#### Strategy for 2020 to 2024 and Operating Plan for 2023 to 2024

- 1.1 Our vision is that every client receives a professional service, and every lawyer adheres to professional standards.
- 1.2 Our mission is to resolve complaints, prevent the common causes of complaints, and enable quality improvement.
- 1.3 We have five strategic aims to achieve our ambition to be an efficient and effective complaints and improvement body, delivering a quality service. Our aims are to:



1.4 We have four internal priorities which will influence all our work and will ensure delivery of our aims:



1.5 Our values are:

| Fairness | Our processes and outcomes can be trusted by all as fair, independent and impartial.                                      |  |
|----------|---|--|
| Respect  | We understand and respect the diverse groups we work with, work inclusively, and offer a good customer experience to all. |  |
| Impact   | Every element of our work will deliver a meaningful result.   |  |
| Learning | We continuously learn and develop, and share that learning, so we all improve our processes and the quality of our work.  |  |
| Clarity  | Our decisions, explanations, communication, and services will be clear and accessible.                                    |  |



### Users

| Theme   | By the end of 2024 we will have achieved   | In year four we need to…  | Link to strategic aims                               |
|---|--|---|--|
| 1. Using service design to place people first   | Published outcomes from 'service design' projects<br>showing diverse users (lawyers and consumers) at<br>the heart of our improvement work.  | <ul> <li>Context: training and awareness raising has now largely embedded this in our 'toolbox' of techniques used for projects and change</li> <li>To finalise this work we will:<br/>Audit the outcomes of the project and deliver any actions from the audit: <ul> <li>Consider the use of service design in HR to improve employee support and engagement – including attending training on this topic</li> <li>Deliver a Service Experience Team (SET) led customer service project to review the full process for collecting and reporting on feedback from users on the complaints process. To have a new system ready to start by 1 July 2024 [Links to U3 and U4]</li> </ul> </li> </ul> | Deliver<br>Innovate                                  |
| 2. 'Delivering clarity' - quality services in clear<br>and simple language                | Delivery of a four-year programme of work, through a cross-organisational team, on accessible English to ensure everyone understands our reports and decisions.  | <ul> <li>Context: all staff have now been trained and systems put in place to encourage and support use in practice (for example, the use of IT to spot issues in documents and encourage re-drafting, and checking for application of the principles in quality assurance work).</li> <li>To finalise this work we will: <ul> <li>Consider options for further or refresher training and ensure new staff receive training to ensure this embeds in our culture long term.</li> <li>Audit the use of new templates rolled out in 22/23</li> <li>Implement actions from the audit</li> </ul> </li> </ul>  | Deliver<br>Innovate                                  |
| <ol> <li>Delivering quality customer service and<br/>making people feel heard</li> </ol>  | Improvement in the quality of our customer service<br>across all stages of our process – from enquiries to<br>final outcome - ensuring all our diverse users feel<br>heard, and get the information they need when they<br>need it. Ensure this can be delivered in a more<br>remote work context. | <ul> <li>Continue to test the refreshed Service Delivery Complaints Process</li> <li>Deliver a SET led customer service project to review the full process for collecting and reporting on feedback from users on the complaints process. To have a new system ready to start by 1 July 2024 [Links to U1, U4 and CP1]</li> <li>Deliver a short-life SET project to review 'chill factors' in terms of making a complaint (including drawing on expertise in the Consumer Panel) [Links to CP1]</li> </ul>  | Deliver<br>Innovate<br>Adapt                         |
| <ol> <li>Listening to, and acting on, customer<br/>feedback to improve quality</li> </ol> | The launch of a new feedback system to allow us to<br>understand our diverse customers' experiences of<br>enquiries and throughout the complaints journey, and<br>we will have undertaken a post implementation<br>review.   | <ul> <li>Deliver a SET led customer service project to review the full process for collecting and reporting on feedback from users on the complaints process. To have a new system ready to start by 1 July 2024 [Links to U1, U3 and CP1]</li> <li>Improve on our first attempt at an annual customer feedback report (in our 2023/24 annual report) that highlights feedback received in-year and how we responded to that feedback.</li> </ul>   | Deliver<br>Innovate                                  |
| 5. Engaging directly with the profession  | Better direct engagement with the profession, by<br>working with frontline practitioners on projects and<br>policy, with an increased focus on digital<br>communication.   | <ul> <li>Produce a suite of tools and case studies based on feedback about what the profession finds most useful</li> <li>Discussion sessions with the profession to inform our response to and implementation of the Regulation of Legal Services (Scotland) Bill [Links to I6]</li> </ul>   | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |
| <ol> <li>Engaging more with Consumer<br/>Organisations</li> </ol>                         | More effective engagement with diverse consumers<br>and consumer groups to understand changing<br>expectations and ensure people are directed to our<br>services where relevant.   | <ul> <li>Update our guides for consumers, testing with consumer groups and promoting through relevant channels.</li> <li>Review any updates and guidance on the consumer duty for public bodies in Scotland</li> </ul>  | Deliver<br>Innovate<br>Influence<br>Adapt            |



## Improvement

| Theme   | By the end of 2024 we will have achieved   | In year four we need to  | Link to strategic aims                               |
|---|--|--|--|
| 1. Continually improving the quality and pace of<br>our service                                   | A refresh of our ongoing improvement programme,<br>and further delivery of change, based on our work<br>with staff and users to identify improvements it is<br>possible to make within the current legislation to<br>achieve a more efficient and effective process.   | <ul> <li>Context: as reform becomes more certain internal process change may reduce where work done will not be a benefit under any new system.</li> <li>Continue our successful programme of sprints, with half of sprints in the year focussed on efficiency and half on customer service / quality</li> <li>Consider if agile methodology will be appropriate for implementation of any changes coming from any new legislation</li> </ul>  | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |
| 2. Resolving complaints early and consensually  | Maintenance of our successful focus on early<br>resolution and building of understanding with our<br>stakeholders that most of our work does not involve<br>formal adjudication but is facilitating consensual<br>outcomes.  | - Continue to promote the value of early resolution through outreach communications and social media   | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |
| 3. Tackling poor professional engagement  | Substantial improvement in the persistent issue with<br>firms not responding when we request documents<br>and explanations, which involves cost and delay.   | <ul> <li>Continue to monitor our S17 work and collect data on patterns and issues</li> <li>Review the process for, and leadership/staffing of, our S17 work as this move from 'initiative' to 'ongoing' work</li> <li>Continue to pursue all means of escalation to tackle this issue</li> <li>Ensure the operational practice is optimised around the court decisions on 3<sup>rd</sup> party cases in 22/23</li> <li>Deliver an internal project to review and standardise how we deal with requests for extensions/continuations, leading to an external communications plan [Links to U3]</li> </ul>   | Deliver<br>Innovate<br>Prevent<br>Influence          |
| <ol> <li>Increasing the effectiveness of 'Oversight' as<br/>a tool to increase quality</li> </ol> | A final published statement and plan of work,<br>following consultation, on how we intend to use our<br>'Oversight' functions more coherently and effectively.<br>This will include how we will use data to focus on<br>systemic issues to inform our approach to audits,<br>handling complaints, redress, guidance, advice and<br>trend publication. Delivery of that plan of work will<br>also have been achieved. | <ul> <li>Follow up any recommendations made from our review of LSS conduct investigation timescales</li> <li>Publish a report on Faculty's conduct complaint handling processes</li> <li>Deliver relevant follow up actions on our 2021 Master Policy report</li> <li>Consider first steps to identify an oversight plan for the solicitor Client Protection Fund</li> <li>Publish key data linked to our 15-year anniversary</li> <li>Deliver a new approach to our publication of trends in complaints [Links to D4]</li> <li>Develop a report to help us track regulatory risk factors</li> <li>Review our oversight strategy in light of any indicators in new legislation on the future of the oversight functions to ensure alignment</li> </ul> | Deliver<br>Innovate<br>Prevent<br>Influence          |
| <ol> <li>Working to prevent common causes of<br/>complaint</li> </ol>                             | An enhanced model of education, guidance and<br>outreach work which will have moved to focusing on<br>how we prevent the common causes of complaints,<br>and prevent the need for complaints to move from<br>'first-tier' to the SLCC. We will also increase our<br>digital outreach (see digital section).  | <ul> <li>Deliver our statutory guidance in bite-sized videos [Links to D3]</li> <li>Carry out focused work on cost/ price transparency as a key complaints risk</li> </ul>   | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |
| 6. 'Reimagine Regulation'   | Consistently promote the core policy themes set out in our #ReimagineRegulation work.  | <ul> <li>Deliver our engagement plan on the Legal Services Regulation Reform Bill</li> <li>Draw on our operational expertise to assess and respond to legislative proposals and amendments</li> <li>Develop implementation plans</li> </ul>  | Innovate<br>Prevent<br>Influence                     |
| 7. Delivering sustainable operations  | Reduced environmental impact through staff-led initiatives, and delivery of our biodiversity duties.   | <ul> <li>Reuse office furniture and supplies in the office move, and source new items in a sustainable way</li> <li>Continue to run training and events with a sustainable theme for staff.</li> <li>Maximize opportunities for an improvement in our environmental performance.</li> <li>Measure energy use to allow publication of savings made in new office</li> </ul>   | Deliver<br>Innovate<br>Adapt                         |
| 8. Implementing the 2010 Act  | Continued monitoring of the ongoing implementation<br>of the Legal Services (Scotland) Act 2010, and<br>preparation for the introduction of Alternative<br>Business Structures.  | <ul> <li>Context: In December 2021 the first Approved Regulator was fully authorised.</li> <li>Finalise implementation of the LS(S) Act 2010 within the SLCC.</li> <li>Ensure website contains consumer information and complaints forms, and relevant information for the profession</li> <li>Report in Annual Report &amp; Accounts on progress of implementation, and any complaints received</li> </ul>  | Deliver<br>Innovate<br>Influence                     |
| 9. NEW: review performance against strategy and set new 'strategy'                                | Review the implementation of the 2020-24 strategy<br>and ensure strategic direction is in place during a<br>period of uncertainty coming from transition around<br>reform.   | <ul> <li>Context: Our current strategy ends at the end of this business year. With a high degree of uncertainty from reform on functions and operations we do not envisage publishing a full new strategy at this time.</li> <li>Review performance against our strategy</li> <li>Publish outcomes in our annual report/ accounts in autumn 2024</li> <li>Set strategic themes for transition period</li> <li>Consult on strategic themes for transition period</li> </ul>   | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |



# Digital

| Theme   | By the end of 2024 we will have achieved  | In year four we need to   | Link to strategic aims                               |
|---|---|---|--|
| 1. AMENDED: Moving to a fully cloud based,<br>cybersecure network by Sept 2023, and<br>implementing a paperless and digital first<br>approach | A fully cloud based IT system, which has no office<br>dependency, and can be securely deployed at home<br>work locations and any office(s) used by the SLCC.<br><b>Amendment explanation:</b> in 2020 we set an<br>ambitious strategy to be a fully digital business<br>(whilst ensuring no one was excluded). This remains<br>a key focus, but the learning from Covid-19 meant<br>the aim also became operating this through a fully<br>cloud based network, not dependent on any office<br>location. | <ul> <li>Context: Substantial work will have been undertaken in 2022-2023, and so this period is about completion and consolidation.</li> <li>Complete the roll out of a full cloud-based network, with no office dependency</li> <li>Move the final files from our local server to cloud/hosted solutions</li> <li>Produce a final project close out report</li> </ul> | Deliver<br>Innovate<br>Adapt                         |
| 2. Developing new rules for a digital age   | New rules which reflect a digital and paperless focus in operations and engagement with the profession.   | <ul> <li>N/A – this work is complete</li> </ul>   | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |
| 3. Increasing our online offering of guidance, training and outreach  | A 'digital first' approach to first-tier complaints,<br>training, guidance, and outreach to better deliver the<br>right messages, at the right time, to improve<br>outcomes for users of legal services. Our social<br>media presence will increase.  | - Deliver our statutory guidance in bite-sized videos [Links to I5]   | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |
| 4. Investigating Artificial Intelligence and Big<br>Data  | Effective tracking of Artificial Intelligence (AI) and<br>'Big Data' use in law firms, regulation and complaints<br>to ensure we understand the risks and benefits for<br>public, profession, and for use in complaints.  | <ul> <li>Explore the possibility of a data maturity audit to inform the development of a new data strategy</li> <li>Further develop the breadth and depth of our use of Power BI to improve reporting and analytics</li> </ul>  | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |
| 5. Preventing digital exclusion   | Demonstrable evidence that our drive to digital does<br>not impact those excluded from digital means for<br>whatever reason, as informed by our risk and impact<br>assessments.   | <ul> <li>Ensure accessibility is fully embedded in our ways of working through digital exclusion checks, ongoing<br/>improvements to our website/ digital accessibility and new processes</li> </ul>  | Deliver<br>Innovate<br>Adapt                         |



# People

| Theme  | By the end of 2024 we will have achieved  | In year four we need to…  | Link to strategic aims                               |
|--|---|---|--|
| . Adapting to a blended staffing model               | To ensure the effective management of a 'blended'<br>model as lockdown restrictions ease and before<br>long-term decisions (and investment) on operating<br>model are taken.  | <ul> <li>1 year review of how the new operating model has worked collecting experience of all staff, and of line managers<br/>on management issues</li> </ul>   | Deliver<br>Innovate<br>Adapt                         |
| 1.1 Refocusing our job design                        | Role descriptions, training, and performance<br>systems which value flexibility, adaptability and<br>resilience alongside existing core skills.   | <ul> <li>Consult on, and if appropriate issue, new terms and conditions (taking account of the office move) and new job descriptions</li> </ul>   | Deliver<br>Adapt                                     |
| 1.2 Exploring talent pipelines and markets           | A review of the markets from which we can attract<br>talent which fits with our culture of wellbeing and<br>performance.  | <ul> <li>Context: we expect recruitment to be low and must also take into account that staffing needs may change</li> <li>Continue to monitor the talent market and be aware of developments and trends to be able to respond to any changes in SLCC recruiting.</li> <li>Embed a new method of interviews that includes giving candidates questions in advance</li> </ul>  | Deliver<br>Innovate<br>Adapt                         |
| 1.3 Providing positive career pathways               | More visible career pathways, showing routes to<br>promoted, managerial or technical specialist roles,<br>and trying to offer maximum opportunity in an<br>inclusive way (including split roles and<br>secondments).  | <ul> <li>Context: with reform now highly likely we need to balance ongoing development of the organisation with not committing to new structures until we know more.</li> <li>We will continue to support the new career pathways we have created, including senior, and specialist case investigator roles, split roles, and a digital lead</li> </ul>   | Deliver<br>Innovate<br>Adapt                         |
| 1.4 Delivering training, support and wellbeing       | Annual training, development and wellbeing plans to<br>support the aspirations of this strategy and to<br>develop the CVs of our team to give them<br>exceptional transferable skills for internal roles, and<br>ones within the regulatory and complaints sector,<br>while supporting wellbeing. | <ul> <li>Deliver a training programme supporting the full operating plan.</li> <li>Continue to run wellbeing awareness events</li> <li>Provide any training required to support the technology</li> <li>Providing training and coaching to support an office move</li> <li>Mark the 15th anniversary of the organisation in an appropriate way (considering staff and stakeholders)</li> </ul>  | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |
| 2. Creating an environment that supports performance | An accommodation review (in line with lease<br>renewal) and office environment review to support<br>effective work and wellbeing.   | <ul> <li>Context: We have service a break clause on our current office and plan to move to a new location in late August/early September 2023.</li> <li>Engage staff in planning the office layout and move</li> <li>Complete a relocation to a new property. This includes moving people, office kit out, updating templates and contact details, external comms, etc., etc.</li> <li>To consider opportunities to improve our environmental / carbon footprint performance</li> </ul> | Deliver<br>Innovate<br>Prevent<br>Influence<br>Adapt |
| 8. NEW: Monitor the Retained EU Law Bill             | Monitor the passage of the Retained EU Law<br>(revocation and Reform) Bill 2022. Assess the<br>potential impact on our people, data, and other<br>policies.   | <ul> <li>Monitor the passage of the Bill</li> <li>Assess the potential impact on our people, data, and other policies</li> </ul>  | Deliver  |



#### **Consumer Panel**

The statutory Consumer Panel is part of the SLCC and is funded and supported by it. However, it has a remit defined in law and its decision making and prioritisation is independent of the SLCC's Board and Executive.

Whilst the SLCC's adjudication functions are impartial, the Consumer Panel exists to ensure an equal voice for consumers in a context where professional input is more readily available from established and well-funded organisations. It also assists in ensuring services are equally understandable and accessible to all, again in a context where lawyers already find this easier due to their professional knowledge and expertise.

| 1 | . Theme   | By the end of 2024 we will have achieved   | In year four we need to   | Link to strategic aims                      |
|---|---|--|---|---|
| 2 | Improving the complaints process                  | A better complaints system for all users which is<br>accessible, provides clear and understandable<br>information and decisions, and delivers a good<br>customer experience.   | <ul> <li>Provide input and advice to the SLCC in delivering its change and improvement work to ensure it meets consumer needs</li> <li>Support SET in its work on customer feedback [Links to U3 and U4]</li> <li>Draw learning from SPSO project on child friendly complaints to improve SLCC processes</li> </ul> | Deliver<br>Innovate                         |
| 3 | Promoting consumer focused regulatory reform      | Reform of legal regulation based on the Consumer<br>Principles, the 'better regulation' agenda, and<br>insight into and from service users and those<br>experiencing vulnerability.  | - Ensure consumer input to the Parliamentary debate on the Legal Services Regulation Reform Bill  | Innovate<br>Influence                       |
| 2 | Championing consumer voice, and consumer research | A greater voice for consumers in reform, legal<br>services, and regulation by promoting and<br>commissioning work, including research, which<br>values the lived experience of individual service<br>users. Produce practical insights from this for firms<br>and organisations. | - Input to the SLCC's update of its guides for consumers, drawing on insight into consumer need   | Deliver<br>Innovate<br>Prevent<br>Influence |
| Ę | . Working across the consumer landscape           | A role in wider reform of consumer affairs in<br>Scotland, where there is a connection to legal<br>services.   | <ul> <li>Consider any learning from or response to wider consumer policy, including the implementation of the Consumer<br/>Duty</li> </ul>  | Innovate<br>Influence                       |

