



## 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:

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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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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 checked="" 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
<input type="checkbox"/>	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 expression “if it ain’t broke don’t fix it” springs to mind. The Land Registry appears to work well at present, particularly with the dedicated customer teams. We cannot see that splitting the organisation into two bodies would be more efficient.

### 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:

### Question 3

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

Comments: All current functions.

### Question 4

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

Comments:

Splitting these between two separate bodies would be less efficient not more efficient. For example, paragraph 51 anticipates two separate bodies issuing forms. This is not likely to improve efficiency.

### Question 5

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

Comments:

These functions should not be hived off in the manner suggested.

### 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:

We do not see the point of separating the policy and service delivery functions. The Government should retain ownership.

### 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:

We believe that land registration should be a function of the Government.

### 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:

### 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:

No objection to the involvement of an independent complaints reviewer.

### 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:

This seems to complicate the process, rather than simplify it.

### 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:

We do not think there should be a separate service delivery company. However, if this is to happen, then it would be sensible to have a representative from the service delivery company on the Rule Committee

### 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:

### 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 agree with this.

### 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:

It is undesirable that a private sector company should be in possession of sensitive personal data of the sort currently held by the Land Registry.

### 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 14 above.

### Question 16

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

Comments:

We do not see the need for a "business strategy" of this kind for an organisation which should continue to be non-profit making.

### Question 17

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

Comments:

It is hard to see the reason for the proposed changes. The present system appears to work well and is entirely self-funding.

As the Land Registry indemnity is state-backed, then the state should retain control of the Land Registry. We oppose the idea of privatisation.

### 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

The questions appear to be phrased in such a way as almost to assume that the proposed changes are necessary and desirable. Instead, the Consultation should have addressed the fundamental question of whether they are needed. We do not believe that they are.

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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