scottish legal complaints commission slcc

MINUTE OF A BOARD CONFERENCE CALL OF THE MEMBERS OF THE SCOTTISH LEGAL COMPLAINTS COMMISSION: 10am on MONDAY 8 June 2026 on MS Teams

PRESENT:

LAY:
Jane Malcolm, Chair
Ged Bell
Anne Gibson
Thane Lawrie

LAWYER:
Lynne Collingham
Dale Hughes
Richard McMeeken

Apologies:
Jean Grier, John Stevenson and Caroline Robertson (DoR)

In attendance:
Neil Stevenson (CEO)
Vicky Crichton (DoPP)
[redacted] (Secretariat - minutes)
Louise Burnett (DoBP)
[redacted] (PCo)

Abbreviations used:
SGvt – Scottish Government
DoPP – Director of Public Policy
LSS – Law Society of Scotland
MP – Master Policy
FinO – Finance Officer
JT – Journey Time
DoBP – Director of Business Performance
DoR– Director of Resolution
FoA – Faculty of Advocates
PCo – Project Co-ordinator
EA – External Auditor

Private Member only session, after which, the Chair invited SMT, PCo and Secretariat to join the meeting at 10.10am

1. Welcome and Apologies

1.1 The Chair welcomed everyone to the Conference Call, and noted the apologies as recorded from Jean Grier, John Stevenson and Caroline Robertson (DoR).

2. Declaration of Interests

2.1 The Chair noted the standard declarations of interest declared by Lynne Collingham, Dale Hughes and Richard McMeeken in relation to any pecuniary interest with regards to budgetary and the reform discussions by the SLCC.

3. Key Issues

3.1 The CEO spoke to the paper presented and provided an update on the following specific matters.

3.2 **ET (Solicitor challenging Complain Decision) & Litigation Update** – Board noted the ongoing litigation matter involving a solicitor seeking to challenge a complaint decision through the ET route. Further debt hearings have continued, and cost recovery remained ongoing. Members noted that there had been limited recent activity by the solicitor in terms of new challenges to the SLCC and no further escalation, suggesting the position may be stabilising. The CEO advised whilst cost recovery was ongoing the matter will remain under review and continue to be reported as a key issue.

3.3 **Changes at Eligibility and working new approach through the system** – Board received an update and progress on the revised eligibility ‘sprint’ approach following the Wilson appeal. Noting we are becoming more confident in early evidence that indicates improved processing times and efficiency savings. There has been limited external challenge, with no significant adverse impact on customer service experience. Members noted it was planned to roll this out to include additional staff. Board discussed feedback from the profession regarding the perceived inconsistency in requesting comments from practitioners and firms. It was confirmed that a standardised approach was now in place, with all firms receiving the complaint form at allocation and being invited to provide comments at that stage. This replaces the previous approach of asking for comments at the summary of complaint stage. Board welcomed the responsiveness to feedback by SMT and agreed this approach should be continued to be monitored during the rollout.

3.4 **Staff Conference** – Board noted the early planning for the one-day staff conference, which will be core to staff development. The CEO confirmed members were invited to support participation at the event on 7 October 2026. The DoBP gave assurance that, in addition to this event, staff development remains a priority. Staff would continue to be supported through: the annual performance review cycle; the ongoing compliance and wellbeing training; and specific on-the-job and team-led development (especially around reform implementation). Board emphasised the importance of maintaining development and support for staff during the period of organisational change. SMT agreed.

3.5 **Benchmarking Exercise – A Report for the Legal Ombudsman** – Board considered the benchmarking report information comparing complaint volumes across ombudsman bodies. This was shared in advance of the meeting. Board noted that whilst the SLCC has experienced a significant increase in complaints, this remains lower than increases reported elsewhere, which in some cases approach 50%. Board noted that no single contributory factor has been identified, though possible influences include economic pressures and increased accessibility of complaints processes (including the use of technology and AI tools). Board noted the findings and the absence of clear definitive reasons for increasing complaints.

3.6 **Change to Mileage Rate** – Board considered a proposal to align mileage rates with updated HMRC guidance. Board confirmed their approval to increase the mileage rate from 45p to 55p per mile.

3.7 **Legal Panel Tender Update** – Board noted the update on the legal tender process. The CEO confirmed that approx. 21-22 expressions of interest were received, with the majority being considered as credible bidders. This resulted in 6 full submissions being received, which was consistent with expectations for a specialist procurement of this nature. Board took assurance that the level and quality of interest reflected positively on a healthy market response and engagement.

3.8 **Additional Board Meeting – Case Management System** – Board noted that a further Board conference call session would be arranged to consider the Case Management System (CMS) appraisal in detail. Members would be asked to confirm their availability to support timely decision making on this strategically significant matter. It was agreed the Secretariat would share proposed dates by SMT.

Action	Owner	Due Date
Secretariat to seek member availability for an additional Board conference call to consider the CMS.	Secretariat /SMT	By 9 June 2026

3.9 The Chair thanked SMT for their updates to the paper presented.

4. Year-end Budget Figures

4.1 Board received a verbal update on the year-end position from the DoBP.

4.2 The DoBP confirmed legal costs will be higher than budget, reflecting the increased activity due to appeals and S17 cases. The bad debt provision is expected to increase significantly (approx. £104k vs £60k budget), and this is largely attributable to a small number of firms. The DoBP confirmed this provision relates primarily to complaint levy debt, rather than compensation awards. Debt recovery is pursued initially through engagement by the FinO with firm(s), with escalation to legal action where required.

4.3 Board discussed the concentration of risk to a small number of firms, and noted the absence of a formal debt recovery policy, observing this as a potential area for future development. The DoBP and CEO confirmed a formal debt recovery policy could be developed.

Action	Owner	Due Date
CEO and DoBP to consider the development of a formal debt recovery policy.	CEO & DoBP	By 26 October 2026

4.4 Board noted the ongoing engagement with the LSS and use of data sharing to highlight non-compliance issues.
4.5 The DoBP assured Board that no unanticipated issues were expected in the final accounts and that all material matters have been reported during the year. The DoBP confirmed the accounts will be sent to the EA by 31 August, and a copy will be circulated to Board prior to being signed off by 31 October.
4.6 Board also noted that the narrative to the accounts would include reference to the ET and appeal costs which are linked to one individual, and also include an explanation on Reform costs (April-June).
4.7 The Chair thanked the DoBP for their update.

5. Reform Implementation Programme

5.1 **Programme Progress** – Board noted the transformation programme remains on track overall. Individual elements may vary in timing, but no material risks to delivery have been identified. Early project completions and lessons learned have provided positive assurance.
5.2 **Stakeholder Engagement and Timeline** – Board considered stakeholder feedback, particularly from the LSS, regarding consultation sequencing and implementation timing. Board noted that the LSS has raised concerns about their capacity to respond to our consultations but no clear or detailed alternative proposals have been provided by the LSS nor have they been able to share thinking on their own preferred timetables.
5.3 Board expressed a clear view that the proposed implementation target date of 1 July 2027 remains appropriate and in the consumer interest.
5.4 Board also discussed a staggered implementation, but noted it would introduce significant operational risk and should be resisted, and that any delay would require clear evidence and justification.
5.5 Board emphasised the importance of maintaining pace and providing certainty for both consumers and the profession. Board highlighted the risk of prolonged transitional arrangements.

Action	Owner	Due Date
CEO and DoPP to reflect stakeholder alignment risks within programme reporting.	CEO & DoPP	By 20 July 2026

5.6 **Unregulated Market** – Board noted the ongoing discussions and engagement with SGvt regarding the approach to complaints about unregulated providers. The DoPP reported the SGvt's preference appears to favour a phased approach. Further legal advice is being sought to clarify the extent to which this is supported by legislation.

Action	Owner	Due Date
CEO and DoPP to continue engagement with SGvt and stakeholders on implementation approach.	CEO & DoPP	By 20 July 2026

5.7 The Chair confirmed Board were in agreement with the direction of travel for SMT to move all these matters forward.

6. Planning Timetable – Budget, Op Plan and Strategy

6.1 The CEO spoke to the paper presented.
6.2 Board considered the proposed planning timetable for the forthcoming planning and budget cycle. It was noted that the timetable follows the established approach, providing structured opportunities for Board engagement and refinement of assumptions ahead of final approval. Members noted that key assumptions, including case volumes, would be updated as further data becomes available.
6.3 Board took assurance that the approach provides appropriate oversight and opportunity for further review prior to final decisions.
6.4 Board approved the planning timetable and noted the draft budget assumptions.
6.5 The Chair confirmed Board were in agreement with the draft timetable as presented.

7. Draft KPIs for 2026/27

7.1 In the absence of the DoR the CEO spoke to the paper presented.
7.2 Board reviewed the draft KPIs and noted overall strong performance, with continued improvement in the eligibility allocation timescales, noting this had reduced to 7 weeks from 8-10 weeks. Although was still not on target (2-6 weeks).
7.3 Board approved a proposed reduction in the total JT KPI from 7.9 months to 7.5 months, reflecting performance improvement and a commitment to continuous improvement.
7.4 Board also discussed the role of customer feedback and the potential for further development of performance measures in this area.
7.5 The Chair asked that Board's thanks be passed to the DoR.

8. Governance Project

8.1 Board considered the paper confirming completion of the governance action plan arising from the previous governance review. It was noted that the Governance Subgroup had reviewed progress in detail and was satisfied that the agreed actions had been delivered, including updates to policies and strengthening of governance arrangements over the course of the year. Board acknowledged the contribution of the Subgroup and those involved in progressing the work.
8.2 Board took assurance that the agreed governance improvements have been implemented and embedded within current arrangements.
8.3 Board approved completion of the governance action plan.

9. Date of Next Meetings

9.1 Members noted the next full Board Meeting and Development Session will take place in person, in the Boardroom on **Monday 20 July 2026**, with lunch being provided.

- **Board Development Session will commence at 10am**
- **Board meeting will start thereafter, with a short lunchbreak in between.**

10. AOCB and Review of the Meeting

10.1 Board noted the strong progress on the Reform programme and acknowledged the contribution of staff, and thanks were given to SMT and IMT for this.
10.2 The Chair thanked everyone for their time and input on to the Conference Call.
10.3 With no other business the meeting concluded.

Private Member only session, where SMT, PCo and Secretariat left the meeting at 11.50am
Call ended 11.55am