

ILEX PROFESSIONAL STANDARDS LTD

CONSULTATION

PROPOSAL TO SEEK CONVEYANCING RIGHTS FOR ILEX MEMBERS

INTRODUCTION

The Institute of Legal Executives (ILEX) is an approved regulator under the Legal Services Act 2007. In accordance with the requirements of the legislation it has separated its regulatory and representative functions. The regulatory functions have been delegated to ILEX Professional Standards Ltd (IPS). IPS is the regulatory body for Legal Executives and all other grades of members registered with ILEX.

The Legal Services Act 2007 specifies reserved instrument activities as a reserved legal activity that can only be carried out by authorised persons. 'Reserved instrument activities' are defined by paragraph 5(1) of Schedule 2 of the 2007 Act and are referred to in this document as conveyancing or conveyancing rights.

IPS is making an application on behalf of ILEX under the Act to the Legal Services Board to become the relevant approved regulator able to grant the right to undertake conveyancing to those of its members who are suitably qualified.

The scope of the rights being sought is to be found in the definition of 'reserved instrument activities' as defined in the 2007 Act, these are as follows:

(a) preparing any instrument of transfer or charge for the purposes of the Land Registration Act 2002

(b) making an application or lodging a document for registration under that Act;

(c) preparing any other instrument relating to real or personal estate for the purposes of the law of England and Wales or instrument relating to court proceedings in England and Wales.

Instrument is defined as including a contract for the sale or disposition of land (except a contract to grant a short lease). It does not include a will or other testamentary instrument, an agreement not intended to be executed as a deed, a letter or power of attorney, or a transfer of stock not containing a trust or limitation on the transfer.

IPS is consulting upon the application. This consultation document begins by outlining the nature of the application, summarising the arrangements by which members will qualify as conveyancing practitioners, and then outlining the conduct and practice rules proposed for conveyancing practitioners.

This consultation will close on 24th December 2010.

INTRODUCTION

1. The proposed application seeks authorisation for ILEX to become an Approved Regulator for the purposes of granting conveyancing rights under the Legal Services Act 2007 ('2007 Act'). It also seeks approval of the related qualification scheme and conduct rules.

PRESENT POSITION

2. At present ILEX members ('members') involved in conveyancing tend to practise as employees of solicitors' firms, legal departments in organisations where there is a supervising solicitor or barrister or in firms of licensed conveyancers. These members do not have independent practice rights to undertake the conveyancing activities reserved under the 2007 Act. This application seeks rights for members that may be exercised independently of solicitors, barristers or licensed conveyancers whether as independent practitioners or as employees.
3. This application, if successful, will enable members to provide conveyancing services as independent practitioners, to clients either as a single service or in conjunction with any other services they are authorised to provide, such as probate services. As employees they will be able to undertake conveyancing services without the supervision of solicitors, barristers or a licensed conveyancer.
4. If granted, this application will ensure that all those who seek authorisation to carry out conveyancing services from ILEX are competent to the same standard. Authorisation will be granted by IPS on behalf of ILEX.

RIGHTS SOUGHT

5. The right is sought to grant a Conveyancing Certificate ('the certificate') to suitably qualified members of ILEX to enable them to undertake reserved instrument activities.
6. The Certificate will enable such members to take instructions, prepare documents relating to real and personal estate including land transfers or charges under the Land Registration Act 2002 and where required to so lodge documents with or make application to the Land Registry. It is also proposed that practitioners will be able to make a charge for these activities.

Question

Q1. ILEX is seeking the right to authorise its suitably qualified members to carry out those conveyancing activities that are reserved legal activities under the 2007 Act. Do you have any comments on the scope of the activities covered by the application?

REGULATORY OBJECTIVES

7. ILEX believes that its application complies with the regulatory objectives set out in the 2007 Act. The ILEX certification scheme will:
 - protect and promote public and consumer interests through the qualification, practice management and account rule requirements for certification described below;
 - support the rule of law in the work undertaken by certified practitioners;

- help to improve access to justice by creating alternative means for consumers to access a full range of conveyancing services from suitably qualified and regulated practitioners;
 - promote competition in conveyancing services by establishing a credible set of alternative providers accredited and regulated by an experienced approved regulator;
 - create the opportunity for providers to establish practices that are able to provide a diverse range of approved activities accredited and regulated by a single experienced approved regulator;
 - encourage and support a strong, independent, diverse and effective legal profession through a robust regime of practice management rules and supporting codes applicable to all certificate holders;
 - provide services in a way that will help to promote greater understanding by citizens of their legal rights and duties; and
 - promote and maintain adherence to the robust and transparent professional principles underpinning the practice management rules and supporting codes that apply to certificate holders.
8. This application seeks to establish a scheme designed to ensure that:
- Members of ILEX wishing to undertake a full range of conveyancing activities are qualified in accordance with the proposed regulations and have the necessary education, knowledge and experience.
 - Certificate holders are subject to the current rules of conduct applicable to and enforceable against all ILEX members. These rules include provisions for the protection of clients' money, acting in clients' interests, supporting the rule of law and only acting where the individual has the appropriate level of skill and competence. This regulatory regime is

consistent with the professional purposes set out in the 2007 Act.

QUALIFICATION SCHEME

9. The application proposes that there will be a comprehensive assessment of the knowledge, skills and experience of members seeking a certificate before they will be authorised to provide conveyancing services. A draft of the scheme rules, including the qualification scheme appears at **Appendix 1**.
10. The following will be entitled to apply for a certificate under the qualification scheme:
 - Fellows or Graduate members of ILEX, or
 - Those seeking to become **Conveyancing Associate members of ILEX**. A Conveyancing Associate Member will be a person who has been accepted by ILEX as meeting the requirements to become a certificate holder but who is not registered as a Graduate Member or Fellow of ILEX.
11. All candidates for a certificate will need to meet the eligibility and knowledge and experience criteria described below. However, it should be noted that Fellows will have completed the academic stage of qualification and will have at least 5 years legal practice experience. Equally, Graduate members will have completed the academic stages of the ILEX qualification scheme. This includes include study at Level 3 (A level standard) and Level 6 (Honours Degree standard). Graduate members will also have gained some practical experience. The scheme is designed to ensure that those seeking to become Conveyancing Associate members will meet the minimum knowledge and experience requirements even though they may not be an ILEX member or have commenced the ILEX qualification scheme at the time of application.

Question

Q2. Do you have any comments on who is entitled to apply for a certificate?

Eligibility

12. All those applying for a certificate must meet the IPS eligibility criteria. The eligibility criteria are that applicants must:
- Be of good standing, and for those members or fellows of ILEX, in good standing with ILEX/IPS;
 - Have gained an acceptable level of experience of conveyancing business;
 - Have sufficient knowledge of law and legal practice to undertake conveyancing business.

The criteria are set out in detail below.

Question

Q3. Do you have any comments on the eligibility criteria?

KNOWLEDGE AND EXPERIENCE REQUIREMENTS

13. Applicants for a certificate must meet the eligibility criteria. A key part of the process of assessment will be establishing that applicants have an acceptable level of experience of delivering conveyancing services and that they have sufficient knowledge of the relevant law and practice relating to conveyancing. IPS has developed knowledge and experience criteria for those applying for a certificate and these criteria, which appear at **Appendix 2**, will be used by

IPS to assess information provided by an applicant about their knowledge and experience of conveyancing.

14. Applicants will be required to submit details of their qualifications and provide a description of their typical workload including the type, range and complexity of the business that they have handled over the last two years.

Examinations

15. Applicants must either have:
 - Passed the ILEX Level 6 Land Law and Conveyancing examinations or have passed examinations that are of a similar standard and content. They must also have knowledge and experience of conveyancing services which will be demonstrated by providing portfolios of 5 matters which they have handled, **OR**
 - Had experience of delivering conveyancing services as a substantial part of their work prior to making their application, and knowledge and experience of conveyancing services demonstrated through portfolios of 5 matters that they have handled.
16. In assessing the knowledge and experience of candidates IPS will employ external assessors who will be suitably qualified in that field. The assessor will pay careful attention to the range and complexity of an applicant's experience of providing conveyancing services.
17. An applicant who relies on knowledge that has not been gained through formal examination will be expected to map their knowledge and experience against the syllabus of the relevant examination. In assessing that mapping exercise IPS will pay careful attention to ensuring that applicants have covered a comparable range of topics to the Level 6 examination, and are able to evidence their knowledge.
18. Where IPS is not satisfied that a candidate's knowledge and experience meet the required standards the applicant will be

expected to undertake relevant study and/or assessment before their application may proceed.

Case Portfolios

19. All applicants will be required to provide portfolios of 5 cases that they have handled during the preceding two years that demonstrate their legal and procedural knowledge of conveyancing practice. IPS has produced guidelines for the preparation of portfolios and these appear at **Appendix 3**.
20. Where IPS decides that the portfolios are unsatisfactory and do not meet the required standards applicants will be expected to resubmit or withdraw their application.
21. Applicants who are employed will be required to obtain confirmation from their employer that the contents of their application are correct.

References

22. All applicants will also be required to provide two referees who will be asked to comment upon their knowledge and experience.

Questions

- Q4. IPS has set out minimum entry requirements that applicants must meet to obtain a certificate. Do you have any comments on these requirements?*
- Q5. IPS has set out knowledge requirements in the form of academic qualifications and an alternative route for those who do not hold relevant qualifications. Do you have any comments on this proposal?*
- Q6. Do you have any other comments on the entry requirements?*

INDEPENDENT PRACTICE

Practice Management Criteria

23. Applicants who seek to provide conveyancing services in independent practice will also need to meet the practice management criteria.
24. The practice management criteria require that applicants must have certain policies and procedures in place and have made a contribution to the ILEX Compensation Fund for the year for which the application is made. Written evidence will be required that shows that candidates meet the criteria in all respects.
25. The criteria are:
 - Practice management arrangements that comply with the Practice Management Rules.
 - Accounting arrangements that comply with ILEX Accounts Rules.
 - A complaints procedure complying with ILEX Practice Management Rules.
 - An anti-discrimination policy which is consistent with ILEX Equality and Diversity Code
 - A money laundering policy that meets current legislative requirements.
 - A publicity code consistent with the ILEX Publicity Code.
 - Professional indemnity insurance.
26. Applicants will be required to provide details of their business arrangements and accounts procedures. These must be provided in the form of a financial or business plan.

Business Arrangements and Qualification

27. IPS may require an applicant to undertake a practice management course and/or an accounts course before they can be authorised to provide conveyancing services in independent practice. Where an applicant is required to undertake a practice management course their application to provide conveyancing services in independent practice will be deferred until the requirement is met. IPS may require applicants to complete the course within 12 months of an application being made.
28. Applicants will be required to demonstrate that they are capable of making financial arrangements within their practice that comply with the ILEX Accounts Rules. Where an applicant fails to demonstrate to IPS that they are able to make such financial arrangements it may require that applicant to undertake an accounts course accredited by IPS and to pass an approved assessment as part of that course. An applicant who has not undertaken the accounts course and passed an approved assessment within 12 months may apply for an extension of time to complete the qualification.
29. IPS will reconsider the application once the applicant has completed the practice management or accounts course or both.
30. IPS has developed course criteria for the practice management and accounts courses and these appear at **Appendices 4(a) and 4(b)**. Any practice management course or an accounts course taken by an applicant must meet the relevant criteria. IPS has developed assessment criteria for the accounts course and this is set out in **Appendix 5**.

Questions

- Q7. Do you have any comments on the proposals by which members in independent practice will be authorised to provide conveyancing services?***
- Q8. Do you have any comments on IPS proposals that applicants for a certificate may be required to undertake a practice management course?***
- Q9. Do you have any comments on the practice management criteria?***
- Q10. Do you have any comments on the requirement that applicants may be required to undertake an accounts course and assessment?***
- Q11. Do you have any comments on the proposed content of the accounts course and assessment criteria?***

VALIDITY AND RENEWALS OF CERTIFICATES

31. Those applicants who are granted a certificate will for regulatory purposes be designated as conveyancing practitioners.
32. Certificates granted to employed applicants will not require renewal provided the practitioner continues to be in good standing with ILEX.
33. Certificates granted to applicants who practice independently will need to be renewed annually. These practitioners will be required to submit
- (a) their annual accounts certified by a qualified accountant;

- (b) proof that they have professional indemnity insurance in place;
 - (c) proof that they have made a contribution to the compensation fund for the forthcoming year;
 - (d) proof that they continue to meet the practice management criteria;
 - (e) an annual return containing details of complaints made to the practitioner or his practice in the preceding 12 months, information on staff employed (including their qualifications and experience), a copy of their standard client care letter, a written undertaking that clients are being updated on a regular basis, and such other information as IPS may from time to time require.
34. IPS, at its discretion, may impose conditions or restrictions on the renewal of a certificate provided it gives its reasons in writing for doing so. IPS will also reserve the right to inspect a practice before renewing a certificate where a practitioner practises independently.

Question

Q12. Do you have any comments on the proposals for renewing certificates?

PRACTICE STRUCTURES

35. Conveyancing practitioners will be able to provide services through a variety of means. They may be:
- employed in a legal practice regulated by an approved regulator,
 - a manager in a legal disciplinary practice,

- an employed person providing third party services, or
 - practise independently.
36. IPS envisages that Conveyancing Practitioners practising independently may practice as a sole principal, in partnership with one or more ILEX practitioners or approved practitioner, or in a mixed disciplinary partnership. Other options include practicing through a limited company, in a limited liability partnership with non-ILEX partners, or in a limited partnership wholly owned and controlled by ILEX practitioners.
37. Legal Disciplinary Partnerships are not currently regulated by IPS. However, Conveyancing Practitioners will be permitted to practice in LDPs regulated by other approved regulatory bodies.

Question

Q13. Do you have any comments on the practice structures through which Conveyancing Practitioners may practice?

Practice Management and Accounts Rules

38. IPS has developed **Practice Management and Accounts Rules** and supporting codes and schemes for those of its members who wish to practice independently and they appear at **Appendix 6**. An ILEX Conveyancing Practitioner would fall within the definition of ILEX practitioner referred to in these Rules. These Rules have been developed to ensure the interests of clients are protected and to maintain consumer confidence in Conveyancing Practitioners.
39. Conveyancing Practitioners who work in solicitors' practices or as an employee in other organisations will be required to comply with those provisions of the Practice Management Rules applicable to employed members.

40. The Practice Management Rules set out the general duties and standards of conduct expected of Conveyancing Practitioners. Consequently, Conveyancing Practitioners are required to act professionally, with integrity and to ensure that the interests of their clients are paramount. They reflect and build on the general ILEX Code of Conduct for its members that will also be binding on Conveyancing Practitioners.
41. The client care provisions within this Code ensure that clients are provided with clear confirmation of the instructions they have given to a Conveyancing Practitioner, the extent of the retainer, costs and details of the fee earner handling their case, internal complaints handling procedures and the existence of the Legal Ombudsman Scheme. Conveyancing Practitioners will be required under the Rules to keep clients regularly updated on case progress and on costs. They will also be required to develop an in-house complaints handling scheme complying with IPS, LSB and statutory requirements.
42. IPS will develop an adjudication process for the determination of disputes about costs for use by Conveyancing Practitioners or their clients in circumstances where legal proceedings have not been commenced or are not contemplated.
43. The Practice Management Rules include a requirement that Conveyancing Practitioners must act with independence in the interest of their client and that they should not act where there could be a conflict of interest.
44. IPS has taken the view that transparent referral arrangements should be permitted and the Rules enable fee sharing and referral arrangements to take place provided there has been honest and open disclosure to clients.
45. The Rules also contain provisions relating to the supervision of a Conveyancing Practitioner's practice and that a Conveyancing Practitioner will remain personally responsible for the activities of their practice.

Questions

Q14. Do you have any comments on the Practice Management Rules?

Q15. Are there any matters that should be included in or excluded from the Practice Management Rules as they apply to Conveyancing Practitioners?

Supporting Codes and Rules

46. The Practice Management Rules are supported by the ILEX Equality and Diversity Code and Publicity Codes.
47. The Equality and Diversity Code and Publicity Codes appear at **Appendices 7 and 8** respectively.
48. The aim of the ILEX Equality and Diversity Code is to ensure that a Conveyancing Practitioner does not engage in anti-discriminatory practices. All Conveyancing Practitioners in independent practice will be required to have in place a code of practice that is consistent with the ILEX Code. They will have the choice of either developing their own code or adopting the ILEX Code. Failure to comply with the code for the practice will be treated as a disciplinary issue.
49. The Publicity Code has been developed to ensure that there is clarity in any material published by a Conveyancing Practitioner. The Code requires that clients be provided with information about a practice and the person dealing with their matter. It also requires that any advertising undertaken by a practice is clear and accurate. Again a failure to comply with the policy will be treated as a disciplinary issue.

Questions

Q16. Do you have any comments on the ILEX Equality and Diversity Code?

Q17. Do you have any comments on the ILEX Publicity Code?

Accounts Rules

50. IPS has developed Accounts Rules that will apply to relevant Conveyancing Practitioners. Conveyancing Practitioners will be expected to have a good working knowledge of the IPS Accounts Rules. The Practice Management and Accounts Rules appear at **Appendix 6**.
51. The IPS Accounts Rules have been modelled on approaches to the regulation of accounting practices by other regulatory bodies. The Rules will require that relevant Conveyancing Practitioners keep client and office money separated and that there is a clear audit trail of transactions. Practitioners will be expected to maintain a client ledger for each client.
52. The Rules contain provisions about the use of client accounts and the payment of interest on those accounts.
53. Conveyancing Practitioners in independent practice will be expected to prepare an annual accountant's report in a format developed by IPS. The reports will enable an independent assessment to be carried out of compliance with the IPS Accounts Rules.
54. A reporting accountant appointed by the practitioner will be required to carry out various test procedures and provide a copy of his report to IPS. This will provide IPS with an opportunity to assess whether clients' money is properly protected and, in cases where issues arise, to take any remedial action.

Questions

Q18. Do you have any comments on the Accounts Rules?

Q19. Are there matters that should be included within or excluded from the Accounts Rules?

Q20. Do you have any comments on the arrangements for accountants' reports?

SCHEMES OF CLIENT REDRESS

55. IPS has developed a number of channels through which clients will be able to seek redress. These are indemnity insurance, a client protection scheme, and complaints handling and disciplinary procedures.

Indemnity Insurance Rules

56. Details of the IPS scheme of indemnity insurance and its Rules appear at **Appendix 9**. All Conveyancing Practitioners will be required to obtain cover under this scheme unless they are employed. Employed Conveyancing Practitioners will need to provide evidence that they are covered by their employers' indemnity insurance scheme or, have obtained their own independent cover. Conveyancing Practitioners will also be required to have run-off cover for a period of 6 years.

57. The existence of professional indemnity insurance will provide a route of redress for clients for any civil liability incurred by the Conveyancing Practitioner's practice.

58. Ultimately IPS will operate a master policy scheme through which individual Conveyancing Practitioners will be able to obtain cover. This scheme will be open to other categories of practitioner regulated by IPS. However, initially practitioners, including conveyancing practitioners will need

to seek their own professional indemnity insurance until there are sufficient potential participants in the master policy scheme to make it viable.

59. Conveyancing Practitioners will be required to obtain cover at the minimum level set by IPS from time to time. They can obtain a higher level of cover if they so wish.
60. IPS will not issue a certificate to an applicant until they have satisfied it that they have obtained adequate cover.

Question

Q21. Do you have any comments on the ILEX Practitioners Indemnity Insurance Scheme?

Client Protection Scheme

61. IPS has developed its own client protection scheme whereby clients who suffer loss as a result of dishonesty or failure to account by a Conveyancing Practitioner will be able to seek redress from a compensation fund. Access to a compensation fund will be important to clients who have no other route of redress available in circumstances where there has been dishonesty or failure to account.
62. The Client Protection Fund will be a new fund to which all Conveyancing Practitioners will be expected to contribute. In the first instance ILEX will allocate some of its reserves to establish the fund. The scheme rules will enable IPS to invest and borrow for the purposes of developing the fund. The Scheme Rules appear at **Appendix 10**.
63. The fund will be a discretionary fund of last resort and IPS will expect clients of Conveyancing Practitioners to have exhausted all other forms of redress before making a claim. IPS will set the maximum payment it can make from the fund, which will be reviewed on a regular basis.

64. The Rules set out the procedure to be followed where a claim is made to the compensation fund. The onus will rest on a claimant to provide information in support of their claim and to show the loss they have suffered. A claimant will subrogate to IPS their right to make a claim against a Conveyancing Practitioner and will be required to support IPS in making any such claim.
65. In assessing what level of payment to make to a claimant IPS will take into account various factors such as whether the claimant contributed to their loss, failed to act with integrity or failed to co-operate with IPS.
66. Where a claimant is shown to be suffering severe hardship during the investigation of their claim IPS has a reserved power to make an interim grant. This will be important in providing assistance to vulnerable clients.

Questions

Q22. Do you have any comments on the arrangements proposed for the IPS Client Protection Scheme?

Q23. Will the Client Protection Scheme provide adequate safeguards for clients in the event of their suffering loss as a result of a Conveyancing Practitioner's misconduct? If not, what changes would you recommend?

DISCIPLINARY PROCEEDINGS

67. In addition to the requirement to comply with the Practice Management and Accounts Rules, Conveyancing Practitioners will also be required to comply with the ILEX general Code of Conduct.
68. Any complaint regarding the conduct of a Conveyancing Practitioner will be dealt with through the normal disciplinary procedures. The disciplinary procedures are set out in the

Investigation, Disciplinary and Appeal Rules, recently revised by IPS, which have been the subject of an earlier consultation.

69. IPS will also set up a Committee that will determine whether a Conveyancing Practitioner remains a fit and proper person to continue holding a Certificate, following an investigation into their conduct. The Committee will have the power to withdraw a Certificate.

Question

Q24. Do you have any comments on the proposal that complaints and allegations about the conduct of Conveyancing Practitioners will be investigated in accordance with the normal IPS procedures?

RIGHT OF INSPECTION AUTHORITY

70. IPS will not issue a Certificate to an applicant practising independently unless they sign a Right of Inspection Authority in its favour. The Authority will be an irrevocable written authority to IPS in which the applicant agrees:
- To give full and unimpeded access to his practice papers, accounts, records and files; and
 - To co-operate, personally and by direction to his staff, with the inspection; and
 - To provide any information relating to the practice requested by IPS; and
 - To provide such office facilities as IPS may reasonably require; and
 - To provide copies of any documents which IPS wishes to remove; and

- To give authority to his previous and present accountant to provide any information and documents that IPS may require.

Question

Q25. Do you have any comments on the Right of Inspection Authority?

SUSPENSION OF CERTIFICATES

71. IPS may suspend a Certificate where a Conveyancing Practitioner becomes subject to an inspection, investigation or disciplinary proceedings.

Question

Q26. Do you have any comments on the circumstances in which a Certificate may be suspended?

CONTINUING PROFESSIONAL DEVELOPMENT

72. Conveyancing Practitioners will be required to complete 16 hours CPD of which at least 8 hours CPD must relate to conveyancing services. All Conveyancing Practitioners will be required to provide a record of their CPD to IPS.

Question

Q27. Do you have any comments on the proposals for CPD?

CONSULTATION QUESTIONS

The questions are listed below. Please provide your responses on the attached response form, providing reasons for your answers.

- Q1. ILEX is seeking the right to authorise its suitably qualified members to carry out those conveyancing activities that are reserved legal activities under the 2007 Act. Do you have any comments on the scope of the activities covered by the application?***
- Q2. Do you have any comments on who is entitled to apply for a certificate?***
- Q3. Do you have any comments on the eligibility criteria?***
- Q4. IPS has set out minimum entry requirements that applicants must meet to obtain a certificate. Do you have any comments on these requirements?***
- Q5. IPS has set out knowledge requirements in the form of academic qualifications and an alternative route for those who do not hold relevant qualifications. Do you have any comments on this proposal?***
- Q6. Do you have any other comments on the entry requirements?***
- Q7. Do you have any comments on the proposals by which members in independent practice will be authorised to provide conveyancing services?***
- Q8. Do you have any comments on IPS proposals that applicants for a certificate may be required to undertake a practice management course?***
- Q9. Do you have any comments on the practice management criteria?***

- Q10. Do you have any comments on the requirement that applicants may be required to undertake an accounts course and assessment?***
- Q11. Do you have any comments on the proposed content of the accounts course and assessment criteria?***
- Q12. Do you have any comments on the proposals for renewing certificates?***
- Q13. Do you have any comments on the practice structures through which Conveyancing Practitioners may practice?***
- Q14. Do you have any comments on the Practice Management Rules?***
- Q15. Are there any matters that you consider should be included in or excluded from the Practice Management Rules as they apply to Conveyancing Practitioners?***
- Q16. Do you have any comments on the ILEX Equality and Diversity Code?***
- Q17. Do you have any comments on the ILEX Publicity Code?***
- Q18. Do you have any comments on the Accounts Rules?***
- Q19. Are there matters that you consider should be included within or excluded from the Accounts Rules?***
- Q20. Do you have any comments on the arrangements for accountants' reports?***
- Q21. Do you have any comments on the ILEX Practitioners Indemnity Insurance Scheme?***
- Q22. Do you have any comments on the arrangements proposed for the IPS Client Protection Scheme?***

Q23. Will the Client Protection Scheme provide adequate safeguards for clients in the event of their suffering loss as a result of a Conveyancing Practitioner's misconduct? If not, what changes would you recommend.

Q24. Do you have any comments on the proposal that complaints and allegations about the conduct of Conveyancing Practitioners should be investigated in accordance with the normal IPS procedures?

Q25. Do you have any comments on the Right of Inspection Authority?

Q26. Do you have any comments on the circumstances in which a Certificate may be suspended?

Q27. Do you have any comments on the proposals for CPD?

HOW TO RESPOND

A response form has been produced for completion. Please send the response form to IPS through one of the following methods:

Email to keithemslie@gmail.com

By post to Keith Emslie Conveyancing Rights Consultation ILEX Professional Standards Ltd, Kempston Manor, Kempston, Bedford MK42 7AB

By DX to Keith Emslie Conveyancing Rights Consultation ILEX Professional Standards Ltd, DX 124780 Kempston 2

SUBMISSION DEADLINE

The deadline for the submission of responses is 24th December 2010.