



Department
for Business
Innovation & Skills

CONSULTATION DOCUMENT

Introduction of a Land Registry
service delivery company

JANUARY 2014

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Introduction of a Land Registry service delivery company

Land Registry is responsible for processing the registration of title to land under the Land Registration Act 2002. It has developed a business strategy for 2013 to 2018 to improve the ease with which land registration services are provided.

The Department for Business, Innovation and Skills (BIS) is considering measures to enable the business of land registration to be more delivery-focused and for Land Registry to have greater flexibility to operate.

This consultation sets out our proposals to create a new company, to which responsibility for the performance of service delivery functions would be transferred, and to have a separate Office of the Chief Land Registrar which would be retained in Government.

The Land Registry service delivery company would be responsible for the processes relating to land registration whereas the Office of the Chief Land Registrar would primarily perform regulatory and fee-setting functions to ensure that customers' interests continue to be protected.

We have carefully considered the views of Land Registry's customers and stakeholders and have sought to mitigate any concerns through the design of the proposals – in particular through the retained Office of the Chief Land Registrar. Your comments on this feature, as well as on the proposals in general, would be very welcome.

Issued: 23 January 2014

Respond by: 20 March 2014

Enquiries to: Kirun Patel, Shareholder Executive, Department of Business Innovation and Skills, 1 Victoria Street, London, SW1H 0ET. Tel: 0207 215 2090 Email: bis.lr.consultation@bis.gsi.gov.uk

This consultation is relevant to: Stakeholders of Land Registry, representative bodies, the devolved administration of Wales, as well as other interested bodies.

1. Foreword

Land Registry has recently celebrated a landmark 150th year and continues to be a cornerstone of property ownership in England and Wales. It undertakes a range of functions and responsibilities, which are critical to the property market functioning effectively.

Land Registry provides a number of services through digital channels, and is now looking to become a leader in digitising land and property services and in the management and re-use of land and property data. I am committed to enabling Land Registry to achieve this in the best way possible. Creating a delivery-focused company with the ability to operate more flexibly is a key part of this.

I consider that the proposal to create a delivery-focused company would not only achieve this but would also continue to provide the assurance which is critical to underpinning the property market. This consultation offers an opportunity for customers to understand and comment on the proposals.

We welcome views from all interested stakeholders and we will use your responses to help us shape the future of land registration services.

Michael Fallon

As Chief Land Registrar, I have responsibility for the management of Land Registry. Our main purpose is to register ownership of land in England and Wales and to record dealings in land once it is registered. In addition, we provide data and ancillary services in relation to the registration of land.

Land Registry's business strategy is ambitious but achievable. The business strategy was created around customer needs and the changing face of the property market. I have confidence that by focussing on our customer needs, we would continue to improve our service delivery and make the process of dealing in land and property more efficient.

Land Registry's customers, whether market professionals or property owners, are at the heart of what we do and we therefore need your help to make sure we are addressing your needs.

Ed Lester

2. Executive Summary

1. Land Registry plays an essential role in the property market. Its principal function is to keep a register of title to freehold and leasehold land and charges throughout England and Wales and to record dealings in land once it is registered. On behalf of the Crown, it guarantees title to registered estates and interests in land and facilitates one of the most active property and mortgage markets in the world, while also supporting economic growth and data transparency.
2. To further improve the ease and efficiency with which land registration services are accessed, Land Registry has developed a business strategy for 2013 to 2018. The strategy is based on meeting the needs of its customers and stakeholders, facilitating digitisation of land registration services, and improving the management and re-use of land and property data.
3. There are significant benefits to customers from Land Registry delivering its business strategy including reduced processing times, reduced risk of error and fraud, lower search costs, a centralised access point for searches and greater access to a richer data set.
4. As Land Registry strives to deliver the business strategy and become an efficient, digital and data centric organisation which can play a wider role in the property market, we have concluded that it would benefit from a separation of the policy and delivery functions, a greater focus on service delivery, greater flexibilities to operate around pay, recruitment and possibly provide other services, and a more clearly defined relationship with Government.
5. Today, Land Registry is a Trading Fund and is responsible for both policy and delivery. It is also a creature of statute, which means that its ability to carry out additional activities is constrained by legislation.
6. Therefore, against the option of remaining as it is, we are considering the proposal to create a new company, to which responsibility for the performance of the service delivery functions would be transferred, and to have a separate Office of the Chief Land Registrar (“OCLR”) which would be retained in Government.
7. The relationship between the OCLR and the service delivery company would be managed through a service contract.
8. The OCLR would primarily perform regulatory and fee-setting functions to ensure that customers’ interests continue to be protected, whereas the Land Registry service delivery company would focus on the delivery of land and property services on behalf of the OCLR.
9. To enable this separation of the performance of functions, we would be looking to make changes to legislation, principally amendments to the Land Registration Act 2002. This would enable the service delivery company to deliver land registration services.

- 10.** The proposals outlined in this document would have a very limited impact on customers and there would continue to be a primary point of contact for customers, through the service delivery company following the separation.

3. How to respond

11. When responding please state whether you are responding as an individual or representing the views of an organisation. If you are responding on behalf of an organisation, please make it clear who the organisation represents by selecting the appropriate interest group on the consultation form and, where applicable, how the views of members were assembled.
12. The consultation response form is available electronically on the consultation page: www.gov.uk/government/consultations/land-registry-new-service-delivery-company (until the consultation closes). The form can be submitted online/by email or by letter to:

Kirun Patel
Shareholder Executive
Department of Business, Innovation and Skills
1 Victoria Street
London
SW1H 0ET
Tel: 0207 215 2090
Email: bis.lr.consultation@bis.gsi.gov.uk

13. A list of those organisations and individuals consulted is in Annex B. We would welcome suggestions of others who may wish to be involved in this consultation process.
14. Other versions of the document in Braille, other languages or audio-cassette are available on request.

4. Confidentiality & Data Protection

15. Information provided in response to this consultation, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004). If you want information, including personal data that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.
16. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system would not, of itself, be regarded as binding on the Department.

5. Help with queries

17. Questions about the policy issues raised in the document can be addressed to:

Kirun Patel
Shareholder Executive
Department of Business, Innovation and Skills
1 Victoria Street
London
SW1H 0ET
Tel: 0207 215 2090
Email: bis.lr.consultation@bis.gsi.gov.uk

The consultation principles are in Annex A.

6. The proposals

Introduction

18. Provision for an 'Office of Land Registry' was first made in the Land Registry Act 1862. The Land Registration Act 1925 subsequently required that there continue to be a land registry, a requirement which was replicated in the Land Registration Act 2002 ("LRA 2002").
19. In 1993, the operating model of Land Registry changed when it was established as a Trading Fund in accordance with the Government Trading Funds Act 1973. This Act allows Government to set up trading funds to provide certain services which are provided by the Crown but which have a commercial element. As a result, Land Registry must finance all of its operating costs through its revenue (i.e. from the user fees which are paid for its services).
20. Ministerial responsibility for Land Registry lies with the Department for Business, Innovation and Skills. Land Registry is run by the Chief Land Registrar and Chief Executive, Ed Lester, who is responsible to the Secretary of State, Vince Cable, and the Minister of State for Business and Energy, Michael Fallon.
21. Land Registry plays an essential role in the property market. Its principal function is to keep a register of title to freehold and leasehold land and charges throughout England and Wales and to record dealings in land once it is registered. On behalf of the Crown, it guarantees title to registered estates and interests in land and facilitates one of the most active property and mortgage markets in the world, while also working to support economic growth and data transparency.
22. Land Registry operates through offices located across England and Wales. Its organisation mainly comprises the section dealing with registration of title and the much smaller Land Charges and Agricultural Credits departments. The functions it performs are principally defined in the Land Registration Act 2002, the Land Charges Act 1972 and the Agricultural Credits Act 1928.
23. The Register, which is part of the Critical National Infrastructure, is backed by a State Guarantee. This means that when a property is registered, the owner is compensated for errors in registration that cause loss. This gives buyers, sellers and lenders confidence in the property market, which is a cornerstone of the economy.

Strategy for the future

24. Land Registry has developed a business strategy for 2013 to 2018 which is designed to meet the needs of its customers and stakeholders and aims to obtain recognition as a leader in digitising land registration services and in the management and re-use of land and property data. The central aims of the strategy relate to Land Registry playing a greater role in the property sector to:
 - unlock efficiency in the public sector and the land and property market;

- maximise the re-use of data for the benefit of the wider economy; and
- increase and extend assurance and compliance provided to the market.

Achieving this would make searching for and registering land and property easier, with the benefits delivered to the wider property market.

25. The business strategy is closely aligned with a number of key Government priorities:

- **Efficiencies:** Government's commitment to improve the efficiency of public services;
- **Digital by default:** Government's digital strategy to offer world class digital products and services provision;
- **Transparency:** Government's agenda to give better access to data, some free of charge, and to maximise the potential for its re-use;
- **Ease of registering property:** Government's ambition to ensure that the UK is one of the best economies for ease of doing business, the fulfilment of which requires improvements in the ease of buying a property.

26. It is envisaged that the benefits to customers of delivering the business strategy are significant:

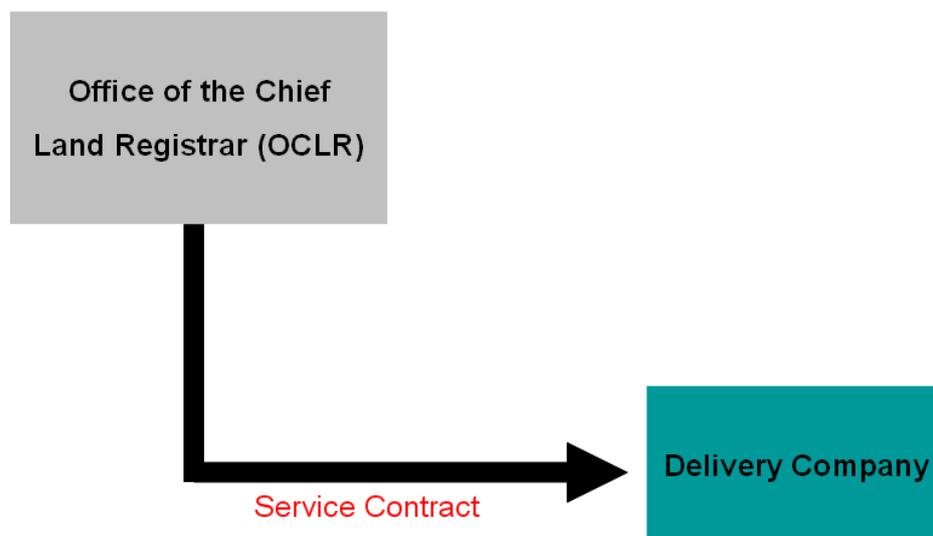
- more extensive, effective and efficient digital services would help Land Registry **reduce processing times** and also **reduce the risk of error and fraud**;
- customers would see **reduced costs** across Land Registry preliminary searches and registration as well as potentially local land searches;
- a **centralised access point** for searches would be created with more consistent service levels;
- customers would have **greater access to a richer data set**, brought together in one place.

Outline of proposal - company structure and governance

27. Today, Land Registry is a Trading Fund and is responsible for both policy and delivery. It is also a creature of statute, which means that its ability to carry out additional activities is constrained by legislation.

28. As Land Registry strives to deliver the business strategy and become an efficient, digital and data centric organisation which can play a wider role in the property market, we consider that it would benefit from a **separation of policy and delivery**, a greater **focus on service delivery**, **greater flexibilities to operate** around pay, recruitment and possibly provide other services and a more **clearly defined relationship** with Government.

29. Therefore, against the option of remaining as it is, we are considering the proposal to create a new company, to which responsibility for the performance of the service delivery functions would be transferred, and to have a separate Office of the Chief Land Registrar (“OCLR”) which would be retained in Government.
30. By creating a distinct entity, a service delivery company, that is responsible for the performance of the delivery functions of land registration on behalf of the OCLR, which has greater flexibility to operate, but which is still subject to Government oversight, it is considered that Land Registry would be able to serve the property market more effectively.
31. We recognise that the cost and speed of service is important but it is also important that the assurance and integrity of the Register is not compromised. Central to any plans for the future is that we continue to **protect the integrity of the Register** such that Land Registry’s role of underpinning the property market - by giving confidence to buyers, sellers and lenders - is not compromised.
32. The proposal looks to **separate policy and delivery** and address each of these objectives:
- **Focus on delivery:** A new company would be created to focus on delivering services on behalf of the Chief Land Registrar (“CLR”);
 - **Flexibility to operate:** The delivery company would be outside the civil service and would be subject to company law, which would give greater future flexibilities to operate around pay and recruitment and possibly provide other services;
 - **Clearly defined relationship:** The service delivery company would deliver land and property services on behalf of the OCLR. CLR would have a clearly defined relationship with the service delivery company through a service contract. It would also manage or oversee (depending on the circumstances) continued relationships with the Rule Committee, Independent Complaints Reviewer (“ICR”) and the First-tier Tribunal;
 - **Protect the integrity of the register:** To maintain operational integrity and stakeholder confidence, certain functions would remain with the CLR. The CLR would retain a small office, known as the ‘Office of the Chief Land Registrar’ (“OCLR”).



Vision for the service delivery company

33. We expect the service delivery company would operate as set out below.
34. The service delivery company would be a company limited by shares, subject to the provisions of company law.
35. The company would focus on the delivery of land and property services on behalf of the OCLR. This includes receiving and processing substantive applications for registration and preliminary services. As is currently the case, where work is not automated, it would be carried out by skilled technicians.
36. The service delivery company would have its own articles of association and, with it, the flexibility to facilitate a wider role in the property market, consistent with the business strategy.
37. The proposals outlined in this document would have a very limited impact on customers and the service delivery company would continue to be a primary point of contact for customers following the separation.
38. The new service delivery company would be governed by a Board of Directors who would be responsible for all aspects of managing delivery, on behalf of the OCLR. This focus on delivery only would enable them to more effectively achieve the ambitions of the business strategy.
39. The Board itself would be constituted in line with best practice in corporate governance. It would be presided over by an independent Chair and would include the Chief Executive Officer, directors from within the company, and non-executives who bring a suitable range of skills and experience.
40. The Companies Act 2006 requires companies to keep adequate accounting records and places duties on all company directors, requiring them to act to promote the success of the company.

41. It is anticipated that the service contract would have provisions to enable Government to take back delivery responsibility should the company fail to fulfil the terms of the service contract.

The Office of the Chief Land Registrar (OCLR)

42. The OCLR would be retained within Government, and would consist of the Chief Land Registrar and a small team of staff who would be civil servants.
43. The OCLR would be responsible for regulation and policy in relation to land registration and related services, including fee-setting (through the Secretary of State). The OCLR would have ultimate responsibility for the keeping of the Register.
44. The proposed separation of functions, and details of which functions would remain with the OCLR, are set out in greater detail below. Such functions include annual reporting and accountability to Parliament.
45. The OCLR would also be responsible for monitoring and overseeing certain functions which would be delivered by the new service delivery company on OCLR's behalf. Details of these functions are provided in the 'Shared Functions' section below.

Separation of performance of functions

46. To enable a separation between delivery functions and the policy and regulatory functions, we propose to make changes to legislation, principally amendments to the LRA 2002. The LRA 2002 currently permits the functions of the CLR to be carried out by authorised members of the Land Registry. It is envisaged that we would seek to make amendments which would allow for certain (but not all) functions of the CLR to be performed on his/her behalf by a service delivery company outside of the civil service.
47. The broad principles which have been applied to define which functions should be performed by the OCLR, and which would move to the service delivery company, are as follows:
 - OCLR would need to retain functions, such as defining the business rules that relate to how the register is kept, to ensure that the register is maintained and that its integrity continues to be protected. This would instil confidence in buyers, sellers and lenders which is crucial to underpin the UK property market;
 - The proposals outlined in this document would have a very limited impact on customers and there would continue to be a primary point of contact for customers, through the service delivery company following the separation.
 - The new company would focus on administrative and service delivery on behalf of the OCLR, operating within the framework set by the company's articles of association and the service contract, and needs to have sufficient flexibility to drive through improvements in the delivery of land registration and to adopt new services in the future for the benefit of its customers.

48. Under the proposed new structure, certain functions would not be capable of being delegated to the service delivery company because these CLR and Land Registry functions relate to activities which go beyond mere service delivery. These types of activities, such as fee setting (through the Secretary of State) are to remain with, or at least within the overall control of the OCLR for reasons including integrity, transparency and accountability. Accordingly, we consider that there would be a mixed model to how functions would be delegated:

- certain functions of the CLR would remain solely the responsibility of the OCLR (without any ability to delegate them to the service delivery company) (“**OCLR Functions**”);
- responsibility for certain functions would be shared between the OCLR and the service delivery company, either because both would need to exercise certain functions or because it is desirable for the ultimate responsibility of the function to remain with the OCLR (but with the service delivery company being responsible for the day-to-day management) (“**Shared Functions**”); and
- the day-to-day undertaking of most functions (which relate to processes and services) would be solely allocated to the service delivery company (“**Service Delivery Company Functions**”).

OCLR functions

49. The following functions are examples of activities which it is currently expected would remain the exclusive responsibility of the OCLR:

- requiring a person to produce a document for the purposes of proceedings before the CLR (section 75 LRA 2002);
- making orders about costs in relation to proceedings before the CLR (section 76 LRA 2002);
- producing and publishing annual reports on the business of the Land Registry (section 101 LRA 2002);
- being a member of the Rule Committee (which provides advice and assistance to the Secretary of State in respect of making Land Registration Rules) (section 127 LRA 2002);
- appointing staff and determining the terms and conditions of appointments (with the approval of the Minister for the Civil Service) (Schedule 7, paragraph 3 LRA 2002). This function would be the responsibility of the OCLR in respect of appointments to the OCLR only; the service delivery company would have its own powers to recruit staff.

Shared functions

50. It is currently expected that certain functions would be shared between the service delivery company and the OCLR. This is because, for example, they relate to activities which:

(a) both OCLR and the service delivery company would need to be able to exercise in order to operate effectively and efficiently;

(b) although the service delivery company would be primarily responsible for the performance of the activities, the OCLR would retain an oversight role (for example, by setting operational parameters which the service delivery company must adhere to); or

(c) it would be desirable to escalate to the OCLR e.g. for decision-making purposes.

51. The following functions are examples of activities which it is currently expected would be Shared Functions:

- activities which require registers in respect of land to be kept. For the purpose of the split between OCLR and the service delivery company, we would differentiate between keeping and maintaining the register. Keeping a register of title, and other registers connected or ancillary to the main register of title, would be the ultimate responsibility of the OCLR, but the maintenance of these registers on a daily basis would be the responsibility of the service delivery company. Accordingly, the following functions would effectively be shared by OCLR and the service delivery company:
 - keeping a register of title (section 1(1) LRA 2002);
 - keeping a register of cautions against first registration (section 19(1) LRA 2002);
 - keeping an index which allows for certain information in relation to any parcel of land to be ascertained (e.g. whether there are any registered estates in relation to that parcel of land) (section 68(1) LRA 2002);
 - retaining custody of records of title made under the Land Registry Act 1862 (section 122 LRA 2002);
 - keeping certain registers (land charges, pending actions, writs and orders affecting land, deeds of arrangement affecting land and annuities) and an index whereby all entries made in any of those registers can readily be traced (section 1(1) of the Land Charges Act 1972);
 - keeping a register of agricultural charges (section 9(2) of the Agricultural Credits Act 1928);
 - keeping an index of proprietors' names (Rule 11(1) of the Land Registration Rules 2003);

- dealing with objections. In keeping with the principle that the service delivery company remains the primary point of contact for customers, it would be responsible for dealing with objections in the first instance. However, the OCLR would deal with unresolved objections and matters which need to be referred to the First-tier Tribunal (in accordance with section 73 LRA 2002). This is set out in more detail in the process maps below;
- preparing and publishing forms and directions as considered necessary or desirable for facilitating the conduct of the business of registration under the LRA 2002 (section 100(4) LRA 2002). To allow the OCLR and the service delivery company to operate effectively and efficiently, both would need powers to prepare and issue forms and directions which facilitate the land registration process;
- functions which relate to claims for, and payment of, indemnity. The responsibility for the day-to-day processing of indemnity claims would be with the service delivery company but the OCLR would remain ultimately responsible for the indemnity (Schedule 8 and paragraph 9 of Schedule 4 LRA 2002);
- responsibility for the consequences of complaints arising from alleged maladministration. The OCLR would be responsible for ensuring that the service delivery company takes appropriate action whenever maladministration is established, in order to prevent the recurrence of similar failures.

Service delivery company functions

52. The vast majority of functions in relation to land registration are administrative in nature. Accordingly, other than functions which are set out in the 'OCLR Functions' and 'Shared Functions' sections above, and other functions which are of a similar nature to these functions, it is anticipated that all remaining activities of Land Registry and the CLR which are set out in legislation would be delivered by the service delivery company.

The relationship between OCLR and the service delivery company

53. The relationship between OCLR and the delivery Company would be governed by a service contract.

The Service Contract

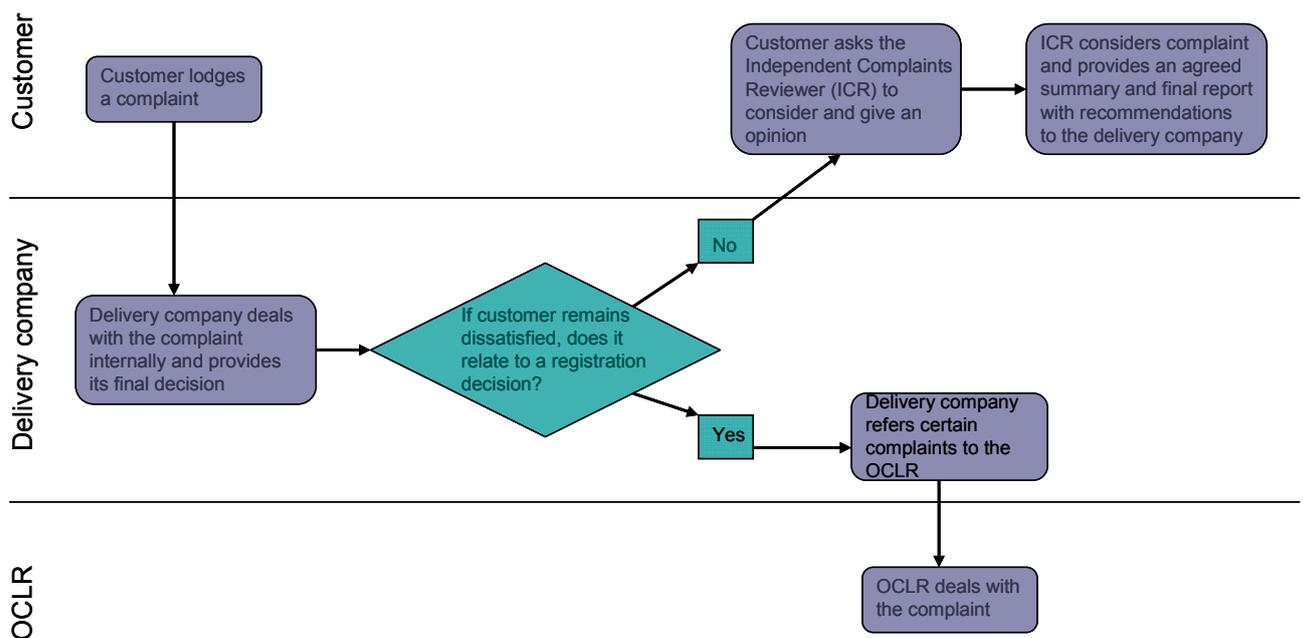
54. Amongst other details (including details in respect of the Shared Functions) the service contract would cover the scope of services that the Company would provide, the service delivery company's responsibilities relating to receiving fees from customers, OCLR funding, how the new service delivery company will be funded for statutory services and some other services, obligations around monopoly data sets and obligations in respect of quality and operations.

55. The service contract would also define the areas where operational interaction would be required. Areas where this would be necessary are expected to include indemnity claims, disputes, complaints, requirements to produce documents and orders about costs. To ensure that the relationships with, and the services to, customers are as effective and efficient as possible, some basic principles would be applied (wherever appropriate) in the service contract. To test these principles, Land Registry is internally implementing an operational separation that would mirror the envisaged OCLR/ service delivery company split. The principles are:

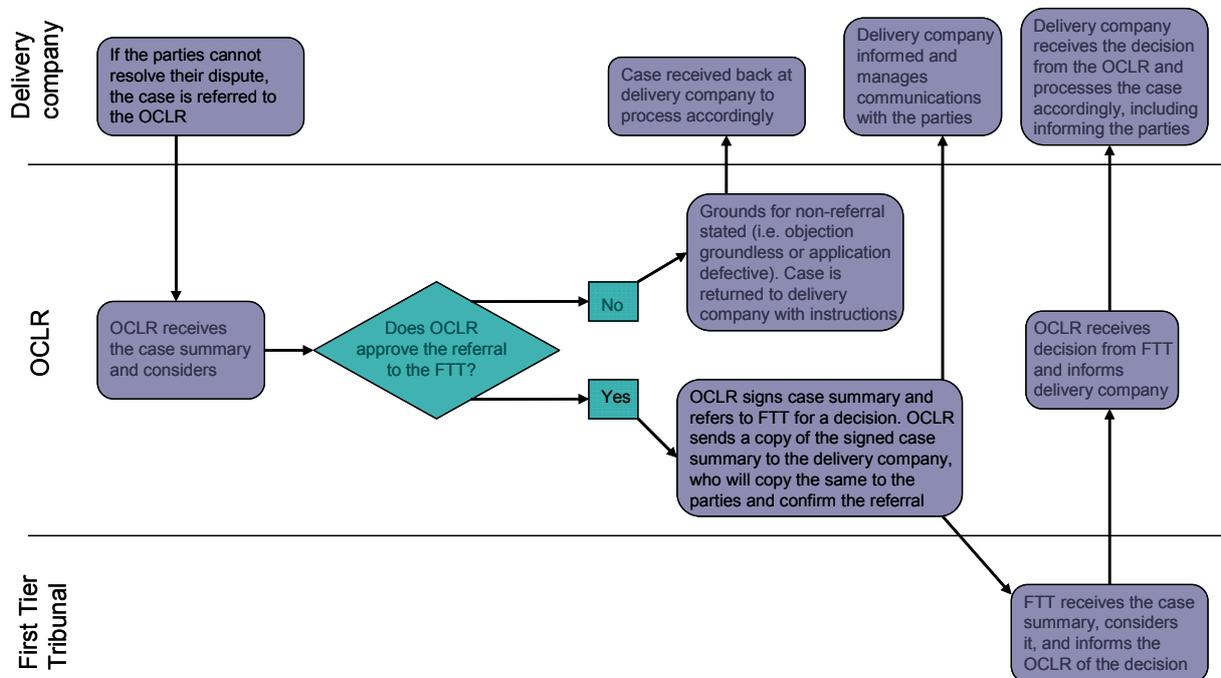
- the service delivery company should focus on delivery and the OCLR should deal with policy;
- the customer should see little or no change as a result of the OCLR / service delivery company split;
- processes instigated by the customer should start with the service delivery company;
- the service delivery company should be the first point of contact for the customer;
- The OCLR / service delivery company split should not add cost or time to the process.

56. Example process maps showing operational interactions for complaints and objections are shown below.

Customer complaints process



Objections process



Ownership and control of the service delivery company

57. The Government is committed to ensuring the effective and efficient management of publicly owned assets. This includes assessing options for moving assets to the private sector where there is no longer a strong policy reason for continued public ownership or where there is potential for an asset to operate more sensibly and efficiently in the private sector.

58. If Government moves forward with its proposal to create a new service delivery company, no decision has been made yet on ownership and some of the models being considered for the transformation phase include:

- a service delivery company which is 100% owned by Government;
- a service delivery company which is jointly owned by both Government and a private sector company;
- a service delivery company which is 100% owned by Government but day-to-day operations would be the responsibility of a private sector company on Government's behalf.

59. Beyond the transformation phase, Government will review the ownership and control of the service delivery company in line with the policy on asset ownership that is set out above and consistent with the policy to continue to keep assets under review to ensure the best value for money for the taxpayer.

- 60.** The function split between the OCLR and the service delivery company, the design of the service contract and the oversight that is retained by the OCLR would ensure that Land Registry customers and the integrity of the register of title and related registers would be protected irrespective of the decision on ownership and control.

What is the impact on customers of Land Registry?

- 61.** The proposals outlined in this document would have a very limited impact on customers.
- 62.** The indemnity arrangements would continue to be state-backed.
- 63.** In all cases, there would continue to be a primary point of contact for customers, through the service delivery company, following the separation.
- 64.** In the event of complaints, these would be managed internally by the service delivery company. The ICR would continue to consider complaints unresolved within the internal system which are of a customer service nature.
- 65.** Disputes between parties which relate to objections to applications, which cannot be resolved between the parties, would be referred to the OCLR. The OCLR would give further consideration to the application, and where appropriate the CLR would refer the dispute to the First-tier Tribunal (which is inline with current practice).
- 66.** Data protection procedures that currently apply to Land Registry would continue to be in place for the service delivery company to ensure personal information is not mishandled or exploited.

What is the impact on staff?

- 67.** There are currently over 4,000 full time equivalent employees working in Land Registry offices throughout England and Wales, all of whom are currently civil servants.
- 68.** As part of the creation of the new service delivery company, we expect that the majority of staff would transfer to the service delivery company and would cease to be civil servants. A small minority of staff would remain in the OCLR and would continue to be civil servants.
- 69.** Land Registry would continue to engage with trade union representatives throughout the transition.

Wider responsibilities and relationships

- 70.** In the course of setting up the new service delivery company, we would ensure that Land Registry's wider responsibilities are protected and maintained. This would include:
- Information management standards

- Obligations arising from Critical National Infrastructure status
- Crime prevention, detection and anti-terrorism protocols agreed with enforcement and intelligence agencies
- Data sharing arrangements across Government and other agencies (including fraud initiatives)
- Data protection legislation and compliance needs
- Licensing requirements set by Government e.g. the Information Fair Trader Scheme
- Government Transparency agenda, including the management of a data policy
- Information rights legislation and compliance needs (including public sector information requirements)

7. Consultation questions

1. Do you agree that by creating a more delivery-focused organisation at arms length from Government, Land Registry would be able to carry out its operations more efficiently and effectively for its customers?
2. Do you agree that the OCLR should retain exclusive responsibility for the functions set out in paragraph 49?
3. Are there additional functions that should be retained in the OCLR? Please explain what and why.
4. What are your views in respect of the proposals for shared functions set out in paragraphs 50-51?
5. What are your views on the proposed approach to service delivery company functions in paragraph 52?
6. Do you agree that the overall design provides the right checks and balances to protect the integrity of the Register and safeguard the provision of indemnities and state title guarantee? If not, please state your reasons why not.
7. Would you be comfortable with non-civil servants processing land registration information provided they do so within the framework set out by the OCLR through the service contract? If not, please explain your reasons why not.
8. Are there any situations, other than those set out in this consultation, in which you would want to see an escalation process to the OCLR? Please explain what and why.
9. Do you agree with the proposed approach for handling complaints, as set out in paragraph 56? If not, please explain your reasons why not.
10. Do you agree with the escalation process set out for objections in paragraph 56? If not, please state your reasons why not.
11. Do you think the Rule Committee should include a representative from the service delivery company? Please explain why or why not.
12. The Data Protection Act would protect personal data that is provided to the service delivery company. Would you like to see any protections beyond this? If so please explain what and why?
13. What are your views on the proposed system for safeguarding customer service issues and the continued role of the Independent Complaints Reviewer?
14. Do you think there is a difference between the opportunities and risks depending on whether operational control over the service delivery company is entrusted to Government or a private sector company? If yes, what?

15. Do you think there is a difference between the opportunities or risks depending on whether the service delivery company is owned by the Government or a private sector company or both? If yes, please explain your reasons.
16. What do you think are the constraints and dependencies for Land Registry's successful delivery of the business strategy?
17. Do you have any other comments on the proposals contained in this consultation?
18. Do you have any other comments that might aid the consultation process as a whole? Please use this space for any general comments you may have. Comments on the layout of this consultation would also be welcome.

8. What happens next?

71. This consultation is open until 20 March 2014.

72. A formal response to the consultation will be published as soon as possible after the consultation ends, setting out the views expressed and the reasons for the final decisions taken.

Annex A: Consultation principles

The principles that Government departments and other public bodies should adopt for engaging stakeholders when developing policy and legislation are set out in the consultation principles.

<http://www.cabinetoffice.gov.uk/sites/default/files/resources/Consultation-Principles.pdf>

Comments or complaints on the conduct of this consultation

If you wish to comment on the conduct of this consultation or make a complaint about the way this consultation has been conducted, please write to:

John Conway,
BIS Consultation Co-ordinator,
1 Victoria Street,
London
SW1H 0ET

Telephone John on 020 7215 6402
or e-mail to: john.conway@bis.gsi.gov.uk

However if you wish to comment on the specific policy proposals you should contact the policy lead (see section 5).

Annex B: List of Individuals/Organisations consulted

Ministry of Justice

First Tier Tribunal

Office of Fair Trading

National Audit Office

Independent Complaints Reviewer

HM Revenue and Customs

Department for Communities and Local Government

Information Commissioner's Office

National Crime Agency

The National Archives

Ordnance Survey

Unions

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