



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  
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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.

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Name: ANDREW LUND  
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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)
	Micro business (up to 9 staff)
<b>X</b>	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:

THERE IS NO EVIDENCE TO SUPPORT THIS PROPOSITION. THE LAND REGISTRY IS HEAD AND SHOULDERS ABOVE OTHER ENTITIES THAT HAVE BEEN PRIVATISED IN THE PAST IN TERMS OF SERVICE DELIVERY AND REPUTATION. IT IS ALSO FAR FAR BETTER THAN ANY OTHER GOVERNMENTAL ORGANISATION WE DEAL WITH. AS A FIRM OF SOLICITORS WE HAVE ENJOYED AN EXCELLENT RELATIONSHIP WITH THE LAND REGISTRY STRETCHING BACK MANY YEARS. ACTING FOR MAJOR FINANCIAL INSTITUTIONS WE HAVE ALSO COLLABORATED WITH THE LAND REGISTRY IN RELATION TO THE INVESTIGATION OF MAJOR PROPERTY RELATED FRAUD.

### 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:

N/A – THERE SHOULD BE NO INTERFERENCE WITH THE STAUS QUO

### Question 3

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

Comments:

N/A – THERE SHOULD BE NO INTERFERENCE WITH THE STATUS QUO

### Question 4

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

Comments:

N/A – THERE SHOULD BE NO INTERFERENCE WITH THE STATUS QUO

### Question 5

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

Comments:

N/A THERE SHOULD BE NO INTERFERENCE WITH THE STATUS QUO

### 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

X No

☐ Not sure

Comments:

THE OVERALL DESIGN PROCEEDS UPON THE MISCONCEIVED NOTION THAT PRIVATISATION IS APPROPRIATE

### 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

X No

☐ Not sure

Comments:

THE CULTURE AND ETHOS OF THE CIVIL SERVICE IS COMPLETELY DIFFERENT FROM THAT OF THE PRIVATE SECTOR. THOSE IN THE PAY OF THE PRIVATE SECTOR WILL CORRECTLY FOCUS UPON A COMPLETELY DIFFERENT SET OF PRIORITIES DRIVEN BY THE NEED TO GENERATE PROFIT AND TO MAKE A RETURN FOR THOSE PROVIDING EQUITY. DECISIONS WILL NOT BE BASED UPON WHAT IS IN THE BEST INTERESTS OF THE PUBLIC AT LARGE.

### 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:

N/A

### 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

X No

☐ Not sure

Comments:

N/A

### 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

X No

☐ Not sure

Comments:

N/A

### 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:

N/A

### 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:

N/A – THERE SHOULD BE NO SERVICE DELIVERY COMPANY

### 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:

WE HAVE NEVER HAD TO MAKE A FORMAL COMPLAINT ABOUT THE LAND REGISTRY – IF WE HAVE A PROBLEM WE PICK UP THE PHONE. YOU CANNOT IMPROVE UPON THE SERVICE WE ALREADY HAVE.

### 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 ABOVE ON CULTURE

### 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 PRIVATE SECTOR WILL LOOK FOR OPPORTUNITIES TO INCREASE INCOME BY LOBBYING FOR INCREASED REQUIREMENTS TO COMPULSORILY REGISTER TRANSACTIONS – EG LEASES FOR LESS THAN 7 YEARS AND WILL BE PRONE TO EMPIRE BUILD – IF SEARCH COMPANIES GAIN CONTROL THEN THEY WILL HAVE CREATED A COSY MONOPOLY.

### Question 16

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

Comments:

MEDDLING BY THE TREASURY

### Question 17

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

Comments:

THEY ARE MISCONCEIVED AND BASED UPON IDEOLOGY. THE LAND REGISTRY HAS THUS FAR STOOD THE TEST OF TIME – IT HAS GENERATED HEALTHY CASH FLOWS AND SURPLUSES OVER MANY YEARS AND IT HAS DONE SO WHILST RETAINING THE TRUST THAT HAS BEEN REPOSED IN IT.

### 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?

X Yes ☐ No

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