Consultation response

SRA: The architecture of change: the SRA's new Handbook

Overview

1. **The move towards OFR is welcome. However, by adding to the existing Principles rather than starting from a blank sheet of paper, the new Handbook is a missed opportunity to deliver fully cultural change within firms. The SRA should consider an approach, akin to Treating Customers Fairly in financial services, where a small number of key consumer outcomes, firmly rooted in the client experience, lie at the heart of the regulatory framework. Alternatively, there is a case for a consumer-facing Charter setting out what a consumer can expect from their provider.**

2. **In places the Handbook comes across as lacking ambition in the standards expected of solicitors. It should set out the vision of improvement to which the SRA aspires and describe how its provisions relate to the SRA's other tools to raise standards.**

3. **The content of the Handbook should be simplified and written in a language that is designed for, and makes sense to, the general public. A plain language version of the Handbook would improve accessibility for consumers, but it would also send a message to solicitors about the ultimate purpose of the rules and the need to be transparent and accessible in all their communications.**

4. **In some areas the SRA may need to be more prescriptive, by setting minimum requirements, in order to guarantee consumers certain standards. For example, a written complaints procedure and adequate insurance cover should be minimum requirements.**

5. **The Handbook needs to make clearer linkages with the LSB's required outcomes for ABS regulation. In particular, the approach to regulating ABS does not sufficiently reflect the LSB's outcomes in relation to access to justice and consumer protection.**

6. **The new approach to conflicts of interest is supported in part. If Model 2 is adopted, the detailed provisions on acting for both sides in conveyancing could be removed. However, solicitors should never act where there is a conflict between their own and their client's interests.**

7. **The greater emphasis on vulnerable clients is welcome; however this should be an explicit outcome rather than merely an indicative behaviour.**

8. **To bring the Handbook in line with the LSB rule on first-tier complaints handling, clients should be told at the outset of their right to complain to the Legal Ombudsman.**

The proposals

9. The SRA is consulting on the new Handbook that will underpin the shift to a system of outcomes-focused regulation (OFR). The paper sets out:

- An explanation of OFR and how it influenced the development of the new Handbook;
- The structure of the new SRA Handbook (which will contain all of the regulatory requirements for both firms and individuals);
- The new Code, Accounts Rules and Specialist Services rules;
- How firms will engage with the SRA from authorisation to disciplinary action; and
- How the SRA intends to protect clients through professional indemnity requirements for firms.

10. Of particular note is the structure of the new Handbook, which consists of:

- Principles – ten Principles which are mandatory and apply to all regulated bodies and to all aspects of practice;
- Outcomes – positive outcomes which, when achieved, will benefit users of legal services and the public. All outcomes are mandatory and each chapter of the Handbook sets out the outcomes which firms and individuals should achieve in order to comply with the relevant Principles;
- Indicative behaviours – specify but do not constitute an exhaustive list of the behaviours which tend to establish compliance with, or contravention of, the Principles; and
- Guidance – non-mandatory explanation of how firms and individuals can comply with the Principles and achieve the outcomes.

The Panel's response

11. The Panel's response is in three parts:

- Overall comments on the Handbook, including its structure and the ten Principles: the most important part of the proposals but where the Panel has significant concerns;
- Key Issues and themes; and
- The detailed content of the Handbook, on which we have few comments.

Part 1 – Overall comments

12. The Panel has previously indicated its support for OFR. We agree with the critical success factors identified by the SRA for the Handbook and welcome the incorporation of themes from the Panel's past consultation responses, such as clarity and enforceability, and the need for the new regulatory approach to work for the whole market including small firms.

13. The Handbook provides a framework of rights for consumers as well as a set of rules for solicitors. The Panel views the document from the former perspective, leaving the profession to comment on whether it provides sufficient clarity for practitioners. On this basis, in the Panel's view, the Handbook as a standalone document falls short on two levels: at a high level, it does not provide a convincing account of the purpose and benefits that OFR should deliver for consumers; and on a content level, it does not communicate to consumers in a short and simple format, and in a language that is written for them, what they can expect from their solicitor.

Purpose level

14. The Panel's response to the January consultation called on the SRA to draft the

new code "from a blank piece of paper, aiming to meet the challenges of the 2010s, rather than seek to adapt the existing model". In light of this, while it is difficult to argue against each of the ten Principles, which individually all make good sense, it is not necessarily true that these are the right ones for today's world. The Panel would have liked the SRA to have asked consumers directly about the key outcomes they expect from solicitors and, together with an analysis of intelligence, use this as the basis for the new rules.

15. The SRA describes OFR as a radical break from the past. However, by adding to the existing Principles, rather than by starting afresh, the code might not deliver the hoped-for cultural shift within firms that would ensure core outcomes for clients are the dominant driver of business operations. This may be a problem of perception, as there is much laying behind the Handbook that suggests transformation. However, if firms come to consider the Handbook as requiring little more than mild adjustment, rather than a shift in mindset, any change in behaviour will represent an adaptive step rather than a cultural leap.

16. The Panel's impression of the consultation is that the SRA's primary focus is on minimising harm for the few by targeting regulatory failure, rather than stimulating competition to raise standards for the many. It is accepted that the primary purpose of a rulebook is to lay down a set of minimum requirements to protect consumers, and that competition, rather than rules, should be the main driver for raising standards. However, there remains the need to link the Handbook back to an vision of improvement which meets consumer expectations of a profession. One consequence of the current approach is that the Handbook appears to lack ambition in the standards expected of solicitors. For example the focus is on providing a 'proper' standard of service, whereas the outcome that the Panel wants for consumers is for the best service possible and for solicitors to strive for continual improvement.

17. In financial services, the Treating Customers Fairly (TCF) initiative captures more successfully, through six core consumer outcomes linked to the customer journey, what the regulator wants firms to achieve for consumers. TCF is a key reference point for consumers and firms and is fully embedded within the Financial Services Authority's (FSA) regulatory and supervisory approach. TCF is separate from the FSA Handbook, but is directly linked to it through the Principles for Business. In particular, Principle 6 states: 'a firm must pay due regard to the interests of its customers and treat them fairly'. We encourage the SRA to consider a similar approach so that a small number of key consumer outcomes are put at the heart of the regulatory framework in a way that is capable of being recognised by consumers.

18. If a TCF-style approach is not pursued, the Panel suggests two less far reaching options. The first is for a consumer-facing Charter setting out what a consumer can expect from their provider. This would overcome the problem that the Handbook is not targeted at consumers and fails to communicate their rights in an accessible way. Another option is to insert a preamble in the Handbook, setting out the SRA's vision in the terms described above. Furthermore, such a text should make clear that the Handbook is just one part of the SRA's regulatory armoury, alongside tools such as quality assurance and information provision. The Handbook should briefly describe how the SRA intends to use these other tools to drive up standards.

Content level

19. The SRA has reduced the Handbook from 270 to 34 pages, although it is still considerably longer than the six page code issued by ILEX Professional Standards. Furthermore, once the detailed rules in the annexes are added, the document becomes intimidating for the lay reader. In particular, the detailed practising and accounts rules are difficult to digest. The Panel calls on the SRA to simplify these areas and to incorporate good design principles to help users navigate the Handbook more easily, in both paper and electronic formats.

20. A concern is that the Handbook still takes solicitors, rather than the consumer experience, as its starting point, which dilutes the message that regulation is for consumer benefit. For instance, the document is addressed to solicitors through use of the word 'you', whereas a better approach would see the consumer outcome as the point of reference. Throughout, there should be recognition that the outcomes must be consumer-focused and for the benefit of clients, not for the benefit of firms.

21. The content also needs to be consumer proofed, using language that is simple and accessible to the public. At one level, this is about using terms with which consumers are familiar and dispensing where possible with unnecessary jargon. Whilst this is partly about making the Handbook accessible for consumers, once again, it sends a clear message to solicitors that the purpose of the Handbook is to improve outcomes for consumers. The next form of the Handbook should be tested with the public to check for its comprehensibility.

22. Nevertheless, if the SRA's chosen approach is accepted, the four new principles are welcome additions:

- Cooperation with regulators – the Panel has been shocked to learn of high levels of non compliance in certain areas, such as failure to disclose referral fees and non payment of compensation awarded by the Legal Complaints Service.
- Running an effective business – there is an apparent lack of commercial awareness among small firms, whilst the high numbers of insolvencies and increase in firms entering the Assigned Risk Pool, is concerning.
- Equality and diversity – the focus on the diversity and vulnerability of clients, in addition to treatment of employees, is very welcome.
- Protect client money and assets – inclusion of this principle is welcome given the degree of potential harm to consumers and the increase in mortgage fraud.

23. Finally, the approach of setting mandatory principles and outcomes, supplemented by indicative behaviours, is supported. The flexibility afforded by indicative behaviours is welcome, but in some areas the SRA may need to be more prescriptive, by setting minimum requirements, in order to guarantee consumers certain standards. This is about striking the right balance. Adequate insurance cover and requiring all firms to have a written complaints procedure are examples (see discussion in Part 3 of this response).

Part 2 – Key issues and themes

Alternative business structures

Outcomes-based regulation of ABS entities

24. The Handbook will also form the licensing rules for ABS. However, the linkages between this document and the Legal Services Board's (LSB) guidance on the content of licensing rules – which sets 25

outcomes that '*all LAs must seek to achieve when regulating ABS*' – are not always apparent. In particular, the following consumer-related outcomes appear missing from the proposals, or not are discussed:

- Outcomes related to the expected seniority and authority of HoLP and HoFAs (paragraphs 12 and 13 in the LSB Guidance);
- Outcomes related to professional indemnity insurance and consumer awareness of risks around compensation (15 and 16);
- Outcomes relating to access to justice (18-21); and
- Outcomes related to diversity (26-27).

25. The outcomes relating to access to justice are particularly notable by their absence. Little to no analysis is provided as to how the new regime will address the Legal Services Act 2007 regulatory objective of improving access to justice, or the access to justice outcomes set by the LSB. This objective is a key part of the regulatory structure, so it is disappointing that the only visible reference appears to be a single line in Rule 6 of the Authorisation Rules.

Harmonisation

26. The Panel supports the SRA's proposal that consumer protection should be the same irrespective of firm type and can see merit in harmonisation as a means of achieving this. Harmonisation is especially welcome in areas, such as the sanctioning toolkit, where the same approach is needed to deliver equal protection for consumers. However, care is needed to ensure proportionality, especially as it relates to sole practitioners, in order to avoid unintended consequences. An ideological approach to harmonisation could actually create a more uneven playing field if its impact is disproportionate.

27. One area of significant difference, as highlighted in a separate consultation on the SRA's approach to implementing OFR, is that ABS firms will be licensed by activity, while traditional firms will continue to have a general permission to practise in all areas of law. In order to deliver the benefits of harmonisation, the Panel encourages the SRA to undertake its promised review of licensing by activity for solicitors at the earliest opportunity.

Multi-Disciplinary Partnerships (MDPs)

28. The consultation rightly identifies some difficult challenges in developing an appropriate regulatory regime for MDPs. The Panel supports the proposal that ABS licenses should cover non-reserved legal activities, which mirrors the scope of regulation for solicitors. This approach should help to minimise confusion and avoid creating gaps in consumer protection. Clearly, the SRA's regime must be able to adapt to the conclusions of the LSB work on reserved activities.

29. The MDP working group will provide an important forum to help resolve these issues. The Panel is pleased to participate in this group, to ensure that the consumer voice is central to its deliberations.

Conflicts of Interest

Degree of flexibility

30. The consultation identifies three potential options for reform of the conflict of interest arrangements:

- Model 1 – firms do not act where there is a conflict of interests;
- Model 2 – firms only act where there is a non-substantive client conflict of interests, and subject to certain conditions; and

- Model 3 – firms are permitted to act where there is a client conflict of interests subject to certain conditions.

31. The SRA has previously consulted on relaxing its conflicts of interest rules for sophisticated users of legal services. The Consumer Panel represents all types of consumer, but generally prioritises those who are less able to give voice to their own interests. These groups of consumers will also be the Panel's focus in this consultation.

32. The SRA describes the consultation in terms of a fundamental review of its approach. In light of this, the very brief discussion of the issues is surprising; this makes analysis of the options especially difficult for the lay reader who does not have the same knowledge as practitioners. If the SRA is to improve the quality of decisions and enhance its accountability, it is vital that its consultations are as accessible to the general public and consumer representatives as they are for legal practitioners and their representatives.

33. An initial view is that Model 1 is too restrictive and does not fit with the spirit of OFR. Equally, Model 3 provides too much flexibility as it would seem to allow solicitors to act in all situations subject to certain conditions. This offers insufficient protection to individual (even sophisticated) clients, who lack knowledge to identify conflicts, and who are likely to defer to the solicitor's judgement, especially if the solicitor emphasises the advantages of acting for both sides, such as reduced cost and greater convenience.

34. Therefore, Model 2 offers the best balance between providing flexibility where the risks to clients' interests are insignificant and disallowing solicitors from acting where this would not be in clients' interests. The Panel agrees with the definition of a substantive conflict and the proposed safeguards in Annex D. In particular, obtaining each client's informed consent is a necessary safeguard, notwithstanding the limited ability of individual clients to identify conflicts, as described above. For the avoidance of doubt, the consent process should be documented. Guidance should state that the information provided to clients must make clear the potential risks of conflicts specific to the proposed service and by means of a vague, general statement that becomes meaningless with repetition. Solicitors must also inform clients how these risks will be managed. One risk is that the solicitor might have to cease acting should the matter progress such that a conflict emerges, potentially leading to delay and additional cost.

35. With regard to their own situation, however, solicitors should never act where there is a conflict between their own interests and those of a client.

Detailed provisions - conveyancing

36. The consultation asks for views on more detailed provisions which govern acting for seller and buyer and for the lender and borrower. The SRA consulted on this issue in 2007, but decided to defer consideration due to the introduction of Home Information Packs. At the time, the National Consumer Council – the only consumer respondent – argued that the rule should be removed, relying instead on the general conflict rule, but adding safeguards to ensure lawyers understand their responsibilities and deliver informed consumer choice.

37. The Consumer Panel sees no reason to depart from this view. As the NCC said, allowing one solicitor to act for both sides could minimise inconvenience caused by exchanges of correspondence and reduce avoidable cost. Licensed conveyancers have long been permitted to act for both

sides, apparently without problems, so this experience should provide useful learning. Under the SRA's favoured Model 2 above, solicitors would still not be permitted to act should they identify a substantive client conflict of interest, but removal of the detailed provisions would appear to provide greater flexibility for solicitors to act for both sides when a conflict is not present. Moreover, the safeguards built into the model, especially client consent, match those demanded by the NCC in 2007.

38. However, the SRA's decision should be evidence-based. This should include research with consumers to ascertain whether such a change would have public confidence. Research would also tell the SRA what information consumers would value as help in making an informed choice. Another important source of evidence would be the frequency of instances where a sale has fallen through as a result of issues discovered by a conveyancer, as this could be one indicator of the frequency of conflicts occurring.

Outcomes or rules

39. The conflicts section should be written as outcomes, rather than rules, supplemented by some worked through examples in guidance. The conflicts regime is a litmus test of OFR – if the SRA cannot rely on outcomes (which are mandatory) in this area, this would not give confidence in its ability to enforce outcomes in other areas. The interpretation of conflicts ultimately involves the exercise of judgement on behalf of individual practitioners and their firms. In the Panel's view, the outcomes, when supported by the indicative behaviours, provide sufficient basis for solicitors to make such judgements.

Client care issues

Vulnerable clients

40. The Panel is delighted that greater emphasis has been given in the Handbook to taking into account any potential vulnerability of a client. However, this should be given further emphasis still, by making the reference to vulnerability explicit at the outcome level (recognising that outcomes are mandatory) as well as at the indicative behaviour level.

41. Guidance should make clear what the SRA means by 'other vulnerability'. The Panel encourages a broad view that recognises clients can be vulnerable in different ways:

- They lack knowledge about the law and use solicitors rarely – in this sense, all individuals are potentially vulnerable;
- Even the most confident people can be vulnerable when using a solicitor at a time of distress, for example when dealing with bereavement; and
- A person can be vulnerable due to their personal characteristics, for example low literacy or a disability. However, it is patronising to label all persons falling in one category, such as old people, as vulnerable. Therefore, assessment of vulnerability can only be done on a case-by-case basis.

42. Solicitors are also subject to general consumer law and it would be helpful for the SRA Code to reflect this. In particular, the Consumer Protection from Unfair Trading Regulations 2008 references three types of consumer: 'average', 'average targeted' and 'average vulnerable'. The key test is whether the trader could have reasonably foreseen that the effect of the commercial practice would have been to materially distort the consumer's economic behaviour[1].

Client information

43. Whether using ABS or traditional law firms, consumers need to understand the services on offer, the terms of trade and how to access redress. Regulators need to understand the value and limitations of information remedies – this is discussed in the Panel's report on referral arrangements.

44. As identified in the consultation paper, this becomes an even greater challenge in the context of MDPs. The Panel looks forward to the opportunity for further discussion of these matters via the MDP working group. Some preliminary comments on areas identified by the consultation are:

- The Panel agrees that clients should be informed about all four areas (which activities are regulated, who to complain to, insurance and financial interest in referral arrangements);
- Consumers are not interested in the niceties of regulatory boundaries, but simply need assurance that the firm they are dealing with is regulated by a respected, independent body. This might require a single regulatory badge that consumers can recognise as a quality signal;
- In a similar vein, consumers need a seamless service to handle complaints about ABS firms – there should be a single entry and exit point through the Legal Ombudsman, with any complexities in regulatory boundaries dealt with behind the scenes; and
- The Panel's investigation into referral arrangements emphasised the importance of disclosure in order to facilitate informed consumer choice (see discussion in Part 3).

External influence and the impact on clients

45. The consultation rightly identifies as a key risk situations where a firm's ability to give independent advice may be undermined by virtue of external influence or fee arrangements. The Panel has not considered whether contingency fees produce an inherent conflict of interest, but conditional fee agreements are also a form of 'payment by results' that could influence the way solicitors handle cases, for example by under-settling personal injury claims. The Jackson Review recommended that solicitors should be permitted to enter into contingency fee agreements. At the time of writing, the coalition government is reviewing the Jackson Report; the Panel would welcome consideration of this issue by the SRA.

46. The Panel's investigation into referral arrangements argued that these produced theoretical risks to the independence of lawyers, but found no evidence that solicitors were over-reliant on work coming from a single introducer, although the Solicitors Disciplinary Tribunal had previously intervened on this basis. We recommended that Approved Regulators issue guidance on the circumstances under which a dependency on referral arrangements creates a risk of conflict.

47. The Panel supports a consistent approach to the regulation of reserved and unreserved activities. In the context of the current reserved/unreserved split, we do not object to the separate business rule – either for traditional law firms or for ABS. However, in the absence of analysis of other options, it is difficult to judge whether the re-application of the separate business rule is the best way to protect consumers in relation to unreserved legal activities into the future. The Panel would welcome an analysis of whether the separate business rule has been successful in protecting

consumers and discussion of how this approach may need to change in light of LSB work on reserved and unreserved legal activities. As discussed earlier, the new regime must be capable of adapting to policy change in this area.

Authorisation Rules

CoLP and CoFA requirements

48. The Legal Services Act requires all ABS firms to have a HoLP and a HoFA. The LSB has set two further outcomes in relation to these roles emphasising the importance of experience and governance arrangements.

49. The proposed Authorisation Rules require all authorised firms to have a Compliance Officer for Legal Practice (CoLP) and a Compliance Officer for Finance and Administration (CoFA). The SRA's approach raises two issues:

- While the SRA has met the requirements in the Legal Services Act, the Handbook does not reflect all the outcomes set down by the LSB in its guidance document.
- Regarding the nomenclature used by the SRA, the HoLP and HoFA roles are a key consumer protection part of the ABS framework, and the SRA has decided that this protection should be applied to all firms. However, in naming this role a 'Compliance Officer' instead of a 'Head', there is a risk that the role could be perceived as less senior, and therefore hold less authority. More generally, it is unhelpful to use different terms for the HoLP and HoFA – chaos would ensue if each licensing authority used its own terminology.

50. The Authorisation Rules also appear to contain a (potentially inadvertent) inconsistency relating to approval of CoLPs and CoFAs. Specifically, the rules only prohibit disqualified CoLPs and CoFAs from becoming a CoLP or a CoFA in *licensed bodies* (i.e. ABS firms), rather than in all *authorised bodies*. This could allow a disqualified person being eligible to be a CoLP or CoFA in non-ABS law firms, but not in ABS firms, thereby providing greater protection to customers of ABS firms.

Practising Regulations and Practice Framework Rules

51. The consultation paper seeks views on who should assume the role of CoLP/CoFA in a sole practitioner firm. The Panel prefers the second option – that is, it can be the sole practitioner or an employee, subject to the SRA reflecting the LSB's outcomes around authority and governance. The second option would allow the best person for the role to be selected, and is consistent with the approach for larger firms, where there is no stipulation that the CoLP or CoFA must be a Manager.

52. For the role of CoFA, it makes no sense for this to have to be the sole practitioner, when part of the reason for having this role is to ensure that the person responsible is suitably qualified. The fact that sole practitioners face the largest issues of fraud and indemnity insurance access suggests it is likely that many sole practitioners would not be suitable.

53. If the intention is to improve financial compliance, it is more important that it is an appropriately experienced person, subject to the SRA being satisfied they have sufficient seniority to be able to have authority within the firm.

Protecting the Public Interest

54. The Panel supports the proposal that the same professional indemnity insurance requirements should apply to all regulated

firms. This is an area where harmonisation would benefit consumers and firms alike. The Panel welcomes the SRA's recent announcement of a root and branch review of professional indemnity insurance – we will wait for that review before making any comments on the substantive issues.

Part 3 - The Draft Handbook

55. Notwithstanding our overall comments in the first part of this response, the SRA has produced a comprehensive set of outcomes and indicative behaviours. The comments below are confined to issues of detail where the Panel seeks change or clarification.

56. Building on earlier remarks on vulnerability, the relationship between the Code and general consumer law is unclear. In some areas, such as advertising, the Code reminds solicitors of their general law obligations, but this does not happen in other areas, such as data protection. Furthermore, the Handbook might note that failure to honour a commitment in a code of conduct is a misleading omission under the Consumer Protection from Unfair Trading Regulations, and so solicitors could be subject to enforcement action by public authorities such as the Office of Fair Trading, as well enforcement action under the Code by the SRA.

Chapters 1 and 8 – Fee arrangements

57. The Panel considers that non-optional disbursements should be presented to clients from the outset and included in the advertised price. The Legal Complaints Service told us a historic source of complaints was the final conveyancing price being much higher than the original quote due to additional unexpected costs. Legal services can be expensive so it is important that consumers have a good idea of the final price before committing to proceed. Furthermore, it is important there is a level playing field so solicitors compete on price on equal terms and do not seek to hide non-optional costs. There are clear parallels with the airline sector, where the authorities have acted to ensure that compulsory additional charges, such as airport taxes, are included in the advertised price.

Chapter 1 – Complaints handling

58. The provisions on complaints handling do not appear fully consistent with the rule on first-tier complaints handling set by the LSB in May 2010. In particular, outcome 8 states that clients must be informed of their right to complain to the Legal Ombudsman and indicative behaviour 'R' states that clients should be informed at the outset about how complaints can be made. However, the connection is not explicitly made that clients should be told *at the outset* about their right to complain to the Legal Ombudsman.

59. The Handbook removes the obligation on solicitors to have a written complaints procedure as a minimum requirement. The Panel acknowledges that there are different means for solicitors to resolve complaints in ways that deliver the desirable outcomes. However, we cannot envisage circumstances where it would be unhelpful for there to be a written procedure. The Panel urges the SRA to include a written complaints procedure as a minimum requirement, reflecting the importance of accessing complaints mechanisms.

Chapter 9 - Referral arrangements

60. The draft Code references referral arrangements in both Chapters 1, 6 and 9 – we draw together our comments here.

61. The Panel has recently completed a major investigation into referral arrangements[2]. Two building blocks of consumer protection were identified: independence, to avoid biased advice; and disclosure, to ensure

informed choice. These principles should apply equally to referrals from solicitors to ancillary providers such as medical organisations, as well as from introducers to solicitors.

62. The draft outcomes are consistent with these two issues. In particular, the Panel is pleased to note the requirement that clients should be fully informed about any financial or other interest, which the indicative behaviour suggests should be in writing. Guidance should state that 'fully informed' means disclosing the size of fee as well as the existence of the referral, as this is likely to influence the consumer's decision to shop around before accepting the referral. Similarly, the guidance should also clarify that this information should be given to clients at the time of engagement. The Panel appreciates that it will not always be straightforward to present the size of referral fee as by no means all referrals occur on a case-by-case basis; however, it should be possible to provide an approximate amount.

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[1] For guidance, see: http://www.oft.gov.uk/shared_oft/business_leaflets/cpregs/oft1008.pdf

[2] Legal Services Consumer Panel, *Referral arrangements*, May 2010.