

**Council for Licensed Conveyancers Report to the Legal Services Board
on Empowering Consumers - 30 September 2024**

INTRODUCTION

In June 2024, Richard Orpin, interim Chief Executive of the LSB wrote to the CLC and other front line regulators seeking assurance by 30 September 2024, as to how regulators are meeting the expectations of the LSB’s Empowering Consumers Policy Statement.

This is the CLC’s assurance report; the table below summarizes our response to the Policy Statement and signposts to relevant paragraphs in the body of the report where there is greater detail regarding CLC’s implementation of the Policy Statement, and what we have done to deliver against the prescribed Outcomes and Expectations.

LSB Outcomes	Summary of CLC Actions	Further detail is set out at
<p>a. Pursue the following outcomes:</p> <p>i.. Consumers have the knowledge and capability to recognize when their problem is a legal issue and know how to get legal assistance where necessary.</p>	<p>The nature of conveyancing and probate is driven by very clear and obvious circumstances, the need or desire to purchase or sell a property and death, as such, it is not recognizing the ‘legal issue’ where the CLC focuses its efforts, it is in legal education around choice, how to exercise that choice and how to engage with service providers where our efforts are focused.</p>	<p>Paragraph 1.1 to 1.5 pages 9 and 10</p>
<p>ii. Consumers have the knowledge and capability to engage effectively with the legal services market.</p>	<p>Engaging consumers at the point when they are considering appointing a legal advisor through an up-to-date CLC website with consumer-focused information and through the development and ongoing enhancement of the Legal Choices website and through contributing to developing the government’s guidance to buying and selling property.</p>	<p>Paragraph 1.1 to 1.6, page 9 and 10</p>
<p>iii. When choosing a legal services provider, consumers can access, as a minimum, useful information about a provider’s services, price, quality, regulatory status and access to resolution of</p>	<p>The CLC’s register of licensed practices provides consumers with information about regulated practices and under a dedicated ‘consumer’ banner on the CLC website, a suite of consumer-focused information is published including information about services offered by regulated lawyers, how</p>	<p>Paragraph 1.6, page 11</p>

complaints that enables them to make an informed choice as to the provider most suited to meet their needs.	to raise complaints, redress and general price information, as well as what levels of service consumers can expect from a CLC regulated lawyer. Through the Legal Choices website, the CLC provides a further avenue for consumers to access independent, factual information about legal issues, legal advisers and related consumer issues such as complaints and redress.	
b. Ensure compliance by those they regulate with the regulatory arrangements they put in place to pursue these outcomes, including through effective measures to address non-compliance	Mandatory Informed Choice Rules for regulated practices and additional guidance and supporting materials to enable compliance with the rules introduced in December 2018.	Paragraph 1.7, page 11
c. Have appropriate mechanisms in place to evaluate and report on the effectiveness of the steps they have taken in pursuit of these outcomes and make changes where these have not been met.	Compliance with the Informed Choice Rules is a routine element of monitoring and where non-compliance is identified proportionate enforcement action will be taken in line with CLC enforcement processes.	Paragraph 1.8 to 1.11, pages 11 and 12
LSB Principles	Summary of CLC Actions	Page number
Principles a to e	Relevant measures and findings of Legal Services Consumer Panel Tracker Report noted with further commentary in relation to specific CLC actions.	Pages 12 to 15
LSB Specific Expectations	Summary of CLC Actions	Paragraph & page numbers in body of report
Public legal education	In addition to regular publications in the online and print media that target legal services users when they are considering appointing a conveyancer, the CLC co-founded Legal Choices, an independent source of information to assist consumers in making legal decisions and continue to support its evolution in the interests of consumers. We have a 'Consumers' section on the CLC	Paragraphs 3 to 4, pages 13 to 16

	<p>website, which is positioned prominently at the top of the landing page. Information in this section includes 'Find a Conveyancer', numerous consumer-focused guides, information and support for consumers on various topics, a suite of information to help consumers avoid falling victim to fraud and scams, as well as a series of Frequently Asked Questions addressing issues including costs, benefits of using a CLC regulated lawyer, information for consumers about financial protection and how to raise a complaint.</p>	
Information about price	<p>Publication of Informed Choice Toolkit to enable understanding of and ease of access to the rules and guidance on Informed Choice. The toolkit is published on CLC website and brings together a comprehensive suite of material including the CLC Informed Choice Rules, Informed Choice Guidance, supporting information including about using client reviews and comparison websites, how to implement Informed Choice rules, a Cost estimate template, Frequently Asked Questions, suggested wording for practices on pricing and related consumer information, Guidance on Complaints and Redress and the Complaints Code Information, standard wording for practices to ensure consumers are provided with clear and accurate information about the CLC Compensation Fund.</p>	<p>Paragraphs 5 to 6, pages 16 to 17</p>
Information about quality	<p>Disciplinary and enforcement action is one indicator of quality about which the CLC is transparent, providing consumers with access to decisions reached by the independent Adjudication Panel and Enforcement Decision Notices regarding regulated individuals and entities by publishing this information in full on the CLC's website. This information is also made available via the 'Help me trust my legal advisor' tool on the Legal Choices website.</p> <p>Information published on the Consumer pages of the CLC website helps educate consumers about what indicators of quality they should look for in legal services</p>	<p>Paragraphs 7 to 8, pages 17 to 19</p>

	<p>providers and we are continuing our work around Quality Indicators following the joint pilot we undertook in 2021/2022 with the Solicitors Regulation Authority (SRA), the Council for Licensed Conveyancers (CLC), and CILEx Regulation worked together to undertake a pilot.</p> <p>Information and data from the Legal Ombudsman and HM Land Registry have the potential to be hugely informative when it comes to assessing quality and we continued to explore how this data can be harnessed effectively to support education about quality and inform consumer choice.</p>	
<p>Information about service, redress and regulation</p>	<p>In addition to consumer-focused information on the CLC website, the CLC Handbook sets expectations regarding the conduct of professionals, including regarding how services are delivered; information about redress and regulation is published on the CLC's website and in addition to requirements on practices to make information about service and redress available to consumers, the CLC publishes information about complaints, when and how to access the support of the Legal Ombudsman and information about protection offered by professional indemnity insurance and the CLC's own Compensation Fund. Information on the CLC's and the Customer Charter introduced in 2019 provide consumers with information about regulation and the assurances this offers.</p>	<p>Paragraphs 9 to 13, pages 19 to 21</p>

BACKGROUND

Before we report against the Outcomes and Expectations set out in the LSB's Policy Statement, we should set out some background. The genesis of the LSB's Policy Statement was a Market Study report undertaken by the CMA. The key objective of the Report was to provide consumers with more, and more easily comparable, information about legal services providers. When the CMA reviewed progress in 2020, it found tangible progress and suggested in particular further work on information about the quality of legal services and the development of a single register of all legal services providers.

The Chief Executive of the CLC had led the sector's initial response to the CMA's 2016 report, Chairing the group of regulators seeking to ensure consistency of approaches across the sector to deliver genuine comparability between providers

under different regulatory regimes.

The CLC's [Informed Choice](#) framework, which enacts the CMA's recommendations, embedded quickly and well across the regulated community with the help of significant work to ensure that practices understood the new expectations and were implementing all the necessary steps to deliver transparency of price and service delivery. Monitoring compliance is now part of the day-to-day operations of the CLC, including at inspection.

The CLC has also played a leading and active role in the development of the Legal Choices website to become a useful tool for the potential consumers of legal services, providing public legal education on a wide range of legal services from employment to immigration and the CLC regularly provides content for the site and related social media on conveyancing and probate.

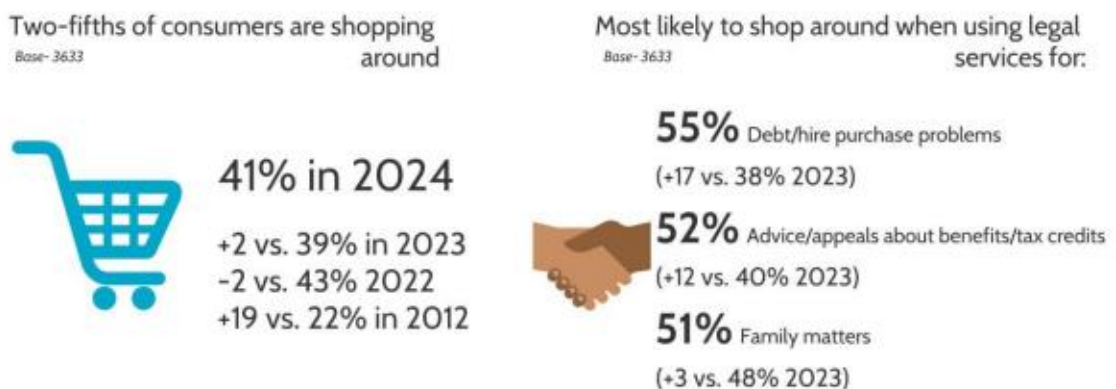
Responding to the CMA's recommendation that regulators should do more to explore the potential for making available more information about the quality of legal services, the CLC worked on joint research with the SRA and CILEx Regulation. That [Report](#) was published in 2023. It found that consumers most wanted the views of other consumers, through tools such as TrustPilot, to inform their choice of legal service providers.

Recent evidence on consumer choice of legal service provider and satisfaction

The Legal Services Consumer Panel undertakes an annual tracker survey of consumer views of legal services provision. The 2024 report was published in two parts on 17th July this year. The first report looks at how consumer [choose a legal service provider](#) and the second how they [use legal service providers](#) and their satisfaction with the service .

The most significant measure in the survey in relation to the Empowering Consumers Agenda is arguably the proportion of users of legal services who say they shopped round before choosing a legal service provider.

The headline figures on that are presented in the report as follows:



(Graphic extracted from the LSCP's report.)

In fact, 54% of consumers who most recently used a Licensed Conveyancer reported

that they had shopped around for that service. This is very significantly above the average for all legal services of 41%.

If we look at consumers who had most recently used conveyancing services (from any type of lawyer), we see that 48% report having shopped around for that service.

These two data points indicate that users of Licensed Conveyancers for conveyancing are more likely to have chosen their legal service provider having first shopped around than users of other legal service providers.

Probate services see much less shopping around. This may be because users of probate services are likely to stick with the legal service provider who drew up the will for the deceased. Only 32% of users of probate services provided by any type of lawyer report shopping around.

Analysis of the data to identify how many probate consumers using a CLC lawyer shopped around is not yet available.

Looking at satisfaction, we can see the following headline figures and breakdown.

Overall satisfaction with outcome

	All respondents	Users of Licensed Conveyancers	Users of conveyancing services from all sources	Users of probate services from all sources
Very satisfied/satisfied	89%	91%	93%	85%
Dissatisfied/very dissatisfied	3%	4%	3%	3%

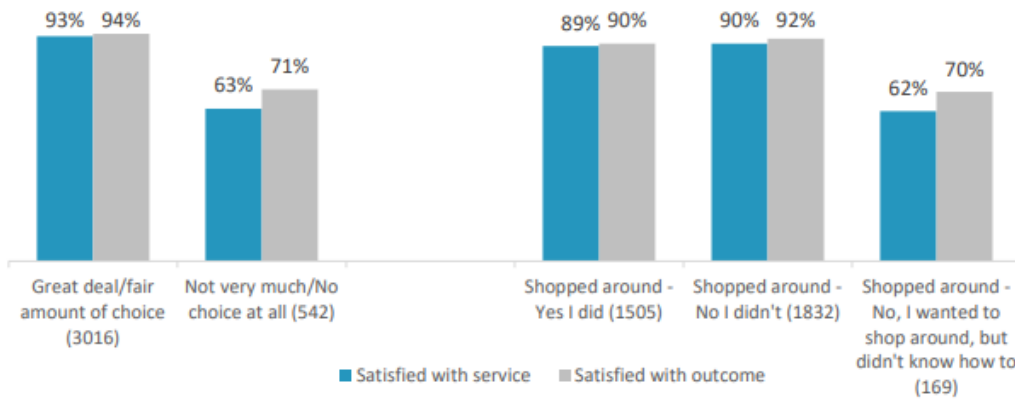
Overall satisfaction with service

	All respondents	User of Licensed Conveyancers	Users of conveyancing services from all sources	Users of probate services from all sources
Very satisfied/satisfied	89%	91%	93%	85%
Dissatisfied/very dissatisfied	3%	4%	3%	3%

The LSCP also finds that whether or not a consumer shopped around has only a very little impact on satisfaction with the outcome or service eventually provided. Those who shopped around being marginally less likely to be satisfied. However, the very small group of respondents who wanted to shop around but did not know how to do so

are very much less likely to be satisfied with either the outcome or the service provided.

Fig 20. Overall, how satisfied or dissatisfied were you with the SERVICE/OUTCOME you received from your provider? (Base size in brackets, by choice and whether they shopped around. Showing the proportion that were satisfied.)



Conclusions from this evidence

The first observation is that, overall, satisfaction with legal services appears to be high. If we were to translate it into a TrustPilot rating, it would be 4.5 out of 5 stars for CLC-regulated lawyers and users of conveyancing services but perhaps just 4/5 for probate consumers. That lower score might be linked to the lower propensity to shop around for probate services leading to less satisfaction because of using a provider one has not chosen for oneself¹.

Conveyancing is often referred to as the most complained-about legal service. As is often observed, this will in large part be due to the fact that it is, along with probate, the most used legal service.

The proportion of conveyancing transactions that result in complaints that have to be dealt with by the Legal Ombudsman is very low – roughly 1 in 400 transactions by CLC lawyers results in LeO accepting a complaint for investigation and only around 1 in 2,750 transactions results in a full Ombudsman decision. (Based on estimates of CLC-regulated conveyancing transactions and complaints to LeO in 2022/23.) The levels of satisfaction that are reported in the LSCP survey underline the positive position.

Second, the level of shopping around for Licensed Conveyancers compared to other providers found by the LSCP survey indicates either that:

- a. the CLC's Informed Choice rules are having a greater impact than is average for the legal sector; or
- b. when consumers shop around, they are more likely to choose a Licensed Conveyancer for conveyancing or probate services than another provider.

Given that both factors are likely to contribute to the finding, we can say that the CLC's

¹ It is not possible to identify whether consumer responses on probate related to CLC or SRA regulated providers.

Informed Choice regime is effective and is having a significant, measurable impact.

PROVIDING ASSURANCE IN RESPONSE TO THE STATEMENT OF POLICY

In the Statement of Policy in 2022, the Legal Services Board set out

- General Expectations (including three specific outcomes)
- Principles
- Specific Expectations (including some considerations that regulators should bear in mind when delivering Expectations)

In his letter of 17th June 2022 to front line regulators, the interim Chief Executive of the LSB made clear that regulators are required to provide assurance and evidence against each of these elements of the Statement.

The commentary below takes the Statement and provides updates against each individual element, following the structure of the statement.

We should observe before we move to the detailed commentary, that, because of the low frequency of use of conveyancing and probate services, consumers need to be educated at each time of using them that they should shop around and how to do so. It is difficult to create the habit in each consumer with such long gaps between usage for most people, particularly as we note below, some consumers are dissuaded from shopping around in favor of instructing conveyancers recommended by estate agents, or deferring to the probate professional responsible for drafting the will in question.

Anecdotally, the CLC understands that users of probate will be likely to stick with the provider that the deceased used to write the will because that appears to have been the preference of the deceased. That may be difficult behaviour to affect, and for some consumers, particularly vulnerable consumers, the idea of shopping around for a probate practitioner may be imponderable at such a difficult time in their lives.

The home buying and selling process, of which conveyancing is the legal portion, is beginning to become more integrated across the process. Hand-offs from estate agent or mortgage broker to conveyancer may become more of a fixed pipeline as technical integrations for data and processes provide natural progressions from provider to provider that will disincentivize shopping around at different stages, as stepping outside the pipeline would introduce friction the consumer will prefer to avoid. That is an intensification of what is already the case.

The CLC continues to call for the regulation of estate agents because of concerns that the existing model employed by some, frustrates consumer choice, amongst other concerns, and may be argued to be anti-competitive. Whilst the National Trading Standards Estate and Letting Agency Team is tasked with enforcing compliance with consumer protection legislation as it applies to Estate and Lettings Agents. However, this depends on consumer initiative, whereas there seems to be a strong case for before-the-event regulation of estate agency, setting standards and maintaining standards in the consumer and public interest.

Further progress against the consumer empowerment agenda must take into account these particular challenges in relation to conveyancing and probate services and the wider ecosystem that can influence consumer choice.

Updated commentary on CLC actions relevant to the LSB's Statement on Empowering Consumers

General expectations

1. The LSB expects regulators to:

a. Pursue the following outcomes:

- i. **Consumers have the knowledge and capability to recognize when their problem is a legal issue and know how to get legal assistance where necessary.**
- ii. **Consumers have the knowledge and capability to engage effectively with the legal services market.**

1.1 These outcomes are key objectives of the CLC's Public Legal Education work. For the two legal services that the CLC regulates, conveyancing and probate, recognizing that they have a legal issue is not the challenge for consumers. Informed by the joint CLC-SRA-CILex Research report of 2023 referred to above, the CLC's work focuses on making sure that consumers know that they have a choice of legal service provider, how to make that choice and are advised on how best to engage with the legal service provider. Thus, meeting the 'knowledge' and 'capability' points.

1.2 Because of the infrequent use of conveyancing and probate services, we aim to engage consumers each time they use those services. This means attempting to engage them close to the point at which they are beginning to consider appointing a lawyer as this is when they will be open to advice. It is not possible to create the habit in each consumer with such long gaps between usage for most people.

1.3 We reach consumers through content on the CLC's own website², content on the Legal Choices website and the efforts to engage consumers with that content about conveyancing and probate. This is chiefly achieved through the Legal Choices website now as that is where the promotional effort is concentrated. The Solicitors Regulation Authority (SRA) leads on Legal Choices. The CLC is part of the Governance and Steering Groups and a funder of the project. We are aware that the SRA is providing detail about the Legal Choices project in its submission to the LSB on Consumer Empowerment. However, we would like to pull out some key points here.

- The number of people visiting the Legal Choices website rose from 130,000 in 2018 to more than 1.1 million in 2024, a result of re-launch and targeted marketing
- A year after the CMA's December 2016 legal services market study was published, frontline legal services regulators and the Legal Ombudsman launched a programme of work that has run for seven years and included a re-design, re-build, and re-launch of the Legal Choices service
- As a result, the number of people visiting the Legal Choices website rose from 130,000 in the 12-month period ending 31 October 2018 to more than 1.1 million in the 12 months to 31 August 2024. In each of the past four legal years, more than a million people have visited the website

- We undertook user testing on the new service with individual consumers to maximise usability and ensure consumers are able to find the information they need.
- We drew on the expertise of the [Legal Choices Advisory Panel](#) to inform content and provide advice on issues faced by consumers and businesses
- Alongside this, we created a catalogue of resources that can be used both directly by individual consumers, but also as a tool for consumer representative groups, charities and law centres. These are focused on demystifying the experience of using legal services, to help people understand their legal issue and how to access professional help
- This includes over 100 podcast style videos dealing with housing, employment, immigration and asylum, and going to court. In doing so, we have recognised where different groups of consumers may have different needs
- We have developed and published specific content for potentially vulnerable consumers, such as asylum seekers and people with other immigration issues, to ensure they have a clear path to progress a legal need and mitigate some of the stress involved with being in such a situation
- We have effectively built the reach of our messaging particularly through social media campaigns
- Over the past four years, Legal Choices web pages have been rated more than 8,000 times by users. On average, 60% of users rate pages as useful
- We have designed Legal Choices with direct input from consumers and have increased its reach.
- We are confident this work is providing significant benefit to consumers in helping inform them make decisions about using legal services and meets the expectations of the LSB
- We continue to keep Legal Choices content under review, regularly discussing this and other key issues collaboratively with the other frontline legal regulators, the Legal Ombudsman and Legal Services Consumer Panel
- The development of content is also informed by the views and experience of the Legal Choices Reference Group
- We are continuing work to build the Legal Choices brand externally. We are piloting the use of short engaging videos using Instagram reels and curating our YouTube Shorts. We will evaluate this pilot and consider building on this if successful.

1.4 We contributed to the development of the government's guides to buying and selling property.

1.5 The CLC also publishes regular articles in First Time Buyer magazine and in What Mortgage to reach consumers at moments when they may be looking for guidance on conveyancing services. Other opportunities can be engineered or taken advantage of from time to time. For example, we have recently given an interview to the BBC's Morning Live show about protecting oneself from fraud during legal transactions. While this will be broadcast rather than targeted at consumers looking at conveyancing or probate services, it is a useful way to raise general awareness of fraud risk and the simple ways consumers can protect themselves.

iii. When choosing a legal services provider, consumers can access, as a minimum, useful information about a provider's services, price, quality, regulatory status and access to resolution of complaints that enables them to make an informed choice as to the provider most suited to meet their needs.

1.6 These are information points that the CLC required regulated practices to make available through the introduction of the Informed Choice rules and guidance which came into force in early December 2018. Intensive work with practices in the run-up to that deadline and for a period afterwards ensured very high levels of compliance from that time.

b. Ensure compliance by those they regulate with the regulatory arrangements they put in place to pursue these outcomes, including through effective measures to address non-compliance;

1.7 Monitoring and enforcing compliance with the Informed Choice agenda quickly became part of the day-to-day operations of the CLC, as intended. Compliance is kept under review in the same way as all other regulatory expectations, through monitoring, including face to face inspections, and intelligence received from multiple sources including amongst others, consumer complaints, whistleblowing, thematic reviews and Annual Regulatory Returns. Failures to comply with the CLC's expectations in this area are generally easy to remediate and have not proved challenging. In line with standard CLC compliance processes, practices not meeting expectations are required to put in place a timebound action plan bringing the practice back into compliance. Effective implementation of the action plan will be monitored by the CLC. An area of specific focus was costs and whether practices make price information available in a prominent place on their websites (or by other reasonable means on request where they do not have a website) and whether cost information is adequate, we also reviewed practices' online quote generators and whether the costs estimates provided online were adequate.

c. Have appropriate mechanisms in place to evaluate and report on the effectiveness of the steps they have taken in pursuit of these outcomes and make changes where these have not been met.

1.8 Evaluation of the impact of the CLC's approach takes place in two main ways:

- Monitoring compliance assesses the 'inputs' that the practices are making to fuel informed choice outcomes
- LSCP tracker surveys looking at propensity of consumers of legal services to shop around changing over time, and satisfaction with the services received provides insight into the outcomes.

1.9 Monitoring Compliance

In relation to monitoring compliance, we have set out above how that takes place. Where we see trends in issues or systemic problems in a particular practice, those are reported to the Council and feature in the Risk Agenda. Informed Choice continues to appear as a subject in the [Risk Agenda](#), because it remains an important focus for the CLC and practices, but non-compliance is not of a nature that presents significant risk to consumers. (The Risk Agenda is an annual CLC publication which brings together a list of the biggest risks faced by the CLC's regulated community, which emerge

during through monitoring and inspection work throughout the year, along with advice to help practices stay on the right side of compliance.).

1.10 Consumer Behaviour and Satisfaction

The LSCP's reports on its 2024 Tracker Survey of consumers found 54% of consumers who most recently used a Licensed Conveyancer reported that they had shopped around for that service. This is very significantly above the average for all legal services of 41%.

If we look at consumers who had most recently used conveyancing services (from any type of lawyer), we see that 48% report having shopped around for that service.

These two data points indicate that users of Licensed Conveyancers for conveyancing are more likely to have chosen their legal service provider having first shopped around than users of other legal service providers.

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Analysis of the data to identify how many probate consumers using a CLC lawyer shopped around is not yet available.

1.11 Information from Consumer Complaints

In addition, we monitor trends in consumer complaints against CLC-regulated practices. The provisions of the Informed Choice rules themselves do not give rise to consumer complaints that reach the attention of the CLC though some 10% of complaints that are referred to LeO relate to fees, most often in relation to failures to inform clients about unanticipated costs incurred because of issues that arise during transactions. These have not coalesced as systemic problems in relation to a specific practice under-quoting and over-charging however.

Principles

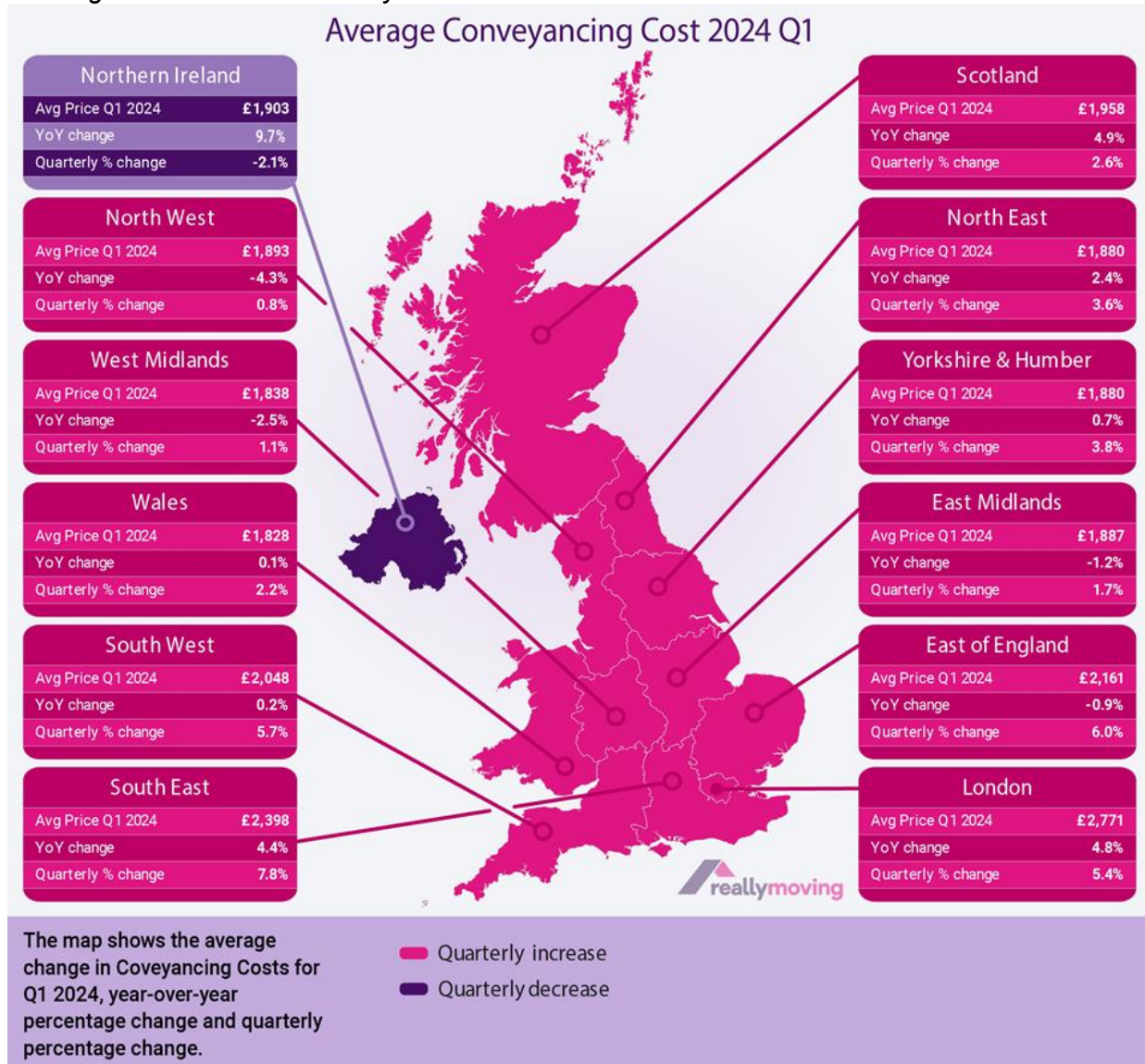
2. In implementing this statement of policy, the LSB will have regard to the following principles:

- a. **In its 2016 study of the legal services market and 2020 review, the Competition and Markets Authority (CMA) found that competition is not working well in the legal services sector for individual consumers and small businesses. As such, regulators should pursue the outcomes with particular attention to individual consumers and small businesses. In considering their approaches, regulators should have regard to the wider findings of the CMA's study and review.**

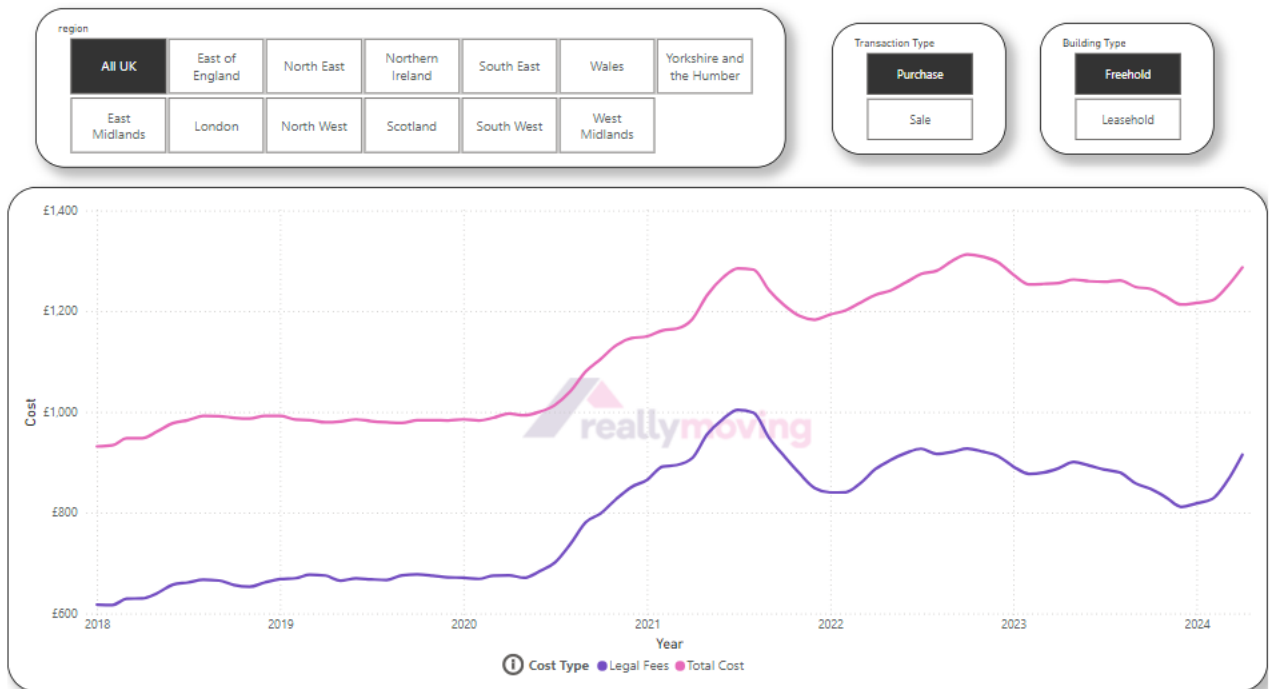
In line with this principle, the development of the CLC's Informed Choice rules was targeted at meeting the needs of individuals and small businesses. However, it is not clear that competition is not effective in the conveyancing sector, where

we see comparatively high levels of shopping around, especially by clients of Licensed Conveyancers. As a finding of its last wave of prices research, in 2020, the LSB noted that geographical location accounted for the vast majority of variation in price.

Recent data on conveyancing prices from ReallyMoving shows high levels of price convergence around the country as set out on the illustration below.



Another chart, below, from the same source, shows changes to the cost of conveyancing over the years since 2018, demonstrates the use of dynamic pricing by conveyancing practices, as prices increased significantly when demand for conveyancing was high and fell back again following the period of SDLT holidays that increased market activity.



This data indicates a highly competitive market for conveyancing.

As we have noted elsewhere, the market for probate appears less competitive, with consumers less likely to shop around and sticking with the provider chosen by the person who wrote the will.

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- b. Regulators regulate different professions within the legal services sector, and, as a consequence, may adopt different approaches to meeting the general and specific expectations.**

This is a fair observation. However, the CLC worked hard with other regulators of conveyancing and probate services to ensure a consistent approach, especially on the presentation of price information, to ensure that there is a fair basis for comparison between providers of those services under different regulatory regimes.

- c. In considering whether specific approaches are required for providers in different practice areas within their regulated communities, regulators should consider:**
 - i. the needs of consumers, including those of consumers in vulnerable circumstances (for example where consumers are digitally excluded and do not have access to information online);**

This consideration applies to the entirety of service delivery and not only the provisions relating to consumer information. To make further improvement in this area, the CLC has decided to adopt the British Standard definition of vulnerability and will be advising practices on how to put that into practice in their work. We are also part way through joint research with the Bar Standards Board and CILEx Regulation that aims to find ways to

tackle digital exclusion more effectively.

- ii. **the types of provider and services offered (for example some services are more “commoditised”, such as conveyancing and wills and probate, whereas in more bespoke areas, such as legal aid work, it may be more difficult to compare providers).**

We agree with this observation. All of the legal services regulated by the CLC are mass market services which have been commoditized to a very significant degree. This facilitates comparison and thus has driven the degree of competition that is considered above.

- d. **Collaboration between regulators is encouraged where this may lead to more effective and proportionate activities (for example where there may be overlapping consumer needs, where practice areas are covered by more than one regulator, or where economies of scale are sought, particularly on testing solutions).**

As mentioned above, the CLC drove collaboration with the SRA and CILEx Regulation in 2018 to develop common ways of presenting price information on conveyancing and probate services. The CLC has monitored compliance with its expectations closely since their introduction.

- e. **Testing proposed measures with consumers is encouraged.**

The steps recommended by the CMA in its two reports have been very clear. Rather than test them prior to implementation, the CLC has monitored changes in the market and in consumer behaviour as set out above, and intends to test future proposals with the Consumer Reference Group.

The CLC, SRA and CILEx Regulation undertook joint research with consumers into further information that they might use to make their selection of legal services provider and the findings are set out in the [report from 2023](#). That report is informing ongoing work by the CLC to attempt to empower more consumers.

- 3. **Regulators are expected to put in place an effective programme of activity to support the regulatory objective of increasing public understanding of the citizen’s legal rights and duties. This should be with a particular focus on public legal education that supports people to understand where they have a legal problem and how to access the professional help they need to resolve it.**

General Public Legal Education

We have a dedicated ‘[Consumers’ section](#) on our website. This includes a range of articles and guides. It currently includes content on (amongst other items): warnings to consumers on scams; mortgage fraud; legal requirements on identification; guides to purchasing property; reporting problems; and a specific glossary to help navigate legal terms.

Reaching consumers at point of consideration of potential legal services provider.

We have long had a regular monthly column in [“What Mortgage”](#), whose readers will be focused on the home buying and selling process and so considering appointing a conveyancer. We also have a quarterly article in *First Time Buyer* magazine, which allows us to target that particular group of legal services users when they are considering appointing a conveyancer.

To reach other users of CLC-lawyers services in financial institutions, we also have regular articles in *Mortgage Finance Gazette*. These are in addition to coverage in the legal, conveyancing and insurance press on the work of the CLC that is generally secured through press releases.

Disciplinary information

Disciplinary information about CLC-regulated lawyers is published on our website and highlighted from the register. That information is also included in the ‘help me trust my legal adviser’ tool on *Legal Choices*.

- 4. Regulators are expected to make meaningful contributions to cross-sector initiatives, such as Legal Choices, that are subject to appropriate mechanisms to ensure they are effective. Regulators should be able to demonstrate suitable investment, reach and impact of such initiatives following evaluation.**

We are a key contributor to, and funder of [Legal Choices](#). The website helps consumers understand whether they are facing a legal issue and how to go about addressing it. It supports consumers in making legal decisions, and helps them understand what good regulated provision looks like. We have contributed articles and promotional content to address the potential users of conveyancing and probate services. *Legal Choices* is exceeding its targets for engagement and progress is reported annually. The SRA has reported in greater detail about the progress and impact of *Legal Choices*.

Information about price

- 5. Regulators are expected to put in place regulatory arrangements and undertake other appropriate activities to ensure the provision of useful information that best enables effective consumer choice about the price, or potential price, of the services offered by providers.**

Informed Choice

Much of the CLC’s work can be grouped under ‘Informed Choice’ framework, which gathers together our expectations in response to the CMA recommendations.

We maintain a webpage setting out our [Informed Choice Toolkit](#), including a sub-page on tips for firms to follow on costs, etc. This is a comprehensive kit for law firms looking to comply with the CLC’s requirements.

Generally, we have found good and even high standards of compliance, but as firms update websites and marketing materials, we maintain compliance through our standard monitoring and enforcement procedures.

6. In assessing what information about price is useful and best enables effective consumer choice, regulators are expected to consider such factors as:
- a. The pricing/charging model;
 - b. Hourly fees (where charged) by grade of staff;
 - c. Indicative fixed fees, factors that may affect these and the circumstances where additional fees may be charged (where offered);
 - d. Typical ranges of costs for different stages of cases (where appropriate);
 - e. The scale of likely disbursements (e.g. searches, court fees); and
 - f. Other key factors that determine price (including disbursements).

Price Transparency

Our specific advice to firms on transparency has been consistent and clear, it is published on our website, and is echoed during regular meetings with firms, at inspections and conferences etc.

Our guidance sets out that CLC practices can decide the best way to display cost information, but also that we've found (and are vigilant for) some practices that are abiding by the letter and not the spirit of the rules.

Our price guidance is designed to cover a range of possible instructions from clients. For example, it states that: information needs to be in a prominent place and be accessible; should be available with one click from the homepage; broad example examples (e.g. "Our fees range from £300 to £2,500" do not meet our expectations for transparency); the display of any calculation of fees; whether disbursements and VAT are included; the use (and misuse) of quote generators; and what to do if your firm doesn't have a website (i.e. it still needs to be clear on this).

The CLC's monitoring and inspections look at this area and if non-compliance is found, a remediation plan is put into place.

Information about quality

7. Regulators are expected to put in place regulatory arrangements and undertake other appropriate activities to ensure the provision of useful information that best enables effective consumer choice on the quality of legal services providers to consumers. Such information should include as a minimum:
- g. Providers' disciplinary and enforcement records, including any sanctions; and

The CLC publishes disciplinary and enforcement information in line with its Publication Policy as maintained by the governing Council of the CLC. This currently means that decisions reached by the independent Adjudication Panel and agreed Enforcement Decision Notices in respect of regulated individuals or

entities are published in full on the [CLC's website](#).

The CLC's online register includes links from entries for individuals and entities wherever there is a published disciplinary or enforcement decision. This information is also made available via the 'Help me trust my legal advisor' tool on the Legal Choices website.

h. Published decisions made by the Legal Ombudsman on complaints about providers.

The CLC is still in discussion with the Legal Ombudsman about published data and how it can be used. Once the data is clean and reliable we will consult on ways that it could be made available to consumers. There is a question about what data to provide that will not create misleading impressions and at what level of granularity.

For example, in the year 2022-23, the Legal Ombudsman (LeO) resolved 856 complaints against CLC entities. This is higher than the number of cases accepted for investigation in the same year (421) because LeO has been working its way through a backlog of cases.

***608** of the 856 were disposed of through early resolution – a finding that a reasonable offer had been made, or an improved offer was made by the entity following receipt of guidance from LeO, or where minimal engagement by the Legal Ombudsman secured resolution whether that was through movement by the complainant, entity or both. We would expect that in future the majority of complaints in which a reasonable offer had been made would not be accepted for investigation by LeO, though we accept that there may be some cases at the margins.*

***135** were resolved by an agreed outcome between the complainant and the entity following Legal Ombudsman's advice.*

***60** required an Ombudsman Final decision because the parties refused to reach an agreement.*

***53** were resolved by other means (described by LeO as 'complainant unable to proceed, complaint resolved without investigation, withdrawn, general guidance given, contacted in error, dismissed, out of jurisdiction or premature'). It would appear that some of these cases should not have been accepted for investigation in the first place. Given they nearly equal in number those cases that required an Ombudsman Final decision, they seem material and have scope to mislead consumers.*

The CLC hopes that the LSB will take assurance that the CLC is pursuing the issue of publication of complaints data seriously with a view to settling data that will be useful to consumers.

8. In considering what further information about quality is useful, the LSB expects regulators to have regard to:

- i. Information about:**
 - i. The quality of legal services provided;**
 - ii. The quality of customer service; and**

iii. **Outcomes of work done.**

- j. **The following types of information, as appropriate for the particular market:**
- i. **Quantitative data on a provider's performance (for example complaints data, success rates, error rates); and**
 - ii. **Customer feedback, ratings and reviews, in particular those that comment on the aspects of quality set out in paragraph 19a.**

Quality Indicators

True quality indicators are not easily available in relation to conveyancing and probate services.

We were supportive of HM Land Registry's initial plans to publish data on requisitions, error rates in title change submissions, as a good proxy for quality of legal work overall. Now we are in new discussions with HM Land Registry, SRA and CILEx Regulation to identify new ways to bring cleaned-up requisition data to potential users. This may include self-publication by entities and/or the use of requisition data by Digital Comparison Tools (DCT). We expect this to be an ongoing project with HM Land Registry over at least 18 months.

There is analogous data available from Probate Registry (stops, that is restrictions placed on registration of certain transactions where HMLR identifies anomalies) and we hope to be able to begin discussions with the Probate Registry about whether it would be useful and possible to use that data in some form as a proxy for quality. The Probate Registry has not been responding to approaches as yet.

Customer feedback, ratings and reviews are widely collected and published by the practices the CLC regulates.

The CLC has long [encouraged](#) the entities it regulates to make available customer reviews provided by independent third parties. Increasing numbers now engage with, for example, TrustPilot and/or Google Reviews. Some DCT carry TrustPilot and/or Google Review ratings alongside other data they provide about legal services providers and we are committed to encouraging this practice.

In June 2024, the CLC hosted a free webinar with Reallymoving.com, focused on how CLC practices can engage with comparison websites to enable consumers to make meaningful comparisons when shopping around for conveyancing services.

Information about service, redress and regulation

9. **Regulators are expected to put in place regulatory arrangements and undertake other appropriate activities to ensure the provision of useful information that best enables effective consumer choice, including:**
- k. **Contact information;**
 - l. **A description of the services that the provider offers, including areas of practice;**

- m. **The mix of staff that deliver the services;**
- n. **Key (and discrete) stages of services;**
- o. **Indicative timescales of completing services and factors affecting these;**
- p. **The provider's regulatory status, registration details; and**
- q. **The provider's complaints process and access to the Legal Ombudsman.**

This is all information that CLC-regulated entities are required to make available via their websites or print materials. Compliance with the requirement is monitored and enforced alongside the rest of the CLC's Handbook requirements.

How information is made available to consumers

- 10. Where information set out at paragraphs 16 to 20 is made available, this should relate to regulated entities and/or regulated individuals as appropriate.**

This refers to price information. This information applies at entity level for CLC practices as individuals are not charged out individually.

- 11. Regulators are expected to take steps to ensure that their regulatory arrangements and activities result in the provision of information by providers that is:**

- r. **Clear and prominent;**
- s. **Comprehensible, including through the provision of appropriate contextual information;**
- t. **Accurate and up-to-date; and**
- u. **Easy to compare to information made available by other providers.**

This is information that CLC-regulated entities are required to make available via their websites or print materials. Compliance with the requirement is monitored and enforced alongside the rest of the CLC's Handbook requirements.

- 12. Regulators are expected to take steps to ensure that the following information about the providers they regulate is available in at least one single location online. This may include the regulator's own register of regulated providers⁴:**

- v. **Contact information;**
- w. **A description of the services that the provider offers, including areas of practice;**
- x. **The provider's regulatory status and registration details;**
- y. **The provider's disciplinary and enforcement records, including any sanctions; and**
- z. **Published decisions made by the Legal Ombudsman on complaints about the provider.**

Items v to y inclusive are all available through the CLC's online register. As noted above, the CLC is exploring complaints data options with LeO to address z. Proposals

for that addition will be the subject of future consultation.

- 13. Regulators are expected to consider how to facilitate the use of tools that could provide useful and comparable information to consumers, such as digital comparison tools, review websites or a centralised database of regulatory information.⁵**

The CLC has undertaken research with the SRA and CILEx Regulation to look at how to enhance the availability and ease of comparability of information about legal services providers and that research has identified further work that the CLC is undertaking as part of its commitment to continuous improvement.

Regulators should consider the following activities:

- aa. Ensuring consumers are made aware of such tools;**
- bb. Embedding trust among consumers and providers in such tools; and**

The CLC regulatory promotes DCTs to consumers as part of its encouragement to shop around for legal services providers. They are promoted through the Legal Choices Website.

As part of the joint follow-up to the Quality Indicators research, the SRA, CLC and CRL are jointly promoting an updated Voluntary Code of Conduct for DCT operators. The Voluntary Code is published on the [SRA website](#).

- cc. Making relevant information freely available to third parties on an open data basis.⁶**

The CLC makes [data about its regulated entities](#) available to DCTs and others to use as they will.