



# FACULTY OF ADVOCATES

Mr. Neil Stevenson  
Chief Executive  
Scottish Legal Complaints Commission  
Capital Building  
12-13 St Andrew Square  
Edinburgh  
EH2 2AF

19<sup>th</sup> March 2026

Dear Neil,

## **Consultation on SLCC Budget & Operating Plan Consultation 2026–2027**

The Faculty of Advocates welcomes the opportunity to comment on the Scottish Legal Complaints Commission’s Draft Strategy 2026–2030 and the proposed Operating Plan and Budget for 2026–2027. Faculty recognise the important role that the Commission plays in maintaining public confidence and supporting a robust complaints system.

While the Faculty supports a modern, efficient, and fair system for handling legal complaints in Scotland, we have significant concerns regarding the proportionality, justification, and impact of the proposed 12.5% increase in the general levy and the accompanying increase in total budgeted expenditure. These concerns relate particularly to:

- The disconnect between rising levies and the Faculty’s extremely low number of complaints
- The continued use of a funding model that does not reflect relative workload to Faculty
- Uncertainty about the scale, timeline, and efficiency of transformation activities under the Regulation of Legal Services (Scotland) Act 2025
- Risks of cross-subsidy, whereby groups with low complaint burdens fund costs generated almost entirely elsewhere in the sector

The Faculty addresses each of these below.



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### **Disproportionate Increase in Fees Relative to SLCC Workload from the Faculty**

The proposed 12.5% increase in the general levy for advocates, £246 for those over three years' call and £207 for those under three years (Appendix 2), represents a substantial uplift despite complaints relating to advocates continuing to represent only a handful of cases annually. This position has been consistent over a long period<sup>1</sup> which remains extremely low relative to the wider sector. Advocates, as a professional group generating minimal SLCC workload, should not be required to fund service expansions or cost increases arising from the significantly higher complaint numbers in other branches of the profession.

Faculty would welcome further clarity on how the proposed levy levels reflect the true workload generated by Faculty members.

### **Lack of Differentiation in Levy Setting Despite Vastly Different Complaint Profiles**

A number of the pressures driving cost increases, such as the projected rise in complaints, appeal costs, and work associated with s17 non-compliance, relate predominantly to sectors other than the Faculty. The Faculty is concerned that, without adjustment, the levy model may result in cross-subsidy, with advocates effectively funding pressures arising elsewhere.

### **Transparency Around Transformation Costs**

The Faculty acknowledges the scale of change required under the Regulation of Legal Services (Scotland) Act 2025. We would nonetheless welcome greater clarity on which elements of the transformation programme relate to advocates, and how the associated costs have been apportioned among the different branches of the profession.

### **Encouragement to Explore More Nuanced Levy Structures**

Given the longstanding pattern of very low complaint incidence involving advocates, the Faculty would encourage the SLCC to consider a more differentiated levy model, one which

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<sup>1</sup> For example, in 2024–25, only 33 of 1,339 new complaints related to advocates, with just 14 accepted for investigation. SLCC Annual Report 2024-25, [SLCC 2024-25 annual report](#).



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more closely reflects actual complaint volumes and avoids disproportionate impacts on smaller or low-complaint groups.

### Further Engagement

The Faculty supports an effective and properly resourced legal complaints system and remains committed to a constructive dialogue with the SLCC. However, the proposed budget and levy increase fail to recognise the very low complaint burden arising from advocates and risk imposing an unjustified and disproportionate financial obligation on a professional group that contributes minimally to SLCC caseload.

The Faculty would welcome further engagement with the SLCC on proportionality, transparency, and future levy-setting methodologies, particularly as the new regulatory framework beds in over the coming years.

Yours sincerely,

Fiona Barr,  
Co-Chief Executive Officer