

**SRA Consultation Paper 3 – Miscellaneous amendments to the Code of Conduct**  
**LSC Response**

*1. Have we overlooked any consequential amendments to the rules listed in paragraph 3.2 - i.e. those rules we have identified as not appearing to need amendment?*

**No**

*2. Do you have any comments on the minor changes to the rules listed in paragraph 3.3 – i.e. those changes where provisions have simply been applied to the authorised individuals and bodies the SRA will regulate under the LSA?*

**No**

*3. In relation to rule 3 and the proposed amendment to 3.12 dealing with conflicts in property selling, what are your views on the proposal to include non-SRA authorised firms in the definition of a “participating firm” in a SEAL? Do you agree that at least one “participating firm ” should be SRA regulated? (paragraph 3.3.5.)*

**n/a**

*4. In relation to rule 5:*

- do you agree with our proposal to allow all lawyers (including those regulated by other regulators such as licensed conveyancers, costs draftsmen etc.) who have the relevant experience and training required by the rule to be “qualified to supervise”? (paragraphs 3.3.6. and 3.3.7)*

**Yes**

- what are your views on non-lawyer managers being allowed to be “qualified to supervise” – and should we devise a test which equates to that required of solicitors by 5.02 concerning practising experience? (paragraph 3.3.8.)*

**Yes we agree as long as they have the necessary experience and training. We agree that the test should equate to that for solicitors.**

- do you think that the requirement for firms to have someone “qualified to supervise” is no longer necessary? (paragraph 3.3.9.)*

**No – we think this requirement should remain as an explicit requirement until at least the new regulatory regime beds in.**

*5. In relation to rule 7 we are proposing that all partnerships and sole practitioners must indicate on their letterhead their SRA recognised name and their unique SRA number. In the case of an LLP or company we propose that the corporate name and number must be included. Do you agree that this would be helpful to the public and not be too burdensome to the profession? (paragraph 3.3.12.)*

**We agree**

*6. Do you agree with the proposal in relation to rule 8 to allow fee sharing with the practices of lawyers which are authorised non-SRA firms? (paragraph 3.3.14)*

**We agree**

*7. In rule 9, do you agree that the referral arrangement requirements should be disapplied to authorised non-SRA firms? (paragraph 3.3.15)*

**No**

*8. Are there any other points you would like to make with regard to the proposed consequential amendments? Please bear in mind that, as part of this exercise to amend the rules to allow legal disciplinary practice and entities regulation, we are not proposing to deal with any other issues which may indicate changes to any of the rules.*

**No other comments.**