details about reporting and notification from the SRA would assist them in meeting the requirements.

*"Large firms like ours already have sophisticated business planning and financial modelling in order to keep a tight control on overheads and expenditure as well as WIP. We would ask the SRA to show flexibility about the format of the information it will request so that firms can adapt their existing financial information reporting systems to provide what the SRA will need... we would ask the SRA to confirm the final reporting arrangements as soon as possible so that firms have a reasonable period of time to implement any IT changes, etc that they may wish to make as a result." – Irwin Mitchell*

Following on from this, a number of respondents emphasised the need for reporting and notification to be proportionate, and focus to be on those firms where significant risks are identified, in line with outcomes-focused regulation.

*"For firms that have been identified as having a higher risk of financial difficulty, regular (at least quarterly) financial information could be requested" – Association of Partnership Practitioners*

Respondents had a variety of views about what type and frequency of information collection by the SRA would be the most beneficial. The most frequent comment on this issue was that the SRA should be mindful of the information firms already compile for accountants and insurers. Responses varied between thinking this information would be sufficient and no more should be collected, to specified lists of further information that the SRA should collect.

*"We suspect that many smaller firms have not invested sufficiently heavily in IT to be able to produce analytical data on the proportion of fees generated by their different types of work: however, the message needs to be got to those firms that, unless they make that investment (which should allow them to determine what types of work*

*they are doing are not economic and ought to be abandoned) they will not be able to compete in the post-ABS world.” – Liverpool Law Society*

Other points of note were:

- Some respondents thought that requests for information should vary depending on the type of firm, whereas others thought it important to have uniform requests across all firms.
- Some respondents wanted assurance that the SRA staff involved in collecting financial information had the relevant knowledge of business and finance to make effective judgements.

### **Our response**

The SRA's firmly believes that the financial stability of legal services providers is essential to in the public interest and to protect, and ensure positive outcomes for clients. The SRA currently deals with insolvent practitioners and firms; their status impairs their ability to deliver the required outcomes. Our proactive stance to financial management will ensure those who face potential difficulty receive our constructive engagement at the right time, meaning in future those problems do not develop.

We have provided further information about reporting and notification in the Policy Statement and, in Section 3, set out details of further work we will be undertaking on this issue in 2011.

### List of respondents to the April Consultation Paper “Outcomes-focused regulation: Transforming the SRA’s regulation of legal services”

Advice Services Alliance

Allen & Overy

Alisa Willows, Solicitor

Association of British Insurers

Association of Partnership Practitioners

Austins

Association of Women Solicitors

Bar Standards Board

Bevan Brittan

Bond Pearce

Burges Salmon

Beachcroft LLP

Clarke Willmott  
Osborne Clark  
TLT  
Veale Wasborough  
Bird & Bird  
Birmingham Law Society  
Bournemouth & District Law Society  
Cambridgeshire & District Law Society  
City of London Law Society  
Clifford Chance  
Linklaters  
Slaughter & May  
Reavers Smith  
Pinsent Masons  
Freshfields  
Allen & Overy  
Olswang  
DLA Piper  
Hogan Lovells  
Herbert Smith  
Clive Roger Wooliscroft, Solicitor  
Conveyancing Association  
Devon & Somerset Law Society  
Dickinson Dees LLP  
DLA Piper UK  
DWF LLP  
Express Solicitors  
Finance & Leasing Association

Foot Ansty  
Forum of Insurance Lawyers  
Holman Fenwick Willan  
Horwich Farrelly Solicitors  
ICAEW  
Immigration Law Practitioners Association  
Institute of Legal Executives (ILEX)  
Institute of Legal Executives Professional Standards (IPS)  
Irwin Mitchell LLP  
Julian Cohen  
Legal Complaints Service  
Legal Services Consumer Panel  
Liverpool Law Society  
Macfarlanes  
Manchester Law Society  
Michael Robinson, Solicitor Advocate  
Morgan Cole LLP  
Motor Accident Solicitors Society  
Nick Gale, Solicitor  
Norton Rose  
Nottingham Law School  
Parabis Law LLP  
Paul Howard, General Counsel, Wragge & Co  
Peninsula Business Services Ltd  
Russell Jones & Walker  
SIFA  
Skadden, Arps, Slate Meagher & Flom (UK) Ltd  
Sole Practitioners Group



SRA Ethics Guidance Team

Stephensons Solicitors

Taylor Wessing

The Co-operative Legal Services

The Law Society

The Leicestershire Law Society

Tope Ojikutu

Tunbridge Wells, Tonbridge & District Law Society

West London Law Society

Anonymous

Anonymous

Anonymous