



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
SW1H 0ET
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 type="checkbox"/>	Legal representative

	Local Government
	Medium business (50 to 250 staff)
x	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:

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:

However, I am fundamentally opposed to the proposal to set up a “service delivery company”, so it follows I consider that all functions should remain with the Land Registrar.

Question 3

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

Comments:

Se above

Question 4

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

Comments:

No comment, beyond opposition to the plan in its entirety. I fail to see what advantage can be gained from the proposed changes for the Land Registration system, and its users (not “customers”).

Question 5

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

Comments:

No comment, beyond opposition to the plan in its entirety.

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:

No comment, beyond opposition to the plan in its entirety.

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:

Government's past attempts to farm out functions to the private sector have all too frequently been a disaster. It is difficult to understand why this is being contemplated in regard to a government department that works rather well, and covers its costs.

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:

No comment, beyond opposition to the plan in its entirety.

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:

How on earth can this be an improvement on the present arrangements?

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:

Please see previous answer.

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:

No comment, beyond opposition to the plan in its entirety.

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 DPA does not protect data, it lays down rules and guidance for organisations and individuals to do so.

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:

No comment, beyond opposition to the plan in its entirety.

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:

I consider that the whole plan is risky and unnecessary.

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 whole plan is risky and unnecessary.

Question 16

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

Comments:

The Land Registry has been a beacon of efficiency compared with central government's dismal record on delivering anything, except for its misguided attempts to go all out for digital conveyancing. Whilst I can see an argument for the Registry taking over local land charges, and generally aiming to improve land registration processes, it should not be too ambitious.

Question 17

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

Comments:

I cannot see any advantage to be gained from the proposals put forward. I am surprised that such no doubt expensive consideration has been given to messing up a well-run and efficient part of government for no useful purpose. Is this hubris and empire-building at work? Land registration is a very important process which has always been considered a State function in England & Wales, and so it should remain. Farming out its so-called "administrative functions" to a private entity would be a recipe for disaster. There is absolutely nothing to recommend this plan, and the sooner you abandon it, the better.

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 ☒

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?

☐ Yes

☐ No

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