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Dear Neil,

## **CONSUMER SCOTLAND RESPONSE TO SLCC CONSULTATION ON 2025-26 DRAFT WORK PLAN**

Thank you for the opportunity to respond to the Scottish Legal Complaints Commission's 2025-26 Draft Work Plan.

I have set out in this letter Consumer Scotland's feedback on the Draft Plan, which I will hope will be of value to you as you finalise your activities for the coming year.

Consumer Scotland has valued our engagement with the SLCC and the Consumer Panel, of which we are a member, over the past 12 months. In particular, we have been pleased to work with you on ongoing legislative and regulatory reforms and on issues experienced by former clients of the firm of McClure's. We look forward to continuing to work together to achieve positive outcomes for consumers of legal services in Scotland during 2025-26.

Consumer Scotland recently published our own Draft Work Programme for 2025-26. In this Programme we set out our planned work for the year ahead, across four overarching outcomes:

- Fair and affordable markets
- Investing for the future
- Trustworthy, high quality goods and services
- Consumers at the heart of Scotland's economy and society

Our Programme sets out our proposed research, analysis, policy, advocacy and strategic partnerships activities for the year ahead, alongside our statutory roles on the Consumer Duty for public bodies in Scotland, our recall of goods function and the next steps in our planned investigations on behalf of consumers. In the next year our work across the wider consumer economy will include supporting work to ensure the effective implementation of legal services reforms alongside our continued membership of the Consumer Panel. We are also scoping the shape of future work on redress which may be of interest given the SLCCs remit in this area.

We welcome the SLCC's recent response to our own plan of work and would offer the following comment on the SLCC's plans:

- We note the significant uncertainty around ongoing legislative reforms. As the Regulation of Legal Services Bill has now passed Stage 2, we are moving to a position where the legal framework is becoming clearer. However, there is room for further change during Stage 3 and we understand that detailed discussions regarding the pace of implementation are still ongoing.
- Given this, we support the SLCC's decision to undertake a two year strategy refresh, to bridge this period of uncertainty, and allow for more detailed consultation to take place once the

operational requirements of the new legislation are clearer. We also support the identified areas of focus, and in particular, the focus on how the SLCC's processes can better support the needs of consumers in vulnerable circumstances.

- The new legislation significantly widens the focus of the SLCC's role, conferring new functions in relation to oversight roles and the provision of unregulated legal services. It also provides opportunities to streamline complaints processes, and test new systems, which may better meet the needs of consumers. It will be important to reflect on, and take advantage of, these opportunities in order to effectively meet the regulatory objectives of the new legislation. This will require joint working with other stakeholders, both in relation to the SLCC's role and the further development of the Panel.
- The Panel's remit has itself been significantly expanded. There will be a need to reflect on the role of the SLCC in relation to the Panel and to develop the Panel workplan, support functions and other ways of working. We look forward to playing a part in those discussions.
- We welcome the SLCC's focus on effective consideration of complaints by former clients of the firm of McClure's. These cases will continue to have resource implications over the next year and we welcome the approach that the SLCC has taken to managing these cases. This has included both testing new ways of managing group complaints but also conducting lessons learned reviews. We welcome the incorporation of this learning into SLCC process guidance, allowing it to be applied to future work. We also welcome the SLCC's engagement in wider sectoral networks, to allow for learning and sharing of best practice, and are grateful for the SLCC's participation in our own Consumer Network.
- Finally, we welcome the intended work to support the implementation of the Consumer Duty and would highlight that, following consultation, final guidance on this is now available on the Consumer Scotland website.

I hope these comments are helpful and we look forward to continuing to work with the SLCC during 2025-26.

Yours sincerely,

Douglas White  
Director of Policy and Advocacy  
Consumer Scotland  
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