



Empowering consumers

Phase 1 report to the Legal Services Board

March 2013

Consumer challenge



About Consumer Challenge

Our Consumer Challenge series is designed to create a space for fresh thinking where the Legal Services Consumer Panel can stimulate debate, question the received wisdom and propose new solutions to old policy issues. These documents do not necessarily represent the Panel's final policy position, but instead allow us to test ideas and spark discussion.

This is the third publication in the series. The first Consumer Challenge paper focused on the Legal Education and Training Review, while the second paper discussed issues around third party complaints – when the affected individual is not the lawyer's client.

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1 Executive summary

The challenge

- 1.1. This paper provides initial thinking about how regulators can help consumers to play a more active, empowered role in the legal services market. It concludes a first phase of work in response to the LSB's request for our advice on this topic, and follows a programme of activity which included two published background papers and engagement with stakeholders through a workshop and bilateral discussions.
- 1.2. Consumer empowerment involves two broad elements which interact to create the conditions for consumers to thrive. Firstly, the resources consumers have at their disposal to make better choices. This includes a certain state of mind (confidence and willingness to play an active role), decision-making tools such as good information, and the skills to use these tools to make effective decisions that secure positive outcomes. Secondly, the institutions – for example, the competition regime, consumer protections and regulatory organisations – that support consumers to shape markets. In everyday terms, an empowered consumer has confidence in the regulatory system and can identify the legal issues they face, find the right help, actively take part in decisions about their case and complain when things go wrong.
- 1.3. A review of the research evidence suggests that professional services markets as a whole are poorly rated by consumers since they involve situations that may be distressing, rare, complex and have critical consequences. Yet even within the professional services sector, consumers say they find it especially difficult to compare the quality and price of legal services. We have examined a range of data relating to public confidence and the consumer journey in legal services. This reveals problems of low trust in providers and little faith in regulators, knowledge gaps about consumer rights and of what lawyers do, inaction in response to some serious legal issues, lack of shopping around and minimal use of choice tools, communication breakdown while cases are progressing, and some serious barriers

to complaining. On top of this, vulnerable consumers are less confident, trusting, knowledgeable, likely to shop around, satisfied with the service they receive, or to complain. Therefore, the nature of legal services means that empowering consumers is always going to be challenging. Although there are some small signs of consumers becoming more active, the evidence base makes clear that there is a very tall mountain to scale.

The response

- 1.4. Pursuing policies to empower consumers is important because of the benefits both to the individual and the wider public interest. Empowered consumers are less likely to encounter legal problems and better able to reach a satisfactory resolution to their issues. Yet society also benefits in a range of ways: through cost savings for public services, such as the health and justice systems, that result from preventing avoidable legal problems and resolving these more effectively; through consumers fuelling growth by making purchasing decisions which reward the best providers; and through opportunities to strip back regulation that is no longer needed because consumers can help themselves and discipline markets.
- 1.5. Despite this, we caution against an overreliance on policies to empower consumers due to limits to what these can achieve on their own. The inherent features of the market, described above, are difficult to overcome. Moreover, consumers exhibit a lower appetite for risk in legal services than in other settings since they find it difficult to make informed decisions and worry about the consequences of making mistakes. Research evidence demonstrates that consumers are most likely to have a satisfactory experience of a market if they believe that there are strong consumer protections in the market. Therefore, before expecting consumers to take risks and play an active role in shaping markets, it is necessary first to ensure the consumer protection framework is fit for purpose. When consumers perceive that effective regulation is in place, they will have greater confidence to vote with their feet.
- 1.6. It seems to us that the LSB's first priority should be to set the right strategic direction on a market-wide basis, by identifying the correct balance between

consumer and competition policy. Of course, the legal services market is diverse and so a uniform approach across the approved regulators would be inappropriate. Each of the regulators, and indeed other actors such as the Legal Ombudsman, need to reflect on how this thinking should apply within their own environments.

- 1.7. Leadership and coordination are the common threads underpinning our analysis of the right way forward. This is certainly the case in relation to information provision where the information that consumers need to make rounded and informed choices is scattered across a range of websites. For example, guides on areas of law might be found on the website of a professional body or advice agency, information about consumer protections and disciplinary action taken against providers is located on the approved regulator's website, and details of providers' service complaints history is available on the Legal Ombudsman's website. The complex regulatory landscape, with its multiple regulators and mixture of reserved and unreserved activities and so on, only perpetuates this problem. While better coordination of information is a holy grail across markets, there is fresh impetus as a result of government policy to provide joined up delivery through Citizens Advice. The Money Advice Service, which already provides information on legal issues such as relationship breakdown and will-writing, is another major potential delivery partner.
- 1.8. This situation is a legacy of the organic evolution of legal services regulation and organisations providing information which reflects their distinct remits rather than the reality of people's lives. There are practical things that can be done to make the regulatory landscape appear simpler for consumers, even if this means hiding the actual complexities behind-the-scenes. Also needed is greater collaboration across the various actors – the forthcoming Legal Voices website being established by the Solicitors Regulation Authority is an encouraging development to this end. Above all, however, the range of information that consumers need should be delivered in a type and form that is most useful to them. This is likely to mean making the legal activity, rather than the type of lawyer, the central organising principle. This requires a cultural shift on the part of the regulators, but it is not insurmountable.

- 1.9. Another area where greater leadership and coordination is required is public legal education. 'Increasing public understanding of the citizen's legal rights and duties' is probably the least explored of all the regulatory objectives. Here the first step is greater dialogue in order to work out how regulatory organisations can best add value to existing initiatives, although the prevailing view is that this is most properly the responsibility of government; the regulators can support, but should not lead. One specific and recurring policy idea is to create the equivalent of NHS Direct for law, using intelligent technology to provide a form of early diagnosis which people are most likely to use when experiencing a problem in order to work out what to do next. There is a compelling moral and economic case to strengthen prevention through tools such as this. We consider the desirability and feasibility of such a system should be considered further. However, we also recognise the funding realities and hence the need to explore a range of possible approaches.
- 1.10. Finally, it is important to build on progress already made through existing initiatives; there is much to be said for consolidating this before starting on major new projects. Foremost of these is choice tools, such as accreditation schemes and comparison websites, which need regulators' support to gain more credibility with consumers. Much policy thinking has been done in this area and the approved regulators have now been set the challenge to deliver. Progress should be accelerated on opening up the professional registers where the regulators' response has been lacklustre. Another running theme in our work is not letting the pursuit of perfection get in the way of progress – for example, the regulators should release the data they hold about providers as long as this is accurate and trust the market and consumers to use this sensibly. We also wish to see faster progress on consumer engagement. This is relevant to empowering consumers because the regulators will be better placed to design and implement policies that can support consumers to choose and use legal services with confidence if they have a good understanding of consumer needs, preferences and behaviour.

Next steps

1.11. This project has been designed to run in two phases. The first phase has explored the benefits and limitations of empowering consumers, benchmarked levels of consumer power in the UK economy and elsewhere, reviewed activity by legal regulators and others, and highlighted key findings and strategic choices.

1.12. Our analysis suggests the next regulatory steps should particularly focus on the following areas:

- The LSB needs to define a clear strategic approach towards empowering consumers at a market-wide level and ask the regulators to determine how this should apply within their own operating contexts
- Real headway must be made on the action areas already set in motion by the LSB, such as around choice tools and consumer engagement, using the regulatory standards work as the main lever to ensure delivery
- Coordinating expanded and more joined-up information provision, and ensuring the quality of information resources
- Facilitating dialogue between organisations concerned with public legal education, legal regulators and others to agree respective roles, and to explore the desirability and feasibility of an NHS Direct style service for law
- Reviewing the effectiveness of information remedies, ensuring these work well for consumers without imposing unnecessary burdens on providers

2 Introduction

The LSB's request

- 2.1. In October 2012, the LSB requested the Consumer Panel's advice about how regulators can help consumers to play a more active, empowered role in the legal services market. It asked us to consider the potential for consumer empowerment from a range of perspectives, as follows:
- Competition – Empowerment and competition are clearly linked with one reinforcing the other. How can regulators ensure that consumers play an active role in helping the legal services market work properly?
 - Choice tools – Building on your work to date on price comparison websites and voluntary quality schemes, the investigation should consider what role choice tools have in empowering consumers, and in what areas they have been successfully implemented and executed.
 - Information and Education – With Citizens Advice's new role as national coordinator of consumer education, and charities such as Law for Life taking forward public legal education, what role is there for regulation in addressing these issues?
- 2.2. The Panel agreed with the LSB that this work would be undertaken in two phases. Phase One was to involve a review of existing literature and data to establish a framework through which to define and understand consumer empowerment. It would also consider initiatives in professional services and other markets where there are information gaps between consumers and providers. We also agreed that the scope of Phase Two would be decided once the LSB had reviewed the findings of this first phase of work, which we undertook to complete by April 2013.

Project approach

- 2.3. This document concludes Phase One of the project. It has been written deliberately in the style of our Consumer Challenge series of publications rather than in the form of a traditional report with firm recommendations. This reflects the multi-stage approach to this project, and represents some interim findings to guide the LSB's thoughts on next steps. We also consider it is well suited to the nature of the issues which demand a level of conceptual thinking.
- 2.4. The interim findings presented in this paper follow a programme of work between October 2012 to February 2013, as follows:
- A background paper introducing the theme of consumer empowerment. This covered the potential benefits and limitations of initiatives in this area based on a review of the literature. It also reviewed evidence from major surveys on levels of empowerment among UK consumers as a whole and specifically in the legal services market
 - A second background paper focusing on consumer empowerment initiatives in other sectors to provide legal services regulators with a menu of options and good practice examples. It summarised existing activity by legal services regulators (checked for factual accuracy with them) to provide a benchmark against which to assess the breadth and depth of current practice, and to identify any gaps. The role of non-regulatory actors such as industry and the advice sector was also briefly reviewed
 - A workshop with approved regulators and other stakeholders to discuss the questions raised by the two background papers
 - Bilateral discussions with some approved regulators and others
- 2.5. The two background papers are published on our website.
- 2.6. Issues around choosing and using legal services have overlaps with other areas of the Panel's work programme and these insights have informed our analysis. Of

particular relevance is our consumer research on risk and regulation. As part of its request for advice on financial protection arrangements, the LSB has asked the Panel to consider the 'appropriate level of risk consumers should be expected to bear'. The independent market research report was published in February; we are due to conclude our policy analysis for this project in May.

This document

2.7. This document represents a synthesis of the two background papers and our discussions with stakeholders, culminating in suggestions for next steps:

- Chapter 3 highlights the extent to which consumers are empowered in relation to five dimensions: confidence in the market; identifying legal needs; choosing legal services; using legal services; and complaints
- Chapter 4 identifies some key strategic choices that the LSB and its partners need to grapple with to help empower consumers, and our early views on the direction of travel in relation to these
- Chapter 5 draws conclusions and identifies potential areas for focus in Phase Two of the project

3 Measuring consumer power

What is an empowered consumer?

- 3.1. It is important to have a common definition of empowering consumers otherwise stakeholders may end up pursuing different objectives. The literature suggests consumer empowerment consists of two linked elements:
 - The resources available to consumers to make informed choices
 - The institutions and safeguards that support them in doing this
- 3.2. The starting point for the first element is that consumers and providers have an unequal power relationship. Due to factors such as people's lack of knowledge and experience, or market issues such as barriers to switching and lack of cost transparency; consumers may not make the best choices available to them or may be exploited by unscrupulous providers. This frustrates competition because providers offering the best deals are not fully rewarded, or they may be unfairly undercut by rivals. An effective policy response might therefore be to equip consumers with the information, tools and other resources that will enable them to make better choices. Firstly, this requires consumers to be confident and willing to participate in markets, moving from a situation where they are passive recipients of goods and services, to one where they are active purchasers who signal their needs to providers and, individually or collectively, use their buying power to influence the way that the market operates. Secondly, in order to have a positive influence on the market, the decisions that consumers take should secure good outcomes for them. This requires consumers having the knowledge and skills to navigate the market place effectively and make accurate decisions.
- 3.3. The starting point for the second element is that consumers do not exist in a vacuum, but are supported by an institutional environment that supports them in carrying out this market-shaping role. This consists of various elements including

the market environment and the consumer protection regime. For example, a diverse provider base is a precondition for consumers to exercise choice. Other support mechanisms include a strong framework of consumer rights (including in our context, enforceable codes of conduct) and independent redress mechanisms to turn to if these rights are breached, well-resourced consumer organisations and effective regulators.

- 3.4. In theory, these two elements – well-informed decision-making and institutional support – should interact to create the conditions for consumers to thrive. For example, the ability of consumers to choose services that are most attuned to their needs is enhanced by competition reforms which allow a more diverse range of providers to enter the market, while the removal of switching barriers or complex tariff structures makes it easier for consumers to shop around. Alternatively, a good level of consumer protection, such as access to an ombudsman, may give people greater confidence to use a different provider than previously in the knowledge they will have some recourse if things go wrong.

Survey evidence on levels of consumer power

- 3.5. The central role of consumer empowerment in the policies of the UK Government and European Union has spurred some significant research studies that have attempted to measure levels of consumer power across the economy. These studies are useful since they help to identify various proxies for consumer empowerment that might be applicable in a legal services context, while also providing a benchmark against which to measure the performance of legal services. Details of four major surveys can be found in Background Paper 1.
- 3.6. Five key themes emerge from these studies:
- Consumer perceptions of market conditions closely relate to the innate characteristics of those markets. These include association with either a “pleasurable” or “painful” purchase or activity; whether a market is complex or relatively uncomplicated; and whether it is a familiar “everyday”, or is a

more infrequent “critical event” market. Lower-ranked markets were also those affected by the economic downturn or associated with rising prices or recent adverse publicity. We would observe that legal services – often being a painful, complex, infrequent and critical event purchase – share many if not all of these characteristics

- Some key performance indicators have a particularly powerful influence on consumer perceptions. In particular, consumers are most likely to have a satisfactory experience of a market if they believe that there are strong consumer protections in the market
- Social conditions and personal characteristics affect levels of empowerment with people self-identifying as vulnerable giving significantly lower scores across key performance measures. Survey evidence also indicates that poor living conditions, low educational levels, age and lack of internet access are also predictors of empowerment
- The UK ranks highly for overall consumer conditions in markets across the EU but is middle-ranking in relation to consumer empowerment
- Legal services are relatively poorly rated by consumers when asked to compare their experience across sectors, although this is generally true of all professional services markets. Consumers say they find it especially hard to compare price and quality in legal services. This is also where the UK compares unfavourably to its EU counterparts, although it outperforms other member states on choice and trust in providers

Legal services survey evidence

- 3.7. Building on our definition of consumer empowerment and the design of surveys described above, the Panel reviewed existing legal services survey evidence to identify strengths and weaknesses in this market. Reflecting our brief, we focused mainly on the choosing and using aspects of consumer empowerment.

- 3.8. Overall our analysis suggests that legal services consumers are currently not very empowered. The research also highlights that vulnerable consumers are less confident, less trusting, less knowledgeable, less likely to shop around, less satisfied and less likely to complain. Based on this evidence and inherent features of the market, we conclude that empowering consumers will be an uphill struggle, although there are some small signs of consumers starting to become more active. However, efforts focusing on empowering vulnerable consumers are likely to impact on all consumers positively.
- 3.9. A brief summary of the key findings is below. This uses proxy indicators drawn from existing research data to make inferences about levels of consumer power. This should be read alongside the detailed analysis and charts in Background Paper 1.

Confidence in the market

- 3.10. Confidence should be measured since analysis suggests that consumer confidence that the rules protect them is the single most important factor that explains those markets that work for consumers. Confidence encourages consumers to participate in legal services, for example deciding whether to seek advice when experiencing a legal problem or to write a will. It also encourages people to make more varied choices, for example choosing a different provider to one used previously.
- 3.11. The evidence suggests that the public is not very trusting of lawyers as a group, although they are confident about the professionalism of their own lawyer. People also seem to lack confidence that their consumer rights will be protected or that lawyers who do bad things will face the consequences of their actions. Confidence in the justice system appears to have improved over recent years, although a good majority of people consider that judges are out of touch.
- 43% of the general public say they generally trust lawyers to tell the truth
 - 49% of people are confident their rights as consumers would be protected when using lawyers
 - 30% of people think that lawyers are well regulated

- 53% of people agree with the statement that ‘judges are out of touch’

Identifying legal needs

3.12. It is important to measure ability to identify legal need because law-related issues arise from time to time in everyone’s lives. Not all of these will require people to obtain legal advice, but the chances of getting a successful outcome – whether through preventing or resolving issues – are surely increased if people recognise what their legal needs are and employ strategies to deal with them effectively.

3.13. The evidence suggests that a significant minority of people take no action to resolve some serious legal problems, often due to a sense of powerlessness, lack of knowledge or belief that their efforts would be futile. Over one third of people admit to having no understanding of their rights when experiencing a legal need. More positively, knowledge about what lawyers do is slowly rising and people are increasingly using the internet to find information about legal issues.

- 35% of people experiencing a problem say they had no understanding of their rights at the time this occurred
- 10% of people experiencing a problem took no action – levels are higher for some serious problem types such as clinical negligence and employment
- 36% of people who did nothing when experiencing a legal need said this was because they felt nothing could be done
- 53% of people claim to have only a little or no knowledge about what lawyers do

Choosing legal services

3.14. Consumers exercising choice in the market is a key element of empowerment as it signals how demanding they are of providers. We reviewed data on how people select providers as a means of gauging how far they are driving competition.

3.15. The evidence suggests there are low levels of shopping around and many consumers who do search find it difficult to make comparisons – although this data has improved slightly over time. The absence of credible choice tools inhibits comparisons. Referrals by commercial intermediaries are widespread, but this tends to produce lower service satisfaction ratings than other selection methods.

- 19% of consumers use the internet to research legal advice
- 22% of consumers shop around for legal services; of these 57% find it easy to compare providers
- Only 1% of consumers use comparison websites to find lawyers and just 4% refer to an accreditation scheme
- 68% of consumers choosing their provider through referral by a commercial intermediary are satisfied with customer service (compared to 79% overall)

Using legal services

3.16. An empowered consumer in the context of using legal services is one who actively participates in and takes informed decisions about their case. This is the least researched of the five dimensions, perhaps due to the methodological challenges, but we have used some proxies to make inferences. The quality of communication between providers and consumers is one indicator. Another feature of the market is the increasing numbers of people who for various reasons are seeking to resolve legal needs without professional advice.

3.17. The evidence suggests there are lower satisfaction ratings and high complaint volumes relating to communication by lawyers during a case; this gets in the way of consumers actively participating in decisions about their legal needs. The use of legal jargon exacerbates this problem. In relation to those people handling their legal matter alone, many do this successfully, find the process straightforward and would do it again. However, in some areas of law this appears to be driven by affordability concerns, in a sector where legal services are perceived as expensive.

- 71% of consumers are satisfied with ongoing communication during their matter – one of the lowest rated aspects of customer service
- 27% of the Legal Ombudsman’s caseload relates to cases alleging a failure to advise clients or to keep them informed
- 24% of legal needs are handled alone; just over half of people doing this say they found the process easy, with only 18% finding it difficult
- In around one quarter of debt, wills and conveyancing cases people choose to handle the legal work alone for cost reasons

Complaining about poor service

3.18. The extent to which consumers have the confidence to complain about poor service, their ability to do so successfully and the actions of providers in handling complaints are all elements which contribute to consumer empowerment.

3.19. The evidence suggests only half of people are confident complaining to a lawyer and many dissatisfied consumers do not complain or give up before their complaint is satisfactorily resolved. People are confused about what to do, get overwhelmed by legal jargon, believe they won’t get a fair hearing and fear that upsetting their lawyer could have repercussions for their case. Signposting rules that would help alert consumers to their right to complain are not working effectively.

- 42% of people do nothing when dissatisfied with the service they receive
- 23% of consumers decide not to complain to their lawyer because they have no confidence their complaint would be resolved fairly
- 70% of consumers who are dissatisfied with how their lawyer handled their complaint abandon their complaint at this stage
- 35% of complainants to the Legal Ombudsman recall being informed about the organisation by their provider

4 Strategic choices

Level of priority

- 4.1. The Panel's methodology in this project has been to ask questions that present a series of strategic choices for regulators. One question that must be answered first, before getting on to issues around approach, is whether consumer empowerment should be a policy priority for the LSB.
- 4.2. It is of course desirable that individuals should be empowered to deal with lawyers. Empowered consumers are less likely to encounter legal problems and better able to reach a satisfactory resolution to their issue, whether by dealing with the matter themselves or through seeking professional help. If the latter, active, well-equipped and confident consumers can identify a suitable provider for their circumstances, find a good deal, manage relationships with their advisor and actively participate in decisions about their case. Individuals gain from being more empowered, but so does society at large. These wider benefits include cost savings for public services, such as the health service and justice system, which result from both preventing avoidable legal problems and resolving legal needs more effectively. Empowered consumers also support economic growth since they drive competition through their purchasing behaviour, rewarding providers who offer better and cheaper services. Finally, empowering consumers may enable deeper deregulation, the idea being that as increasingly consumers help themselves and discipline markets, so government can step away and strip back unnecessary regulation.
- 4.3. Another reason why this should be a priority is that the evidence clearly shows consumers are not very empowered across a range of performance measures. This is frustrating a series of regulatory objectives: improving access to justice; protecting and promoting the interests of consumers; promoting competition; and increasing public understanding of the citizen's legal rights and duties. We also consider that competition reforms alone are unlikely to address these problems.

Greater visibility of providers through more advertising, wider choice, growth in fixed fee deals and packaging of legal services in simpler language are all early trends since the introduction of alternative business structures – each should help tackle barriers to empowering consumers. However, experience elsewhere suggests that competition often creates new challenges, such as confusing tariffs and misleading advertising, which hinder consumers in making good choices. Regulators can help by tackling these market practices and aiding more effective consumer decision-making, but significant barriers will still remain.

Policy attitude

- 4.4. Empowering consumers should be a priority for the LSB, but we caution against an overreliance on this policy approach to deliver the regulatory objectives due to limits on what consumer empowerment policies can achieve on their own. There are inherent features of the legal services market that are difficult to overcome, such as wide asymmetries of power and information, and the fact that consumers access services rarely and often in distress. Also, consumers exhibit a lower appetite for risk than in other settings since they find it difficult to make informed decisions and worry about the potentially serious consequences for their lives and those of loved ones should mistakes happen. People are acutely conscious of their vulnerability when using legal services and are intimidated by the law and lawyers. Finally, legal services are a good which everyone in society must be able to access. Research evidence suggests that social conditions and personal circumstances affect levels of empowerment. While targeted interventions may empower vulnerable groups, the LSB must guard against initiatives that inadvertently widen inequalities as there is concern that empowerment initiatives aimed at the whole market generally tend to benefit most those who are already relatively empowered.
- 4.5. Consumer representatives emphasise that perceptions of consumer protection are a precondition of people being willing to take risks and play the more active role in markets envisaged for them. This requires first making the consumer protection framework fit for purpose in order to give consumers justified confidence to act.

This is especially true in a legal services context given the nature of the market, consumer attitudes towards lawyers and their low risk appetite. Recalling the dual consumer decision-making and institutional dimensions of empowerment, this suggests the LSB must ensure effective regulation before it can expect consumers to drive competition. This does not mean being fatalistic about the prospects for empowering consumers, as there is much that can be done to improve matters. However, it does demand a level of realism and to strike the right balance between the two dimensions. For example, the time is not right to strip away regulation and thus load more risk on to consumers, as a technique to encourage consumers to regulate the market through choosing and using legal services more effectively. Indeed, the research evidence justifies a stronger consumer protection framework in legal services than in the wider economy overall.

- 4.6. When we looked at activity by regulators in other sectors, a key learning point was the benefit of defining a strategic approach towards consumer empowerment. Real impetus, a coherent approach and measurement of success is more likely when empowering consumers is made an explicit strategic goal. This includes having an 'attitude' about the appropriate balance between competition and consumer policy. As an oversight regulator, the LSB has an important role in setting the overall direction of travel across the market. Of course, legal services is not a homogenous market, but has great diversity in its providers and consumers and the issues it has to address. Flexibility is needed to tailor approaches to the situation at hand, but there remains a need to set some core principles at a market-wide level.

Clarity over roles

- 4.7. The previous chapter indicated that consumers are currently not very empowered across a range of performance measures. However, it is important to acknowledge work already completed or underway to address this situation. Moreover, policy decisions being made now will take time to translate into better outcomes for consumers on the ground. Background Paper 2 contains a summary of initiatives

by the LSB, Legal Ombudsman and approved regulators, plus a brief overview of activities by a series of non-regulatory actors.

- 4.8. While the LSB should set the overall direction of travel, market differences mean a uniform strategic approach across the approved regulators is inappropriate. Some types of lawyer deal with lay clients to a greater extent than others and this will naturally reflect their regulator's level of focus on these issues. However, this is an evolving picture as traditional referral professions, such as barristers and costs lawyers, are experiencing greater levels of direct access, while chartered legal executives may soon operate independent practices. Therefore, empowering consumers is becoming a more relevant concern for a wider range of regulators. Level of resources is another constraint on scale of activity, although many of the activities which can be undertaken do not require significant financial resources. This being the case, each approved regulator should be encouraged to work out the best approach in their operating environment. In this context, the SRA should be applauded for having already developed an empowering consumers strategy. We also encourage the LSB to reflect on how to make greater use of its regulatory effectiveness work to lever change by the approved regulators, where needed.
- 4.9. The Legal Ombudsman is the body in the regulatory landscape with the highest public profile and greatest contact with consumers. Its strategy includes, as part of its role to raise standards and prevent complaints, 'helping consumers become more confident in using legal services'. It has already started to share the learning from its caseload to help consumers avoid problems with costs, use conveyancing services and has produced a guide with tips on how to complain to providers. The Legal Ombudsman must maintain its neutrality and avoid 'shopping' for complaints. This may make positioning difficult, but its scale, outreach potential and repository of consumer problems makes it uniquely placed to help empower consumers. The Legal Ombudsman's own view is that, in addition to signposting its service, it should focus on users (rather than the wider public, although obviously the wider its reach the better) at the point when they access legal services. While agreeing with this approach, we consider this activity should also cover the client-provider relationship as the case progresses.

4.10. The Panel's second background paper records initiatives across a range of actors, both regulatory (LSB, approved regulators, Legal Ombudsman) and non-regulatory (professional bodies, industry, consumer bodies, advice agencies, charities). All of these organisations have identified how they can help to empower consumers. While each effort is very welcome, there is currently a lack of vision and strategy to fit the various pieces together into a coherent whole – indeed, the complexity of the regulatory landscape makes clear leadership even more vital to cut through this. The next two themes make apparent the need for better coordination of resources to ensure that all contributions are appropriately targeted and effective.

Prevention and legal information

4.11. There has been a particular lack of clarity about what regulators should do in relation to public legal education (PLE). Law for Life states the purpose of PLE is to *'equip people with the knowledge, skills and the confidence needed to successfully resolve problems encountered in everyday life'*. The LSB sees a role for itself to *'encourage, with approved regulators and legal service providers, a better understanding by consumers of "rights and responsibilities" and for them to be confident about where to turn to identify them and their application in a particular situation'*. However, 'increasing public understanding of the citizen's legal rights and duties' is probably the least explored of all the regulatory objectives so far. Indeed, our stakeholder workshop was the first occasion when Law for Life and most of the approved regulators had met one another.

4.12. The nature of PLE – stress on prevention, practical solutions, and local delivery – adds a different perspective to choosing and using legal services than the work of legal regulators has historically focused on. Instead, they target the relationship between providers and consumers in the marketing of services and from the point of engagement onwards. While the legal regulators agree that PLE is worthwhile, the prevailing view in our discussions is that the scale and nature of PLE is such that this is more properly a role for government than for them. In short, they can support, but not lead. However, this may be an area where the professional bodies

can provide leadership. The Law Society already produces a series of useful legal guides and is currently considering options for expanding the information it provides to the public. We see that PLE objectives could fit neatly with the legal profession's ongoing commitment to pro bono initiatives. However, this may also be in lawyers' self-interest as greater public awareness of legal issues could help to grow the market. These issues need teasing out further and greater dialogue between legal education initiatives and the various actors would be a desirable next step.

- 4.13. A recurring policy idea in this vein is to create the equivalent of an NHS Direct for law, enabling people to recognise when a problem has legal consequences and access the help and information they need. This would not be just an information resource, but a form of online triage which used algorithms to offer a personalised diagnosis and tailored guidance based on details entered by users. Developments in intelligent technology have opened up new possibilities to deliver such guidance even in quite complex areas. The LSB has commissioned research that suggests there is demand for such an authoritative one-stop shop information resource, although people say they are likely to use this to resolve problems rather than explore issues in advance. There is a debate about the value of investing in such a 'just in case' solution (education before problem emerges) versus 'just in time' measures (assistance once a problem occurs).¹ In reality, the research evidence appears to suggest this may be best targeted as an 'early diagnosis model' – i.e. something has happened to me and I need to know what to do next. This next step may or may not involve the need for professional help. However, there are very real issues around digital exclusion and it needs to be acknowledged that, in many cases, such solutions are a complement to, not substitute for, face-to-face advice.
- 4.14. We consider the desirability and feasibility of such a system should be considered further as there are strong moral and economic reasons to strengthen prevention.

¹ For a good discussion see: Consumer Focus Scotland, *Ensuring effective access to appropriate and affordable dispute resolution. The final report of the Civil Justice Advisory Group*, January 2011.

However, this is an idea that has frequently resurfaced without anyone properly investigating whether it could work. In addition, the prospect of central government finding the resources for such an initiative are surely slim. This suggests a need to think imaginatively and consider alternative options. In doing so, it will be important to consider carefully the role of existing information providers including Citizens Advice and the Money Advice Service. The interactive and diagnostic ideas discussed above are already a core feature of the Money Advice Service website, which has benefited from significant government start up investment based on the perceived economic benefits of improving people's financial capability (it is now funded through an industry levy). Notably this service already includes information on legal issues such as wills, buying for the first time, benefits, redundancy rights and divorce – serving a timely reminder that people do not divide their affairs into neat parcels in the same way that legislation ascribes specific responsibilities to individual regulators.

4.15. Finally, the potential for industry to deliver such solutions should be considered, especially given government funding pressures. There are already new entrants, such as Rocket Lawyer, who operate a 'freemium' business model, enabling consumers to access legal information free of charge and pay only when they require professional help. If comparison websites take off in legal services, these are another potential source of information. There are obvious concerns about the quality and neutrality of information, privacy and wider commercial associations. Indeed, the LSB research highlighted the importance consumers attach to obtaining legal information from a trusted source. In addition, it must be questioned whether such sources would provide information outside the more profitable areas of legal services, rather than in social welfare law type areas where need is greatest.

Joining up information provision

4.16. One problem, certainly not confined to legal services, is that the information consumers need to make informed choices is spread across multiple websites. Consumers wanting to research the legal steps involved in getting divorced might

visit the Law Society's website or that of Citizens Advice, Advicenow or a specialist charity. If they want to find out what their consumer protections are, this information tends to be found on the websites of the approved regulators – although not always translated into simple language. This is also the source for checking the disciplinary record of a lawyer they are considering using, although they would need to visit the Legal Ombudsman's website to find details of a firm's service complaints history. Therefore, consumers are left to piece together a complex jigsaw by visiting a series of websites each containing fragments of information that reflect the distinct remits of each organisation rather than the reality of people's lives. Of course, they are highly unlikely to do so – potentially making poorer decisions as a result.

- 4.17. Better coordination of information provision is something of a holy grail across markets. What's different now is an impetus behind joined up delivery through the advice sector, particularly Citizens Advice in the consumer field. We think this creates new opportunities for regulators to harness the efforts of others who have greater reach and communications expertise. This does not mean that regulators should stop providing public information through their websites, not least given the linkages between perceptions of consumer protection and confidence in markets. However, it means greater partnership working and willingness to experiment to find the best delivery mechanisms. A small example is 'white labelling' where information might be produced by an approved regulator that another organisation – an advice agency or even a business – could rebrand to make it appear as if they developed it. This approach allows information to reach a far wider audience, but it received a mixed response in our discussions with some approved regulators.
- 4.18. Generic advice providers, due to the breadth of the issues they deal with, are likely to provide a first level of information that points consumers in the right direction. Citizens Advice's Adviceguide website aims to provide information at a level which empowers people to solve their own problems and signposts to appropriate advice when necessary. These 'second-tier' advisors include statutory advice services such as local authority housing and welfare services, and charities specialising in particular areas of law, such as Shelter and LEASE for housing issues, or the Debt Advice Foundation for debt problems. Other charities represent specific groups of

people, such as Mind for people with mental health needs and Gingerbread for single parents. However, funding pressures facing the third sector is placing the continued provision of such valuable information under threat.

4.19. We encourage the approved regulators to develop joined-up information provision as consumers cannot be expected to navigate the current landscape. Now that there is clear separation between regulatory and representative roles, there should be no issue of promoting one type of legal professional over another. In fact, if the Act's intention of promoting a diverse legal services market is to be achieved, there needs to be an approach which supports the full plurality of regulated providers. The 'Legal Voices' website being created by the SRA is an encouraging initiative in this respect. It is still in the testing phase, but in essence will be a platform, open to all the approved regulators, where consumers can both obtain information about lawyers and provide input on policy development. The real test will be whether such collaborative approaches can deliver information of a type and in a form that is most useful to consumers. The challenge on type is to provide the spread of information that people need to make well-rounded and fully informed choices. Providing information in the right form is likely to mean making the legal activity, rather than the type of lawyer, the central organising principle. This will require a cultural shift on the part of the regulators, but it is not insurmountable.

Navigating complexity

4.20. The numerous regulators, the mixture of reserved and non-reserved activities, the separation of service and conduct complaints and so on, makes it difficult for consumers to understand their rights and protections. The complexity of current arrangements makes it difficult for advice agencies to understand the legal services market and for them and others to communicate simple messages to consumers. The continued scope for consumer confusion has been noted in recent reports

prepared for the OFT and Legal Ombudsman.² Simplifying the regulatory landscape was an objective of the Legal Services Act reforms, but many people consider that one regulatory maze has been replaced by another. While debating regulatory structures goes beyond the remit of this project, it is relevant to explore whether there are ways of mitigating these problems within the current framework.

4.21. One line of opportunity is to simplify the front-end and hide complexity behind the scenes wherever possible. Reinforcing the message that the Legal Ombudsman is the first port of call for all legal complaints is an obvious example. It was always intended for the Legal Ombudsman to act as a single post box; consumers wouldn't have to work out what constituted a service or conduct complaint, as good referral mechanisms would operate between the Legal Ombudsman and the regulators. However, some of the regulators' websites continue to emphasise the distinction between service and conduct rather than 'keep things simple'. In similar vein, there are some situations where it is unclear to consumers whether they should direct their complaint to the Financial Ombudsman Service or the Legal Ombudsman. While debates over the design of the redress landscape are for the medium-term, putting in place memoranda of understanding and sharing protocols across redress schemes, as is already happening, at least helps to mitigate the complexities.

4.22. The LSB has previously accepted a Panel recommendation to explore the viability of a single regulatory badge that would help consumers to identify more easily all authorised persons.³ This followed research which suggested consumers falsely assume that all providers of legal services are regulated, and so they do not understand the implications of choosing between regulated and unregulated firms. The LSB undertook to consider this recommendation further through its work on the future scope of regulation. This has not progressed, but we still consider there is

² Europe Economics, *Economic Research into Regulatory Restrictions in the Legal Profession – report for the Office of Fair Trading*, 2013; Centre for Consumers and Essential Services, *Mapping potential consumer confusion in a changing legal market – report for the Legal Ombudsman*, 2011.

³ LSB, *Quality in legal services: Response to advice from the Legal Services Consumer Panel*, 2011.

merit in the idea. While a patchwork of regulators may remain for the time being, it would help consumers to know that all regulated persons are subject to the same *minimum* checks and balances whatever their professional background.

4.23. Following this, there may be scope to harmonise codes of conduct as there is no good reason in principle why lawyers doing essentially the same work should have to follow different rules. We note that harmonisation with other redress schemes was a core organising principle of the Legal Ombudsman's scheme rules review. Finally, the approved regulators could also reduce complexity by writing their codes in simple language and translating these documents into a clear set of 'rights' for consumers. The Council for Licensed Conveyancers' Client Charter is a good practice example which other regulators could follow.

Choice tools

4.24. The OFT define choice tools as '*structured sources of information, discussion and comparison that help consumers compare and choose between alternative service and product offerings*'. The Panel has not focused heavily on choice tools in this first phase of the project since we have previously considered three such tools – ombudsman complaints data, comparison websites and voluntary accreditation schemes – in some detail. Our review of learning from other sectors confirms that regulators elsewhere have seized on the benefits of choice tools. The Government is putting energy behind this, for example the BIS consumer empowerment strategy sets a clear expectation that publication of complaints and performance data should be the default position of public bodies; this is fast becoming the norm.

4.25. Part of the attraction of choice tools is the market coming up with its own solutions, but it is acknowledged that these initiatives might not always work in the interests of consumers and they need to win consumer trust if they are to make a significant impact. Experience in relation to comparison websites demonstrates that regulators can help consumers by signalling which tools are reliable by accrediting schemes (Ofcom and Ofgem), facilitating self-regulation (the Financial Services Authority has issued guidance) and taking enforcement action to tackle illegal practices (OFT).

Regulators can also enable the development of choice tools by making publicly available data they hold about regulated entities on open access platforms. Initiatives in higher education and social care highlight the importance of making available a wide range of information about the characteristics of providers to allow consumers to make well-rounded choices. Thinking about comparison websites in legal services, in the absence of information relating to quality, consumers are left to choose on price alone – this is not what matters to them most when choosing legal services (according to our research) and risks creating unhealthy incentives. Regulators have expressed concern about the reliability and misuse of data, but they need to acknowledge that perfect data is impossible and show greater trust in consumers to use the information sensibly.

4.26. The Panel has previously called on regulators to open up the professional registers to assist the emergence of comparison websites, a recommendation which the LSB emphasised in its response to our report. We would make the same point in relation to Legal Ombudsman complaints data. The Protection of Freedoms Act has given a fresh push to this by requiring datasets obtained under freedom of information laws to be provided in a reusable form. There is scope for regulators to use access to their data as a lever to improve the credibility of comparison websites, for example by restricting access to those sites meeting specified licence conditions. However, the OFT has warned about the risks of this approach creating market concentration, promoting inferior choice tools which become the default option for consumers and limiting providers' ability to innovate and respond swiftly to consumers' needs.

4.27. The LSB has made some headway on choice tools through its response to the Panel's recommendations from previous reports and in its *Approaches to quality* paper. This work outlined the following success criteria in relation to transparency:

- Regulators publish information held on quality issues directly and, where appropriate mandate entity level publication, both in terms of specific research and more granular routine information (including information on disciplinary action)

- Regulators make available information on individual and entity level authorisation, including details of specialism, panel membership and quality marks where applicable
- Information sharing between approved regulators and providers of legal services “choice tools”, for example professional registers made available to price comparison websites
- Regulators use consumer feedback information in assessment of quality risks where appropriate
- Regulatory arrangements support the provision of performance information

4.28. The Panel considers these five criteria to represent a good set of building blocks for future work. Rather than suggest new initiatives on choice tools, consistent with the tenor of the LSB’s Strategy and Business Plan the approved regulators should now be given the opportunity to demonstrate delivery. The LSB has said it looks forward to seeing evidence of the issues being addressed in the action plans developed for the regulatory standards work. This was not greatly in evidence in the first round of action plans, but we expect this to be a key focus of the 2013-14 exercise.

Understanding consumers

4.29. The Panel has pursued issues around consumer engagement under a different work stream, but there are important linkages with this project. By having a good understanding of consumer needs, preferences and behaviour regulators will be in a better position to design and implement policies that can support consumers to choose and use legal services with confidence. We have made clear on numerous occasions our disappointment with the level of consumer engagement by most of the approved regulators to date, as has the LSB in its regulatory standards work. Despite this, more recently we have been encouraged by commitments made in business plans to address this – of course, the proof will be in the delivery.

4.30. One of the ten learning points from our review of initiatives by regulators in other sectors is the need to draw on insights from behavioural economics. These theories recognise that not all consumers respond in an economically rational way to financial or other incentives, but instead may fail to act in their own best interests due to innate behavioural traits. Increasingly regulators are using insights from this discipline to better understand consumers and design solutions that run with the grain of consumer and provider behaviour. The OFT, Ofcom, Ofgem and the Financial Services Authority have all done so, whilst this is also emphasised in the BIS consumer empowerment strategy. Therefore, we are pleased that the LSB has commissioned a paper which will set out the key areas of behavioural economics that are relevant to consumers of legal services.

4.31. Information remedies – requirements on third parties to provide consumers with certain information, often in a prescribed format – are a very commonly used tool by regulators. A study by the Better Regulation Executive and National Consumer Council found that consumers reject much of the information because it is not helpful or is presented in a complex or unappealing format. It also found that providers may comply in ways designed to protect them from litigation rather than genuinely to aid consumers. Information remedies that ran counter to business interests were found to lead to creative or minimum compliance responses.⁴ Anyone who has read a law firm’s client care letter should recognise many of these problems also exist in legal services, which is an information-heavy environment. Information remedies can benefit consumers in lots of ways, but learning from other sectors suggests these should be used with care. We note Ofcom is undertaking work to evaluate the conditions in which consumer information remedies are most effective. This promises to be a valuable exercise and we encourage legal services regulators to extract and apply relevant learning in their contexts.

⁴ Better Regulation Executive and National Consumer Council, *Warning! Too Much Information Can Harm*, 2007.

4.32. Finally, consumers are not all the same and one of the Panel's strategic objectives is ensuring that all consumers, especially those in a position of vulnerability, have access to affordable and high quality advice. We have adopted the British Standard on inclusive service provision to help us address these issues and are pleased to note that the LSB has agreed to both incorporate this into its policy toolkit and to invite the approved regulators and the Legal Ombudsman to demonstrate how they have incorporated it into their work. Our research programme has highlighted the experience of specific population groups – a study on deaf and hard of hearing people has been published and a new project with people with learning disabilities is near completion. Importantly in the context of this project, some of the most common barriers facing these groups revolve around communication. Our review of regulators' activities also suggests this is an underexplored area in other markets. However, Citizens Advice, Citizens Advice Scotland and Consumer Focus have recently completed a report for BIS on how they, local and central government and other organisations could help empower the very vulnerable as consumers. The Regulated Industries Unit's draft work programme includes a study on regulator performance in the area of consumer vulnerability. Again, there are opportunities to extract and apply learning from this work in a legal services context.

5 Next steps

Key findings

5.1. Some key themes and strategic choices have emerged from our two background papers and stakeholder discussions:

- The research evidence suggests that legal services consumers are not very empowered, while consumers in vulnerable positions are even worse off
- Empowering consumers is a desirable objective, but there should not be an overreliance on this to deliver the regulatory objectives. The LSB should develop a 'policy attitude' which recognises the need to make the consumer protection framework fit for purpose in order to give consumers justified confidence to drive competition in the market
- Each approved regulator needs to consider consumer needs in the context of their operating environments, but increasing direct access to traditional referral professions is making this policy area of ever wider relevance
- Legal services regulators consider on balance that their role in relation to public legal education is quite limited, but this may be an area where the professional bodies can add value. There are differences of opinion about the merits of developing an equivalent service to NHS Direct for the law, but we consider the desirability and feasibility of this should be explored further
- The information consumers need to make rounded and informed choices is scattered across a range of websites. Joined-up information provision is a holy grail in many markets, but there is fresh impetus following the new responsibilities given to Citizens Advice. The Money Advice Service's role also creates intriguing possibilities for legal services

- The complexity of the regulatory landscape inhibits efforts to empower consumers, but steps can be taken to mitigate these problems
- Choice tools need the support of regulators to become more credible with consumers. A good deal of policy thinking has been done in this area and it is now up to the approved regulators to deliver on this agenda
- A better understanding of consumers would help the approved regulators to make progress. Applying behavioural economics principles and assessing the impact of information remedies should be two priorities
- The LSB is rightly challenging the approved regulators to take proper account of consumers in vulnerable positions

5.2. The Panel's second background paper identified ten learning points from regulators in other sectors (see Annex) that we encourage the approved regulators to consider. The paper also analyses current activity by the approved regulators against the ten themes. This was not intended as a scorecard due to differences in the approved regulators' operating contexts. Nevertheless, this exercise indicates that these bodies, with the exception of the SRA, have yet to develop a strategic approach to empowering consumers. There is much more they could all do – many of these simple steps – to help consumers choose and use legal services. More positively, we also identified some good practice examples to build on.

Phase Two

5.3. Phase One of this project explored the benefits and limitations of empowering consumers, benchmarked levels of consumer power in the UK economy and in legal services, identified learning from regulatory experience elsewhere, reviewed activity by legal regulators and others, and concluded by highlighting key findings and strategic choices. The intention is that the LSB now reviews this initial work before agreeing with us the scope of a possible second phase to the project. Given the nature of the issues and the stage of the project, we consider it is appropriate to identify high level priorities rather than make specific recommendations.

- 5.4. We would observe that this is potentially a very large agenda, although it is also a greatly important one. Effective leadership is necessary to identify common goals and draw together the various strands so that the efforts of each of the wide range of actors is targeted where they can most make a positive difference. While there are lots of new things that could be started, much is to be said for consolidating existing work. The LSB has already set expectations for the approved regulators in areas such as choice tools and consumer engagement; to make good progress on these will demand significant and sustained commitment in their own right.
- 5.5. It will be important to make linkages with other work streams. For example, the Panel is currently helping the LSB to carry out research on why many people do not trust lawyers; it is difficult for consumers to be empowered if they lack trust in the providers they deal with. Similarly, our work on risk suggests that consumers will not feel empowered if burdened with risks which they feel unable to manage.
- 5.6. Our analysis suggests the next regulatory steps should particularly focus on the following areas:
- The LSB needs to define a clear strategic approach towards empowering consumers at a market-wide level and ask the regulators to determine how this should apply within their own operating contexts
 - Real headway must be made on the action areas already set in motion by the LSB, such as around choice tools and consumer engagement, using the regulatory standards work as the main lever to ensure delivery
 - Coordinating expanded and more joined-up information provision, and ensuring the quality of information resources
 - Facilitating dialogue between organisations concerned with public legal education, legal regulators and others to agree respective roles, and to explore the desirability and feasibility of an NHS Direct style service for law
 - Reviewing the effectiveness of information remedies, ensuring these work well for consumers without imposing unnecessary burdens on providers

Annex – learning from others

The Panel's second background paper identified ten themes or trends based on analysis of initiatives by regulators in other sectors, which we encourage legal services regulators to consider as they develop their own approaches to empowering consumers:

- **Adopt a strategic approach towards consumer empowerment** – real impetus, a coherent approach and measurement of success is more likely to happen when empowering consumers is made an explicit strategic goal
- **Ensure there is adequate generic information provision** – there is an expansion of general materials in some spheres, but also ambition to streamline provision through the advice sector in a joined-up way that cuts across regulatory boundaries – this leaves some strategic choices for legal regulators
- **Make it easier for consumers to understand their rights** – through simplification of consumer law and increased public awareness, for example via charters. This is really important given perceptions of consumer protection are a precondition of people playing the more active role in markets envisaged for them.
- **Create incentives for consumers to take a more active role** – especially in public services, there is a trend to give people more control over decisions affecting them, including by giving consumers a greater financial stake in their choices, emphasising personal responsibility for decisions and involving people directly in the design and delivery of services and their regulation
- **Draw on insights from behavioural economics** – increasingly regulators are using insight from this discipline to better understand consumers and design solutions that run with the grain of consumer and provider behaviour
- **Open up data about regulatory performance** – encouraged by government, regulators are opening up a wide range of complaints and performance data they

collect about businesses to inform consumer choice and give powerful incentives for providers to behave fairly. Regulators are also reflecting on the possibilities and limitations of transparency as a regulatory tool

- **Share data on open access platforms** – government is also encouraging regulators to make data about provider performance available in a format that can be easily reused for other purposes with as few restrictions as possible
- **Strengthen choice tools so that consumers can trust them** – regulators see the potential for tools such as feedback and comparison websites and trusted trader schemes to inform consumer choice, but recognise the need to support self-regulatory solutions to bolster consumer trust
- **Make careful use of information remedies** – many regulators require providers to give consumers certain information which has a range of useful purposes, but there is limited evidence as to the effectiveness of these approaches. It should not be assumed that more information results in more empowered consumers. There are some efforts to evaluate when information remedies succeed or fail
- **Take targeted action to empower vulnerable consumers** – there is a greater general commitment in relation to empowering vulnerable consumers, but this is an underexplored area and requires further work

The Legal Services Consumer Panel was established under the Legal Services Act 2007 to provide independent advice to the Legal Services Board about the interests of consumers of legal services in England and Wales. We investigate issues that affect consumers and use this information to influence decisions about the regulation of legal services.

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