Strategy for 2020 to 2024 and Operating Plan for 2022 to 2023

Our vision is that 'every client receives a professional service, and every lawyer adheres to professional standards'.

Our mission is to resolve complaints, prevent the common causes of complaints, and enable quality improvement.

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:

- **Deliver**: Deliver a high-quality service which is approachable, people-centric, prompt, and proportionate, and which delivers fair resolutions.
- **Innovate**: Innovate by working as a performance-focused, change-confident and resilient team, delivering our work in new and efficient ways.
- **Prevent**: Prevent the common causes of complaints through analysis, shared learning and improvement work.
- **Influence**: Influence the debate on reform, and lead the change as soon as final proposals are in place.
- **Adapt**: UPDATED: Adapt by building on learning from Covid-19 and beyond to ensure an agile and resilient operating model, focussed on function over form.

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

- **Users**: Good customer experience is at the heart of how we design and deliver services, and feedback drives our improvement work.
- **Improvement**: Our people, processes, and outcomes demonstrate a commitment to, and delivery of, continuous quality improvement and best value.
- **Digital**: Our thinking will focus on digital solutions, paperless processes and 'social' engagement, whilst ensuring access for all.
- **People**: Our approach to wellbeing, development and a high performance culture ensures we can meet the challenges of ongoing change and increased demand, in a stimulating and enjoyable environment.

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.
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| **1. Using service design to place people first** | Published outcomes from ‘service design’ projects showing diverse users (lawyers and consumers) at the heart of our improvement work. | **Context:** rather than one big project, we plan to embed this into individual projects this year.  
- Finalise the roll out of last year’s customer service project (offering customer specified call back times), as identified by the Service Experience Team (SET).  
- Evaluate last year’s customer service project.  
- Identify additional customer service project from SET service user survey and other customer feedback (linked to I3). | Deliver Innovate |
| **2. ‘Delivering clarity’ - quality services in clear 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. | - Implement any further work needed that came from last year’s audit/review.  
- Work to ensure the changes remain embedded through Quality Assurance, audits, training and management. | Deliver Innovate |
| **3. Delivering quality customer service and making people feel heard** | Improvement in the quality of our customer service across all stages of our process – from enquiries to final outcome - ensuring all our diverse users feel heard, and get the information they need when they need it. Ensure this can be delivered in a more remote work context. | - Continue to develop the Service Experience Team to lead customer service work in the business.  
- Widen our new telephone standard to a full communication standard across all our contact methods. | Deliver Innovate Adapt |
| **4. Listening to, and acting on, customer feedback to improve quality** | The launch of a new feedback system to allow us to understand our diverse customers’ experiences of enquiries and throughout the complaints journey, and we will have undertaken a post implementation review. | - Roll out any further changes to the feedback system and reporting in light of the 2021-2022 Op Plan.  
- Look to develop an annual customer feedback report that highlights feedback received in-year and how we responded to that feedback.  
- Review if we need to update questions in light of ongoing customer service project. | Deliver Innovate |
| **5. Engaging directly with the profession** | Better direct engagement with the profession, by working with frontline practitioners on projects and policy, with an increased focus on digital communication. | - Use feedback from engagement with profession to inform our work.  
- Ensure the profession are aware of any changes to our powers or processes resulting from ABS (I10), and interim changes (I6), if implemented. | Deliver Innovate Prevent Influence Adapt |
| **6. Engaging more with Consumer Organisations** | More effective engagement with diverse consumers and consumer groups to understand changing expectations and ensure people are directed to our services where relevant. | - Engage with relevant groups on the changes and opportunities resulting from our new rules, from ABS (I10), and from interim changes (I6), if implemented, and update relevant materials and content. | Deliver Innovate Influence Adapt |
## Improvement

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| 1. Continually improving the quality and pace of our service | A refresh of our ongoing improvement programme, and further delivery of change, based on our work with staff and users to identify improvements it is possible to make within the current legislation to achieve a more efficient and effective process. | - Monitor Quality Assurance changes from last year.  
- Continue our successful programme of sprints, with half of sprints in the year focussed on efficiency and half on customer service / quality. | Deliver  
Innovate  
Prevent  
Influence  
Adapt |
| 2. Resolving complaints early and consensually | Maintenance of our successful focus on early resolution and building of understanding with our stakeholders that most of our work does not involve formal adjudication but is facilitating consensual outcomes. | - Review what was published in 2021-2022 and plan out content for 2022-2023.  
- Ensure parties and stakeholders are aware of the impact of any changes to our powers or processes resulting from interim changes. | Deliver  
Innovate  
Prevent  
Influence  
Adapt |
| 3. Tackling poor professional engagement | Substantial improvement in the persistent issue with firms not responding when we request documents and explanations, which involves cost and delay. | - Continue to monitor S17 work.  
- Review S17 work and staff leads.  
- As appropriate publish decisions and impacts of this work.  
- Consider and pursue all means of escalation to tackle this issue. | Deliver  
Innovate  
Prevent  
Influence |
| 4. Increasing the effectiveness of ‘Oversight’ as a tool to increase quality | A final published statement and plan of work, following consultation, on how we intend to use our ‘Oversight’ functions more coherently and effectively. This will include how we will use data to focus on systemic issues to inform our approach to audits, handling complaints, redress, guidance, advice and trend publication. Delivery of that plan of work will also have been achieved. | - Engage with the Law Society and the Regulatory Committee on the development of new strategies and annual plan actions on areas where we have oversight.  
- Deliver relevant follow up actions on our Master Policy report.  
- Update our data and information sharing protocols with the RPOs and other bodies  
- Continue to learn from other sectors and jurisdictions to inform how we discharge our expanding oversight duties. | Deliver  
Innovate  
Prevent  
Influence |
| 5. Working to prevent common causes of complaint | An enhanced model of education, guidance and outreach work which will have moved to focusing on how we prevent the common causes of complaints, and prevent the need for complaints to move from ‘first-tier’ to the SLCC. We will also increase our digital outreach (see digital section). | - Carry out focused work on Terms of Business letters as a key risk management tool.  
- Identify and use new channels to share our content with firms. | Deliver  
Innovate  
Prevent  
Influence  
Adapt |
| 6. ‘Reimagine Regulation’ | Consistently promote the core policy themes set out in our #ReimagineRegulation work. | - Continue to engage with Scottish Government on reform, and the potential for legislation in 2023.  
- Continue to work with the Scottish Government, the Law Society of Scotland, the Faculty of Advocates and our Consumer Panel on changes by statutory instrument (if not yet implemented).  
- Conclude review of complaints levy and implement any agreed changes | Innovate  
Prevent  
Influence |
| 7. NEW – Implement changes from Statutory Instrument on complaints reform and the SLCC’s own reform of rules | If a statutory instrument is passed, based on the outcome of the December 2020 consultation on medium term ‘fixes’ to the complaints system, then there will be significant work for the SLCC to deliver these improvements. | - Amend our rules, our policy and processes, our website, complaint forms and public information and close to 100 templates.  
- Make changes to our case management system.  
- Proactive communication will be needed to the profession and public. | Deliver  
Innovate  
Prevent  
Influence |
| 8. Improving Transparency | Increased transparency by publishing more online information on our work and performance. | Work is postponed to 2023-2024 business year, as we focus on the priorities laid out at the start (operating model for staff, IT, property). | N/A |
| 9. Delivering sustainable operations | Reduced environmental impact through staff-led initiatives, and delivery of our biodiversity duties. | - Implement new strategies identified as part of 2021-2022 Op Plan.  
- Continue to monitor the impact hybrid working has on our sustainability.  
- If we begin to reduce furniture etc. within in the office for a possible move – ensure this is done in a sustainable way.  
- Continue to run training and events with a sustainable theme for staff.  
- Build environmental requirements into our property search and decision making. | Deliver  
Innovate  
Adapt |
|---|---|---|---|
| 10. Implementing the 2010 Act | Continued monitoring of the ongoing implementation of the Legal Services (Scotland) Act 2010, and preparation for the introduction of Alternative Business Structures. | **Context:** In December 2022 the first Approved Regulator was fully authorised.  
- Finalise implementation the LS(S) Act 2010 within the SLCC.  
- Ensure website contains consumer information and complaints forms, and relevant information for the profession.  
- Report in Annual Report on progress of implementation, and any complaints received. | Deliver  
Innovate  
Influence |
| 11. Onboarding our new legal panel | Ensure a competitive tender for legal services to the SLCC. | - Following the tender in 2021/22 to appoint and onboard a new legal panel. | Deliver  
Innovate |
### Digital

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| 1. **AMENDED**: Moving to a fully cloud based, cybersecure network by Sept 2023, and implementing a paperless and digital first approach | A fully cloud based IT system, which has no office dependency, and can be securely deployed at home work locations and any office(s) used by the SLCC. **Amendment explanation:** in 2020 we set an ambitious strategy to be a fully digital business (whilst ensuring no one was excluded). This remains a key focus, but the learning from Covid-19 meant the aim also became operating this through a fully cloud based network, not dependent on any office location. | - Complete the roll out of a full cloud based network, with no office dependency.  
- **Note:** Substantial work will have been undertaken in 2021-2022, and so this period is about completion and consolidation.  
- Migrate our website to an updated version of our content management system. | Deliver Innovate 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. | - Publish and implement our updated Rules, along with supportive guidance and comms. | Deliver Innovate Prevent Influence Adapt |
| 3. Increasing our online offering of guidance, training and outreach | A ‘digital first’ approach to first-tier complaints, training, guidance, and outreach to better deliver the right messages, at the right time, to improve outcomes for users of legal services. Our social media presence will increase. | - Deliver accessible and engaging digital content that helps the profession deal with complaints and avoid their common causes. | Deliver Innovate Prevent Influence Adapt |
| 4. Investigating Artificial Intelligence and Big Data | Effective tracking of Artificial Intelligence (AI) and ‘Big Data’ use in law firms, regulation and complaints to ensure we understand the risks and benefits for public, profession, and for use in complaints. | - Complete the DataLab MSc internship programme, and produce a lessons learnt report on this first experience of using data science and natural language processing techniques in the organisation. | Deliver Innovate Prevent Influence Adapt |
| 5. Preventing digital exclusion | Demonstrable evidence that our drive to digital does not impact those excluded from digital means for whatever reason, as informed by our risk and impact assessments. |  
**Context:** By the end of 2021-2022 an independent audit of our website accessibility will have taken place.  
- Ensure appropriate alternatives to digital processes are in place using project plans and relevant sign off.  
- Ensure our digital services are accessible and meet relevant guidelines, including implementing actions from last year’s website accessibility audit. | Deliver Innovate Adapt |
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<td>1.</td>
<td>Adapting to a blended staffing model</td>
<td>To ensure the effective management of a ‘blended’ model as lockdown restrictions ease and before long-term decisions (and investment) on operating model are taken.</td>
<td>as of December 2021 we have still not been able to fully pilot ‘normal’ blended working as in-office restrictions have persisted. We hope piloting can take place in Q4 - Finalise a new operating model for staff (following testing in the previous year), offering increased flexibility, to then inform property decisions in terms of P6 (above).</td>
<td>Deliver Innovate Adapt</td>
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<tr>
<td></td>
<td>1.1 Refocusing our job design</td>
<td>Role descriptions, training, and performance systems which value flexibility, adaptability and resilience alongside existing core skills.</td>
<td>Linked to above.</td>
<td>Deliver Innovate Adapt</td>
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<td></td>
<td>1.2 Exploring talent pipelines and markets</td>
<td>A review of the markets from which we can attract talent which fits with our culture of wellbeing and performance.</td>
<td>we expect recruitment to be low based on reduced resource need and ongoing low turnover until we are fully past Covid-19. - Continue to monitor the talent market and be aware of developments and trends to be able to respond to any changes in SLCC recruiting.</td>
<td>Deliver Innovate Adapt</td>
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<td>1.3 Providing positive career pathways</td>
<td>More visible career pathways, showing routes to promoted, managerial or technical specialist roles, and trying to offer maximum opportunity in an inclusive way (including split roles and secondments).</td>
<td>we have already created senior, and specialist case investigator roles, as well as a digital lead. - Focus will be on whether there are requirements or opportunities for career pathways linked to supporting the priority projects identified and the new operating model.</td>
<td>Deliver Innovate Adapt</td>
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<td>1.4 Delivering training, support and wellbeing</td>
<td>Annual training, development and wellbeing plans to support the aspirations of this strategy and to develop the CVs of our team to give them exceptional transferable skills for internal roles, and ones within the regulatory and complaints sector, while supporting wellbeing.</td>
<td>Deliver a training programme supporting the full operating plan. - Continue to run wellbeing awareness events - Provide any training required to support the new working model (Digital or Soft Skills)</td>
<td>Deliver Innovate Prevent Influence Adapt</td>
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<tr>
<td>2.</td>
<td>Creating an environment that supports performance</td>
<td>An accommodation review (in line with lease renewal) and office environment review to support effective work and wellbeing.</td>
<td>To complete a property review and make a recommendation to Ministers. - To ensure learning is incorporated from the Scottish Government’s Covid-19 Recovery Strategy for Scotland – For a fairer future and from the Scottish Future Trust’s New Frontiers for Smarter Working - To consider the opportunity to approve our environmental / carbon footprint performance</td>
<td>Deliver Innovate Prevent Influence Adapt</td>
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<td>3.</td>
<td>Recruiting a new Board to continue the delivery of change</td>
<td>The recruitment, working with the Public Appointments Team, of a new Board with the skills and aptitudes required to continue the ongoing delivery of this strategy.</td>
<td>Induction of 2 x legal chairs - To complete the appointment process for, and induction of, a new Chair and new lay member by 1 Jan 2023.</td>
<td>Deliver</td>
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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.

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<td>1. Improving the complaints process</td>
<td>A better complaints system for all users which is accessible, provides clear and understandable information and decisions, and delivers a good customer experience.</td>
<td>- Provide input and advice to the SLCC in delivering its change and improvement work to ensure it meets consumer needs.</td>
<td>Deliver Innovate</td>
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<td>2. Promoting consumer focused regulatory reform</td>
<td>Reform of legal regulation based on the Consumer Principles, the ‘better regulation’ agenda, and insight into and from service users and those experiencing vulnerability.</td>
<td>- Ensure consumer input to the development of the Scottish Government’s reform proposals and legislation.</td>
<td>Innovate</td>
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<td>3. Championing consumer voice, and consumer research</td>
<td>A greater voice for consumers in reform, legal services, and regulation by promoting and commissioning work, including research, which values the lived experience of individual service users. Produce practical insights from this for firms and organisations.</td>
<td>- Support the SLCC to develop its approach to service design. Carry out, promote or support consumer research to inform policy and practice.</td>
<td>Deliver Innovate Prevent Influence</td>
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<td>4. Working across the consumer landscape</td>
<td>A role in wider reform of consumer affairs in Scotland, where there is a connection to legal services.</td>
<td>- Engage with Consumer Scotland to encourage a focus on legal services.</td>
<td>Innovate Influence</td>
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