



Department for Business, Innovation & Skills

## Introduction of a Land Registry service delivery company: Consultation response form

This consultation response form is available electronically on the consultation page:  
[www.gov.uk/government/consultations/land-registry-new-service-delivery-company](http://www.gov.uk/government/consultations/land-registry-new-service-delivery-company)

Alternatively, this form can be submitted by email or by letter to:

Kirun Patel  
Shareholder Executive  
Department of Business, Innovation and Skills  
1 Victoria Street  
London  
SW1H 0ET  
Email: [bis.lr.consultation@bis.gsi.gov.uk](mailto:bis.lr.consultation@bis.gsi.gov.uk)

This closing date for this consultation is **20 March 2014**.

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

---

Name: Baljinder Dhaliwal  
Organisation (if applicable): BLS  
Address: 30 South Road, Southall UB1 1RR

Please tick the box from the list below that best describes you as a respondent. This allows views to be presented by group type.

<b>x</b>	Business representative organisation/trade body
	Central government
	Charity or social enterprise
	Individual
	Large business (over 250 staff)
	Legal representative

	Local Government
	Medium business (50 to 250 staff)
	Micro business (up to 9 staff)
	Small business (10 to 49 staff)
	Trade union or staff association
	Other (please describe)

### Question 1

Do you agree that by creating a more delivery-focused organisation at arms length from Government, Land Registry will be able to carry out its operations more efficiently and effectively for its customers?

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

IPSA has raised the majority of these issues with Government Officials over the last 57 weeks, because this consultation should never have taken place until the HMLR Wider Powers consultation finished and to run them almost concurrently is shameful. IPSA remains the only Personal Search Company (PSC) body to have engaged with HMLR officials and Government since these plans came to fruition. IPSA has voiced genuine concerns over the term of our engagement and we will do so again in this document:

- (1) IPSA has genuine concerns regarding the formulation of the consultation questions because they are assumptive in nature of a positive outcome for Government regardless of critique. We are particularly concerned by the entry at paragraph 23 "Critical National Infrastructure" - this appears to be a very bold overstatement designed to be deceptive in nature to the reader. HMLR and property are not listed in the 9 categories of CNII which the Government department CPNI has responsibility. IPSA can provide screenshots from [www.cpni.gov.uk](http://www.cpni.gov.uk) as evidence.

- (2) IPSA has genuine concerns regarding the motivations behind both this consultation and the HMLR Wider Powers because both demonstrate a bloody minded approach to controlling data, selling data and 'bulking up' HMLR for sale; creating a Government Monopoly at taxpayers' expense and to the detriment of livelihoods across both the private and public sector is a travesty of policy design and proposed implementation.
- (3) IPSA has genuine concerns regarding the KPMG 'Feasibility Study' of 2011 and its outcome/implementation by Government; separation of policy, greater flexibility, other services, GovCo's – all very vague with no true evidence to back up the situation we currently find ourselves in.
- (4) IPSA has genuine concerns regarding ministerial statements made to The House of Commons by the Rt Hon Francis Maude (Cabinet Office) and the Rt Hon Chris Grayling (Lord Chancellor) prior to the conclusion of the BIS/HMLR consultations. See Hansard (February and March 2014). IPSA can provide copies as evidence.
- (5) IPSA has genuine concerns regarding civil service job losses within HMLR itself and Local Government departments; we would also question why BIS/HMLR cite flexibility of staffing as a real reason and genuine benefit should these proposals become fact, when BIS and HMLR both frequently appoint public sector employees via off-payroll hiring.
- (6) IPSA has genuine concerns regarding Governments over all approach to HMLR; a trading fund which delivers millions to The Treasury, enjoys a market satisfactory rating of 98% and costs the taxpayer nothing – why change a winning formula. HMLR should remain exactly and carrying out the functions it currently does. Political meddling, creation of spin-off agencies/companies and spending millions on another IT system has disaster written all over it. The UK housing market underpins the whole economy and the current system works perfectly – tampering, tweaking, adding additionality functions to such a complex system will cause problems too big for quick political fixes.
- (7) IPSA has genuine concerns regarding the timing of both the HMLR and BIS consultations; it would seem both are being hurried to make legislation appear in the Queens Speech (May 2014).
- (8) IPSA has consulted widely within the Micro, Small and Medium Enterprise (MSME) sector regarding procurement – none of which have been invited to respond to this consultation. We note from this detail including other trade bodies that the proposed creation of HMLR as a GovCo would not seek procurement from the sector, which seems odd when Government wishes to raise the engagement of innovative MSME's to 25%.

IPSA will now continue with the leading questions asked by this consultation. Our answers are in turn negative based upon the lack of information provided; however we do suggest you pay particular attention to answer 18 and this section.

## Question 2

Do you agree that the OCLR should retain exclusive responsibility for the functions set out in paragraph 49?

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 3

Are there additional functions that should be retained in the OCLR? Please explain what and why.

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 4

What are your views in respect of the proposals for shared functions set out in paragraphs 50-51?

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure

national stability – stakeholders must include the wider Personal Search Companies representative, “IPSA”.

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 5

What are your views on the proposed approach to service delivery company functions in paragraph 52?

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA’s suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, “IPSA”.

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 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.

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA’s suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, “IPSA”.

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) –

which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 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.

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 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.

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, IPSA and exclude any trade body attached to the Land Registry Advisory Council – which is just a narrow collective of vested interests.

### Question 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.

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 10

Do you agree with the escalation process set out for objections in paragraph 56? If not, please state your reasons why not.

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 11

Do you think the Rule Committee should include a representative from the service delivery company? Please explain why or why not.

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is "IPSA"'s suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

## Question 12

The Data Protection Act will protect personal data that is provided to the service delivery company. Would you like to see any protections beyond this, and if so please explain what and why?

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

## Question 13

What are your views on the proposed system for safeguarding customer service issues and the continued role of the Independent Complaints Reviewer?

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

#### Question 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?

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

#### Question 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.

☐ Yes

☒ No

☐ Not sure

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 16

What do you think are the constraints and dependencies for Land Registry's successful delivery of the business strategy?

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver.

### Question 17

Do you have any other comments on the proposals contained in this consultation?

Comments:

The level of information provided so far regarding; HMLR its quest for wider powers and its transformation into a GovCo have been severely lacking. The business cases are littered with omissions citing confidential plans, factual inaccuracies which demonstrate Governments ability to run before it can walk and a distinct required outcome to paint the vaguest picture possible. It is IPSA's suggestion that both BIS and HMLR engage on more meaningful and transparent dialogue with all stakeholders, face to face and over a serious timeframe to ensure national stability – stakeholders must include the wider Personal Search Companies representative, "IPSA".

The Land Registry Advisory Council (LRAC) – which is just a narrow collective of contingent interests and serves NO consumer benefit, must be made a Public Interest Company (PIC) – which operates independently and is open to all who wish to participate; regardless of the consultation outcome. This action alone would go some way to promote the transparency agenda the Government wishes to deliver. See Question 1.

## Question 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.

### Comments

IPSA does not claim to be exclusively speaking for the national regulated personal providers, we only have 2 nationals as members but we do represent all the micro and small independent companies many of which are family businesses and they are IPSA members for good reason. The outcomes of both HMLR and BIS consultations are of deep interest and distress. The creation of a data monopoly then privatised seems to be the only game in town. The HMLR internal testing operations are not conclusive. The business strategy is vague and shrouded in 'confidential' data not published to stakeholders prior to this consultation, or the HMLR Wider Powers consultation – NO clear vision is being made available for critique, positive or negative; what Government have delivered is, at best, an outline of the future – and the sandwich analogy fits best – all bread and no filling; rather unappetising when presented.

IPSA has genuine concerns regarding the use of 'personal data' by a third party. The DVLA have proved themselves to be robust in selling personal data, why would HMLR and BIS promote this model over the excellent framework and delivery it currently enjoys.

IPSA have stated within this document, many times, the need for Government to engage with all stakeholders and just for a moment BIS and HMLR need to think about the UK housing market and the businesses attached to it in the process of buying and selling a home; the estate agents, the cleaners, the gardeners, the 'for sale' sign erectors, the DIY companies, the retail sector, the builders, painters and decorators, the electricians, plumbers, gas/boiler specialists, the conveyancing lawyers, the personal search companies, the local authorities, the environmental data companies, the CON29DW providers, the chancel repair liability report providers, the flood risk report providers, the coal risk report providers, the brine, tin, clay the insurance brokers, the mortgage brokers, the lending institutions, the removal companies and the lease companies who supplied the finance for those vehicles, the print and web media who advertised the properties and ancillary services that make up what is great about the UK housing market.

These proposals are narrow minded if they fail to consider what and whom it takes to buy and sell a home in UK.

Support micro, small and medium enterprises – think small first – before tampering with the nation’s biggest resource.

Thank you for your views on this consultation. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply x ☐

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

x ☐ Yes      ☐ No

© Crown copyright 2014

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. Visit [www.nationalarchives.gov.uk/doc/open-government-licence](http://www.nationalarchives.gov.uk/doc/open-government-licence), write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

This publication is also available on our website at <https://www.gov.uk/bis>

Any enquiries regarding this publication should be sent to:

Department for Business, Innovation and Skills  
1 Victoria Street  
London SW1H 0ET  
Tel: 020 7215 5000

If you require this publication in an alternative format, email [enquiries@bis.gsi.gov.uk](mailto:enquiries@bis.gsi.gov.uk), or call 020 7215 5000.

**BIS/14/510RF**