



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

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
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Email: 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.

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

<input type="checkbox"/>	Business representative organisation/trade body
<input type="checkbox"/>	Central government
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Individual
<input type="checkbox"/>	Large business (over 250 staff)
<input checked="" type="checkbox"/>	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: See comments below to Q17.

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: See comments below to Q17.

Question 3

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

Comments: See comments below to Q17.

Question 4

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

Comments: See comments below to Q17.

Question 5

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

Comments: See comments below to Q17.

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: See comments below to Q17.

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: See comments below to Q17.

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: See comments below to Q17.

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: See comments below to Q17.

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: See comments below to Q17.

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: See comments below to Q17.

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?

x ☒ Yes

☐ No

☐ Not sure

Comments:

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: See comments below to Q17.

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: *See comments to Q 17.*

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: See comments below to Q17.

Question 16

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

Comments: See comments below to Q17.

Question 17

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

Comments:

The consultation paper does not provide enough detail to enable us to respond in detail on the internal workings of the Land Registry; however, the creation of a new service company will add an additional layer of bureaucracy which we believe is likely to give rise to additional costs.

If control of the service delivery company is moved to the private sector, we believe that this would increase the risk of fraud, delays and errors for no real benefit to consumers as there would be an inherent conflict between a private sector company, whose main purpose is to maximise shareholders' profits, and the need of consumers for a low cost, high quality and risk free service.

The Land Registry already operates with a high degree of efficiency. It is therefore difficult to see how the new structure will lead to further improvements. The consultation paper omits any data or projections to support this. The only obvious cost saving is staff costs. In a profit-motivated private sector service company, there will be pressure to push as much work as possible to less (non-qualified) staff. This would be detrimental both to users and to the state guarantee of title. The Land Registry staff have over

the years built up a body of legal and technical skills that are extremely important and valued by Land Registry users. Any questions as to quality of service or the accuracy of the Register will have a detrimental effect on the state guarantee of title, which is fundamental to land ownership in England and Wales.

Lastly, the consultation paper gives very little information on how the proposed shared functions will operate, particularly, the keeping of the register.

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;

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

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