



## **RESPONSE TO SLCC BUDGET AND OPERATING PLAN CONSULTATION 2021**

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**18 March 2021**

The Consumer Panel welcomes the opportunity to comment on the Scottish Legal Complaints Commission's proposed budget and operating plan for 2021-22.

The Panel responds to the questions posed in the consultation documents as outlined below.

### **Changes to the strategy made in light of Covid-19 (Section 3)**

The Panel welcomes the proposed changes to the strategy in light of Covid-19. The Panel notes the commitment to respond to the impact of Covid-19 on clients and the sector, and believes it is vital that changing consumer needs and expectations inform decisions made about the SLCC's business model, alongside the needs of the profession and organisational needs. Further work may be required to ensure consumer needs and expectations are monitored and understood, as many may be more likely to disengage with a service that doesn't meet their needs than make their voice heard.

#### Planned activity within the operating plan for 2021 -2022 (Section 4)

- **Using Service Design:** the Panel welcomes the commitment to test thinking on “how we deliver our services to ensure a customer-centric focus” and looks forward to seeing further details on this and working with the SLCC to achieve this aim.
- **Delivering Clarity:** the Panel welcomes the ongoing commitment to continued action to improve the accessibility of the SLCC’s reports and decisions. The Panel is aware that consumers often struggle with the way in which decisions are expressed and feedback suggests further opportunities for improvement.
- **Customer service:** the Panel welcomes the continued focus on customer service, and the opportunity to feed into projects to date.
- **Customer feedback:** the Panel plays a key role in considering the SLCC’s customer feedback and making recommendations for how learning from that feedback could drive improvements, and we look forward to continuing to feed into this work as it develops.
- **Engaging with consumer organisations:** the Panel has already contributed to thinking on this work and welcomes this continued focus on effective engagement with diverse consumers and consumer groups to understand changing expectations, and to ensure people who may have legal complaints are directed to the SLCC.
- **Prevent the common causes of complaints:** the Panel recognises that some complaints will always occur and need handled appropriately, but it is clear that many of the circumstances in which complaints commonly arise could be avoided. A key benefit to be derived from any complaints process is feeding outcomes and learning back into the profession to prevent recurrence and improve overall service levels for consumers.
- **Reform:** the Panel welcomes the SLCC’s continued work to make the case for reform, and commits to working with the SLCC, and other stakeholders, to ensure any reform is informed by the voice of consumers. This includes major reform of the regulatory and complaints system, as well as more targeted improvements to the complaints and redress processes.

- **Opportunities from Covid-19 experience:** the Panel welcomes this commitment, but, as above, urges caution that it must be informed by a sound understanding of the consumer experience.
- **Digital first approach:** the Panel specifically welcomes the inclusion of a phone services in this work. Consumers should be offered a choice of channels to engage with the SLCC, and should be able to choose which to use at any given time based on their personal needs and preferences. Research shows that many consumers welcome the opportunity to discuss issues on the phone – it can aid understanding, allow for questions and can play a crucial role in identifying opportunities for resolution.
- **Preventing digital exclusion:** the Panel welcomes the further development of this work to ensure that a move to digital practices is not exclusionary, and that sufficient safeguards are put in place to ensure access for all.
- **Consumer Panel priorities:** the Panel commits to working with the SLCC, and other relevant stakeholders, to achieve the priorities set out in section 4.36.

### **Ideas on further efficiencies or ways to improve the SLCC's service (Section 6)**

The Panel welcomes the SLCC's continued focus on improvement to the efficiency and effectiveness of its work.

We know that concerns about the time taken to deal with complaints continues to be a feature in the feedback received from the SLCC's stakeholders. We are also aware of the restrictions which the current legislative framework imposes on making radical improvements to the complaint handling process. We welcome the proposals for continuing to improve the current system within the legislative restrictions and particularly welcome any changes which result in improving the consumer experience. The Panel will continue to monitor the impact of this work on customer experience, through the customer feedback received by the SLCC. We will also continue to highlight new research or work by other organisations that may demonstrate best practice or new approaches to improve the SLCC's customer service.

The Panel particularly highlights the need to focus on the quality and clarity of information provided and decisions issued, as a key aspect of effectiveness, and therefore welcomes the specific commitments to do so in the SLCC's operating plan.

The Panel also commits to continuing to work with the SLCC and others to identify and welcome improvements which require changes to the statutory process, including the recently concluded consultation on changes to the complaints process via statutory instrument, and the ongoing discussions about wider regulatory reform.

### **Impact of Covid-19 on clients and the sector (Section 12)**

As above, the Panel welcomes the commitment to consider the impact of Covid-19 on consumers. However we note that insight into changing consumer behaviour in this field may be limited. The SLCC should consider how to do this, and work with other stakeholders, including the Panel itself, Relevant Professional Organisations and others to consider how to best to ensure this insight is sought, considered and acted upon. The SLCC may wish to consider whether and how existing commitments within its operating plan will allow it to sufficiently monitor changing consumer engagement with its service, and with legal services more broadly, on an ongoing basis.