

Discussion paper: October 2019

Transparency and Reporting Impact

LEGAL
OMBUDSMAN

Reporting our impact on legal services

The Legal Ombudsman (LeO) was set up by the Office for Legal Complaints (OLC) under the Legal Services Act 2007 as an independent, impartial, ‘single-point-of-entry’ ombudsman scheme for complaints about the service received from regulated legal service providers.

We opened our doors in October 2010 and have been helping consumers and the legal profession resolve their disputes ever since, through facilitating agreed outcomes and making formal ombudsman’s decisions. In this way we provide assurance to users of legal services that standards in the sector remain robust, and that they can have confidence in the services they pay for. We support lawyers to understand what reasonable service looks like, so that they can meet and exceed expectations of the public. In this way we foster trust in our legal services and uphold the rule of law in England and Wales.

We use our data and insights to provide feedback to the profession on the type of complaints we are seeing and the most complained about areas of law. We develop bespoke guidance that centres on the questions we are most often asked, or about topical matters such as cybersecurity. This discussion paper considers the range of information we could provide in the future and how it will support transparency.

Background

As a principle, the Ombudsman Association encourages its member schemes to be open and transparent. This forms one of its ‘principles of good complaint handling’ which drives accountability and ‘demystifies’ the service we provide:

A scheme is expected to have a policy of openness and transparency in relation to what it does, how it does it and the results it achieves. This is fundamental to accountability. It enables a scheme to demonstrate fairness of approach, which in turn increases public confidence. It also ensures that a scheme is not perceived as exclusive, secretive or unwilling to be open to public scrutiny.¹

LeO is determined that its scheme should not fall short on this important principle. In our experience, consumer understanding of how ombudsman schemes work is not especially good. Moreover, the legal services market can be intimidating and confusing, even for those who have used it a number of times before. We are here to build confidence in legal services, and being transparent in our own work is a crucial foundation for this.

Other sectors have already demonstrated the value of greater transparency of complaints data. The Local Government and Social Care Ombudsman (LGSCO) publishes a vast range of information about the cases it sees and the decisions it makes. For them, the driver is transparency in the round, in that doing this helps to encourage wider service improvements

¹ The British and Irish Ombudsman Association, *Guide to principles of good complaint handling*, 2007

alongside its work of remedying individual injustice with its decisions. It creates a knowledge bank of casework, which is useful for bodies in its jurisdiction so that they can read about situations similar to those facing them and avoid the same mistakes, as well as helping consumers to hold their local authorities to account.

LGSCO publishes full decisions as well as sending local authorities an annual letter about the complaints it has dealt with about them that year. It has launched an interactive map on its website to communicate this information easily to consumers, in order to drive scrutiny (and therefore improvement) in the sector.

The financial services sector, which is perhaps the closest comparable sector to our own, has had full transparency of data and decisions for seven years. Since 2012, the Financial Ombudsman Service has been required by statute to publish its decisions, and it provides a wide range of data on businesses and the complaints it sees as well. The Pensions Ombudsman also publishes its decisions as a way of setting service standards and guiding providers on how to interpret the rules of its scheme, and have found a degree of success in doing this.

Within the legal sector, transparency is increasingly being championed. In December 2016, the Competition and Markets Authority (CMA) published the final report of its legal services market study. This report made a number of recommendations for improvement in the way the legal sector operates, and focused in large part on the degree of transparency offered by firms and regulatory bodies alike. This centred on pricing structures and service provision, but also made reference to complaint procedures and signposting.

More specifically for LeO, a number of recommendations were made regarding greater transparency. Our main focus for this discussion paper is to move forward with work in relation to provision of data and further insights, as articulated in this recommendation from the CMA's 2016 report:

“Our recommendations to the frontline regulators to address these issues are:

[...]

(c) To facilitate the development of a dynamic intermediary market through making data more accessible to comparison tools and other intermediaries. [This recommendation would also apply to the LeO as well as to the regulators.]”²

We are of course aware of the steps that have already been taken by frontline regulators in relation to transparency, and have indicated our support for these measures in our group consultation response published in December 2017³. We now wish to discuss which steps LeO can take to best serve the needs of consumers, the profession and the wider sector.

² Competition and Markets Authority, *Legal service market study: Final report*, 15 December 2016

³ Legal Ombudsman, *Regulator transparency measures: SRA, BSB, CLC, CILEx, IPReg, MoF*, December 2017

<https://www.legalombudsman.org.uk/?portfolio=consultation-response-regulator-transparency-measures-sra-bsb-clc-cilex-ipreg-mof>

There has also been some persuasive research done which has indicated to us that greater transparency of our data and insights would be useful in the market today. The latest Tracker Survey⁴ from the Legal Services Consumer Panel (LSCP) reports that:

Overall, the majority of consumers do find it easy to find the information they are looking for when they shop around. However, consumers do report they find it most difficult to find information on the quality of the service (14%) and information on how long it would take (17%).

This desire for quality markers is something we are keen to answer. As LeO assesses the quality of the service provided to a consumer, we believe that our data could help to fill the current gap. Our Better Information research⁵, jointly commissioned with the Solicitors Regulation Authority (SRA), found that:

Consumers engage with the data provided by the Legal Ombudsman... without a deep understanding of what the data shows.

The research demonstrates that our existing ombudsman decision data is useful to consumers in ranking service providers, but that it could be improved to be more informative. We are therefore looking in this paper to explore ways in which our data and information on complaints handling more widely could play a clearer role in directing choice and differentiation.

This discussion paper sets out the range of options which are available and is intended to initiate conversations with all stakeholders.

Our aims

There are a number of different ways in which we anticipate that providing more information about our work will be beneficial. In considering any and all of the options detailed here, we are aiming to:

1. Give consumers information about quality of service in order to help them make decisions about who to instruct
2. Offer detail of complaints to regulators and the profession to help them identify areas for improvement in service provision
3. Raise the profile of the work we do and encourage stakeholders (such as media outlets and academics) to use our data and decisions as an information source
4. Enhance the transparency of our decision-making to help our customers understand better what we do

Our current approach

There are two ways in which we currently share information on our website about the decisions we make and the impact we have. We are in the process of developing a new website platform to improve the accessibility of our information for our stakeholders.

⁴ Legal Services Consumer Panel, *Tracker Survey 2019 – How consumers are choosing legal services*, 30 July 2019

⁵ Economic Insight, *Better Information in the Legal Services Market*, June 2018

▪ Case studies and summaries

We have published a number of illustrative case studies to help service providers to understand our approach to applying our Scheme Rules and the limits of our jurisdiction. These are short, anonymised summaries of real cases that have been brought to LeO and are shared to make our processes clearer.⁶

We will shortly begin publishing case summaries of decisions signed off by our Chief Ombudsman where the remedy has been particularly high, and thus the impact of service failing on the complainant has been significant. These will be more detailed accounts of complaints (still anonymised for both complainant and firm) which are shared to give an indication of the impact we can have for consumers, and the part we play in providing access to justice.

These case studies are interesting to communicate the type of work we do, and they do target aims 2 and 3 listed above. However, because they are anonymised they do not give consumers information about standards of service.

▪ Data table of final decisions made by our ombudsmen

The OLC is empowered by s150 of the Legal Services Act 2007 to publish information about ombudsman decisions. The information we publish is a simple and transparent record of decisions made by ombudsman at the final stage of our process.

The data is published in accordance with our [Publishing Decisions policy statement](#), which summarises how we approach the publication of decisions, how we use this information to raise standards and how we monitor and review our policy. It refers to two categories of publication:

- **Category 1:** In these cases, we identify the name of a particular service provider where there has been a pattern of complaints that have resulted in ombudsman decision(s), or set of individual circumstances which indicate that it is in the public interest that we should publish a report and name the service provider.

A full summary of the case is published immediately following a decision by our Board's Category 1 committee, and the information is included in quarterly data updates.

- **Category 2:** The names of all service providers that have been involved in complaints resolved by an ombudsman decision are published on a rolling 12-month basis, and is updated every quarter.⁷ All service providers due to have information published about decisions received against them are notified at least 14 days in advance.

⁶ Case studies are published on this page of our website: <https://www.legalombudsman.org.uk/helping-legal-service-providers/#case-studies>

⁷ Our ombudsman decision data is published here: <https://www.legalombudsman.org.uk/ombudsman-decision-data/>

The information currently published for Category 2 decision data is as follows:

- > Name of service provider
- > Total number of decisions made in relation to that service provider
- > Date of the ombudsman decision(s)
- > Area of law
- > Remedy required
- > Complaint type
- > Evidence of poor service (Y/N)
- > First-tier complaints handling reasonable (Y/N)

This policy has been reviewed and updated recently, to include a new field in our Category 2 data table which notes whether first-tier complaint-handling was found to be reasonable. This information will be useful to consumers of legal services when choosing a service provider.

Our *Better Information* research conducted with the SRA in April-June 2018⁸ indicates that consumers find our decision data useful but that it is open to misinterpretation. We have therefore sought to make it more understandable by including this extra field. Our website re-development project will also involve considering how we can improve the presentation and understanding of our data.

This new approach is being introduced gradually. We will be starting to notify service providers of this new field of data from 1 January 2020, meaning that the first data on this will be published on our website from Spring 2020.

Even with the recent improvements we have introduced, our data table only meets some of the aims laid out above (1 and 3) and does so in a limited way. While the data is useful, it suffers from a lack of detail and context to help outside parties to make fully informed decisions on the basis of it.

Improving transparency

LeO must therefore consider how we can add to the content on our website to achieve these aims. The data and insights we already provide are valuable to consumers and service providers alike, and making more of this available and accessible to a range of stakeholders can only be a positive step. We have a number of proposals for how we could do this, and are seeking your views on which of these approaches would best serve the needs of consumers (to support them in their decision-making) and the profession (to share learning and raise standards), as well as supplying the kind of information that our other stakeholders are hoping to see.

Our first three options are those that we could achieve on our own with some time and resource input. The final two options presented later would require external change to enable them to happen. More detail on this is provided later in the paper.

⁸ <https://www.legalombudsman.org.uk/?portfolio=better-information-in-the-legal-services-market-research-report>

Section A: proposals within our current powers

OPTION 1: Create more filters to sort our decision data

One of the easiest ways for us to provide consumers with more information about the legal services market is to provide an extra range of filters for our ombudsman decision data. Currently, those who visit our website are able to view our data by service provider or by area of law, but we consider that it could be useful to allow them to filter by complaint type, or by remedy.

This would be a low-cost, easily-implemented change to our data. However, it is not clear that this would have a great deal of impact with regards to transparency. We would be interested to hear views on whether our stakeholders believe this would be beneficial for consumers, and whether there are more options we could offer to improve understanding of our data.

Q1. Would adding extra filtering options for our decision data help consumers to make informed decisions when selecting a service provider? Are there other filters we do not currently offer that we should consider including?

OPTION 2: Write annual reviews of service providers

Other ombudsman schemes such as the Financial Ombudsman Service and the Local Government and Social Care Ombudsman publish annual reviews of the complaints they have received about the organisations in their jurisdiction. These provide overview information about a particular provider's performance over the year.

This could involve producing letters/reports which present an overview of the number of complaints about that provider that reached final decision stage, what their top areas of complaint were, and the type of remedies awarded.

We will not produce these for all service providers in our jurisdiction. We would instead look to write annual reviews for a set percentage of service providers (based on a specific selection criteria, likely to be firms with the highest complaint volumes⁹) at the end of a given year, on the basis of complaint volumes received, how we resolved their complaint, whether we found reasonable service, and the most common complaint types raised about them.

We believe this could be of great interest to consumers, service providers, regulators, policy-makers and journalists. However, we are constrained by s150 of the Legal Services Act 2007 as to what we could include in these reports¹⁰. We would look to produce a much more detailed report to be sent directly to providers which could support their own learning process, and an edited version which could be published on our website for consumers to read.

⁹ Ideally, this would be calculated in reference to size of firm/number of files, but there are challenges for us in contextualising data, as outlined later in this paper.

¹⁰ S150 specifically allows us to 'publish a report of the investigation, consideration and determination of a complaint made under the ombudsman scheme'. We have received counsel's advice that only a complaint that has had a 'determination' (or ombudsman's decision) can therefore be reported publically, so any resolved earlier in our process are excluded.

Q2. Would sending annual reviews to service providers (without publishing the information) be helpful in raising standards? If so, what should the selection criteria/methodology be?

Q3. Would edited annual review letters be useful to consumers? Are there any risks we should take account of when considering this proposal?

OPTION 3: Publish all ombudsman decisions in full

The final option to consider (that is within our current powers) is publishing all decisions made by an ombudsman in their entirety. These would have all identifying details of complainants removed, in compliance with s150(2) of the Legal Services Act 2007.

Publishing full decisions is common practice within the ombudsman sector. Many different schemes have already done this for some years (including the Financial Ombudsman Service, The Pensions Ombudsman, and the Local Government and Social Care Ombudsman) and others (such as the Parliamentary and Health Service Ombudsman) are currently in the process of implementing this. It is widely acknowledged as best practice and useful for consumers across a range of markets.

Undertaking full publication would have significant resource implications for us, as it would require a tailored IT solution, and several staff posts dedicated to adapting and anonymising decisions to make them suitable for publication. At a time where operational resource is at a premium, aiming for this in the short term is not a realistic goal.

Nevertheless, we do see this as the end goal of improving LeO's transparency, and therefore believe that it would be useful to gauge opinion and identify risks and challenges before we begin work on it.

We can see several distinct benefits in publishing this information:

1. **It will provide a fairer picture of complaints that have made it all the way to final decision.** We are aware that some complaints that reach the point of having a final decision do so because the complainant is dissatisfied with findings at case decision, but these remain the same at final decision. In just under half of final decisions (2018/19: 46%)¹¹ we find that the service provided was reasonable and no remedy was required.

Service providers often contend that any publication against them is detrimental, as consumers do not fully appreciate that a complaint may reach the point of final decision without any poor service on the part of the provider.

One way of managing this risk is to improve the quality and depth of explanation that accompanies the decision data on our website. This would help consumers to understand what the data shows and hopefully prevent them assuming that any publication is negative.

¹¹ NB: In 2018/19, there was a change in the proportion of cases where an ombudsman found (at final decision) that there was a reasonable service provided. Typically in previous years, we found that the service provided was of a reasonable standard in a majority of cases concluded (2016-17: 54%; 2017-18: 53%). However, this year we have seen that in 54% of cases the service provided was not reasonable. See our [Annual Report and Accounts 2018-19](#) for more information.

Nevertheless, it would still be helpful for consumers to have a greater level of detail about complaints so that they can make a clear assessment of the facts for themselves. We believe that this deeper explanation of the circumstances of the complaint and the eventual decision we made will offer a fairer, more rounded account for the benefit of all service providers.

- 2. It will give consumers richer data to make judgements about quality when choosing a service provider.** One of the central challenges posed to regulators when transparency rules were first consulted on was that giving more price information on websites necessarily encourages consumers to discount quality markers. It was noted in several places that there is no clear way to measure and communicate quality, and that this therefore might result in a ‘race to the bottom’ on price.

We believe that our data might help to plug this gap, by providing potential clients with information about how former clients/beneficiaries/etc. have found the service to be at a particular firm – and whether we agreed with this assessment. We hope that providing more data about the cases we have seen will encourage consumers to use our decisions as a way to discern which provider they would like to instruct.

If our data were to play this role, we would need to be clear about what our decisions communicate about the quality of service provision – and what they cannot guarantee. We would need to be careful that consumers understand that we do not consider breaches of principles or issues of conduct. It will mean we also have to keep a close eye on other sites where our data may be deployed as a marker of quality, to ensure these explanations are provided no matter where the figures are used.

- 3. It will offer a more comprehensive picture of the work we do and allow for better reporting across media platforms.** At the moment, there is not widespread understanding of the role we play in the legal services sector and the ways that we can help people to access redress. At the front end of our process, we still engage in a lot of signposting to other organisations due to misunderstanding about what we do. When people come to us, they also often have mistaken expectations about how our process works, or the type of remedy they might receive at the end.

By publishing full decisions, the work we do will be better communicated and understood. Consumers, service providers and other stakeholders would have a more rounded sense of the way we make decisions and our approach to determining reasonable service. This should help to manage expectations and make our decision-making clearer for all who use our service, while providing assurance that we are addressing complaints appropriately to raise standards. It will also allow for academics and others to conduct further research into the issues raised.

This may, however, also encourage more challenge to our decisions from those who have seen what they deem to be a similar complaint, where the outcome reached on their own complaint is different. We consider that this can largely be mitigated by

ensuring that the way we explain our decisions is clear and robust, highlighting the individual facts of the case that have led to that particular outcome.

Q4. How might publishing full decisions help consumers to assess quality of service?

Q5. In what ways could publishing full decisions have benefits for firms and the wider sector?

Q6. What reasons should we consider for not publishing full decisions? Please provide evidence with your answer.

Section B: proposals for long-term development

Our current constraints

Having considered the options available to us immediately, there are two further options LeO would like to explore, but there are constraints which prevent us from being able to pursue them any further at this time:

- **Regulator data**

Currently there are limits to the amount of context we can offer around our data. As the ombudsman scheme for the legal services sector, we are able to provide information about the complaints we receive, the issues that are raised, and the matters that we uphold or dismiss. However, crucially, we cannot report reliably on contextual details (such as firm size) about the service providers involved in the complaints we see, and therefore consumers have minimal ability to judge whether the level of complaints for a particular firm is a matter for concern or assurance. This data is either not currently collected or not shared by regulatory bodies.

- **Legislation**

Section 150 of the Legal Services Act 2007 allows us to ‘publish a report of the investigation, consideration and determination of a complaint made under the ombudsman scheme’. According to legal advice we have sought on this matter, this means that we can only publish a report where there has been a ‘determination’. Determinations refer to the decisions made by our ombudsmen, and therefore anything closed earlier on in our process by a more informal route (agreed outcome or case decision) cannot be published.

If either of these two issues could be addressed, we could consider the following two options in addition to those above.

OPTION 4: Contextualise our decisions with firm-based data

It would be useful to provide better context around the data we provide. For instance, the *Better Information* research highlighted that:

Overall, there is a desire for contextual information, such as the number of legal cases handled by each provider.

This would paint a more accurate picture of satisfaction with legal services more broadly, as well as on an individual firm level.

We recognise that the number of cases handled by firms is likely to be commercially sensitive information, and that service providers would be unlikely to want it made public. However we consider that publishing the size of firm (as an approximation for the number of files they deal with annually) alongside our decision data¹² would assist consumers in assessing whether the number of complaints we receive about that provider represents a large or small

¹² This has previously received support from the profession: GfK NOP, *How High Street solicitors view the publication of complaints information*, 2011.

percentage of the matters they deal with. In practice, this might mean reporting on the annual turnover of firms, or the number of fee earners, to indicate the size of the entity – although it should be noted that the *Better Information* research found that these two particular figures were considered to be the least useful additional information to help consumers make decisions.

We do understand that there are a number of challenges for regulators in collating and sharing any of this information, and that in some cases it would require further investment of resources. We would welcome further conversations with all of the regulatory bodies as to what is possible, and how we can better share information to support greater transparency.

Q7a. Would it be useful and appropriate to be able to provide contextual information alongside our decision data? Do you foresee any potential difficulties with this, other than those already identified?

Q7b. (if you are responding from a regulatory body) What are some of the barriers preventing sharing of contextual data, or lessons we can learn from other sectors? Are there ways of overcoming these?

OPTION 5: Publish a greater range of data about the complaints we see

Another option we would very much like to explore is that of publishing a much greater range of data from the beginning to the end of our process. However, we are markedly constrained by the Legal Services Act 2007 on this matter.

At the moment, our published decision data is limited just to matters that receive a final decision from an ombudsman. Yet we capture and carry much more data within our system. We track files from the moment somebody contacts us at the front end – be that by phone, email, live chat, post, etc. – right through assessment, investigation, and (if necessary) to decision.

This means that the information we make public is missing a large swathe of the work that comes to us, including some rich data that would tell us interesting things about the legal services market and the way we operate.

If were to make a greater range of data available, this would include cases resolved by agreed outcome and by case decision (both of which are types of ‘informal’ resolution that we attempt at earlier stages of our process) and would be one of the simplest ways we could clearly improve the transparency of our processes.

We do not believe that there is a significant distinction between complaints that are resolved more informally and those that receive an ombudsman’s final decision. The raw numbers of complaints we investigate about a given firm is indicative of dissatisfaction on the part of consumers and we believe it should therefore be reflected in the data we publish. It should not need to reach an advanced stage for this to matter.

In our view, the Legal Services Act is unnecessarily restrictive on this point, and it prevents us from sharing data that could be useful to many stakeholders in the market. We are keen

to hear views from others about whether we should seek to change this part of the legislation, and if there are any resources that others could offer to help this to happen.

Q8. Does publishing a greater range of data provide consumers with better information on which to make decisions about choosing a provider?

Q9. Would it be useful for LeO to publish a greater range of data for other reasons?

Q10. Would allocation of resource to changing the Legal Services Act 2007 be appropriate? Who would it be most appropriate for us to work with on this project?

- **Budget/resources**

Finally, for any of the proposals outlines in this paper, we would need to invest significant resources into improving our business intelligence, reporting, IT, etc., in order to provide rich, in-depth information that is instructive for service providers and consumers

Our organisation has to be highly efficient and strategic in the allocation of our resources. We receive a great deal of scrutiny and challenge from stakeholders about the budget we request. At the present time, our budget is focused on the demands of our daily operational functions, leaving little opportunity to develop insight and feedback work which has significant cost implications.

This is a major constraint on any future projects, and many of the more significant proposals (such as publishing full decisions) are dependent on increases in budget to fund them.

Q11. Would you support greater investment of budget and resources into improving our data collection and analysis for the purpose of transparency?

Conclusion

The Legal Ombudsman is eager to work with stakeholders in the legal services market to agree an approach to transparency that helps all those involved in delivering and consuming legal services in England and Wales. The options outlined above represent our current thinking and the proposals we think would be desirable and possible.

We are mindful that this can be a controversial topic and therefore we hope that this discussion paper is viewed as an opportunity for constructive challenge and debate in advance of any definite policy development on this issue. We would therefore welcome any additional thoughts on the ideas outlined above, including whether we have considered all the potential advantages and disadvantages of these four proposals, and whether there are other options we have not listed here that we should contemplate.

Q12. Have we considered all the potential advantages and disadvantages of these four proposals? Please provide evidence to support your answer where possible.

Q13. Are there other ways we could improve our transparency?

Summary of options

Option	Key point
1: Create more filters to sort our decision data	A number of filters for our decision data are available currently – we could allow data to be segmented in more ways.
2: Write annual reviews of service providers	We could produce letters/reports which present an overview of complaint volumes, types and remedies for a set percentage of service providers based on a specific selection criteria.
3: Publish all ombudsman decisions in full	We could adapt all ombudsman decisions so that every final decision is published in full on our website (with complainant details removed).
4: Contextualise our decisions with firm-based data	We could publish contextual information alongside our decision data to show (for instance) volumes as a percentage of the matters a provider deals with.
5: Publish a greater range of data about the complaints we see	We could report on the number and types of complaints we see from start to end of our process, including those resolved informally.

Questions

Q1. Would adding extra filtering options for our decision data help consumers to make informed decisions when selecting a service provider? Are there other filters we do not currently offer that we should consider including?

Q2. Would sending annual reviews to service providers (without publishing the information) be helpful in raising standards? If so, what should the selection criteria/methodology be?

Q3. Would edited annual review letters be useful to consumers? Are there any risks we should take account of when considering this proposal?

Q4. How might publishing full decisions help consumers to assess quality of service?

Q5. In what ways could publishing full decisions have benefits for firms and the wider sector?

Q6. What reasons should we consider for not publishing full decisions? Please provide evidence with your answer.

Q7a. Would it be useful and appropriate to be able to provide contextual information alongside our decision data? Do you foresee any potential difficulties with this, other than those already identified?

Q7b. (if you are responding from a regulatory body) What are some of the barriers preventing sharing of contextual data, or lessons we can learn from other sectors? Are there ways of overcoming these?

Q8. Does publishing a greater range of data provide consumers with better information on which to make decisions about choosing a provider?

Q9. Would it be useful for LeO to publish a greater range of data for other reasons?

Q10. Would allocation of resource to changing the Legal Services Act 2007 be appropriate? Who would it be most appropriate for us to work with on this project?

Q11. Would you support greater investment of budget and resources into improving our data collection and analysis for the purpose of transparency?

Q12. Have we considered all the potential advantages and disadvantages of these four proposals? Please provide evidence to support your answer where possible.

Q13. Are there other ways we could improve our transparency?

How to respond

This discussion paper will be open for comment from 1 October 2019 until 31 January 2020. There will be opportunity for stakeholders to comment and contribute in person at events we are holding for the consultation on our Corporate Strategy 2020-23.

We welcome comments on all aspects of this paper, including those questions we have specifically highlighted. If possible, please send your responses electronically – although hard copy responses by post are also welcome. Please note that we plan to publish all responses we receive in relation to this discussion paper.

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If you have any questions concerning this publication or how to engage with us on the topic of transparency, please email support@legalombudsman.org.uk.