



Restoring the annual keeping of the roll exercise

Consultation responses

August 2022

These respondents asked us to publish their responses and their names

Name	Respondent type
Joshua Rozenberg	Individual
Susan Elizabeth Mechan	Individual
Susan Fraser	Individual
Jan Trainor	Individual
Shelagh Fitzpatrick	Individual
Mike Robinson	Individual
Patrick Lines	Individual
Trevor Tayleur	Individual
Peter Careless	Individual
Salim Wadiwala	Individual
Joscelin Davidson	Individual
Laurence Scott	Individual
Malcolm Gaskell Fowler	Individual
Ronald Beech	Individual
David Reissner	Individual
Bernard Joseph Quoroll	Individual
Akikur Choudhury	Individual
Stephen Forster	Individual
Richard Jeremy Golland	Individual
Richard Adkinson	Individual
Julian Pollard	Individual
Jurg Gassmann	Individual
Paul C M Solon	Individual
Robert Dufton	Individual
Lancelot William Gregory Robson	Individual
Anthony Susman	Individual
Harry Melkonian	Individual
Ian Mackay	Individual
Judith Freedman	Individual
Christopher Roblett	Individual
Karen Sarah Rodgers	Individual
Warren Kaufman	Individual
Norman Macleod	Individual
Timor Malalasekera	Individual
Niels Frenzen	Individual
Ian Gatenby	Individual
Cassandra Jane Cartwright	Individual
Jean Blakemore	Individual
David Rees	Individual
John Robinson	Individual
John Crawford	Individual
Luigi Faraone Mennella	Individual
Peter Watson-Lee	Individual
Jeremy Basil Canter Simmonds	Individual
David Bailey	Individual

Michael Howells	Individual
Nazar Muhammad Sheikh	Individual
Adrian Clemens	Individual
Brian Scott	Individual
Emma Rawlins	Individual
Paul Richard Sheridan	Individual
Clare Michaela Franklin	Individual
Gerald Howells	Individual
Anthony Robert Jago Pegler	Individual
Alun Wyn Hughes	Individual
Richard Snow	Individual
Dennis Stukenbroeker	Individual
Martin Griffin Whitston	Individual
Stella Westmacott	Individual
John Lawrence	Individual
Charlotte Kibler	Individual
Nigel Duckworth	Individual
John de Frece	Individual
Anthony Michael Heneker	Individual
Paul Davies	Individual
Samantha Woods-Peel	Individual
David Jacobson	Individual
Janis Lyn Purdy	Individual
Robert Frederick Dennis Naylor	Individual
A R J Penny	Individual
I Sol	Law firm
Robert Roscoe	Individual
Katie Paxton	Individual
William John Markwell	Individual
Alan Preskett	Individual
Richard Eugène Peter Spencer	Individual
Nicholas Walton	Individual
Robert Symons	Individual
Paul Martin	Individual
Simon Dudley Armstrong	Individual
Gerald Peter Funnell	Individual
Charles Smith	Individual
Cara Rodger	Individual
Pedro Lorenti	Individual
Francis Walford Taylor	Individual
Edgar Ramón Wagner	Individual
Michael Blacklidge	Individual
Rosanne Ward	Individual
Roger Topping	Individual
Andrew George Payne	Individual
James Roderic O'Sullivan	Individual
Lee North	Individual
Graham Roberts	Individual

Peter Michael Tobias	Individual
Richard Norris	Individual
Annette Rickson	Individual
Michael Wakelin	Individual
Melanie Gibbons	Individual
Ian Geoffrey Williams	Individual
Tiffany Stephens	Individual
Michael Poulsom	Individual
Gillian Mather	Individual
Federico Spinucci	Individual
Alan Edward Short	Individual
Simon Bruce	Individual
John Albert Burrell	Individual
Elizabeth Stevens	Individual
David Connelly	Individual
Vincent Anthony Bishop	Individual
Birmingham Law Society	Law society
Jason Pearce	Individual
Nik Antoniadis	Individual
Liverpool Law Society	Law society
Simon Loveday	Individual
The Law Society of England & Wales	Law society

These respondents asked us to publish their names but not their responses

Name	Respondent type
Pervaneh Child	Individual
Sven Fedorow	Individual
Susan Fletcher	Individual
Elizabeth Kong	Individual
Malcolm Padgett	Individual
Antonios Panagiotopoulos	Individual
Louise Sears	Individual
Tim Soutar	Individual
Geoffrey Arthur Tovey	Individual
Hampshire Law Society	Law Society

This document also includes responses from respondents who asked us to publish their responses anonymously

Restoring the annual keeping of the roll exercise

Response ID:1 Data

2. About you

1.
First name(s)

Joshua

2.
Last name

Rozenberg

3.
Please enter your SRA ID (if applicable)

82088

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The cost to the SRA would be so low that it would be uneconomic to collect it. There should be no charge.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No. No. I can give evidence only on behalf of myself. If this fee is introduced, I shall remove my name from the roll.

Restoring the annual keeping of the roll exercise

Response ID:4 Data

2. About you

1.
First name(s)

Susan Elizabeth

2.
Last name

Mechan

3.
Please enter your SRA ID (if applicable)

149126

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

AXIS Specialty Europe SE

9.
Please specify if you are

an in-house solicitor

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I definitely agree with reintroduction of the annual keeping of the roll exercise.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I think GBP 40 is a reasonable and proportionate amount to charge for the exercise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree with the equality impact assessment conclusions.

Restoring the annual keeping of the roll exercise

Response ID:15 Data

2. About you

1.
First name(s)

Susan

2.
Last name

Fraser

3.
Please enter your SRA ID (if applicable)

132063

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, it is sensible to keep records of non-practising solicitors. I did not think it sensible to stop when you did so previously

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I have no problem with you charging a fair and reasonable admin charge. It was £20 previously, when a hard copy form could be used. You have said in the consultation paper that you now have a better IT system to maintain such a record but you have not provided any justification for doubling the admin fee, when this exercise appears to be purely on line and should therefore have a minimal cost. Without hard evidence that it is going to cost £40 per person to process such applications I can see no justification for charging more than the £20 you charged under the old system.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment on it. I imagine a few very old retired solicitors may struggle with the IT, but I always found MySRA pretty easy to use

Restoring the annual keeping of the roll exercise

Response ID:20 Data

2. About you

1.
First name(s)

Jan

2.
Last name

Trainor

3.
Please enter your SRA ID (if applicable)

21817

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

BTW Solicitors

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

I have no issue with an administration fee per se but see no justification for sum anticipated of £30-40.00

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I consider it would be fairer and more proportionate if the fees collected from practising solicitors was used to maintain the roll. This must be possible given more latterly a fee has not been charged and with automation this should be a simpler task. Alternatively, the roll could be updated every 2 years with a smaller administration charge, say, £20-30.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

From a financial point of view, I consider the plan is potentially discriminatory to our retired members and women, in particular, who are more likely to have limited financial resources (numerous studies have evidenced the "gender pension gap".) Many retired, non-practising solicitors have dedicated decades of their working life to the legal profession, we should be looking after them.

Restoring the annual keeping of the roll exercise

Response ID:26 Data

2. About you

1.
First name(s)

Shelagh

2.
Last name

Fitzpatrick

3.
Please enter your SRA ID (if applicable)

110574

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Freelance

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Having managed very well with levying a fee I can't see why one is necessary now.

How did you arrive at £30 or £40 pa.

It is merely part of the SRA's administrative function and should be included in the work they carry out.

It is a very small task if the database is kept up to date.

If you make the onus on the people wanting to remain on the Roll, inputting the data is minimal.

We do not expect our clients to pay for us keeping their files, records and details.

Offer the job to young people wanting work experience

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

N/A

Restoring the annual keeping of the roll exercise

Response ID:28 Data

2. About you

1.
First name(s)

Mike

2.
Last name

Robinson

3.
Please enter your SRA ID (if applicable)

137847

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Askews Solicitors Ltd

9.
Please specify if you are

an in-house solicitor

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, in principle.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. £40 per annum for an estimated 60,000 non-practising solicitors (which figure will increase over time because there are more solicitors who are living longer) produces an annual windfall of £2.4m. Even allowing for drop -out rate up to 50%, this is still £1.2m which is much too much to be justified for what is a record -keeping exercise. It should be fairly straightforward to match a fee paid to a roll number and even allowing for a couple of warning letters at 2 monthly intervals before strike out, it should not cost anywhere near £1.2m per year to administer. 3 full - time administrators dealing with it at, say £25k pa is not more than a £90k pa overhead. How is the very substantial surplus justified? What is intended to be done with it?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

It is fairly obvious that the proposal will very disproportionately impact solicitors of mature years. It is common knowledge that people of mature age have a higher incidence of illness and medical conditions, including those affecting mental health and decision-making. It would not be acceptable that any person so affected should be put at risk of losing their professional qualification without it being known that they had made an informed choice to be removed from the roll.

Restoring the annual keeping of the roll exercise

Response ID:29 Data

2. About you

1.
First name(s)

Patrick

2.
Last name

Lines

3.
Please enter your SRA ID (if applicable)

142117

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I do not - and I do not consider £30-£40 a small amount. I consider this to be excessive given that this type of exercise can be highly automated. If a sum must be charged it should be a matter of a few pounds only - absolute maximum £5. This is not supposed to be an income generating exercise only a cost covering exercise. In addition I would have thought that my years of being a full practising member should count towards something in my retirement!

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:32 Data

2. About you

1.
First name(s)

Trevor

2.
Last name

Tayleur

3.
Please enter your SRA ID (if applicable)

124825

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Academic

8.
Please enter the name of your institution

The University of Law

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, I don't think the reasons provided are sufficient for an annual update. An update every two years should suffice.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Despite the recent surge in inflation, £30-£40 seems to be an above inflation increase compared to the £15 that was previously charged. More evidence would be needed to show that an online exercise actually did cost the amount claimed.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No, as it ignores the impact on retired solicitors who would like to stay on the roll but will now face an extra payment at a difficult time for the economy

Restoring the annual keeping of the roll exercise

Response ID:37 Data

2. About you

1.
First name(s)

Peter

2.
Last name

Careless

3.
Please enter your SRA ID (if applicable)

95028

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. This appears to be mission creep on the part of the SRA. When I qualified, I applied to be admitted and the Law Society duly submitted the appropriate certificate to the Master of the Rolls. Accordingly Lord Denning did by writing, admit me to be a Solicitor of the Supreme Court. The Law Society at that time kept a list of all those on the Roll who held practising certificates

and also those who were practising Solicitors who were exempted from holding such certificates. This included Solicitors in Local Government who did not need a practising certificate even when representing their Local Authority in open court. It was understood that one's name would be removed from the roll after 100 years had elapsed. The only other way to be removed from the roll was if one requested it or if one was forcibly removed by the Solicitors Disciplinary Tribunal. In the interim a list would be maintained and the Solicitors Act offered no other procedure with complying with state requirements. Now the emphasis has changed. The SRA are proposing to delete from the roll such solicitors who do not pay an annual fee. It is outrageous that the SRA should undermine the authority of the Master of the Rolls who admitted those individuals or bypass the responsibility of the Solicitors Disciplinary Tribunal for removing solicitors from the roll disguised as an administrative exercise. The result will be that unless you pay the Regulator their annual fee, one will not only be removed from the roll but one will not be able to call oneself Solicitor. As far as I am concerned, I have been admitted and this is a qualification which has not become dependant on an annual fee. Neither do I want to be called a non-practising solicitor nor a solicitor without a practising certificate. I want to be able to describe myself as a retired solicitor and feel that the qualification should be like that of a Bishop in so far as once a Solicitor, always a Solicitor. At what point did keeping a list become extended to cleansing the roll of people admitted to be a Solicitor of the Supreme Court. Keep an up to date list by all means but the legislation appears to be quiet of how it is done. If the SRA are determined to remove solicitors from the roll who do not pay an administration charge then at a stroke the Regulator could remove 60,000 individuals from their entitlement and prohibit them from holding out that they were ever a Solicitor in the first place. And then to compound matters, if an individual wants to be reinstated, he or she has to complete a suitability assessment. That seems to me unacceptable on many levels. The SRA complains that there are a proportion of individuals who have never actioned their mysra account. There appears to be no introspection on the SRA's part to try and understand why.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It seems a little late in the day to say that it is appropriate now to carry out this exercise in order to comply with the Data Protection Legislation. It is the responsibility of all organisations to comply with the statutory requirements imposed by this legislation whether it is necessary or not to the operation of the work of the organisation. Most dealt with this by incorporating such systems within their administration without immediately demanding a handling or administration fee. Simply by frontloading the expense onto the existing budget is unacceptable. There never seems to be any motivation by the SRA to improve on their budget unlike other organisations. When the Valuation Tribunal of England upon which I sat in a judicial capacity without a practising certificate, was asked by the relevant Ministry to reduce their expenditure, they did and reduced their expenses from £11m down to £9m. It can be done and in this case most probably by adapting the mysra account into something more user friendly and for that matter relevant at no extra cost. Some people would no doubt try and haggle but my view is that there should be no charge on maintaining an active list for the benefit of not only the public but also for the benefit of the profession who have to be so vigilant to protect themselves and their clients against fraudsters. This should be one of the core duties of the SRA and one that if they now need £30 to £40 for shows a certain dereliction of responsibility

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment one way or the other on the evidence put forward by the SRA. it is not my evidence and it would be imprudent to accept the conclusions without independent research

Restoring the annual keeping of the roll exercise

Response ID:47 Data

2. About you

1.
First name(s)

Salim

2.
Last name

Wadiwala

3.
Please enter your SRA ID (if applicable)

82933

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Non-practising

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

£ 40 is a fair fee.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no information in this regard.

Restoring the annual keeping of the roll exercise

Response ID:62 Data

2. About you

1.
First name(s)

Joscelin

2.
Last name

Davidson

3.
Please enter your SRA ID (if applicable)

356468

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Non-practising solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) **Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?**

Yes.

11.
2) **Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?**

The first year of the exercise may cost more to implement, given then necessity to potentially track down those who have not kept their MySRA up to date. I would not expect, however, that this fee would be more than £30.

Considering that the fee used to be £20 annually, a doubling to £40 is excessive. After the 1st year of the process, the vast majority of people will confirm their details, and pay through an online portal/link to an online system, or if the system allows, renew by annual direct debit (the preferred option, I suspect, for many). Realistically, this will cost a lot less to administer, once it is set up, than the previous system and for this reason, it would be disingenuous to charge a higher fee than the original £20, or perhaps, at most, £25.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

It seems counterintuitive to put the price up to a level that will see those not currently working as a solicitor decide that it is not worth the cost of maintaining their name on the roll, either for financial hardship or other reasons. This would add a further barrier to returning to the profession for those who are taking a break for personal reasons, i.e. caring for a family, and would disproportionately affect potential 'women returners', as those who take a career break for caring purposes are more likely to be female and less likely to have as much disposable income as those who are working within the profession.

Equally, a retired solicitor who has no intention of practising again may wish to proudly remain on the roll of their chosen profession and should be allowed to do so at an affordable annual cost.

Restoring the annual keeping of the roll exercise

Response ID:71 Data

2. About you

1.
First name(s)

Laurence

2.
Last name

Scott

3.
Please enter your SRA ID (if applicable)

104913

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

non-practising

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, save that the charge should be limited to £15 for the first three years.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes as to the first part: no as to the second part.

Restoring the annual keeping of the roll exercise

Response ID:73 Data

2. About you

1.

First name(s)

Malcolm Gaskell

2.

Last name

Fowler

3.

Please enter your SRA ID (if applicable)

95591

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

West Midlands Police and Crime Commissioner and West Midlands Police

9.

Please specify if you are

an in-house solicitor

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes but I am against the levying of a fee, whether annual or not, for the likes of me to remain on the Roll

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Given my by now forty seven years in paid practice and my several years since as an exceedingly active pro Bono solicitor, I resist the proposal for any payment in the face of all those years undertaking poor law activity in what I still insist is one of the caring professions.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

There are very, very many non-practising and technically retired solicitors like me who nonetheless do our profession much credit by deploying their hard earned experience and skills to help those citizens otherwise deprived of their entitlements. We all help those we give such support to enable them to strive effectively for a quality of life and for a respect that ought to be theirs as of right rather than their being the exclusive reserve of the privileged uncommitted to those without the advantages in life.

Restoring the annual keeping of the roll exercise

Response ID:80 Data

2. About you

1.
First name(s)

Ronald

2.
Last name

Beech

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Cocks Lloyd

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:84 Data

2. About you

1.
First name(s)

David

2.
Last name

Reissner

3.
Please enter your SRA ID (if applicable)

82637

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

N/A

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. I do not believe there is any significant cost to retain my name on the roll. With an existing system, there is no need to do anything except to ask solicitors without a practising certificate if they wish to remain on the roll and whether their details are correct. If the SRA is migrating data to a new system, it can ask the same questions before migration. To comply with GDPR, the SRA will probably have to do this anyway without charging a fee. GDPR compliance would be enabled and, as I say, the cost is minimal, certainly nowhere near £30 to £40. If necessary, I would pay a nominal fee that is a true reflection of the cost.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment.

Restoring the annual keeping of the roll exercise

Response ID:87 Data

2. About you

1.

First name(s)

Bernard Joseph

2.

Last name

Quoroll

3.

Please enter your SRA ID (if applicable)

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Other

8.

Please specify

NON PRACTISING SOLICITOR CURRENTLY ON THE ROLL

9.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

YES SUBJECT TO COMMENTS BELOW

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

THE PREVIOUS CHARGE WAS £20. IT WAS DISCONTINUED FOR THE CONVENIENCE OF YOUR ORGANISATION. YOU NOW HAVE ACCESS TO BETTER TECHNOLOGY WHICH SHOULD MAKE THE EXERCISE LESS NOT MORE EXPENSIVE. I WORKED HARD FOR MY QUALIFICATION AND WISH TO RETAIN MY RIGHT TO RETURN TO PRACTICE, WHICH HELPS DEFINE ME AS AN INDIVIDUAL WITH PROFESSIONAL STATUS IN SOCIETY. I WOULD BE HAPPY TO PAY A FEE COMMENSURATE WITH WHAT I PAID PREVIOUSLY. THE PROPOSED FEE DOES NOT SEEM TO ME TO BE COMMENSURATE WITH THE TASK AND HAS NOT BEEN JUSTIFIED. YOU WISH TO REINTRODUCE AN ANNUAL FEE FOR SRA's OWN PURPOSES, RATHER THAN THOSE OF RETIRED MEMBERS. MOST RETIRED SOLICITORS ARE ON FIXED INCOMES. WE SHOULD PAY NO MORE THAN THE JUSTIFIED ACTUAL COST

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

NO COMMENT

Restoring the annual keeping of the roll exercise

Response ID:101 Data

2. About you

1.
First name(s)

Akikur

2.
Last name

Choudhury

3.
Please enter your SRA ID (if applicable)

543024

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other legal professional

8.
Please specify

Company Secretary

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I agree that there should be a system of keeping up to date information on the register. What the SRA should do is:

1. Give non-practicing solicitors the option to be removed once they become non-practicing. If someone does not wish to be removed they should be asked every 5 years whether they would like to remain on the register. They should pay a fee to remain on the register for those 5 years

2. An annual requirement would be costly for people already struggling with low salaries and the cost of living to pay it every

year. Any payment should not be done as an annual payment, I don't see where any physical benefit lies except being called a "non practicing solicitor".

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I'm not sure but the people who aren't working in the field should not be charged for using the system that doesn't benefit them. I would perhaps think increasing the practicing certificate charge a little or charging every 5 years like I suggested.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:106 Data

2. About you

1.
First name(s)

STEPHEN

2.
Last name

FORSTER

3.
Please enter your SRA ID (if applicable)

101568

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

N/a

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No - if payment was abolished because £20pa was simply not economic I assume that in the years that have since passed £20 must have now become more than double so I suspect that you are introducing this proposal on the basis of hope rather than reality. Then, doubtless sadly, once introduced you will feel compelled to increase the annual charge. In any case why can't you

estimate what it will cost with greater accuracy? I suspect the whole exercise is a waste of time and resources. Any retired solicitor is only on the roll as they wish to stay there or cannot be bothered to notify you that they wish to come off. In either case it is surely their responsibility to notify you of any changes. This all appears to be the sort of solution a trainee would come up with, looking at the fine print without seeing the wider picture. Presumably you will go ahead regardless of this consultation. Sad to say, but if this is what you get up to, I doubt your fitness to do anything worthwhile. Anyone checking the register can see that I am not practising so why on earth is anything else needed?

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:112 Data

2. About you

1.

First name(s)

Richard Jeremy

2.

Last name

Golland

3.

Please enter your SRA ID (if applicable)

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

I do not agree with your proposals. I qualified in 1971, and retired in 2010. Why should I pay anything to keep my name on the Roll? I cost you nothing to remain on the Roll. Rubbish iterated by you such as compliance with data protection legislation is a poor excuse for taking money from a retired person to maintain a register that needs no work until I die!

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

What is the relevance of your impact assessment upon my right to remain on the Roll? I qualified following 5 year articles and have no degree. Would you seek to take away a law degree unless payment is made? I demand that you maintain my entry on the Roll as it represents my qualification which you are not able to take away!

Restoring the annual keeping of the roll exercise

Response ID:120 Data

2. About you

1.
First name(s)

Richard

2.
Last name

Adkinson

3.
Please enter your SRA ID (if applicable)

102042

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:123 Data

2. About you

1.
First name(s)

Julian

2.
Last name

Pollard

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired Solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. A reduction in the salaries of the Solicitors Regulation Authority quangocrats'

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

A self justifying cartels looking for a reason to exist

Restoring the annual keeping of the roll exercise

Response ID:124 Data

2. About you

1.
First name(s)

Jurg

2.
Last name

Gassmann

3.
Please enter your SRA ID (if applicable)

380821

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other legal professional

8.
Please specify

Solicitor, non-practicing

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

n/a

Restoring the annual keeping of the roll exercise

Response ID:129 Data

2. About you

1.
First name(s)

Paul C M

2.
Last name

Solon

3.
Please enter your SRA ID (if applicable)

101004

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other legal professional

8.
Please specify

Notary Public

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) **Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?**

Yes

11.
2) **Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?**

I was admitted as a Solicitor in 1973. After retiring from full time practice 10 years ago, I stopped taking out a practising certificate but have kept my name on the roll for 'sentimental' reasons. While I cannot really argue with the principle of making an administration charge, I suggest you might consider a reduced rate or even an exemption for, say, the over-65s or those who have held a practising certificate for (in my case) just short of 40 years?

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

yes

Restoring the annual keeping of the roll exercise

Response ID:130 Data

2. About you

1.
First name(s)

Robert

2.
Last name

Dufton

3.
Please enter your SRA ID (if applicable)

133845

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Moorfields Eye Charity

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:133 Data

2. About you

1.

First name(s)

Lancelot William Gregory

2.

Last name

Robson

3.

Please enter your SRA ID (if applicable)

113327

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

Retired

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

In these computerised days, the proposed fee seems extortionate. Effectively the charge is for sending out a round robin email to all non-practising solicitors, asking them to fill in an electronic form. The forms can then be scrutinised electronically to pick up exceptions. The actual cost should be pence. The greater cost will result from administration of the annual fee.

I would agree to a nominal fee of £5, on the basis that a charge will encourage solicitors to actually think about why they are staying on the Roll, as opposed to having to do nothing to keep their solicitor title and status.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no views on this point.

Restoring the annual keeping of the roll exercise

Response ID:138 Data

2. About you

1.
First name(s)

Anthony

2.
Last name

Susman

3.
Please enter your SRA ID (if applicable)

101096

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

N/a

Restoring the annual keeping of the roll exercise

Response ID:142 Data

2. About you

1.
First name(s)

Harry

2.
Last name

Melkonian

3.
Please enter your SRA ID (if applicable)

437476

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Melkonian & Co

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

As someone who would be included in the annual keeping of the roll, I think the proposal is fair and the cost reasonable

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:154 Data

2. About you

1.
First name(s)

Ian

2.
Last name

Mackay

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

N/a

Restoring the annual keeping of the roll exercise

Response ID:159 Data

2. About you

1.
First name(s)

Judith

2.
Last name

Freedman

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Academic

8.
Please enter the name of your institution

University of Oxford, emeritus

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. I do not accept the GDPR rationale. Anyone wanting an update can notify you of this fact. By definition these are non practising solicitors and so there is no issue about protection of the public.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. Your consultation paper states that one rationale for reintroduction of an annual exercise is that technology makes it simple. If so the proposed fees are unnecessarily high. The cost should be much lower.

I suggest a five yearly update which would meet your objectives and cost very little.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Essentially being solicitor is a qualification . Those who have earned this title have passed examinations and earned the description and should not have to pay to use it, any more than we pay to continue to describe ourselves as having a university degree. Nor should we need to worry about how we are describing ourselves in cvs, books and other writings. If we have to pay, this will deprive some older people of the ability to use the title which gives them a sense of self worth and therefore it is ageist, because they have to pay after they have ceased to earn income from the legal profession or any related activity. There seems to be no public protection rationale for this requirement.

Restoring the annual keeping of the roll exercise

Response ID:192 Data

2. About you

1.
First name(s)

Christopher

2.
Last name

Roblett

3.
Please enter your SRA ID (if applicable)

130702

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

New Zealand Ministry of Transport

9.
Please specify if you are

an in-house solicitor

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Given my contact details on MySRA are up to date and I only found out about the consultation from an SRA update, I'm approaching this with a degree of cynicism.

The consultation does not make it clear how it is proposed to implement the exercise. Surely in 2022 there is no need to non-practicing solicitors to complete a form, post it to the Law Society and for an individual to manually check it and update the records if required as occurred prior to 2014?

I currently practice as a Barrister and Solicitor in New Zealand. Each year I log into my NZLS account and tick boxes to confirm that I continue to meet requirements to practice.

Is it intended that a similar requirement would be imposed on non-practicing solicitors to log into their MySRA account at least annually and update their details or check a box confirming the accuracy of the record?

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I can't really comment as the consultation document fails to explain what the exercise would entail. I find it difficult to imagine that implementing an IT solution as mooted above would justify an indefinite charge of £30-£40 per non-practicing solicitor per year.

I would accept it reasonable to make a charge if a non-practicing solicitor did not comply with such a requirement, was removed from the roll and applied to be restored.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The proposal will fall disproportionately on older solicitors who wish to remain on the roll for sentimental reasons. The fact that one was on the roll and is no longer on the roll may raise questions about why someone is no longer on the roll.

Restoring the annual keeping of the roll exercise

Response ID:196 Data

2. About you

1.
First name(s)

Karen Sarah

2.
Last name

Rodgers

3.
Please enter your SRA ID (if applicable)

155738

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Member of the public

8.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

9.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

It seems reasonable to check annually that details are still correct provided that the exercise does not result in anyone being removed from the Roll simply by default.

10.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It is reasonable to ask members to cover such necessary minimal costs as are involved in administering their data. However, it is hard to see what substantive costs the annual exercise would incur given that the technological advances have simplified the process which it seems would now simply consist of an automatic annual email reminder to the member to check their details

and confirm that they are still correct. The current average hourly rate of an office administrator is approximately £10 and it seems hard to imagine that renewal would take up more than an hour of an administrator's time.

11.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Members have worked hard to achieve their membership of the Roll and it would be wrong to deprive a member of membership simply because a reminder to update had gone astray or because the cost of remaining on the Roll had become prohibitive. The cost of the process should be limited explicitly by being linked to say the cost of paying an office administrator for an hour.. Those who are responsible for administering this system should keep in mind that some members will not be using mobile devices or email. Noone should be deleted from the Roll until and unless the administrators have been in communication with the member, or if appropriate his or her executers, regarding their membership and received a response. If the administrators have attempted to contact a member but not heard then it would be reasonable to mark the entry against their name to indicate this fact but not to delete the member.

Restoring the annual keeping of the roll exercise

Response ID:203 Data

2. About you

1.
First name(s)

Warren

2.
Last name

Kaufman

3.
Please enter your SRA ID (if applicable)

365451

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, it is reasonable, so long as the fees do not increase significantly year after year. I also believe it would be a good idea to exempt from the fee lawyers who are in government practice outside of the United Kingdom, for example nonpracticing solicitors who are Assistant United States Attorneys in a jurisdiction within the United States. The exemption is provided to similarly situated solicitors with the UK central government.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, it is reasonable, so long as the fees do not increase significantly year after year. I also believe it would be a good idea to exempt from the fee lawyers who are in government practice outside of the United Kingdom, for example nonpracticing solicitors who are Assistant United States Attorneys in a jurisdiction within the United States. The exemption is provided to similarly situated solicitors with the UK central government.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:211 Data

2. About you

1.
First name(s)

Norman

2.
Last name

Macleod

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired Solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No cost for a retired non practicing solicitor

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:216 Data

2. About you

1.
First name(s)

Timor

2.
Last name

Malalasekera

3.
Please enter your SRA ID (if applicable)

633497

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Solicitor non-practising

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do not agree with it. I strongly believe that those of us who, for various personal reasons, have chosen to not apply for a practising certificate should not be subjected to additional costs each year to retain something that we worked so hard to obtain.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

I don't think applying a fee is appropriate or justified given that administrative tasks should be minimal.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No opinion

Restoring the annual keeping of the roll exercise

Response ID:224 Data

2. About you

1.
First name(s)

Niels

2.
Last name

Frenzen

3.
Please enter your SRA ID (if applicable)

439789

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

University of Southern California, Gould School of Law

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes. I have no information to the contrary.

Restoring the annual keeping of the roll exercise

Response ID:239 Data

2. About you

1.
First name(s)

Ian

2.
Last name

Gatenby

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

7.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

8.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

9.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, I agree

10.
3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No views

Restoring the annual keeping of the roll exercise

Response ID:252 Data

2. About you

1.
First name(s)

Cassandra Jane

2.
Last name

Cartwright

3.
Please enter your SRA ID (if applicable)

158771

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

n/a

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Don't mind either way.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The exercise should be without cost - either completely or at least for those who update their own details online. Alternatively perhaps a one-off lifetime fee of, say, £100 and an obligation or understanding that details will be updated whenever necessary. An automated email which gets a single, simple "I confirm" - which response then feeds automatically back into the system - surely cannot warrant a £40 hit each time.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:263 Data

2. About you

1.
First name(s)

Jean

2.
Last name

Blakemore

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Solicitor without a practising certificate

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I am unsure how this proposed charge is generated or justified. If the annual updating exercise is carried out by those on the roll using the MySRA portal, the only administration will be supervisory. Given that applications for practising certificates are now completed online and one reason cited for this change is a new, presumably better computer system available to the SRA, the proposed level of charge at £30 to £40 seems excessive. I agree a nominal charge would be appropriate.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I am not in a position to challenge the assertions of the EIA

Restoring the annual keeping of the roll exercise

Response ID:273 Data

2. About you

1.
First name(s)

David

2.
Last name

Rees

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

No.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.

Restoring the annual keeping of the roll exercise

Response ID:292 Data

2. About you

1.
First name(s)

JOHN

2.
Last name

ROBINSON

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:297 Data

2. About you

1.
First name(s)

John

2.
Last name

Crawford

3.
Please enter your SRA ID (if applicable)

098773

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:300 Data

2. About you

1.
First name(s)

Luigi

2.
Last name

Faraone Mennella

3.
Please enter your SRA ID (if applicable)

301041

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Luigi Faraone Mennella

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

YES

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I AGREE

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I AGREE

Restoring the annual keeping of the roll exercise

Response ID:303 Data

2. About you

1.
First name(s)

Peter

2.
Last name

Watson-Lee

3.
Please enter your SRA ID (if applicable)

113921

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

In principle, yes.

I am a Law Society Council member for Dorset and have a number of expressions of concern from retired Solicitors about this proposal. They have expressed concerns over the cost but the more important and sensitive issue is what people will be allowed to call themselves. If they are not practising and do not apply to remain on the roll, will they still be able to refer to themselves as a 'Retired Solicitor' or a similar name. Many have given their whole working lives to the profession and feel it would be unfair to

be denied the right to do that. The consultation does not address this important issue I suggest careful consideration needs to be given to it.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I accept the re-creation of the roll will require work, but once it is set up, one would hope the annual fee could be reduced. The project should be cover it's cost but not be a fee earning excerise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:304 Data

2. About you

1.

First name(s)

Jeremy Basil Canter

2.

Last name

Simmonds

3.

Please enter your SRA ID (if applicable)

97409

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

Retired

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:316 Data

2. About you

1.
First name(s)

David

2.
Last name

Bailey

3.
Please enter your SRA ID (if applicable)

302162

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired Solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

In your Consultation Paper you state that the GDPR and the Seven Principles impose upon you as a Data Controller a legal requirement to maintain up to date records. As this is a legal requirement I cannot understand why you are asking this question of me as it is immaterial if I agree or disagree, the legal requirement is on you as the Data Controller. You are required by law to keep up to date records.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

In your Consultation Paper you state that Solicitors can easily update their records using the MySRA portal. I have accessed this today, (13.04.2022), and I have checked my record and it is up to date. Therefore if I am able to update my record easily why do you wish to charge me a fee for doing so? If you are going to require me to provide you with my details on an annual basis and your notification will be by e-mail, which is how you usually contact me, in fact the only way you have ever contacted me, please explain to me as a non-profit making organisation why you need to charge me £30-£40 for something that I am doing for you i.e. confirming my current status. I never understood why I had to pay £20 each year for the annual keeping of the roll exercise and I certainly do not understand why some eight years later you wish to impose a fee of £30-£40 for the same exercise. In short no I do not consider it fair or proportionate to charge for this exercise.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have not had to carry out an EIA myself, why would I? Therefore I can neither agree or disagree with your conclusions, neither can I provide you with any other information.

Restoring the annual keeping of the roll exercise

Response ID:317 Data

2. About you

1.
First name(s)

Michael

2.
Last name

Howells

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

As it appears to be a legal requirement under GDPR, no objection is possible.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The Consultation Paper says that: 'Our 2014 consultation clearly stated that we felt the annual exercise at that time was a "burdensome process" and a "regulatory burden" and the individual respondents to the consultation agreed with this view. Since then, we have introduced a new IT system that has improved any updates or notifications of changes of status. The result is the process is no longer administratively burdensome for solicitors or for us.' If the collection of this data is no longer administratively burdensome for the SRA, it is difficult to see why any fee is justifiable. I have long ceased to practice and am living on a fixed pension/annuity income. Any additional expenditure is unwelcome even if it is trivial in the eyes of the SRA. There should be no fee for what is a simple on-line exercise.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment.

Restoring the annual keeping of the roll exercise

Response ID:328 Data

2. About you

1.
First name(s)

Nazar Muhammad

2.
Last name

Sheikh

3.
Please enter your SRA ID (if applicable)

145986

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired Solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

yes fair and proportionate

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

yes

Restoring the annual keeping of the roll exercise

Response ID:345 Data

2. About you

1.
First name(s)

Adrian

2.
Last name

Clemens

3.
Please enter your SRA ID (if applicable)

117503

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired/non-practising solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) **Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?**

Yes.

11.
2) **Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?**

No. I am not a wealthy retired solicitor, and am of modest means. Many solicitors experience a marked reduction of income after retirement. I wish to continue to be entitled to call my self a non-practising solicitor, having studied and then practised for a total of 41 years. Furthermore, there are bogus websites that imply that retired solicitors are still in practise (I have reported this to SRA). It is essential that records of solicitors are kept up to date until they die. Why should the cost of this fall on retired solicitors? The cost should come from the practising certificate fee or Law Society's other revenue.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I would answer yes and no to these questions respectively.

Restoring the annual keeping of the roll exercise

Response ID:351 Data

2. About you

1.
First name(s)

Brian

2.
Last name

Scott

3.
Please enter your SRA ID (if applicable)

129440

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Self employed

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No - you have not considered whether a less frequent exercise would comply with your legal duties (E.g. 5 years)

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The fee is excessive for an annual exercise which will primarily be an IT exercise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comments

Restoring the annual keeping of the roll exercise

Response ID:353 Data

2. About you

1.
First name(s)

Emma

2.
Last name

Rawlins

3.
Please enter your SRA ID (if applicable)

25307

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Non practising solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. There are other ways of checking data is up to date and whether an individual agrees to their data being held. This exercise will be as cumbersome as before and unnecessarily expensive for the individual concerned.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

The exercise is unnecessary but if the SRA is determined to force this upon members, surely a contribution could be requested, allowing those with little income, particularly at this time, to remain on the Roll through subsidy in effect from other members?

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have not been sent any details of the EIA.

Restoring the annual keeping of the roll exercise

Response ID:361 Data

2. About you

1.
First name(s)

Paul Richard

2.
Last name

Sheridan TD

3.
Please enter your SRA ID (if applicable)

116506

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. As now. I do not pay to hold my University Degree.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No. Stop wasting time and money.

Restoring the annual keeping of the roll exercise

Response ID:369 Data

2. About you

1.

First name(s)

Clare Michaela

2.

Last name

Franklin

3.

Please enter your SRA ID (if applicable)

420336

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

non-practising

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I can imagine the need for a periodic audit, but would query the need for it to be annual.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Given that it is all likely to be conducted online, with the (in my case) the non-practising solicitor being responsible for updating the information through the online portal, I find £30-£40 to be rather excessive. Anyone who does not respond their details can be auto-archived. I don't know why the cost is so high when the onus will be on the solicitor, and much of the process these days can be automated. I earned the right to be on the roll, so I'm unsure why I have to pay a more than a minimal amount to stay on it - especially if my details are unchanged/it is my responsibility to change it.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

N/A

Restoring the annual keeping of the roll exercise

Response ID:373 Data

2. About you

1.
First name(s)

GERALD

2.
Last name

HOWELLS

3.
Please enter your SRA ID (if applicable)

108786

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

RETIRED NON PRACTICING SOLICITOR

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

YES

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I WOULD AGREE TOTALLY TO AN ADMINSTRATION CHARGE OF YOUR ANTICIPATED £30-£40

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I AGREE WITH YOUR CONCLUSIONS . AS A PERSON FROM A WORKING CLASS BACKGROUND IT WAS AN HONOUR TO RECEIVE MY LAW DEGREE IN 1973 AND THEN AFTER MY ARTICLES OF CLERKSHIP AND PASSING MY FINALS IN 1976 TO ATTEND AT CHANCERY LANE FOR THE ADMISSION AND TO BE SPOKEN TO AND HANDED MY CERTIFICATE BY THE MASTER OF THE ROLLS LORD DENNING IN THE PRESENCE OF MY PARENTS . A MEMORY THAT I HONOUR AND CHERISH AND NOW RETIRED IT IS GREAT TO BE STILL ON THE ROLL AND CAN REFER TO MYSELF AS NON-PRACTICING SOLICITOR AFTER ALL THESE YEARS COMING UP 50 YEARS .

Restoring the annual keeping of the roll exercise

Response ID:376 Data

2. About you

1.

First name(s)

Anthony Robert Jago

2.

Last name

Pegler

3.

Please enter your SRA ID (if applicable)

192459

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

Retired

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I consider the charge to be fair and proportionate. I wonder whether there would be any advantage in having an alternative for it to be paid annually by standing order or direct debit.

I wonder whether retired/ non-practising solicitors could be permitted to remain Commissioners for Oaths, since this is at present linked to a practising certificate. This would appear reasonable since the experience is there and would be comparable to court administrators and magistrates being able to undertake this service . It would enable the service to be offered to friends and acquaintances and would enable the fees to go towards the payment of the administration charge.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree with the conclusions.

Restoring the annual keeping of the roll exercise

Response ID:377 Data

2. About you

1.
First name(s)

Alun Wyn

2.
Last name

Hughes

3.
Please enter your SRA ID (if applicable)

11253

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Na

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I respectfully suggest that the proposed range is on the high side. I feel that a maximum of £25 - £28 is fairer to the majority.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no particular view on this

Restoring the annual keeping of the roll exercise

Response ID:381 Data

2. About you

1.

First name(s)

Richard

2.

Last name

Snow

3.

Please enter your SRA ID (if applicable)

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

It is an outrageous charge to make on an annual basis and totally unfair to burden retired solicitors who wish to be kept on the Roll. All you have to do is send an e-mail to the registered e-mail address asking if you want to stay on the Roll or not and giving a link to reply if you absolutely must do it. If you wish to clean your list that is up to you but you should fund it from your general funds rather than to charge retired solicitors.

You have been down this road before and it is unfair to try to go back to the failed old system just like The BBC did with the TV Licence fee which universally upset retired people who felt they had been cheated.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment to make on this aspect.

Restoring the annual keeping of the roll exercise

Response ID:400 Data

2. About you

1.
First name(s)

Dennis

2.
Last name

Stukenbroeker

3.
Please enter your SRA ID (if applicable)

135387

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:402 Data

2. About you

1.
First name(s)

Martin Griffin

2.
Last name

WHITSTON

3.
Please enter your SRA ID (if applicable)

122328

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Strongly Disagree. Looks like a fee earning exercise to me. The SRA should enforce non disclosures or inaccurate disclosures aggressively including summary Striking Off The Roll for dishonesty.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Disagree with the SRA plan. You have done it before. Disagree with any charge. Complete waste of time and cost. If, against my opinion you do proceed, I require a waiver on costs for all Old Age Pensioners, of which I am one.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Not concerned. Not applicable to me.

Restoring the annual keeping of the roll exercise

Response ID:411 Data

2. About you

1.
First name(s)

Stella

2.
Last name

Westmacott

3.
Please enter your SRA ID (if applicable)

133683

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No I do not. It seems to be unnecessary. A simple email could be sent out with a simple question to answer Yes or No.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I do not. Costs can be avoided if there was not a requirement of an annual keeping of the roll exercise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No. It will largely impact retired Solicitors.

Restoring the annual keeping of the roll exercise

Response ID:430 Data

2. About you

1.
First name(s)

John

2.
Last name

Lawrence

3.
Please enter your SRA ID (if applicable)

103964

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, I feel that the Authority should keep the present system.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not understand why the charge is so high, surely a fee of say £10 would cover the minor additional cost

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No I do not, I do not accept that an EIA of the type you envisage is necessary or appropriate. The issue here is no more than a list of mainly retired solicitors. I do not see that there is any impact on other groups or anything that would raise their concerns.

Restoring the annual keeping of the roll exercise

Response ID:439 Data

2. About you

1.
First name(s)

Charlotte

2.
Last name

Kibler

3.
Please enter your SRA ID (if applicable)

643551

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other legal professional

8.
Please specify

French avocat and qualified solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. I think this should be free like in my country. Each solicitor even those who are retired or no longer practising should be responsible for keeping their data up-to-date by connecting with their ID and password.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no opinion about it.

Restoring the annual keeping of the roll exercise

Response ID:442 Data

2. About you

1.
First name(s)

Nigel

2.
Last name

Duckworth

3.
Please enter your SRA ID (if applicable)

107049

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes. It will cost money. However, the previous fee was £20 and the proposed upgrade in fees is between 50 and 100% of this figure in 7 years from 2015 which i think should be justified. Either the previous fee was too low or the proposed figure too high. May I suggest that the figure should be variable. If no details are to be changed, the figure should be between £20 and £30. If new details are submitted, then more work will be required and the fee might extend from £30 to £40. Personally, none of my details has changed from 2014 to the present and, being retired, receive no financial benefit from continuing on the roll. However, my qualification does benefit friends and acquaintances who ask, for instance, that their wills be witnessed or passport applications be certified, the latter requiring a specified person, such as a solicitor, to formally vouch for the applicant. These favours are of course done without fee.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes. See above for impact on other groups and evidence.

Restoring the annual keeping of the roll exercise

Response ID:452 Data

2. About you

1.
First name(s)

John

2.
Last name

de Frece

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

de Frece

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Nothing to add

Restoring the annual keeping of the roll exercise

Response ID:472 Data

2. About you

1.
First name(s)

Anthony Michael

2.
Last name

Heneker

3.
Please enter your SRA ID (if applicable)

92710

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. The present position is perfectly adequate. The data protection aspect is to protect us - those on the roll - not the SRA and we don't need any "protection from you. It has the hallmark of a money gathering exercise. Leave well alone.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Don't introduce and you won't have the problem of whether to charge and if so how.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I don't see how "equalities" or "inequalities" comes into it. The next set of questions show that you are being influenced by the woke brigade.

Restoring the annual keeping of the roll exercise

Response ID:497 Data

2. About you

1.
First name(s)

Paul

2.
Last name

Davies

3.
Please enter your SRA ID (if applicable)

152924

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired Solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. The rationale is flawed and constructed primarily with a view to generating income for the SRA. Timely periodic emails to non practising solicitors reminding them to ensure personal information is kept up to date should be sufficient. The few who choose not to use email who are retired could be advised by post.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Retired solicitors should not be expected to pay the same charge as solicitors who are in employment yet exempt from holding a practising certificate.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

There will be a negative impact on elderly retired solicitors who are no longer in employment and cannot afford the proposed charge.

Restoring the annual keeping of the roll exercise

Response ID:498 Data

2. About you

1.
First name(s)

Samantha

2.
Last name

Woods-Peel

3.
Please enter your SRA ID (if applicable)

167283

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Academic

8.
Please enter the name of your institution

Open University

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) **Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?**

Yes

11.
2) **Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?**

Given that you say "We now have a modernised IT system, particularly the user interface. This will make the process of maintaining personal records considerably less arduous for solicitors than it was." I do wonder what administrative burden you will be put under. You will no doubt have a email list of solicitors without practising certificates (like me) and will emails us annually inviting us to go onto mySRA and confirm our wish to remain on the roll. If we do, we click the relevant button. If we don't do so, we come off the roll.

I do not see what administrative burden you have to charge for really when you are just sending out one email a year. If people change email addresses or haven't supplied you with one and don't get that email, then you can charge for the process of putting them back on. So the people actually causing an administrative burden pay for it!

If the keeping of the roll exercise goes through mySRA, the burden on the SRA is minimal for the majority of people who will stay on the roll or who consciously want to come off. For those who don't keep you updated, they will pay any admin fees required (with waivers possible for those clearly disadvantaged by the policy in the first place - remembering, if you waive the admin fee for restoring to the roll the first time, you can extract correct details and warn it will not be warned again). On that basis I DO NOT find it fair and proportionate to charge everyone for this exercise.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree broadly. The old are the ones likely to be impacted as they are least likely to have emails. That said, those without email addresses at all are going to be a declining group, and if impacted by this policy judicial use of waivers will lessen the impact.

Restoring the annual keeping of the roll exercise

Response ID:502 Data

2. About you

1.
First name(s)

david

2.
Last name

jacobson

3.
Please enter your SRA ID (if applicable)

302860

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

None practising

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, but I do not think a fee should be charged

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Unfair. I am on a pension and such a fee could cause me financial hardship

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

yes

Restoring the annual keeping of the roll exercise

Response ID:523 Data

2. About you

1.
First name(s)

Janis Lyn

2.
Last name

Purdy

3.
Please enter your SRA ID (if applicable)

115220

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I agree that it is becoming more and more important to keep an updated list of solicitors who wish to remain on the Roll. The size of the Roll is growing year by year and the list becomes increasingly inaccurate. There will be some people who are now deceased. There will be other people who, if you asked them, do not wish to remain on the Roll but had completely forgotten that they are on it, and are out of touch with the SRA and The Law Society.

Tidying up the Roll will be of great assistance to The Law Society which, as I understand it, relies on the SRA database to communicate with members and obviously needs accurate contact details.

I therefore agree with the SRA's proposal to reintroduce the annual keeping of the Roll exercise – but I do not agree with some of the detail of that proposal, particularly with regard to charges. See response to question 2.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Given the SRA's clearly stated position that their improved IT systems will make the exercise much easier and more straightforward than previously, then the proposed charges would seem to be excessive. There will probably be more work needed in the first year, but after that the work involved should be far less.

Therefore a fee of say £10 would be more reasonable and proportionate. A fee of £30 - £40 smacks of a money-making exercise. I would think that both the SRA and The Law Society want as many solicitors as possible be on the Roll and to stay on it. A high fee is going to put people off, especially those who perceive that staying on the Roll gives them very little benefit, if any.

The only Regulations I have been able to find are the Solicitors Keeping of the Roll Regulations 2011. The proposed amendments to the Regulations as set out in Annex Two do not make sense in the context of the 2011 Regulations. The consultation should have annexed the version of the Regulations which it is proposed to amend.

The 2011 Regulations set out in paragraphs 8 and 9 the circumstances in which a solicitor may be removed from the Roll or refused restoration to the Roll – i.e. where there are outstanding complaints or disciplinary proceedings. I am assuming that a check on these matters by the SRA constitutes the "character and suitability assessment" .

I do not see why the SRA should charge £39 for that assessment when it should involve no more than a straight search of their own records. This is an additionally punitive measure, particularly in the case of solicitors who for some reason dropped off the Roll through personal circumstances, inadvertence, or because they had lost touch, changed addresses. And they would be in the majority of those applying for restoration to the Roll.

The consultation should have asked a direct question about the character and suitability assessment and the proposed charge for that.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment to make.

Restoring the annual keeping of the roll exercise

Response ID:524 Data

2. About you

1.
First name(s)

GERALD

2.
Last name

HOWELLS

3.
Please enter your SRA ID (if applicable)

108786

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

RETIRED NON PRACTICING SOLICITOR

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) **Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?**

YES

11.
2) **Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?**

I ACCEPT YOUR ANTICIPATED VIEWS OF AN ADMINISTRATION CHARGE OF £30-£40

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I AGREE AND HAVE NO COMMENTS TO MAKE FURTHER . I RELY ON YOUR VIEWS AS EXPERTS .

Restoring the annual keeping of the roll exercise

Response ID:552 Data

2. About you

1.

First name(s)

Robert Frederick Dennis

2.

Last name

Naylor

3.

Please enter your SRA ID (if applicable)

104390

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

I am retired

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not think it fair or proportionate to charge non practicing Solicitors £30-40 annually for keeping their name on the Roll. You say in your consultation paper that recent computerisation makes the process much easier than it used to be. Consequently it would be far more proportionate to charge a nominal fee of say £10 and to update the details of non practicing Solicitors on the Roll once every five years.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Your proposals will unfairly impact retired Solicitors of all ethnic backgrounds and genders. Also women who have career breaks are likely to be adversely affected.

Restoring the annual keeping of the roll exercise

Response ID:558 Data

2. About you

1.
First name(s)

ARJ

2.
Last name

Penny

3.
Please enter your SRA ID (if applicable)

96985

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

retired solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

an ANNUAL exercise seems way over the top why should I have to pay to participate in an exercise that has no real benefit. I worked hard to become a solicitor and I have been proud to be both a solicitor and now a retired solicitor and you want to take this away unless I pay a not insubstantial fee each year..... for what seems to be a very bureaucratic reason .

The SRA has never made the slightest effort in the past to maintain the accuracy of the register ... I cannot ever remember seeing any reference to it in update ... until now. I accept the register needs to be kept up to date but for the likes of me do we really need the full exercise every year.... would it not be better to send out reminders to retired solicitors to keep their particulars updated and then carry out the full exercise every 5 or 10 years.

I am struggling to see the real harm that you are seeking to avoid which justifies the full annual rigmarole
I assume I would also lose my visiting privileges at Law Society's Hall ... which seems a bit hard.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Annually - not acceptable and unreasonable as I get no financial advantage from being able to call myself a "retired solicitor"
Every 5 or 10 years I accept that it would be reasonable to carry out the exercise to ensure the roll is up to date ...

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

no comment

Restoring the annual keeping of the roll exercise

Response ID:564 Data

2. About you

1.
First name(s)

I

2.
Last name

Sol

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

on behalf of an organisation

7.
On behalf of what type of organisation?

Law firm or other legal services provider

8.
Please enter your organisation's SRA ID (if applicable)

9.
Please enter your organisation's name

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. This is stealth tax on people practicing in local government or under other legislation working for central government having to pay annual fees. 10 pound maybe but 40 per year is nonsense. What is this? Some kind of protection racket? SRA is acting like a mafia of late last 3-5 years as if so far from being in touch with reality faced by Solicitors practicing or not practicing. This is just one more nail in the coffin of acting in interests of solicitors and instead raising funds by stealth under the guise of so called GDPR. Wake up and stop this nonsense. You're making enough money from practicing fees already.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. 10 pound is enough if not it should be free. What are we done protection racket? What are we racketeering now? Are practicing fees not bringing enough money in so we need to stoop to these depths

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes the poorest who ended up not practicing are those in the BAME categories also working as non practising and it is those most affected you wish to drum up new taxes fees from unnecessarily

Restoring the annual keeping of the roll exercise

Response ID:579 Data

2. About you

1.
First name(s)

Robert

2.
Last name

Roscoe

3.
Please enter your SRA ID (if applicable)

109126

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No need for any charge at all.

I paid for a practising certificate from 1976 until I retired in 2018-2019.

I am aware that were I to want to practise again I would need a further practising certificate.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

N/a

Restoring the annual keeping of the roll exercise

Response ID:610 Data

2. About you

1.
First name(s)

Katie

2.
Last name

Paxton

3.
Please enter your SRA ID (if applicable)

24261

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Oxford Diocesan Board of Education

9.
Please specify if you are

an in-house solicitor

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, the list at present is of little value. Updating it annually will ensure that it is kept up to date and relevant.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I do not agree with the assumption that solicitors over 51 are more likely to have retired, particularly those under 60. It is equally likely that they are working in contexts that do not need a practising certificate. However, the conclusion remains that keeping the roll up to date is in their interests.

Restoring the annual keeping of the roll exercise

Response ID:620 Data

2. About you

1.

First name(s)

WILLIAM JOHN

2.

Last name

MARKWELL

3.

Please enter your SRA ID (if applicable)

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

WJ Markwell & Associates, Lawyers

9.

Please specify if you are

an in-house solicitor

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

YES

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Sounds reasonable

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes agree

Restoring the annual keeping of the roll exercise

Response ID:633 Data

2. About you

1.
First name(s)

Alan

2.
Last name

Preskett

3.
Please enter your SRA ID (if applicable)

91252

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired Solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If there is to be a charge, this should reflect the age and length of time in practice. Thus, a solicitor who has just retired at 65 would pay more than one of 80 years of age.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:642 Data

2. About you

1.

First name(s)

Richard Eugène Peter

2.

Last name

SPENCER

3.

Please enter your SRA ID (if applicable)

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No!

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

Your blurb tells me that your system is much more modern and efficient, yet, apparently, it will cost up to forty quid to hit < return> No change < return>!

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

While I have no evidence, other than my own situation, I do not think you have grasped the age situation! I'm 78, was admitted in 1979, took out the three Practising Certificates that I was allowed without paying into the compensation fund, and retired from the Army Legal Services in 1995 - I've stayed put since then in one place.

Restoring the annual keeping of the roll exercise

Response ID:647 Data

2. About you

1.
First name(s)

Lancelot William Gregory

2.
Last name

Robson

3.
Please enter your SRA ID (if applicable)

113327

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, if it is of any practical use to the profession.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

For an online based exercise, this seems excessive. It should only cost a matter of pence if properly organised. I suggest an annual fee of £5, so that those who wish to remain on the Roll have to actively consider their continuing presence. For me personally, (and I suspect many other retired solicitors), I remain on the Roll to show my support for, and continuing interest in, the profession. Retaining the right to an unused and somewhat negative appellation is of no use to me.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I find no reason to disagree with your conclusions.

Restoring the annual keeping of the roll exercise

Response ID:651 Data

2. About you

1.
First name(s)

Nicholas

2.
Last name

Walton

3.
Please enter your SRA ID (if applicable)

424364

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I most certainly agree with proposals by the SRA for annual record keeping. An annual response is sufficient to confirm one's continued use of the roll.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

SRA is a professional body representing the interests of the profession, a small fee to support their function is acceptable.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

None

Restoring the annual keeping of the roll exercise

Response ID:654 Data

2. About you

1.
First name(s)

Robert

2.
Last name

Symons

3.
Please enter your SRA ID (if applicable)

105185

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, I don't have a problem with it.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, it's reasonable.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:656 Data

2. About you

1.
First name(s)

Paul

2.
Last name

Martin

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Cavendish Munro

9.
Please specify if you are

an in-house solicitor

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:659 Data

2. About you

1.

First name(s)

simon dudley

2.

Last name

armstrong

3.

Please enter your SRA ID (if applicable)

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Other legal professional

8.

Please specify

Notary public

9.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, because I believe it is excessive red tape .

I am traceable as a Notary and I guess others will be equally traceable

It seems to me that a triennial check should be sufficient because from year to year only a small degree of difference in recorded data will arise .

In other words, while appreciating the need to keep track of us so no repeat of registration would be wrong , to require annual re-registration is unduly excessive and once every three years should suffice . There is too much unnecessary bureaucracy in life and my suggestion would cut it by 2/3rds

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Obviously bureaucracy , necessary or otherwise, costs money and practising solicitors should not subsidise us retirees.

If the fee occurs once every three years , £30.00 would be reasonable

If every year £10 should suffice- especially if you programme things so the actual work of providing GDPR compliant info is computerised so the solicitors concerned do all the work and all the SRA has to do is maintain the computer records

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No view

Restoring the annual keeping of the roll exercise

Response ID:666 Data

2. About you

1.
First name(s)

Gerald Peter

2.
Last name

Funnell

3.
Please enter your SRA ID (if applicable)

87969

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

not emploued

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

IF IT IS THOUGHT NECESSARY. i NO LONGER WORK OR GIVE LEGAL ADVICE, I AM PROUD TO BE A SOLICITOR AND WISH TO CONTINUE AS A SOLICITOR NON PRACTICING

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I would be happy to pay a reasonable sum so that I can remain on the Roll and see all general e-mails issued by the Law Society and see the magazine on line and read the daily remarks from the Gazette as to what is happening in the Profession. I am 87 years of age [dob 22.06.1934]

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

i have no view on this

Restoring the annual keeping of the roll exercise

Response ID:672 Data

2. About you

1.
First name(s)

Luigi

2.
Last name

Faraone Mennella

3.
Please enter your SRA ID (if applicable)

301041

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Luigi Faraone Mennella

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

yes

Restoring the annual keeping of the roll exercise

Response ID:674 Data

2. About you

1.
First name(s)

Charles

2.
Last name

Smith

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do not agree to the proposed reintroduction of keeping of the Roll for solicitors who have been established on the Roll for several years. Once on the Roll it is not necessary to indulge in the expense and duplication of further registration bureaucracy. Until a solicitor comes off the Roll, voluntarily or otherwise, the solicitor, having qualified to be on the Roll, should remain on the Roll without further ado. The proposed reintroduction of a further registration process is quite unnecessary, and instead of allowing itself to be distracted and deviating into a wasteful exercise, the SRA should concentrate on the important role of regulation.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The question is based on a rebuttable presumption in that it assumes the proposed reregistration is a foregone conclusion; administration of fees consequent upon reregistration is a wasteful and unnecessary exercise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:677 Data

2. About you

1.
First name(s)

Paul C M

2.
Last name

Solon

3.
Please enter your SRA ID (if applicable)

101004

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Solicitor (non-practising) & Notary

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) **Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?**

yes

11.
2) **Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?**

I can't argue with a modest fee of £30 to £40, but perhaps there might be an exemption for those of us of a certain longevity (I declare an interest - I am 73 and admitted in 1973!)

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

yes

Restoring the annual keeping of the roll exercise

Response ID:681 Data

2. About you

1.
First name(s)

Cara

2.
Last name

Rodger

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

That charge seems reasonable, though obviously likely to increase.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No further info. Your conclusions sound correct.

Restoring the annual keeping of the roll exercise

Response ID:691 Data

2. About you

1.
First name(s)

Pedro

2.
Last name

Lorenti

3.
Please enter your SRA ID (if applicable)

635481

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Non-practising solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) **Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?**

Yes

11.
2) **Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?**

Yes

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no information about the impact of the proposals on any other groups.

Restoring the annual keeping of the roll exercise

Response ID:693 Data

2. About you

1.

First name(s)

Francis walford

2.

Last name

TAYLOR

3.

Please enter your SRA ID (if applicable)

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

Yes.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No view

Restoring the annual keeping of the roll exercise

Response ID:697 Data

2. About you

1.
First name(s)

Edgar Ramón

2.
Last name

Wagner

3.
Please enter your SRA ID (if applicable)

157856

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Anglo-Spanish Law

9.
Please specify if you are

an in-house solicitor

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

£30 to £40 seems OK to me, but it must not ever become a money-making exercise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree with the equality impact assessment.

Restoring the annual keeping of the roll exercise

Response ID:720 Data

2. About you

1.
First name(s)

Michael

2.
Last name

Blacklidge

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

Agree with nominal fee

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Agree

Restoring the annual keeping of the roll exercise

Response ID:731 Data

2. About you

1.
First name(s)

Rosanne

2.
Last name

Ward

3.
Please enter your SRA ID (if applicable)

108621

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

The SRA decided to abandon the annual exercise in 2015, as being no longer required. The basis for reintroducing this is given as GDPR requirements on data keeping. The regulations merely require data to be kept up to date " where necessary". This is not the same as every year, and once in three or four years would serve the same purpose. To do it annually is un necessarily gold plating the exercise and generating fees from it. The main reason to remain on the Roll has nothing to do with using the Law Society's Hall, which can be of interest only to a tiny local percentage, or voting in elections, again of limited interest to the

great majority, and everything to do with the simple desire to retain that hard won qualification.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

A modest fee of say £20/£25 is fair and reasonable, if only charged once in two or three years. This exercise is, by the SRA's own account, one which will be dealt with by its much improved IT systems, and should not involve any great degree of effort. The input will all be done by those who wish to remain on the roll. A fee of £40 per person per annum from each of the 60,000 non practising Solicitors on the Roll would generate £2.4 million income per annum for the SRA. This is out of all proportion to the scale of the exercise, and it is difficult to see the proposal as anything more than a money raising exercise. Not all non practising Solicitors are rich, many are retired and have fixed incomes and have to have regard to the ever increasing cost of living. Having taken out a practising certificate for many years, I feel that I have made my contribution, and I am reluctant to fund the SRA's latest proposal at the level or frequency. I value having achieved my admission to the Roll of Solicitors, and having my name on the roll but I am unwilling to support this proposal and would have to remove my name.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

It is clear that the SRA's proposals will disproportionately affect those who are retired or taking a career break. They will suffer, in a way which is unnecessary and inappropriate, from this money raising exercise. The whole ill considered proposal should be re thought.

Restoring the annual keeping of the roll exercise

Response ID:739 Data

2. About you

1.
First name(s)

Roger

2.
Last name

Topping

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

self

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. This seems to me to be a disgraceful attempt to raise money from elderly .retired solicitors who have been members of the profession for years. Those responsible should hang their heads in shame

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

There cannot be a huge number of non practising solicitors who are elderly and impecunious but who would wish to remain as non practicing solicitors for the duration of their lives. To charge them the proposed sum is outrageous and does no credit to the profession. The Society should absorb these costs.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No views

Restoring the annual keeping of the roll exercise

Response ID:749 Data

2. About you

1.

First name(s)

Andrew George

2.

Last name

Payne

3.

Please enter your SRA ID (if applicable)

113052

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Other

8.

Please specify

Non practising solicitor

9.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. An annual exercise is disproportionate for the data you will collect. I do not have numbers but I suspect that the vast majority of non practising solicitors are retired solicitors whose personal details are unlikely to change from year to year. The proposal to charge an annual fee of £30 to £40 for this process smacks of a money making exercise. For non practising solicitors it would more reasonable to update the roll every three to five years rather than annually. You could impose an obligation on anyone subject to a three to five year update to notify the SRA of any change in their personal details.

It is perhaps telling that the categories of person under the question in what capacity am I responding did not include a category for non practising solicitors. Non practising solicitors are consigned to the category of "other". As this is supposedly a

consultation about whether non practising solicitors should have to apply annually to remain on the roll I would have thought that the SRA could and should have included a non practising solicitor category. Failure to do so is perhaps a precursor for excising non practising solicitors from the roll.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. I have made the point that keeping the roll on an annual basis for non practising solicitors is disproportionate. Those of us of a certain generation were proud to have been admitted as a solicitor. The wish to remain on the roll is driven by this continued sense of pride rather than for any tangible benefit. If you plan to charge £30 or £40 every year for this privilege under the pretext of having to update data that is unlikely to change from one year to the next, I think you will find very many non practising solicitors come off the roll. That may of course be the SRA's agenda. A fee every three to five years would I believe be palatable to most.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment.

Restoring the annual keeping of the roll exercise

Response ID:752 Data

2. About you

1.

First name(s)

James Roderic Mary

2.

Last name

O'Sullivan

3.

Please enter your SRA ID (if applicable)

104467

6.

I am responding..

in a personal capacity

7.

In what personal capacity?

Solicitor

8.

Please enter the name of your firm/employer

Retired

9.

Please specify if you are

10.

How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

A charge of £30-40 is wholly disproportionate to the work involved. As the details on the roll are already logged by the SRA checking that they are current and logging any change can be simply managed by appropriate software. Likely requirement for individual interventions will be minimal. A charge of £10 would be more than enough to meet all the costs attendant on the exercise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:753 Data

2. About you

1.
First name(s)

Lee

2.
Last name

North

3.
Please enter your SRA ID (if applicable)

120540

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. Firstly: those in practice are able to offset the cost against tax, pay the charge from general fees or to seek reimbursement from employers. Those permanently retired face a disproportionately higher burden not being able to offset the charge in any way. The charge should be met from practice certificate fee. The proposed charge is to that extent discriminatory.

Secondly: properly organised, the whole scheme should require little more than a solicitor logging on to a profile page and ticking a box once per year to confirm their existence, with default triggering automatic removal. So much should incur no continuing cost.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I do not agree that permanently retired solicitors should pay a fee. For the vast majority of retired solicitors there are no practical or pecuniary advantages to remaining on the roll. The advantage for most such is solely the honour of retaining the status of non-practicing solicitor. The majority are unable to use the Law Society facilities or library (contrary to the SRA review conclusion) because of disability or distance, and trading discounts offered by the Society offer little if anything to those who are retired. I suspect the SRA would be hard pressed to show any need for past intervention in respect of permanent retirees. The SRA argument that remaining on the roll grants tangible benefits to retirees which justifies charging a fee, is unsustainable.

Restoring the annual keeping of the roll exercise

Response ID:754 Data

2. About you

1.
First name(s)

graham

2.
Last name

roberts

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

retired Solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Keep costs to minimum

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes.

No information.

Restoring the annual keeping of the roll exercise

Response ID:756 Data

2. About you

1.
First name(s)

peter michael

2.
Last name

tobias

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

no

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

I do not understand why data protection legislation obliges the society to run an annual exercise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

no view

Restoring the annual keeping of the roll exercise

Response ID:760 Data

2. About you

1.
First name(s)

Richard

2.
Last name

Norris

3.
Please enter your SRA ID (if applicable)

119919

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If the person is not working e.g. retired or on a career break then he or she is likely to have a limited income. To expect such a person who may have limited income to pay such a large fee for an automated process is not proportionate
There should be a fee remission for certain categories

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:765 Data

2. About you

1.
First name(s)

Annette

2.
Last name

Rickson

3.
Please enter your SRA ID (if applicable)

136381

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired Solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) **Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?**

Yes

11.
2) **Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?**

Yes

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

N/A

Restoring the annual keeping of the roll exercise

Response ID:766 Data

2. About you

1.
First name(s)

Michael

2.
Last name

Wakelin

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to

meet these costs?

The data relating to non-practicing retired solicitors is unlikely to change from year to year and an obligation to complete either an annual form confirming this or an obligation to report any change should have minimal cost.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:769 Data

2. About you

1.
First name(s)

Melanie

2.
Last name

Gibbons

3.
Please enter your SRA ID (if applicable)

160567

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Wellspring Academy Trust

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I agree that data should be regularly updated but believe that a biennial approach would be more appropriate and place less burden on those not practising law.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

£40 would be reasonable for a two yearly exercise and would be the equivalent of the previous yearly fee.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I think that the conclusions about make up of the group affected are probably accurate.

Restoring the annual keeping of the roll exercise

Response ID:772 Data

2. About you

1.
First name(s)

Ian Geoffrey

2.
Last name

Williams

3.
Please enter your SRA ID (if applicable)

144080

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Williams Consulting

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes. I think it is a good idea to keep in touch with those of us who are not practising particularly with a view to identity theft etc. It also helps to identify those not responding (i.e. death) and a give pause for thought as to whether staying on the Roll is appropriate for their personal circumstances.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Charging directly at that level is fine.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:775 Data

2. About you

1.
First name(s)

Tiffany

2.
Last name

Stephens

3.
Please enter your SRA ID (if applicable)

0001313

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

NA

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No having to apply to remain on The Roll annually is very annoying

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not understand how the administration fees are justified at that amount. If you do not 're introduce a need to apply to remain on the Roll annually then the administration work that goes with that will not be created. Perhaps it would be better for people to remain on the Roll automatically and only notify you if they want to be removed which would greatly reduce administration

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:780 Data

2. About you

1.
First name(s)

Michael

2.
Last name

Poulsom

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Academic

8.
Please enter the name of your institution

Manchester Metropolitan University

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No.

A significant number of solicitors without practising certificates are former practising solicitors now working in academia. Many maintain strong links with the practising profession and are enthusiastic supporters both of the profession and of potential entrants to it. Conversely, the priority for many is being able to promote the profession by way of stating that they are non-practising solicitors, and they do not require or use the associated benefits of rights to vote in Law Society Council Elections or access to the Law Society Hall or Library.

The ambition that costs of processes that are not of general application be borne by those to who such processes do apply needs to be viewed alongside the fact that unlike the proposed administrative charge which would be paid by individuals privately, practising certificate fees are not typically borne by individual solicitors, but are paid by the firms employing them.

To meet the described costs, it is suggested that the right for an individual to describe themselves as a 'solicitor (non-practising)' be separated from the right to participate in Law Society Elections, use the Law Society Hall and to enjoy the associated benefits. The latter presumably have a potential value significantly greater than the £30 - £40 envisaged. Accordingly those wishing to enjoy those associated benefits could pay a charge in excess of that sum, while those wishing only to refer to their qualification as a solicitor (with the 'non-practising' addition) could do so without charge.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes.

Restoring the annual keeping of the roll exercise

Response ID:805 Data

2. About you

1.
First name(s)

Gillian

2.
Last name

Mather

3.
Please enter your SRA ID (if applicable)

83027

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I don't fiercely object to an annual fee to stay on the Roll as a retired solicitor with no practising certificate. For hopefully obvious reasons, more people in my position are likely to pay the fee to stay on the Roll if the SRA doesn't close SIF! By staying on the Roll, solicitors may feel that they are advertising themselves to the world as alive and kicking and able to be pursued. If SIF is closed, this would be a distinct disadvantage to retired solicitors.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Many do not believe that in these days of technology and automation that such a process would be so expensive. Obviously the cheaper the better. It used to be £20 I believe. I think that's enough.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I don't have anything to say to this question

Restoring the annual keeping of the roll exercise

Response ID:807 Data

2. About you

1.
First name(s)

federico

2.
Last name

spinucci

3.
Please enter your SRA ID (if applicable)

388189

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

i agree if the amount won't exceed £30

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

yes i agree with the conclusions in your EIA

Restoring the annual keeping of the roll exercise

Response ID:816 Data

2. About you

1.
First name(s)

Alan Edward

2.
Last name

Short

3.
Please enter your SRA ID (if applicable)

100903

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Alan E Short

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

As a retired solicitor I considers an annual response to be cumbersome. A five yearly exercise is sufficient. An annual exercise would present too many opportunities for a retired solicitor to inadvertently come of the role. It is important that we have the ability to attend General Meetings and vote on proposed motions. The proposed closure of the SIF is a good example of why

this can be important not only in respect of ourselves but in terms of ensuring that wide ranging aspects including public protection is fully taken on board. The importance of notifying a change of address can always be mentioned in communications sent out by the SRA.

A five year cycle for registration rather than annual is supported.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not see the need to levy an annual charge. I paid my practicing certificate fee for some 45 years and they were to cover all administrative costs. I fail to see why this cannot continue. Practicing certificate fees continue to be paid so why cannot this fee income be used for this purpose?

It is stated that the proposed fee of £40 is small but over the total period of retirement it will become a substantial amount. It should therefore be absorbed as part of general practice fee income.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

There is no comment that I wish to make on this.

Restoring the annual keeping of the roll exercise

Response ID:817 Data

2. About you

1.
First name(s)

Simon

2.
Last name

Bruce

3.
Please enter your SRA ID (if applicable)

109418

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Seems a lot, given that it will be an annual charge

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:821 Data

2. About you

1.
First name(s)

John Albert

2.
Last name

Burrell

3.
Please enter your SRA ID (if applicable)

86255

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

The present situation is that Individuals who-

were on a date more than 50 years earlier than the present dated granted by the Judiciary the responsibilities, status and role of-

Solicitor of the Supreme Court, or

Solicitor of the Senior Courts,

but

do not now themselves have, require or seek a Practising Certificate,

do not

have to-

pay

any money for a Practising Certificate,

any money for the presence of their name on the Roll of Solicitors,

any money for the presence of their name on the Solicitors Register, or

any money for the access to the facilities afforded by their free Membership of the Law Society, or

provide the Solicitors Regulation Authority (SRA) with information about themselves.

Comment as to Data Protection for such persons

The obligations upon the SRA as to data protection in respect of personal information about people who had been admitted to the Roll over 50 years earlier but who no longer serve as such arise from its own decision to publish a 'Solicitors Register' that carries entries about such elderly former but now retired and non-practising Solicitors.

Were entries as to such individuals be eliminated from the 'Solicitors Register'-

no Member of the Public would be harmed, and

there would be no publication of personal information requiring data protection.

Comment as to a Demand for a Payment to the SRA by such persons.

The SRA will be committing an offence (Blackmail) under section 21 of the Theft Act 1968 if it makes a demand upon such an individual for a payment to-

it, or

another person or body

upon an expressed menace by the SRA that failure to pay the SRA will result in a loss by such person of his/her present immunity from charges by the SRA and/or the Law Society unless the SRA has the belief that it has reasonable grounds for making the demand and that the use of the menace is a proper means of reinforcing the demand.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the

unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Once an individual has been admitted as-

a Solicitor of the Supreme Court, or

a Solicitor of the Senior Courts,

he or she becomes subject to the jurisdiction of the Solicitors Regulation Authority (SRA) that continues unless his /her name is removed from the Roll as a result of-

disciplinary action by the SRA against him/her, whether the cause was in

a working legal, or

a non-working personal

capacity, or

an granted application by such individual to remove his/her name.

The fact of such admission to the Roll of such individual is evidenced by a Certificate issued by and on behalf of the Judiciary that identifies the individual by name and then address.

As to the Keeping of the Roll

Legislation has provided that the SRA, among its more significant and statutory tasks, is currently charged with the keeping of the Roll.

Such task only needs to record-

the initial entry of the relevant name to the Roll, and

any decision or request resulting in the removal of such name from the Roll.

Thus, action per individual is only required on two occasions.

Accordingly, an annual charge on each individual for each of the years between admission and removal is unnecessary and inappropriate.

As to the Cost of the Maintenance of the Data held by the SRA

The SRA will be committing an offence (Blackmail) under section 21 of the Theft Act 1968 if it makes a demand upon such an individual for a payment to-

it, or

another person or body,

upon an expressed menace by the SRA that failure to pay the SRA will result a loss by such person of his/her present immunity from charges by the SRA and/or the Law Society, unless the SRA has the belief that it has reasonable grounds for making the demand and that the use of the menace is a proper means of reinforcing the demand.

It is accepted by this Respondent that it is essential to the performance of the duties laid down upon it by Parliament and the Executive that the SRA has up to date personal data about those individuals who are subject to its jurisdiction.

It is not necessary for the discharge of duties placed on the SRA as a Data Controller that personal data about individuals is or may be passed by the SRA to Members of the Public or to Bodies that do not have a statutory power to require the onward communication of such information.

If the SRA properly considers that the funds allocated to it by its creators are insufficient to cover the combined cost of its many duties, it should first show that those who have proposed a relevant duty have specifically refused to arrange that necessary money will be available therefor.

The SRA currently makes no charge against those individuals who have been on the Roll for over 50 years but who do not have, require or seek a Practising Certificate.

Inn that such individuals are not, for taxation, persons conducting or employed by a business, they can not set off the expense of keeping their name on the Roll against their income.

Thus, such elderly individuals should not have to pay the SRA each year or, indeed, at all for-

accepting themselves as subject to the jurisdiction of the SRA and/or the Courts,

and/or

keeping their name on the Roll.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

This Respondent can offer no comment.

Restoring the annual keeping of the roll exercise

Response ID:825 Data

2. About you

1.
First name(s)

Elizabeth

2.
Last name

Stevens

3.
Please enter your SRA ID (if applicable)

105907

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes. I agree that the roll needs to be regularly updated.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I have no objection to a direct charge, especially as I am retired and do not hold a practising certificate and so do not contribute to the administration cost indirectly.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment to make about your EIA.

Restoring the annual keeping of the roll exercise

Response ID:830 Data

2. About you

1.
First name(s)

David

2.
Last name

Connelly

3.
Please enter your SRA ID (if applicable)

82844

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

I a retired

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

NO it is yet more unnecessary administrative work. You shared that view as recently as 2014 when we were consulted then and as a result you stopped doing it in 2015. Whilst I expect you consider there has been a change in the rules on personal data and your responsibilities in that regard all that you need to do is remind us through the MY SRA system to keep our details up to

date.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It is interesting to note your proposal to charge a fee for this planned extra administration and compare with the SRAs views about a more modest levy to sustain the SIF for Post run off cover!

Having paid PC fees over some 30 years in practice it is not reasonable to charge retired solicitors a fee for work which I am sure the majority will consider unnecessary

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment on this.

Restoring the annual keeping of the roll exercise

Response ID:841 Data

2. About you

1.
First name(s)

Vincent Anthony

2.
Last name

Bishop

3.
Please enter your SRA ID (if applicable)

94833

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Other

8.
Please specify

Retired Solicitor

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I have no objection to the re-introduction of annually applying to remain on the Roll nor of the responsibility of making an annual application to remain on the Roll and update all relevant changes in detail passing to me. I would be agreeable to making such an annual request. In the absence of such within a reasonable period (say 4 weeks) and subject to one paper reminder being sent First Class mail to my last known address as disclosed on the Roll details, I would accept that I would be removed from the Roll.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not consider in an age of computer software that any such annual fee is justified nor is it fair. For those holding University Degrees there is no provision banning them from using such Degree title until death without payment of a fee upon retirement! I worked hard to qualify and to be admitted to the Roll and have earned the right to be called a Solicitor. It has been something of which I have been proud.

I might be prepared to pay a modest contribution of say £25 to go towards the cost of altering the software but this would be a one-off payment only. After all the years that I have paid for my Practising Certificate I believe that I have earned the right for my name to remain on the Roll free of charge.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment to make upon the equality impact assessment as I do not consider it relevant to the principle of having one's name remain on the Roll.

Restoring the annual keeping of the roll exercise

Response ID:842 Data

2. About you

1.
First name(s)

Janet

2.
Last name

Abe

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

on behalf of an organisation

7.
On behalf of what type of organisation?

Law society

8.
Please enter the name of the society

Birmingham Law Society

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes. It is entirely sensible for the reasons set out in the consultation paper and, in particular, to ensure compliance with GDPR.

11.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It is agreed that those solicitors without a PC wishing to remain on the Roll, should bear a reasonable/proportionate cost of the exercise. Until 2014 the fee was £20. To the best of our knowledge there is no evidence to enable a judgment to be formed as to whether this was the true administrative cost. It is suggested that the fee for the reintroduced scheme might be £30/£40 but there is a lack of evidence/information upon which the SRA relies to support either figure. It is simply observed that in the absence of evidence, round figures like this tend suggest a measure of arbitrariness. The fact that there is not a costing is a concern as these suggested fees represent an uplift on 2014 of 50% or 100% respectively. These are substantial increases and appear to ignore the economies brought about by the introduction of the new IT system and MySRA, each designed to make the system more streamlined, user friendly and enable the registrant personally to input information directly on to the system.

Assuming £20 did indeed represent something close to the true cost in 2014, after taking into account the savings brought about by the technological advances there is a sound argument for saying the fee should be £20 or thereabouts for 2023. If the savings would not allow for this, and we have no way of knowing if this is the case, then we are left solely with trying to assess the influence of inflation. Inflation in the intervening period is 17.86% (CPI) which means £20 translates to £23.57 in May 2022. Allowing for current inflation rates continuing over the next 12 months adding 7% to this produces £25.22 and at 10% £25.93.

In the absence of any other information a fee of £25 would seem to be the correct fee although our expectation is that the SRA would bring into account savings attributable directly to the streamlining of the process. For the purpose of this exercise, it would not be acceptable for those savings simply being deployed to be set against general overheads.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes.

Restoring the annual keeping of the roll exercise

Response ID:846 Data

2. About you

1.
First name(s)

Jason

2.
Last name

Pearce

3.
Please enter your SRA ID (if applicable)

166744

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Everett Tomlin Lloyd and Pratt

9.
Please specify if you are

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, I think it should be every 5 years.

12.
2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and

maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, I think it should be met out of the practising certificate fees of those solicitors who are in practice.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no opinion on this.

Restoring the annual keeping of the roll exercise

Response ID:848 Data

2. About you

1.
First name(s)

Nik

2.
Last name

Antoniades

3.
Please enter your SRA ID (if applicable)

163454

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Academic

8.
Please enter the name of your institution

London Southbank University

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) **Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?**

Yes.

11.
2) **Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?**

The costs of an exercise involving a diarised sending out of a questionnaire is negligible. If any charge is introduced it should be more of the order of £5.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:857 Data

2. About you

1.
First name(s)

Ann

2.
Last name

Murphy

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

on behalf of an organisation

7.
On behalf of what type of organisation?

Law society

8.
Please enter the name of the society

Liverpool Law Society

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

LLS agrees that there is justification for maintaining and keeping up to date data on all solicitors who remain on the roll regardless of whether or not they have a current practising certificate, predominately because of the need for there to be an accurate and clear record of individuals who hold the status of a solicitor. The opening up of the legal market has seen an increase in the number of individuals practising as solicitors, who do not require a practising certificate because they are not carrying out any reserved legal activities or supervising an unqualified person carrying out reserved legal activities. LLS also agrees with the reintroduction of the annual returns exercise after the completion of practising certificate renewals each year.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

LLS does not feel able to answer this question without additional information and does not consider that the SRA's proposal as set out in the consultation is clear.

It is stated in the paper that the SRA 'will make every effort to contact those who are currently solicitors without practising certificates on the roll. If we receive no communications after repeat attempts to contact them we will remove their name from the roll. If individuals subsequently contact us and wish to be restored to the roll they will need to pay the £30-£40 administration charge'. We are then asked (a) if it is fair and proportionate to charge directly for this exercise by which we understand the SRA mean charge the individual who asks to be restored to the roll; and (b) is the proposed unsubsidised amount of no more than £30 -£40 fair and reasonable, which on one reading suggests that the total anticipated costs of the exercise will not be covered by the direct charge and will need to be subsidised by the proportion of the profession with practising certificates. LLS has the following observations:

One of the reasons given for reintroducing the maintaining of the annual roll is that owing to improvements in IT since 2014 the process is no longer administratively burdensome. Notwithstanding, the SRA is proposing an increase in the direct charge to individuals who wish to remain on the roll without a practising certificate to a sum between £30 and £40 compared with the 2014 equivalent of £20 and LLS understands that the SRA also anticipates that the costs of maintaining the roll, in particular of keeping an up to date record of solicitors without current practising certificates will need to be subsidised by those members of the profession with practising certificates. Two points occur; the increase in the direct charge is not consistent with the SRA's statement that the process is no longer administratively burdensome. Secondly, the consultation paper, which seeks endorsement from the profession, is silent as to the overall anticipated costs of maintaining the roll. LLS accepts that the subsidised amount will not be quantifiable whilst the level of uptake/the numbers willing to pay to remain on the roll is unknown. However, in advance of advocating the proposal the SRA should have some idea of the total additional cost.

LLS is unable to comment upon whether a figure of between £30 and £40 by way of direct charge is fair and reasonable because it does not know what the anticipated overall additional charge of maintaining the annual roll for solicitors who do not have a current practising certificate. On the face of it an increase of 100% on the 2014 sum (assuming the latter was fair and reasonable) given the stated advancements in technology does not seem fair and reasonable.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes, LLS agrees with the conclusion in your EIA and does not have anything to add.

Restoring the annual keeping of the roll exercise

Response ID:858 Data

2. About you

1.
First name(s)

Simon

2.
Last name

Loveday

3.
Please enter your SRA ID (if applicable)

126575

6.
I am responding..

in a personal capacity

7.
In what personal capacity?

Solicitor

8.
Please enter the name of your firm/employer

Byrne Group Limited

9.
Please specify if you are

an in-house solicitor

10.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

11.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, I consider it important solicitors can retain a relevant status in case they wish to renew a position in private practice where they have held other roles (which might not require a PC) for a period of time during their career and remaining on the Roll

doesn't result in a "cut-off" on retirement where they may subsequently wish resume a role which could require a PC.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I agree with the proposed administration charge of £30-40.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes, I think it is important to protect the position of women in the profession who could have a career break.

Restoring the annual keeping of the roll exercise

Response ID:859 Data

2. About you

1.
First name(s)

Clare

2.
Last name

Jarratt

3.
Please enter your SRA ID (if applicable)

6.
I am responding..

on behalf of an organisation

7.
On behalf of what type of organisation?

Law society

8.
Please enter the name of the society

The Law Society of England & Wales

9.
How should we publish your response?

Please select an option below.

Publish the response with my/our name

3. Consultation questions

10.
1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

1. The Law Society is responding to the consultation in its representative capacity as the independent professional body for solicitors in England and Wales. Our role is to be the voice of solicitors, to drive excellence in the profession and to safeguard the rule of law.

2. The Law Society supports the SRA's intention to improve the management, including data quality, of those on the Roll. The SRA should be able to engage with individuals on the Roll and have accurate data for them. The expected modern approach, including utilising the SRA's new technology, should enable members to take more control over the administration of their data without negative impacts on accessibility or benefits.

3. Admission to the Roll has a direct connection to an individual's Law Society membership. If an individual opts to be or is removed from the Roll, they can no longer be a Law Society member. This means they cannot be involved in the Society's elections, lose access to member-only services, and can no longer receive membership benefits. This could have a significant impact on hundreds or thousands of Law Society members. The SRA must ensure that the justification for proceeding with this initiative truly delivers value to the individuals being targeted by this consultation, and that communications campaigns are conducted effectively to maximise engagement.

4. The Society would not expect the proposal to affect existing arrangements by which the SRA shares member data with the Society as professional body. This arrangement would continue in respect of persons who do not hold practising certificates but remain on the Roll. Without up to date and accurate data, the Society's ability to identify and engage with such members will be substantially impacted. This could result in a diminished ability to effectively engage with our membership and perform our duties.

5. If the development and subsequent launch of this new process inhibits members from retaining Roll status, the Society's formal membership numbers may reduce. This means there is a risk that the Society's ability to act as the representative voice for the whole profession and to advocate for current and former solicitors (including those who are not currently practising) may be negatively affected. Substantial effort should be deployed to make sure this impact is clearly and visibly communicated in communications relating to this change in approach, to ensure that members are aware and can make an informed decision. If the change is approved, the Society will conduct its own campaigns to minimise the impact on our members and endeavour to work closely with the SRA to maximise the impact of its own communications campaigns.

6. Information is required regarding the data collection and sharing which is to be established as part of the new application processes. This will enable us to better understand the impact for members, the SRA and the Society. For example, we anticipate this could impact the SRA's data collection processes and the data shared between both organisations. The design, development and launch of this technical change may have a direct impact on our processes and technology so we must have engagement throughout the project lifecycle.

7. The following information is requested from the SRA prior to any decision on this consultation so we can assess, on behalf of members, whether the proposed approach is proportionate, targeted and reasonable:

- The expected application period, including communication campaigns and application deadlines
- The data to be collected, and the methods and tools through which it will be obtained
- The expected re-application period, including communication campaigns and application deadlines
- The SRA's approach to engaging with the group of affected members and their relevant organisations, including persons who may be on career breaks or maternity leave and persons in lower socio-economic groups who may require an opportunity to apply with reasonable adjustments provided to support them
- The measures the SRA will implement to maximise accessibility to those who require adjustments
- The SRA's plans for whether an individual who is no longer on the Roll will continue to be able to describe themselves as a 'non-practising solicitor' or similar term.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

1. The Law Society understands the SRA's needs to cover operational costs. We would consider it acceptable for the SRA to charge a nominal fee to cover the cost of basic processes of an application, if this is not able to be covered via other income streams.

2. The fee must be proportionate, reflect cost only and not subject an individual to financial burden for the first or any subsequent renewals. The SRA should clarify why an annual exercise with an annual fee is required, rather than a two-yearly or three-yearly exercise which, at a lower cost, would be more proportionate and may still produce acceptable data quality and minimise

the risk of error (for example missing solicitors on a career break).

3. The suggested fee appears high for what is expected to be a highly automated process. There is no indication of the expected volume of applications on which the fee has been calculated, or the estimated change delivery cost. If the SRA were, for example, to anticipate 10,000 applications, this would equate to an income of between £300,000 to £400,000 being generated per annum. The SRA should provide further information on the assumptions underpinning the proposed fee.

4. The SRA must ensure the fee is affordable for individuals from lower socio-economic groups as this could generate an annual financial burden. This could also have a direct impact on an individual's ability to access Law Society membership, which is directly linked to an individual's status of being on the Roll. As mentioned, the fee level must only cover the operational cost of processing applications. The SRA should provide transparent information about how it will support those from lower socio-economic groups to make sure they are able to remain on the Roll.

5. By comparison, the previous application fee (prior to 2015) was £20. With the benefit of the SRA's improved technology to assist with both processes and automation, the fee being proposed now is disproportionately high compared to the fee that was applied before these improvements were implemented. If the higher fee of £40 is implemented, this would be double the previous fee. The SRA should provide justification to members for such a significant increase in the fee.

6. The Society's view is that more information on implementation cost and fee design is required to fully understand the fee calculation. The SRA should, as a minimum, provide the following information before making any decision to ensure that a proportionality assessment can be made on behalf of members:

- The specific costs relating to and associated with the administration fee and any late penalty fee
- The fee formula used to generate the £30-40 application fee and the £39 late application fee
- The option(s) that will be offered to those who may not be able to pay the annual fee

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

1. We have consulted with our Equality Diversity and Inclusion committee and the committees for our four Diversity & Inclusion Divisions (Ethnic Minority Lawyers Division, Lawyers with Disabilities Division, LGBT+ Lawyers Division and Women Lawyers Division). Their main concerns are the impact on affected members' finances and ensuring access to apply for and retain Roll status and associated benefits (including Law Society membership).

2. The proposal is more likely to affect members of the profession who are retired, undertaking a career break (e.g., those who are on maternity/parental leave or have caring responsibilities), disabled, unemployed, and in lower socio-economic groups. The SRA should further investigate the impact of this proposal in relation to disability, sex/gender, pregnancy, maternity, paternity, caring responsibilities, age and socio-economic groups.

Restoring the annual keeping of the roll exercise

Response ID:5 Data

2. About you

7.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

8.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do not object to the reintroduction of the exercise - subject to the following comments.

One group of solicitors not addressed in the consultative document are solicitor-judges - particularly those that are no longer in private practice, and who will therefore not have a practising certificate. These could be fee-paid judges who no longer are in practice as a solicitor (possibly relying for income on a portfolio of fee-paid judicial appointments) or salaried judges. Although not in practice and not holding themselves out as solicitors, solicitor-judges need to keep their names on the Roll to retain their judicial appointments. Has the SRA considered how many solicitor-judges are affected by the proposal, and its impact upon them?

9.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Given that the exercise will be entirely automated and use the SRA's existing computer facilities, the marginal additional cost cannot be material. No analysis has been given in the consultative paper of the likely total costs of the exercise and the number of individuals who are likely to want to retain their name on the roll (the latter information could be extrapolated from the data available from when the SRA and the Law Society used to have an annual enrolment process). In the circumstances, an annual charge of £30 to £40 appears to be disproportionate and excessive.

I appreciate that there may be additional costs in the first year of reintroduction, when the SRA will need to make contact with all affected solicitors (particularly those who have not kept their contact information up-to-date), but it would be unfair and disproportionate for those solicitors who have kept their contact information up-to-date to carry these costs.

10.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The introduction of a fee will be particularly relevant to solicitor-judges (see answer to Q1). Unless the SRA can persuade the MoJ to meet the charge, it will have a disproportionate and unfair impact on solicitor-judges with diverse backgrounds, whom the SRA should be encouraging to take-up judicial roles.

Restoring the annual keeping of the roll exercise

Response ID:12 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Not as proposed. I am not opposed to the annual up-dating but in respect of a certain aspect of the intended charge. Prior to 2015 any solicitor who had been on the roll for 50+ years was excused payment of the then annual fee. There appears to be no such exemption here. I am a retired District Judge who, on 1st July 2017 attained 50 years post entry on the roll.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I suggest that you retain the fee exemption for those of us who have been on the roll for 50+ years as existed prior to the 2015 change.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment to make

Restoring the annual keeping of the roll exercise

Response ID:13 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The proposed administration charge is grossly excessive. I will come off the roll if this charge is levied.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:14 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No more than £40 per year.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

N/A

Restoring the annual keeping of the roll exercise

Response ID:16 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Your fee is grossly over what a scheme would cost to run. This is a blatant money making scheme for your organisation and has no merit whatsoever. You should be ashamed of yourselves but given the way you conduct yourselves on numerous matters I doubt you will be.

Maintaining the current situation or a fee that actually represents what it would cost to run (ie nothing) would be more appropriate.

If you press ahead with this outrageous fee proposal I will gladly come off the roll. Being attached in any way to your ghastly organisation is an affront to my dignity in any event.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have not read it and try not to read anything from yourselves. Your organisation is moribund and without any valid ideas.

Restoring the annual keeping of the roll exercise

Response ID:18 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

NO

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The cost should be born by the SRA. I have a degree from Sheffield University I do not pay the University a fee for them to upkeep records.

I get no benefit from my registration as a solicitor with you but the qualiification along with my qualification as a solicitor HCA (Criminal) one of my greatest achievements.

The system has worked in the past.

I do not see why non practising solicitors cannot confirm details yearly by an special email link which i think would cost virtually nothing. If you really do have to charge then £5 or £10 should cover it £30 or more is outrageous for no benefit save for my own sense of pride as the "poor boy from the secondary school" making it in life to one of the highest callings and seving the public.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

There is a lot of financial pressure on those who have retired but who need to remain on the role.

What about pro bono work by retired solicitors? How can the charities and others check their bona fides?

Restoring the annual keeping of the roll exercise

Response ID:27 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I dont undertand ehat the charge is propoetionate too? given that solicitors will do all the work in relation to dats entry I fails to seegow the fee has been estimated. In essencei it appears you ar askint solificirors to dfund your own legalduty to have uptodate information

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

NO, you have not priveded a full deomgraphic analyaia. Your analyaia is nothing more thguesdiscriminatory Did it occur that women may be having problem getting back into the profession after child birth

Restoring the annual keeping of the roll exercise

Response ID:42 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Not as proposed. Charge only those who are in employment eg in house, local govt, where PC not required. I worked both in private practice and in house and mostly in latter did not hold PC but would have paid fee. Reasonable to ask to pay if working. If retired, on career break or maternity (if not employed) not reasonable. I am retired now and would not pay a fee nor wish the burden of having to log on annually to an unfamiliar system. Took me more than 30 mins today to get the user name and password amended. Now have a password manager but even with this, there are too many organisations to maintain the details. The SRA could verify name and address from electoral roll if they chose.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

See comment above re payment of a fee.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No don't agree - see comment above on those disproportionately affected. Both retirees and those on career breaks/maternity (mostly women) would be disproportionately affected. Law firms would no doubt keep practising certificates for maternity leavers, but for those in house etc, this is less likely, as often difficulty getting business to pay for practising certificates. SRA statistics will show only a minority of such solicitors hold practising certificates for that reason alone. As the number of non-practising solicitors on the roll is a small minority, the costs of operating the data base should be borne by those with PCs and those solicitors that do not require PCs but are in employment/working.

Restoring the annual keeping of the roll exercise

Response ID:44 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes - I am presently on a career break and may be retiring but do not yet wish to leave the Roll

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Such order of costs - £30-40 - is reasonable and should be compared with the time of of my two queries to the SRA - both answered helpfully and promptly - as to whether I needed to renew my PC or not while on a career break.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment - it does not seem unfair either to require a formal selection or to pay a charge to retain qualification

Restoring the annual keeping of the roll exercise

Response ID:49 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

no

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

As the LSG article states "The regulator says new IT systems will make the process of maintaining personal records considerably less arduous for solicitors." Surely new IT systems will also make it less arduous for the SRA to update the rolls, probably this will cost under 50 p, (which, of course, is no more than £30-£40). The retired sol types in their new address or other details and the rolls are electronically updated without any human effort. So to charge £40 for this is transparently a scam to raise more money for the SRA, using the elderly as cash cows. Shame on all of you, this shows the level of corruption among those who extol the so-called rule of law. RIPOFF!!

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

"The data shows that 22 per cent of solicitors without practising certificates are aged between 51 and 60 (compared to 18 per cent among all solicitors) and 10 per cent are over 60 (compared to five per cent among all solicitors). 74 per cent of solicitors without practising certificates have not held a PC for five years or more and 49 per cent for ten years or more."

This is a dodge because you are not disclosing the per cent of sols over 70 etc but stop at 60. You are trying to mislead the reader by this scam. In fact, the fee is ageist and sexist because it will disparately impact the elderly as well as females.

Restoring the annual keeping of the roll exercise

Response ID:50 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I absolutely do not agree to the reintroduction of annual fees. Solicitors have worked extremely hard to meet the high standards to qualify as such. The requirement for solicitors to be recognised as such by the payment of an annual fee cheapens what it means to be a solicitor.

A solicitor should be recognised as a solicitor until such time they are struck off.

If a fee must be charged, charge only when that solicitor's status is changed. For example, when a practicing certificate is no longer required, that solicitor should update as to why and vice versa. Notification to the SRA of retirement should not come with a charge.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Please see previous responses about only charging when status is changed (excluding retirement when it should be free). Therefore managing the roll will be much easier.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment.

Restoring the annual keeping of the roll exercise

Response ID:52 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I am not sure it benefits people that have been off the roll for a while as there is no litigation risk when you have not worked for 15 years!

I understand that its important to know who was a solicitor but not £40! The cost is not justified by the perceived benefit and IT system is already in place for all practicing solicitors. it would in effect be a button to say - not practicing

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Solicitors have paid the practicing certificate for when they were practicing (and therefore an insurance risk) and maybe an element of that should be set aside for when they come off the roll but £40 per year is too much.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Not all non practicing solicitors are well paid. It seems like a money making exercise and those that are not busy working in the city will have to find the money. Over the years of being a Mum I would have had to have spent £640 for something I didn't actually do! that is crazy! I worked hard to become a solicitor. I left to have kids as it was awful trying to balance so I chose my children over the Partners whims. to pay £640 would have been a kick in the teeth!

Restoring the annual keeping of the roll exercise

Response ID:54 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes. I think it is important that the public can look up and check solicitor qualification and experience.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I think that is fine as long as it is the organisation rather than the individual bearing the cost.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have not seen the EIA.

Restoring the annual keeping of the roll exercise

Response ID:55 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The anticipated £2.4m to be generated by this move seems totally out of proportion to the cost of actually implementing it . £5 a head should be plenty in these paperless post less days.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:61 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I agree there is a need to keep the Roll up to date but I cannot see the legal need to make this an annual exercise. Is not every 2 or 3 years sufficient?

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If it is correct that there are circa 60,000 non-practicing solicitors on the Roll then £40 per person raises £1.4M according to an article in the Gazette. All the necessary IT is in place so the cost of the exercise is staff time only and that surely comes nowhere near £1.4M. You have provided no breakdown or information as to how you arrive at a charge of between £30 and £40. It is disingenuous to have a consultation to where finance is a key issue without providing any financial analysis. Have the figures just been plucked out of the air? Even if half the 60,000 come off the Roll a charge of £10 would raise £300,000. Surely that covers staff costs. Perhaps a fee of between £5 and £10 is more like it.

All in all the fee should be commensurate with staff time involved with no element of surplus fund raising or using money raised to subsidise other SRA functions

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

To my mind this analysis is all irrelevant. If you want to remain on the Roll pay up. As in my reply to 1 and 2 above I can't see why it needs to be either an annual fee or more than £10 at the outside.

Restoring the annual keeping of the roll exercise

Response ID:65 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, if you think it's really needed.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The cost is outrageously high for an online exercise completed by the participants. You should publish your costings and justify the annual fee. Other wise everyone will see this as a shabby money grabbing stunt.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No opinion.

Restoring the annual keeping of the roll exercise

Response ID:68 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes and No. Yes to having an annual keeping of the roll brings us back in line with what similar professions do such as Social Work England. Will all solicitors whether holding a Practising Certificate or not be required to keep a CPD record too? Also how will that impact on solicitors working part-time or with caring responsibilities or health and disability related needs?

No, would like for this to be a validation approach similar to what the GMC seeks from it's members.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Will there be concessions given to disabled solicitors and those facing financial hardship? I would prefer an administration charge of £25 or less in those situations.

May I ask if this charge will be tiered, in the same way that if you apply for a practicing certificate in March or April, the fee is reduced/ pro-rotated?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I believe that it will be harder financially on disabled solicitors and those with caring responsibilities, therefore I do not agree with the conclusions from the SRA's EIA.

Restoring the annual keeping of the roll exercise

Response ID:70 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, I do not consider there is a need for an annual review. Whilst accepting that the keeping of the roll exercise may need to be carried out periodically in order to update information, there appears to be no necessity for this to be done every year where non-practising solicitors are concerned. As long as an email or postal address is provided, there is no good reason why the information should be reviewed more frequently than every five years. Currently the exercise has not taken place for seven years. You acknowledge that a primary reason why the annual exercise was stopped in 2014 was that 'we were not using the information'. What will you now be doing with the information that is different? A majority of respondents in 2014 supported the proposal to stop the annual review. One can assume this remains the case since the burden of annual reporting was removed.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I object to the imposition of a fee. Many currently non-practising solicitors, particularly the retired, will have paid an annual practising certificate fee during their working lives. It is unfair to impose an annual charge simply to keep one's name on the roll. Furthermore, you acknowledge that there is now a modernised IT system to make reporting much easier and quicker. A simple form filled in online should not require payment of a fee. The proposed administration charge of £30-£40 is completely disproportionate. There is no explanation provided to support such an amount, which cannot be described as 'nominal'. If all 60,000 non-practising solicitors choose to remain on the roll, an annual income of £2.4 million would result. This can therefore only be viewed as an exercise by the SRA to raise income since the cost of maintaining a database cannot possibly amount to such a sum.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I believe the proposals will have an adverse financial impact on retired solicitors who simply wish to retain their place on the roll.

Restoring the annual keeping of the roll exercise

Response ID:74 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. As you have introduced a new IT system I would have thought you could undercut the previous charge of £20. You do not say exactly what type of extra work you would have to do in regards to monitoring non-practising solicitors. Most of the monitoring can be done automatically as well as the "nominal payment". As you say you are a non-profit organisation, you should not be charging a profit or seeking to recover other costs. The fee should only reflect the marginal cost in carrying out an exercise say every 3 years.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No. No. No.

Restoring the annual keeping of the roll exercise

Response ID:82 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

no. One of the reasons given is that an annual cycle promotes accuracy. This is not so. A record can be out of date within hours.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not see how you arrive at this sum for an electronic excercise. There are about 60000 solicitors without practising certificates. A £30 annual fee produces an income of £1.8m. This looks like gross profiteering.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Under the previous arrangement solicitors who had been qualified 50years+ were not charged a fee. All these persons are likely to be retired anyway. The 'benefits' for a country solicitor are limited in the extreme. Having laboured to qualify there must be a mechanism to allow us to have the qualification recognised. We do not for example have to pay to call ourselves LLb or BA or whatever university degree we obtained. Why not charge those who are still employed in a legal or quasi legal situation and allow those who are genuinely retired to register for free?

Restoring the annual keeping of the roll exercise

Response ID:88 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. This could simply be an email to all non-practising solicitors annually asking them to confirm/update their details. Respondents could then directly change any details that were out of date. The incremental cost to the sra would be nil. All large organisations hold personal data eg on their customers and manage to comply with GDPR without charging customers £30-£40 per year.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:90 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, but suggest that you may want to offer subsidised or reduced price in certain situations i.e. someone is in part-time employment / on parental leave.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:93 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes as long as it with no charge

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

the charge is, as it is all online minimal...pennies. In any event, this should be borne by the SRA/LS and taken from the monies it receives during the 30-40 years solicitors pay towards the SRA

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:94 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

no

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If this is something that can be done online by self-service it doesn't cost the SRA anything. It should be a simple "please let us know if your details have changed" email requiring a response. £30-40 is not an insignificant amount of money and it's not needed.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

n/a

Restoring the annual keeping of the roll exercise

Response ID:95 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

There should be a charge for this if the non-practising solicitor needs to complete their submission over the telephone or by post (as SRA staff/contractors will need to input the information into a database). However, there should be no charge where a non-practising solicitor enters their information via the mySRA portal. It is important to incentivise solicitors to log in to the mySRA portal as this is the opportunity to remind them of any practice updates and changes of which they should be aware.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes. Those on a career break or who have gone into industry should be made to feel connected to the SRA and the charging of a fee is likely to have the opposite effect.

Restoring the annual keeping of the roll exercise

Response ID:96 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I can understand the need to keep records up to date but to require this annually with the associated fee is disproportionate and imposes a heavy financial and administrative burden on solicitors without practicing certificates e.g. retired. It is also odd that it does not apply to certain in house solicitors without certificates. Surely the requirement is the same. I think 3 yearly would be far more proportionate.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes if not imposed annually but 3 or 5 yearly

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

It would disproportionately impact on the elderly and unemployed who may struggle with the cost

Restoring the annual keeping of the roll exercise

Response ID:98 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Costs should be met from PC s.

Retired solicitors should be allowed to remain on the Roll without charge. They generally will have already paid for 35+ PC s

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Impact on retired solicitors is obvious.

It would impact solicitors taking time out eg maternity break, ill health.

Restoring the annual keeping of the roll exercise

Response ID:100 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

An annual administration charge should not exceed £20 pa.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes.

No.

Restoring the annual keeping of the roll exercise

Response ID:102 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Given the data protection changes I understand the need

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Given that many are retired, like myself, and may have limited income, £30-40 which no doubt will rise over the years seem a little steep simply to records one's basic info which you can,probably get from LinkedIn ! £5-10 is more than enough or alternatively a one off small fee when first applying and a additional charge if changes are made in the future.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:104 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The sum suggested appears vastly inflated given the extremely basic administrative task involved

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:105 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Only if it does not incur a fee.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I strongly disagree with introducing a fee of any kind.

If you wish to reintroduce annual registration of the roll, then this should be treated as normal administration costs.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:107 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I'm unsure as this applies to me. I think the fee quoted is excessive

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not think it's fair to charge such an excessive fee. All it would require is an email going out and a link to complete.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The fee will affect those least likely to avoid it- already marginalised groups

Restoring the annual keeping of the roll exercise

Response ID:108 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Under the GDPR it looks like you have no alternative but it seems a bit like a sledge hammer to crack a nut. You already have information with regard to retired Solicitors etc and surely a simple email to inform them their name is to be removed would suffice. If you get no response then remove the details.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

This seems excessive bearing in mind you say the procedure is simplified from what it was. This implies a 50-100% rise over the last time it was imposed in 2014. Surely this is not justifiable and the rate should be akin to what it was when the procedure was last used.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

N/A

Restoring the annual keeping of the roll exercise

Response ID:113 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

If you are clearly of the view that this is a necessity as a consequence of GDPR, then yes.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The rate in 2014 was £20 so with inflation since then £30 might be justifiable. Might you want to consider a differential charge for (a) those who are retired or over a certain age paying a lower fee than (b) others who might be wishing to retain their name on the list because at some future date they may consider returning to practise or for other purposes wish to retain acknowledgement of their professional standing.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

EIA agreed.

Restoring the annual keeping of the roll exercise

Response ID:117 Data

2. About you

8.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

9.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

10.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I don't think it reasonable to reintroduce this administration fee. The information is clearly digital ,and the proposed cost does not reflect the administration involved.

The updating will be done by those currently not on the Roll themselves. Surely this administration is still in place from the previous regime?

Could the SRA provide a breakdown of the suggested fee?

If imposed it will inevitably increase annually. It doesn't encourage the many non practicing Solicitors to keep their link with the profession.

11.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:119 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

N/A

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

N/A

Restoring the annual keeping of the roll exercise

Response ID:121 Data

2. About you

8.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

9.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

10.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Do not believe a annual, essentially data capture, exercise is warranted nor that this level of cost is appropriate for what would be an electronic exercise. Not reasonable to pay annual fee for retaining non-practising recognition of professional qualifications any more than reasonable to require payment of annual fee to retain a degree.

11.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:127 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do not agree with the SRA charging more than the cost of maintaining the data. I doubt the cost would equate to £40 per annum to keep my name on the roll.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I consider the estimated fee to exceed the cost of maintaining the data and therefore unreasonable. The fee should be what it costs the SRA to maintain the data in accordance with regulations. Given you hold and publish limited information I cannot envisage the task to be arduous or time consuming.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I consider it likely that women will be unfairly disadvantaged by the proposal. Women that have children may have a career break for this purpose and should not be unfairly penalised by have to pay a fee to have their details maintained on the roll. Similarly people take career breaks for various reasons, including own well-being and caring responsibility and therefore I do not feel any people should be penalised paying a fee greater than the cost to the SRA. I did not see a conclusion, only reference to exploring further as part of the consultation process.

Restoring the annual keeping of the roll exercise

Response ID:131 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, it's an unnecessary administrative and cost burden being placed on those solicitors who don't require a practicing certificate.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not agree with the charge. If there is an improved IT system already in place to help manage the proposals the cost has already been incurred - this is simply a new way if SRA raising funds by arguing a need to place additional burdens on those solicitors who don't need a practicing certificate.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No - although agree that this will adversely impact the group of solicitors who don't need a practicing certificate currently.

Restoring the annual keeping of the roll exercise

Response ID:134 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I understand the reasons for this and I agree with the proposal as long as affected solicitors are given enough notice of the exercise each year so that they have time to respond and make sure they stay on the roll.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I agree to the charge being made directly. An administration charge of £30-40 per year seems high though. I would have expected it to be more like £10.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree.

Restoring the annual keeping of the roll exercise

Response ID:140 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. Retired solicitors should not have to pay this fee.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No. This unfairly impacts older, retired solicitors

Restoring the annual keeping of the roll exercise

Response ID:143 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, I believe it is reasonable to make a charge for the necessary administration, but the proposed level of charge does seem rather high. Would be happy to pay at about half the level proposed.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I'm in broad agreement with the conclusions set out in your EIA. It does seem to me that, without the proposed measures, the roll will become increasingly out of date as regards those - like myself - who are no longer practising. I suspect that a significant number in that category will end up being removed from the roll as a result of either not responding or deciding not to pay the admin fee.

Restoring the annual keeping of the roll exercise

Response ID:146 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Ambivalent about your proposal, but disapprove of the manner you propose doing it. A simple Email "click confirmation" by the non-practicing solicitor, that all details as held by SRA remain unchanged,- should suffice for your purposes. How on earth do you justify charging "£30-£40" for that?

Failure by the non-practicing solicitor to respond affirmatively before the end of the year in question, - should then result in his/her name being deleted from the Roll.

This would automatically deal with all cases of death of the non-practicing solicitor.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If the exercise were kept simple, -then OVERALL annual running costs of the SRA would be so reduced as not need any additional charges for maintaining a name on the Roll. Names would simply 'drop off' the Roll by efflux of time / or failure to respond. Does it really cost "£30-£40" to do little or nothing?

What I suspect will happen is that you will lose a large number of names from the Roll, - (perhaps that is the real objective ?),- only for those who have decided to 'drop off' the Roll to continue to refer to themselves as "Retired Solicitor". There won't be much you can do about that! That will remain a true statement, and those who chose that designation will be committing no offence, - (providing they do not hold themselves out as still being practicing solicitors).

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment.

Restoring the annual keeping of the roll exercise

Response ID:152 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, I think it is a very practical approach

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, the Republic of Ireland charges a comparable amount for non practicing solicitors to remain members of the Law Society annually

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

It may disadvantage older members who are not technologically minded

Restoring the annual keeping of the roll exercise

Response ID:162 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I consider it fair to charge for the exercise and that it should cover costs only.

I consider the charge high given that the exercise is now said not to be unduly burdensome nor complicated and that automation has considerably reduced the work required. Costings should be published to quantify the costs. The vagueness of the assertion that 'the charge amount will be no more than £30-£40 pounds' is entirely unsatisfactory and justification for setting the fee at the maximum estimated is not given. Given that the old burdensome and complicated system was run at £20 per registration that would be a more reasonable charge for a simpler automated system.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No view

Restoring the annual keeping of the roll exercise

Response ID:165 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I understand why the change back is being put forward, and accordingly agree with it, though the removal of the annual check after 2014 was something of a relief.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If we non-practising solicitors are doing the SRA's work for it by checking and amending online, it is difficult to see why each of us in addition should be paying a so-called 'administration fee'. Therefore it does not seem fair and proportionate to charge us directly, unless the SRA explains what costs it will incur and why.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I concur.

Restoring the annual keeping of the roll exercise

Response ID:167 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. It is an unnecessary cost for solicitors that is not proportionate to the cost of regulation and imposes barriers on BME and other disadvantaged groups.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

My preference would not be to reintroduce an unnecessary administrative burden on non-practising solicitors. If it is absolutely necessary to do so, the costs should be spread amongst the entire profession.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I do agree with the adverse impacts identified in the EIA. My concern is that the fact the fee is small does not mitigate those impacts sufficiently.

Restoring the annual keeping of the roll exercise

Response ID:172 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I do not.

If a non practising solicitor wishes to use the data base systems in the library they can pay a token amount of £3.

This proposed cost will not be fairly regulated. For example, if someone pays this money and in the same year gets a job as a solicitor or paralegal and then pays the practising fee as required in the same year, it amounts to double payment.

Also, it will not act as an incentive for law firms or in-house organisations to employ their fellow lawyers because they will need them to pay the proposed back up cost.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I do not agree with them and I see those conclusions as being there to a great extent, to provide a reason to re-introduce the proposed cost.

People can be reminded via emails to update their details if required.

Those who have formally retired could be informed to ask for their names to be erased from the Roll, only if they wish to do so. Infact, solicitors who describe themselves as retired, could pay a nominal fee of £5 to remain on the Roll. If a retiree becomes an active job seeker again by indicating same on an updated form, then the nominal charge should be dropped.

Please let me mention that some of us are without PCs because we are looking for work. Lawyers are not employing older fellow lawyers, the way they ought to. Recruitment weighs heavily in favour of younger trainee and newly qualified lawyers. Introducing this cost, means that we are mere supportive spectators in the our profession. It is very unfair. Non-practising solicitors who are looking for work, should not pay the price for a non-emphatetic recruitment system, as exists in our

profession. I hope there will be avenues to discuss this issue through webinars. It is advisable for solicitors to air their views on this matter.

Restoring the annual keeping of the roll exercise

Response ID:174 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I disagree with the proposal. Although GDPR obligations mean that you need to ensure that your records are accurate, an annual exercise is unnecessary and burdensome. Performing the exercise every five years would clearly meet your obligations.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not believe that it would cost you £30 or £40 to process each person's application to remain on the roll. I think it would be much less than that, and that you should be charging in the region of £10. I think you are just trying to raise money, and therefore your question of how your unjustified guesstimate of the costs involved could be recouped in other ways is disingenuous. Your proposal describes the suggested fee of £30 to £40 as "small". Clearly you and I have substantially differing views on what a "small" sum of money is. Charging me £30 to £40 each year just to tell you that my details haven't changed is a complete rip off.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:181 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, if required to do so by legislation. I am not sure that annual updating is required under GDPR, but understand your reasons for doing so - ie it is more efficient for you.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Absolutely not. I cannot understand why you even need to charge for this. Other organisations simply send a bulk email requesting that people log into their account and confirm their details are correct. This will cost you almost nothing. £30-£40 is disproportionate and smacks of revenue raising.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no view.

Restoring the annual keeping of the roll exercise

Response ID:187 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

These costs seem rather high for something we can online and without input. £10 seems fairer to create the relevant IT.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No, but this will impact women more, including those taking a career break.

Restoring the annual keeping of the roll exercise

Response ID:195 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

NO

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

£0

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

NO

Restoring the annual keeping of the roll exercise

Response ID:198 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

This presumes the reintroduction will go ahead; You are choosing to reintroduce and therefore should bare the burden of the costs. I struggle to see how it would cost £30-£40 per year. £10 should be more than adequate

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:204 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

This seems sensible

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

This depends on the cost of doing it. Much can be mechanised and updated quite simply and charging £40 would be an extortionate amount and would more than cover the reasonable costs.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No I do not agree with the conclusions on the EIA. The SRA and you both have email addresses for people on the roll. If people choose not to respond, then yes, delete the people who fail to take action but the simple assessment that the data SUGGESTS "individuals in this group are more likely to be retired from practice, might not have kept their information on mySRA up to date and will be more difficult to contact. There is a potential negative impact on those who wish to continue to remain on the roll, as they will need to participate in the keeping of the roll process each year paying the requisite fee. They will also benefit from having a more accurate current record of their status." Is fallacious, as there is no data that those suggestions have in fact and firm data to support this suggestion.

I am retired and the SRA and the Law Society both have my email address, and as a professional I regard it as my obligation to ensure those regulating me can contact me. I may yet choose to re-enter the profession, and as life changes become more common, then the way to do this must be left open.

I agree that this will impact those who are retired from practice - this is self evident. Have you thought of breaking this data down further - by gender, race, in-house or in private practice etc ? It is not up to us as consumers to provide evidence, I would expect that to be provided for just, rather than bland blanket assertions

Restoring the annual keeping of the roll exercise

Response ID:205 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The charge is too high. It should be free or maximum £10. It is unaffordable for those who are on low incomes. Perhaps you should only charge people who earn over a threshold. The cost of living crisis is affecting many people. This charge is being imposed on people who cannot afford it.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

It seems obvious that the impact of a charge that is a flat rate will disproportionately affect those on lower incomes. Those affected will tend to be Black, Brown, Asian, and also women and disabled persons, with enhanced discrimination at the intersection of these groups. The charge is therefore unethical. There are reasons why some people are non-practising, and the profession excludes these groups I have listed. Please reconsider this charge.

Restoring the annual keeping of the roll exercise

Response ID:206 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

There is no transparency about how the SRA has arrived at the amount of £30-£40 p.a. as the cost of keeping the roll. It strikes me as extremely inefficient that it would cost this amount given that it is an ICT function.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.

No.

NA

Restoring the annual keeping of the roll exercise

Response ID:209 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Not with the proposed cost to non practising solicitors.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, it is not fair and proportionate. Some of us could not afford it and this would result in us being disenfranchised. In this digital age it should be a very simple and cheap exercise to verify basic personal data as is held for this purpose, without the need to charge.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Inevitably, the proposals, if actioned, would affect individuals very differently depending on their personal circumstances. It would be a significant cost, especially at a financially difficult time for many groups in society. There would be many individuals who simply could not afford or justify the cost for a whole variety of reasons and for some the impact could be very great indeed.

Restoring the annual keeping of the roll exercise

Response ID:215 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

YES

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

YES

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

YES

Restoring the annual keeping of the roll exercise

Response ID:221 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:223 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The reason is as stated in the consultation document that "Since then, we have introduced a new IT system that has improved any updates or notifications of changes of status. The result is the process is no longer administratively burdensome for solicitors or for us. Our new approach allows solicitors to update their records easily using mySRA. These changes ensure accuracy and completeness of our records, which is fundamental to our role as a regulator". As this process is now so easy as a result of the introduction of the new IT system, the discussion paper itself nullifies the need for any annual charge.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I do not consider the response to be proportionate with respect to members retired from practice. Why assume that members will not have kept their information on my SRA up to date and will be more difficult to contact. You have my email address. There will definitely be a negative impact on those wishing to continue to remain on the roll, especially for those who are living overseas. I was admitted to the roll on 1 October 1983, having fulfilled all educational (Law Degree and passing of the Solicitors Qualifying Examinations) and the required post-graduate training requirements of Articles of Clerkship. I do not consider that my name should be removed from the roll by a process requiring action and payment of a fee on my part when it has already been stated that the new IT system removes burdens for solicitors and the SRA. I am not seeking a practising certificate - just continuation of my name on the roll as having been admitted as a solicitor. I was admitted to the roll and there has been no reason, disciplinary or otherwise, to remove my name.

Restoring the annual keeping of the roll exercise

Response ID:225 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No! You state that it is no longer administratively burdensome for you but consider those who are required to complete the exercise. They may be experiencing hardships or difficulties. They may be unemployed, hoping to resume work. They may have taken time off work to become a care giver or to take care of a loved one. At this time it would not be appropriate to impose an additional financial or administrative burden. There needs to be a balance. It is by no means clear that, even accepting at this time the need to ensure data is current, the exercise needs to be conducted annually as opposed to say once every 2 or 3 years. Furthermore if it is not administratively burdensome then the need to impose a fee is unjustified and not proportional to the work involved, especially if it is an online exercise. In fact this may drive those people off the Roll and potentially out of contact at a time when they are facing financial or other hardships, at a time when they may need our support. It may well reduce the diversity of those who contribute and potentially mean that the opinions and contributions to consultation exercises or professional development could be lost. The fee should not be imposed. The fee is not part of a data verification requirement it is simply a desire for revenue generation. A desire to create a revenue stream potentially from a segment that is least able to afford it.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. You state that it is no longer administratively burdensome for you but consider those who are required to complete the exercise. They may be experiencing hardships or difficulties. They may be unemployed, hoping to resume work. They may have taken time off work to become a care giver or to take care of a loved one. At this time it would not be appropriate to impose an additional financial or administrative burden. There needs to be a balance. See response to the previous question.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No, however as an impacted person I can only speak from personal experience and personal circumstances.

Restoring the annual keeping of the roll exercise

Response ID:234 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

IF the DPA / GDPR requires it, yes.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I'm surprised that coding a confirmation of the accuracy of information on a web-based system would be that expensive.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

No

Restoring the annual keeping of the roll exercise

Response ID:238 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:241 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. I believe those most affected will be elderly people who spent their lives as solicitors and should not have their title robbed from them due to old age and poverty. And that those who do not apply will largely be those too poor or unable to. GDPR does not require such extreme efforts or terrible consequences

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. I would suggest that solicitors simply remain obligated to update their details. That is enough of an assurance without a massive exercise to get the details of people who do not practice.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I think that a person's good name is their dearest asset. I think the poor, disadvantaged and elderly will be most affected by this. I think such an annual audit is drastic and not required under GDPR. The normal method would work. Let people update their details as they always have.

Restoring the annual keeping of the roll exercise

Response ID:242 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

no

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

absolutely not, this is a ripoff and assault on a vulnerable social group, the elderly. The cost should be zero.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

"The data shows that 22 per cent of solicitors without practising certificates are aged between 51 and 60 (compared to 18 per cent among all solicitors) and 10 per cent are over 60 (compared to five per cent among all solicitors). 74 per cent of solicitors without practising certificates have not held a PC for five years or more and 49 per cent for ten years or more."

This is purposely misleading and incomplete. The total percentage adds up to $22\% + 10\% = 32\%$ Is something missing here, such as the other 68%?? Even going with the SRA disinformation, 32% are the elderly (counting 50+ as elderly. However, the missing 68% should be accounted for, might it be that these are 65 or 70 plus years??

Restoring the annual keeping of the roll exercise

Response ID:243 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do not agree. As a responsible solicitor, I have always ensured the information you hold for me is up to date, and I consider it my duty to continue to do so. I do not feel I should be penalised if there are those who do not keep their information up to date.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, I do not. If GDPR requires us to make these updates, each solicitor should be responsible for making any changes (or confirming existing information) online. This should not require an annual administration charge and certainly not one as high as £30/£40.

In this day and age, there cannot be many non-practicing solicitors who do not have access to the internet. If they cannot keep their information up to date online, I can understand why you would wish to make a small charge for them.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree.

Restoring the annual keeping of the roll exercise

Response ID:245 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, but I think it should be biennial (ie every two years) which is frequent enough to keep up to date with a relatively stable situation.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The fee is fair if the annual registration is changed to every two years

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:246 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It is not fair or proportionate to charge £30-£40. I cannot see how this amount can be justified for the limited amount of administration it would entail.

As the roll is maintained for all solicitors practising and non practising what is the additional cost generated by the latter?

If a fee is to be paid then why annually rather than every 3 - 5 years at a reduced rate.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:249 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Carry out the exercise every five years with an administration charge of say £30. Annually seems excessive. Put onus on solicitors to update as necessary.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Not enough knowledge to agree or disagree.

Restoring the annual keeping of the roll exercise

Response ID:250 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes. It is all too easy to forget to log on to mySRA and update details on a house move, for example. An annual exercise will ensure that the roll is more likely to be accurate.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes and the proposed fee is reasonable.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree and have nothing further to add.

Restoring the annual keeping of the roll exercise

Response ID:251 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No - this was an unnecessary administrative burden and cost.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If the change proceeds this is a reasonable cost but my preference is for the change not to be implemented.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No further information or evidence.

Restoring the annual keeping of the roll exercise

Response ID:253 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

The proposed costs to the individual is excessive and would raise far more revenue than the exercise actually costs

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, this is excessive. You are subsidising the running of the SRA off the backs of those least likely to afford it

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:254 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Not entirely. I note that longer review options have been considered but would have thought biannual would be sufficient. Also I would have thought modern IT would be sufficient to generate an update request & log an exception to this relating to those who don't respond. Any charge should be targeted at non responsive persons who then need follow up.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I am not clear if the exercise involves mailing a letter or electronic enquiry. If the former then I would have thought an opt out in the profile would cover this. I certainly don't need reminding to update my details & assume most of my retired colleagues won't either unless health or death have prevented this ...I do not agree an annual charge is proportionate to what for example in my case could be an annual or biannual check box post an electronic communication. Effectively therefore the charge is subsidising the admin of following up the non responders. A good system should not need a charge either at all or this level. The main cost I would see would be that for the admin of processing the payments

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

As a retired solicitor I have paid my fees over the years and should now be exempted from further charges

Restoring the annual keeping of the roll exercise

Response ID:257 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes but without cost to a non practising Solicitor nearly 90

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

no

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

none. It is a good idea

Restoring the annual keeping of the roll exercise

Response ID:260 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No - it is a burden that is easily overlooked when you are on a career break

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The cost is significant for those not currently practicing but who would like to be able to return in future. My suggestion would be to review the data less often - or for it to be an opt out exercise, rather than an opt in procedure.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I stopped practicing as a result of my maternity leave interrupting my career. As a result of the requirement to re register on the roll each year, my name was omitted for a number of years - life was just too hectic and different for registering each year to be a option. Plus my contact details changing as a result of leaving my job so I did not receive the correspondence. Using my SRA account is not something I do regularly now.

Restoring the annual keeping of the roll exercise

Response ID:268 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. If the need is to comply with data protection rules, I would suggest introducing a duty of non-practising solicitors to notify the SRA of any change through the portal.

Doing this exercise annually is burdensome and costly for you. If it has to be done, then I would suggest running it every 5 years.

Removal from the roll is unnecessary. It may happen that solicitors cannot be contacted for serious reasons. When this is the case, removing a non-practising solicitor from the roll is a disproportionate consequence in respect of the omission of not communicating to the SRA the intention to remain on the roll, especially if the non-practising solicitor has not fault (illness, out of the UK, etc.).

I doubt that data protection rules prescribe the removal from a registry (for example a roll) if a member does not provide the organisation with updated information.

If the solicitor fails to respond to your request to inform of his/her intention to stay on the roll, I suggest adding a note in the solicitor's record, such as: the solicitor did not respond to our request - or - last update //2022. etc.

There should not be any presumptions that just because the solicitor did not respond, then he/she is not interested in remaining on the roll.

In any case, I would like to see some proper guarantees that the SRA will undertake a number of proper steps to contact the non-practising solicitor about his/her intention to stay on the roll (for example, sending an email, then a letter, then a call on the phone, perhaps a search on social media e.g. LinkedIn).

I appreciate that removal from the roll does not preclude a re-admission subject to an administration fee and suitability of character assessment. This is important and should be maintained. There are many reasons why solicitors are non-practising, but please do not think that non-practising solicitors do not care about being on the roll.

In many cases, a non-practising solicitor performs high value legal work that will be an asset when the solicitor starts practising.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

A one-off £30 - 40 is not excessive, however paying this sum every year is. I'd rather make a greater but one-off payment.

In addition, there are lawyers who are qualified in other jurisdictions, which means that paying a fee for any jurisdictions in which the lawyer is admitted is onerous (see my comment below).

As I wrote above, this could be mitigated by running this exercise every five years, rather than annually.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

There are lawyers with multiple qualifications. In some cases, the non-UK regulatory bodies also ask for a yearly membership fee. This will result in greater costs to be sustained every year. This circumstance should be taken into account when determining the amount of the fee.

Restoring the annual keeping of the roll exercise

Response ID:272 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

NO. The proposed charge is exhorbitant. At the most it should be £5 to reflect actual costs involved, not something dreamt up as this proposal clearly is.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.

Restoring the annual keeping of the roll exercise

Response ID:274 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do not entirely agree with the proposal. I have no issue with the reintroduction of the exercise but do not agree with the proposal to reintroduce an annual charge, or the fact that those who do not pay will not be able to call themselves non-practising solicitors.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, as the system should be automated. The consultation states: '...we have introduced a new IT system that has improved any updates or notifications of changes of status. The result is the process is no longer administratively burdensome for solicitors or for us'. Those who are not practising are unlikely to take advantage of any benefits but should still be entitled to call themselves non-practising solicitors as they have met the qualification requirements. Unlike those still practising, many non-practising solicitors will not be able to off-set this charge against tax despite probably earning less than those practising.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:279 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:281 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No it should remain as it is with individuals notifying you if they want to be removed. Also it is unreasonable to expect individuals to pay a fee to remain on the roll. This is aright they have earned through hard work and dedication.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It is unreasonable to charge. They have earned the right to remain on the roll. The alternative is for individuals to contact you if they want to be removed or if their personal information changes. The presumption is that individuals remain on the role unless or until they inform you otherwise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no view on this.

Restoring the annual keeping of the roll exercise

Response ID:282 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:283 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

The proposed fee of £30-40 does not reflect the true cost and is clearly being used to subsidise other activities.

Nor is it necessary to update annually - every 3 years would suffice.

And what exactly are the benefits of being on the roll as a non practising solicitor?

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

See previous response

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

.

Restoring the annual keeping of the roll exercise

Response ID:293 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes as a retired or rather no longer practising with me former firm I would like to retain the status of non practising solicitor

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes it is fair - keep it as low as possible though pls!

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes I agree.

No I do not have any evidence to add.

Restoring the annual keeping of the roll exercise

Response ID:294 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The cost is wholly unreasonable for those who derive little, if any, benefit from the SRA, but who wish to maintain their title. The cost is disproportionate when compared to the current cost of a Practising Certificate, which bestows so many additional benefits. For such a simple exercise, the administration cost is far too high. The SRA ought to examine its processes in order to understand why this exercise is likely to cost so much. The service should be provided free of charge.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.

Restoring the annual keeping of the roll exercise

Response ID:298 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I agree with the need to check the information held regularly, but question whether this needs to be an annual exercise. I have not held a Practising Certificate for nearly a quarter of a century, and there has been no change in my relevant details for about 15 years or more. Would, say, three-yearly reviews not be adequate?

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The fee itself seems reasonable, subject to the comments on frequency in 1 above

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:302 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, not unless it's carried out as a not for profit exercise. The suggested fee of £30-40 per person seems like a profit making operation.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Please provide a breakdown as to how you came up with £30-40. It seems rather steep for pressing a few buttons and storing data.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:308 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. I regret to say that I have difficulty in accepting that the proposal is bona fide and have seen no cogent evidence in support of the need for a change. There may (or may not) be a problem with out of date data in a small minority of cases but that does not justify penalising the majority whose records are accurate.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The proposed fee is disproportionate and wholly excessive. There should be no fee. To charge a fee discriminates against those who cannot afford to pay.

I qualified as a solicitor in 1980. I was proud to have my enrolment certificate signed by Lord Denning. I am now aged 70 and retired. Although I do not practice, I was proud enough of my former profession to remain on the roll after retirement. My details with the SRA are, and remain, correct. If they were not I should have up-dated them.

I have no savings. I live on my state pension and an annuity of £75 a month. Do those who run the SRA really think that in times of serious economic recession those like me who wish to remain on the roll could afford to pay a fee for the privilege?

I have long suspected that those running the SRA had little regard for those whom they regulate. I hope I may be wrong. This proposal does nothing to reassure me. The SRA ought to have other and better things to occupy its time.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The proposal adversely impacts on those financially at a disadvantage or unable to pay a fee. Please refer to the previous answer as to my personal circumstances.

Restoring the annual keeping of the roll exercise

Response ID:309 Data

2. About you

8.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

9.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I agree with the proposal to update the records, but feel that updating annually is excessive, particularly if an administrative fee is charged each year. The majority of this information is unlikely to change on an annual basis, being I imagine mainly a result of some significant long-term change. In my case, I have gone back to University to study a different subject and retrain, which in turn has led to a PhD, but in case it doesn't work I'd still like to keep my name on the roll for the time being. I'd be happy with every 3 years.

10.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, if the fee is every 3 years.

11.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

no comment

Restoring the annual keeping of the roll exercise

Response ID:311 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

£30 maximum (this is an increase from previous charge of £20). A doubling or more of the charge is not justified especially as people like me already have a mySRA account.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes. No.

Restoring the annual keeping of the roll exercise

Response ID:314 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I don't object in principle, although I am personally semi-retired with very little self-employed income now and it will be an additional cost and administrative load for no real benefit as my details will not change year on year. Although I can see the benefits to you of an annual process, I think there should be a longer-term option, or a no-fee option for those of us whose details have not changed but wish to remain on the Roll. For example, all my details have remained unchanged and are correct from 2014 and are likely to remain so - why should I pay £30 to £40 per year to confirm this to you? And why should my only other option be to come off the Roll?

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

A moderate fee seems appropriate; however the amount you are proposing seems high compared with your likely administrative burden, which you say will be greatly reduced compared with the previous exercise where the fee was £20. It should certainly not be more than £30 and even this seems high. As per my previous answer, I would like a no-fee or minimal fee option (say £15 to £20) for a 'no change' return. It is for you to meet your GDPR obligations and you should not pass onto us the costs of your compliance.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I think you have underestimated the impact of age, as this is the largest group affected and will contain more people who are retired and may have reduced income. This also applies to sex as there may be more women on career breaks for childcare or other caring responsibilities, also with reduced income. I suspect this may apply to the pc of disability as well.

Restoring the annual keeping of the roll exercise

Response ID:315 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes but the fee looks high. Will put off lots of people from applying to keep their name on the roll.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I agree with a charge but think it looks very high, particularly given current cost of living crisis. The people this applies to aren't working as solicitors and are in many cases in lower paid jobs or not working at all due to ill health etc. Can't the applicants be asked to perhaps give more information which would reduce the need for as much work to be undertaken by DP officers - put more of the workload on the applicant?

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:318 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

As the process will be automated, with individuals completing the information online through the SRA portal, I consider that a £30 fee would be more than sufficient. Anything higher would need to be justified.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

not applicable

Restoring the annual keeping of the roll exercise

Response ID:319 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Happy with that, not so happy with the fee. I am a retired solicitor, I keep abreast of issues within the working profession through the Law Society news and emails. I am afraid if this becomes subject to a fee that it will have to go, despite all my years in the profession. Could you not have a provision for access to professional information for retired, non-practising solicitors?

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

See above.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:321 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Not if it requires a fee to be paid. Presumably the exercise will require non-practising solicitors to carry this exercise out themselves online. As such I cannot see a reason for a fee being introduced.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The charge discriminates against people who have taken career breaks for caring responsibilities, and I expect this will be disproportionately borne by women. It is another step that will put women off from coming back into the sector following a break.

If it's a case of removing solicitors who have retired and subsequently died, then this is another issue and measures should be put in place to deal with this specifically.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:322 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. It is a heavy administrative burden. It is not necessary to meet GDPR, rather you could simply ask people to give consent to processing their data

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It is unfair as many non practising solicitors may be unemployed

I would suggest that keeping of the roll exercise annually is unnecessary and therefore charge does not need to be made.

Alternatively, this cost could be spread across PC costs of practising solicitors, who by their nature are in paid employment and have their fee covered by employer which is offset against tax.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The impact is likely to be greater against female solicitors who are more likely to take time out of employment due to caring responsibilities. This could mean there is an additional burden on them in the future. It could also impact those from other minority groups or solicitors with disabilities, if they face barriers to employment. There is a large body of evidence which demonstrates that those with disabilities and single parents tend to have lower incomes and can struggle to meet their daily living costs.

Restoring the annual keeping of the roll exercise

Response ID:330 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. The proposal does not appear to incorporate any consideration or even mention of the position of members of the Judiciary, who are required to remain on the roll but do not require practising certificates. It is illogical to exempt government lawyers (who did have to pay the annual charge prior to its abolition) but not to exclude judges and judicial officers.

The proposal is also disproportionate. There is no apparent consideration of alternative periods for updating the information. Retired solicitors are likely to have less frequent changes in their status than practising solicitors. Updating every 2 to 3 years would seem more appropriate.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The fee is grossly excessive, in particular for an exercise which in most cases would be conducted electronically without SRA staff involvement. If the SRA has calculated that this would reflect the true cost of providing the service, then consideration needs to be given to redesigning the process to be less expensive. A fee not exceeding £15 would seem appropriate.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No observations.

Restoring the annual keeping of the roll exercise

Response ID:331 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not consider it fair and proportionate

You actually have not stated how individuals would be directly affected

You have given a generalised proportion in your consultation documentation ,not empirical numbers

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:332 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

As a retired solicitor who does not hold a practicing certificate but wishes to remain on the Roll may I suggest that this category be exempt from the proposed administration fee.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:336 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

NO

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

NO

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

NO

Restoring the annual keeping of the roll exercise

Response ID:337 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I understand that it is important to keep the register up to date.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not agree that the costs proposed are reasonable. The process can be undertaken purely electronically. I do not object to a reasonable charge

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I consider that those in the profession who do not have means to pay should not be expected to do so. There should be an acceptance that there are Solicitors (retired or on a forced career break) who will not be able to pay and will be removed from the roll against their wishes.

Restoring the annual keeping of the roll exercise

Response ID:342 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The proposed charges are clearly far in excess of the actual additional cost to the SRA of administering the proposed system (the necessity for which is dubious in any event). It is clearly an exercise designed primarily to boost the SRA's income.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:346 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes - I can see the GDPR requires it and I think it's useful to have an accurate record of those holding themselves out as non-practising solicitors

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

This feels like a lot. I think it's fair to make a direct charge but it should be in a much lower range. The companies house confirmation statement, by comparison, is only £13 p.a., and this covers a great deal more information.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Looks fine

Restoring the annual keeping of the roll exercise

Response ID:350 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Disappointed as a retired solicitor who would expect still to be on the roll

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:355 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I see no objection to the reintroduction of the annual keeping of the roll exercise. I can see the advantage in doing so.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not consider it fair or proportionate to charge directly for the exercise. You state that "the process is no longer administratively burdensome for solicitors or for us." As a person who is a retired solicitor, I cannot see why I should pay the sum suggested to remain on the roll of solicitors. I have never described myself as "a solicitor without a practising certificate" and can foresee no circumstances when I am likely to do so. I have not voted in any Law Society election nor accessed to the Law Society Hall and or it's library or benefited from any discounts and benefits because I am a retired solicitor. Despite this I regard the fact that I practised as a solicitor as an important element of my life and wish to remain on the roll of solicitors.

If maintaining my name on the roll is not burdensome I can see not reason for charging me to remain on the roll or at the most charging a nominal sum. I am a member of another professional organisation and remain on it's list of members. I do not pay an annual sum to do so.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I do not agree with the conclusions in the EIA. The proposal clearly affects those of us who no longer have a practising certificate. The proposal will have direct effect on me. Throughout my time on the roll those who did not hold practising certificates were on the roll. No problems arose from this for the public. I was happy to fund that situation. I would be happy to respond to an annual questionnaire but can see no reason for incurring the cost to do so. I used to practise as a solicitor. I was pleased to, do so and enjoyed doing so.

Restoring the annual keeping of the roll exercise

Response ID:360 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

£20 max

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:364 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I Yes, but subject to response to question 2.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

A charge of £30 to £40 would be fair and reasonable where the respondent solicitor notifies changes in his or her personal details or other relevant circumstances which require the SRA to update the changes. But for most solicitors who have been kept on the roll, the SRA could with little cost send them an e-mail in standard form asking them to confirm whether or not there are any relevant changes to notify. If all responses are negative, the SRA will have very little administrative burden justifying an admin fee.

A solicitor who does not respond should be notified by e-mail that he or she will be removed from the roll unless he or she responds within a specified short period. An administrative charge would be appropriate if he or she responds to the warning.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:365 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Although the charge is not a large amount it does not seem justified when all you need from a retired, non practising solicitor is confirmation that he/she is not working.

I paid large contributions to the SRA when I was working and those of us who have contributed for many decades with unblemished records should not be called upon to pay the cost of record keeping!

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

none

Restoring the annual keeping of the roll exercise

Response ID:371 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I understand that a fee is necessary but less than £30 pa would be preferable.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes, no and no

Restoring the annual keeping of the roll exercise

Response ID:375 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Not with the amount of the proposed figure. I would suggest a more nominal fee. Alternatively, and as you state that only 5% of non Practising Solicitors are over 60, a reduction in the fee for those either over 60 or slightly older. The cost to the SRA for that smaller group would be able to be covered by the fees charged to the majority.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Overall, yes. However, the impact of the proposed fees on those who undertook Legal Aid work before becoming non-Practising compared with those who did not earn their living undertaking such work, is likely to have a greater impact on the former rather than the latter. I have no empirical evidence to support this but believe it to be generally acknowledged in the Profession. I accept that there would be practical difficulties in trying to make such adjustments but consider that the EIA has not taken this into account

Restoring the annual keeping of the roll exercise

Response ID:380 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Reluctantly yes; the DP regulations impose an unnecessary burden

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Reluctantly yes

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No view

Restoring the annual keeping of the roll exercise

Response ID:384 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, but those who have been on the roll for 50 years or more, such as I, should not have to pay.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:388 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, save for the fee.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Increase the cost of the practising certificate.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The proposed fee disproportionately impacts women, especially those who are on extended career breaks caring for children or other family members, who may wish to stay on the roll in order to re-enter the profession at a later date.

Restoring the annual keeping of the roll exercise

Response ID:389 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The proposed annual cost is extortionate and wholly unjustifiable . It should be no more than the cost of applying for access to what is held on a data subject by any business (say about £5.00) . It should not be so high that the SRA makes a huge profit .

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No , no and Nit applicable are my answers to the above questions .

Restoring the annual keeping of the roll exercise

Response ID:393 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. This is something the Law Society should absorb, or be entirely electronic with a nominal charge of less than 10 pounds only

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:397 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

£20

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:398 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes.

But £30 to £40 is excessive - given how you laud your current IT system.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes.

No.

Not applicable.

Restoring the annual keeping of the roll exercise

Response ID:404 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I recognise there is a cost to administering the exercise. However, having paid the full annual practising certificate fee during my 25 legal career to this point (I am now taking a career break) is a new fee really fair?

If the scheme really cannot be carried out without a new fee I feel £20-£30 would be fairer. This would be proportionate for continued access to the Law Society facilities etc.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment in response to this question

Restoring the annual keeping of the roll exercise

Response ID:407 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Given the legal requirement to ensure that data is kept up to date, there doesn't appear to be any practical alternative.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Until 2014, the fee was £20. I think that it should be kept at a similar level, so no more than £30. I do have a concern that once introduced, the fee might rise exponentially and be seen as a source of revenue, and think that the SRA should be prepared to give assurances that this will not be the case.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:409 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. The system in place since 2014/2015 works perfectly well - with no administration and no costs involved. It should remain as a matter for each solicitor to ensure their own record is up to date and correct.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. It is not fair to charge a fee where the SRA is requiring a solicitor to send a reply and that reply is 'no change'.

If the SRA feels it must ask for solicitors' confirmation, a system should be used whereby it is assumed the record is correct and up to date unless the solicitor informs the SRA to the contrary. The new updated IT system should be capable of operating such an assumption. This IT process should be cost-neutral.

A fee should only be charged where the solicitor requests a change to the record and that change must be verified by the SRA.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.

No.

N/A

Restoring the annual keeping of the roll exercise

Response ID:412 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. It would be an unnecessary and unduly burdensome process for the SRA and for individual (non practicing) solicitors. Many other organisations manage to maintain and update personal information without charge to individuals.

In the event that a solicitor is removed from the roll, your proposals would then increase the administrative burden on the SRA and on the individual to reapply. Additional administration, expense, delay and aggravation would result.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The cost is not fair or proportionate. The additional administration caused by the updating is due to a proposed policy change by the SRA and should not be passed to individuals, who are in many cases, no longer earning income through their qualification as a solicitor. This particularly applies to "retired" solicitors, who should be exempt from any such charge.

If there is any administrative cost, this should be paid by those actively earning income through their professional status.

A simple suitably worded annual reminder (by email) to non practising solicitors would achieve the desired outcome without the need for such administration and cost. The solicitor can simply update details using "mySRA" as they do now.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The SRA proposals would impact disproportionately on older solicitors, particularly those over the age of 60 years and who may have retired from legal practise. The proposals would therefore be discriminatory.

Restoring the annual keeping of the roll exercise

Response ID:413 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Do you agree with the conclusions in our equality impact assessment (EIA)? - Yes

Do you have any information about the impact of our proposals on any other groups? No

Do you have any evidence to support this? N/A

Restoring the annual keeping of the roll exercise

Response ID:416 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes.

Restoring the annual keeping of the roll exercise

Response ID:421 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

These costs are reasonable

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:423 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. Apart from the obvious desirability of updating the information you hold from time to time, there seems to be no good reason for going back on the 2014 decision to discontinue the annual "keeping of the roll exercise". There are other less onerous ways of updating your information - it could, and probably should, be the sole responsibility of the person to whom the data relates to keep their own data up to date. For solicitors who are no longer practising, the essential data to be kept updated is surely minimal - a current contact address and, in due course, notification of decease.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. A charge of "£30-£40" per year for this seems excessive; certainly for retired solicitors who are unlikely ever to return to remunerated legal practice but wish to maintain some contact with their former profession. The updating of personal data, as and when necessary, should be the responsibility of the individual concerned at no significant cost to the SRA.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The proposals impact unfairly on retired solicitors - as is apparent from the "EIA" itself.

Restoring the annual keeping of the roll exercise

Response ID:428 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No I don't think it needs to be annual. Solicitors could agree to you processing their data for up to 5 years which should suffice.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If the updating is every 5 years the cost could be kept down. £30-40 a year is a lot for an individual to bear

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:429 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do not have a strong opinion one way or the other on this. But I do ask that it can be paid via credit card or some means other than a UK bank account transfer. That makes it difficult to pay.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:432 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No point in debating the issue - if it is needed to meet Data Protection legal requirements then so be it.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No.

It was a great honour (and the outcome in my case of a great deal of hard work!) to be admitted as a Solicitor in 1970 and to become a member of a highly regarded profession and the standing that that brought. Throughout my working life in public service, the over-riding mantra was the need to uphold and maintain the integrity and dignity of the Solicitors' profession alongside the highest standards of public service. When I retired I no longer needed a Practising Certificate but I still wanted to hold my head high and with pride by being able to call myself a Solicitor (Retired) and thus a member of a distinguished profession and upholding the standards of the profession.

Telling me that I now need to find £30 - £40 a year to pay for that privilege in my view demeans those standards to a purely commercial entity - "you want, you pay". After more than 40 years as a working professional, and 10 years retired since then, how degrading now to be told that I can now only call myself a Solicitor if I find a fee to buy that dignity.

I have always treasured being a member of the Solicitors' profession but I would have to question whether the current proposal is consistent with the respect which the profession ought to afford to those who have retired from active engagement in its work.

In the same way as is done in other areas, why couldn't the cost of the administration of the Keeping of the Roll for retired Solicitors be an 'overhead' tacked on to the annual fee charged for Practising Certificates - which is effectively how the Roll was kept for retired Solicitors in the past and which afforded them the respect of the profession.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Nothing to add

Restoring the annual keeping of the roll exercise

Response ID:434 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:436 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Shouldn't be a charge

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:440 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, I understand and agree to the reasons as mentioned in the Consultation Paper.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I agree with the costs with an understanding that they may be administrative costs for this task.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes, I agree with the conclusions in the EIA as mentioned in the Consultation Paper.

Restoring the annual keeping of the roll exercise

Response ID:445 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I think the charge should be around £10. I'm not sure why the cost would be in the region of the proposal.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes. I don't have any information on the impact.

Restoring the annual keeping of the roll exercise

Response ID:446 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I suggest that the proposed charge is greater than that needed to reasonably cover the costs of an annual review

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

An unfair charge will impact those who are retired

Restoring the annual keeping of the roll exercise

Response ID:449 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

Proposed fee of £30 to £40 is fair in my view

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:455 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:457 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes. Accurate information on the Roll is essential.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It is only right that in view of the benefits conferred by remaining on the Roll, I should fund a reasonable administrative charge. Your proposed charge is perfectly acceptable.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree and have nothing to add.

Restoring the annual keeping of the roll exercise

Response ID:460 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I disagree with the proposal. I currently hold an employee lawyer practising certificate in Queensland, Australia and I intend to keep working as a lawyer for many years to come. In addition to be admitted as an Australian Lawyer, I am also on the Roll of Solicitors in England and Wales, and New Zealand. Pursuant to section 9(1)(j)(iii) of the Legal Profession Act 2007 (Queensland), the fact that my name may be removed from a foreign roll (i.e England and Wales) would be a 'suitability matter' that would need to be notified to the Queensland Law Society. This is normally done as part of the annual practising certificate renewal process. Similar provisions operate in other Australian states. Therefore, introducing this requirement would require me to pay the annual administration charge to remain on the England and Wales roll, for the time I am working as a lawyer in Australia.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The fee is unfair on lawyers who are working in other jurisdictions, and would be required to pay this charge every year. I note that I earn Australian dollars and paying a sterling fee is a significantly higher cost for me, than for people working in the UK. It should be possible to require people in my position to update their online SRA account every year, for no fee. A simple email asking people to do this by a deadline would suffice, or to tick a box if the details remain correct. The marginal cost of this exercise should be negligible. If people do not respond to this request, they could then be charged a fee and/or removed from the roll.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

This proposal will disproportionately impact lawyers who are currently working as lawyers in other jurisdictions, where the question of whether they have been 'removed' from a foreign roll is a suitability matter in their local jurisdiction. See discussion above in 1.

Restoring the annual keeping of the roll exercise

Response ID:464 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I agree that a charge should be levied to restore solicitors to the roll, but I do not see why there should be any cost to maintaining solicitors on the roll. The system already allows non-practising solicitors to update their details without charge. All that is required is an annual requirement to confirm online "No change", or "Update". If the non-practising solicitor fails to respond to either, then the name is automatically removed.

I was proud of being a solicitor, and accordingly proud to remain on the roll since my retirement over ten years ago. I still read the Gazette. But I am not willing to pay £30 - £40 per year for the privilege.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes, I agree with the conclusions in the equality impact assessment, save for the use of the word "potential" in the sentence "There is a potential negative impact on those who wish to continue to remain on the roll, as they will need to participate in the keeping of the roll process each year paying the requisite fee." Having to pay £30 - £40 per year for something that should not cost anything is actual negative impact, not potential.

Restoring the annual keeping of the roll exercise

Response ID:465 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, in the interests of maintaining accurate and up to date information.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It is fair and proportionate to charge directly at the level indicated.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree with the conclusions in the EIA and have nothing further to add.

Restoring the annual keeping of the roll exercise

Response ID:467 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

In partI understand the need to have an up-to-date database but I do not agree with the charge.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I do not agree with the charge. Like many individuals I no longer have the income I once had. For many years I paid the fees out of my own pocket. I doubt it will remain at no more than £30-40 but in reality..for me that is a weeks shopping basket. I can already see the banner line.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.....you've obviously never been poor...

Or in an age group where the desire to work is just that...age discrimination.

You make these decisions totally out of touch...shame on you....this is just the thin end if the wedge.

Restoring the annual keeping of the roll exercise

Response ID:468 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

No

No

Restoring the annual keeping of the roll exercise

Response ID:475 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do in principle but I ask that you consider an exception to be made for the probably over a 1000 solicitors employed by the Government Legal Department to be exempted from this requirement or for them to be centrally registered by our employer to avoid unnecessary admin!

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

This approach set out above might cut costs if administered centrally by the employer.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:477 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. I suggest an 'opt out' one off data protection process whereby a person admitted to the Roll authorises the continuance of their information as a non-practising solicitor of England and Wales until and unless that person directs removal.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No an annual charge of £30 - £40 does not appear fair and proportionate, specifically if the suggestion above is adopted. Rather with an 'opt out' system a small charge for the administration for removal may be justified. And a once off charge for retention may be justified but costing would be needed for that to be supported.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Gender equality analysis seems inadequate.

Restoring the annual keeping of the roll exercise

Response ID:478 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Having read your proposal, I understand the reasons for re-introducing an annual up-date of the Rolls so my answer is Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The amount proposed does seem proportionate. However, I say this on the understanding that this sum will not be increased every year but remain within the parameters indicated. As most of the work is going to be done by the applicant, I cannot see why, after the first year or so of the re-introduction of annual renewal, there should be any increase because the culling of non-respondents should have been completed by then.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:480 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I understand the reason but do not agree with the reintroduction for solicitors over the age of 60. You say they form 10% of the cohort. I am a retired solicitor with 46 years on the roll. The Law society recognises solicitors who have been on the roll 50 60 or 70 years with a congratulatory certificate. Your suggestion will penalise solicitors who have retired and are proud to still be on the role as recognised by the Law Society. Older retired solicitors may not be able to afford the fee. The proposal is therefore unfair to this group and is not diverse and discriminates against the elderly. After years of dedicated service I feel it is wrong to remove these solicitors from the role just as a cost gathering exercise.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I consider the fee to be unfair if were levied on all solicitors regardless of means and age. Perhaps those over 60 should not have to pay a fee. They only represent 10% of those non practising on the role. Also the cost you say "will be no more than £30-40". This would be a considerable cost to those who are retired and no doubt it would go up every year.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I do not agree with your equality impact assessment. It does not consider the older solicitor and smacks of ageism.

It will have a clear impact on those over 60 who have retired. Not all solicitors are wealthy and some have small or no pensions and to remove them from the role because they cannot pay the fee would be a big insult

Restoring the annual keeping of the roll exercise

Response ID:482 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. On the one hand you state that with your improved IT systems you are now able to restart updating the roll with minimum effort but with an increased fee. Fee is not proportionate

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Not really interested in it

Restoring the annual keeping of the roll exercise

Response ID:488 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Only if it is absolutely required under the UK-GDPR regime

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Given the stress put on the modernised IT system(s) and the consequent lessening of the administrative burden I do not feel that an administrative charge of the amounts proposed is justified. If any fee at all is to be levied, it should be purely nominal (£1?) To do otherwise discriminates against both those on limited incomes (especially pensioners) and those unable to work due to ill health or family difficulties.

With good modern IT capabilities there must be scope for alternative approaches. What about turning the burden around and requiring all solicitors who are not currently practising for whatever reason to log into mySRA annually to confirm that their information is accurate and up-to-date? If no confirmation is received, it is presumably possible to write a program which simply removes that person from the roll. Provision could surely be made for those who really cannot access the internet through any means.

I was proud to qualify as a solicitor but if this proposal were to be brought into force I would reluctantly have to come off the Roll. I object to having my hard-won admission to the Roll removed due to what appears to be little more than a box-ticking money-making exercise.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

It is not possible to comment on the EIA as it is so lacking in detail as to be pretty much meaningless. The proposals certainly seem to discriminate against those of limited means, who are often female (due to career breaks for childcare), and against those in poor health.

Restoring the annual keeping of the roll exercise

Response ID:489 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No view

Restoring the annual keeping of the roll exercise

Response ID:490 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. The impact of doing this will mean that academics, who do not practice, will be impacted to a greater extent than other groups. It could be argued that it is important for this group to maintain the status of a non-practising solicitor, unlike other groups such as those who are retired. As such the impact of a failure to remain on the roll may well be significant and the need to do so on an annual basis with the associated fee, is unfair. There appears to be no need to maintain on an annual basis in the way suggested. It would be much fairer and appropriate to notify individuals of the need to confirm details and only require a fee if change is required.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. Those who do not practice are likely to be retired, etc. and earning substantially less than those in practice. Please note 'will be no more than' illustrates the lack of understanding of the SRA in respect of what people earn who are not in practice. The fee of £30-£40 may be a small amount each year for someone who is in practice, but this is not the case for those who are not. If you are going to charge you need to consider how an individual's economic circumstances may be mitigated (this will mean further expense).

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No. Although I have no supporting evidence, it is clear that the approach to be taken may have an economic impact on some more than others. Clearly some of the most disadvantaged groups will fall into this category.

Restoring the annual keeping of the roll exercise

Response ID:499 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not find it appropriate to charge for this service. There should be an email sent automatically once a year with a request to update personal details. If no answer is received for a 2 or 3 year period a warning to remove the name from the roll is issued. This is a labor free exercise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:506 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, although it should be a slimline as possible. Ideally there should be reminders each year.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Acceptable at £30. Should be automated making it cheap to run

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I don't know enough about the impacts to agree or disagree. There is a logic to the conclusions but that depends on the underlying data which may or may not be correct..

Restoring the annual keeping of the roll exercise

Response ID:509 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do not. The proposal would indeed be burdensome to those, like me who are retired and may not have up to date technology. In order to access my SRA account this morning I had to attempt to change my password, twice, and be sent codes to input as it would not accept the correct password that I was entering. Obviously since that password was created the criteria for passwords has changed and they now have to be at least 8 characters long and include an item of punctuation. I also had to exchange emails with the Law Society to be able to complete this form as the information 'Click on Next' was incorrect. By complete happenstance I touched the arrow beside the percentage bar at the bottom of the page, which in fact gave access to the questionnaire. The older I and my devices get the more unlikely it will be that I would be able to complete the annual task and I would be removed from the roll by default. There must be other methods of your complying with your data holding duties than putting all the responsibility on the individual solicitor. For my part all my details are correct and will remain so until further notice.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I also think that it is outrageous to charge a fee, especially one as high as £40, when all the Society has to do is send out one email a year and sit back whilst the individual recipient struggles with the technology to ensure remaining on the roll. You say that you have modernised your IT systems and presumably will continue to maintain them so I do not see what extra cost there can be to the Society. If my problems today are anything to go by the process will be extremely burdensome to the individuals, who will be wasting their time and effort attempting the process. To demand a fee as well is to add insult to injury.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

In my view the proposals will adversely impact retired Solicitors, that has certainly been my experience to date.

Restoring the annual keeping of the roll exercise

Response ID:522 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. This exercise was carried out previously by the Law Society and there was no charge. many of us retired solicitors are on a limited pension will result on many of us leaving the Roll

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:525 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I agree with a proposal to regularly update the annual roll but I do not agree that this needs to be done annually.

The exercise can be carried out every 3 years and still be reasonable in light of the Data Protection Act 2018 (and GDPR) to keep information held accurate.

The ICO would not consider it a breach to have information that was 2-3 years old. I know from the sector I now work in.

This feels like an exercise in income raising similar to practices seen by local councils in aggressive parking penalties. I am disappointed that the SRA is viewing non-practising solicitors as an income source. I (and I am sure many) spent a lot of personal money to gain qualification and so am reluctant to be removed from the roll. I now feel penalised for wanting to maintain the privilege of this professional qualification that I worked so hard for.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

£15 per annum - why should it cost so much when everything is done digitally and the updates will be by a machine? If it's the import process from the data received into the back end of the roll (ie your database) then I still don't see why it would cost so much per person.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I feel that your assertion that most non-practising solicitors will be retired is false. By your own calculations, those over 50 make up less than 35% of the total of non-practising solicitors. I cannot say about the other protected areas but I suspect that this will have a disproportionate impact on women and ethnic minorities who may not be working in house and cannot expense this cost as part of their 'professional subscriptions'. It will be a personal cost to many and an unnecessary one in my mind as the services we get as non-practising solicitors is minimal. The services have been eroded over the years.

Restoring the annual keeping of the roll exercise

Response ID:528 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I agree that there should be some means of each individual on the Roll showing that they have checked their details and that they are correct. I am not convinced that this needs to be done on an annual basis, unless it is administratively easier for it to be done on an annual basis.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I do not. I do not see why each individual on the Roll should not be required to check their own details on an annual basis and the IT system be able to recognise this having been done. I don't think it would be unreasonable to expect an automatic e-mail reminder to do this, at no charge.

I worked hard to be admitted to the Roll, and worked for many years in the profession. An annual fee of £30 - £40 to anyone still in work may not seem a lot of money, but to many who have been retired for some years, on top of the anticipated increase in living costs, it would be an unaffordable luxury.

If the IT system is set up correctly, I do not think that the proposed 'administration charge' is justified.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes as to the first question.

Restoring the annual keeping of the roll exercise

Response ID:529 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. You could surely comply with GDPR by conducting such an exercise less frequently

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:530 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

If you feel there is no other way to comply with your GDPR requirements - please see my answer below for an alternative suggestion.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I think £30 is far too expensive and I cannot see how the exercise could possibly cost so much. Many of us who are currently not practising but wish to remain on the roll are taking a career break to look after children, are caring for elderly parents, are facing illness and/or are in much lower paid jobs. I would have thought a standard email to all those on the roll informing them they would be removed unless they respond confirming the details on file are correct/they are happy to stay on the roll would be sufficient with a maximum £10 charge to cover administrative costs.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Please see my comments to (2) above.

Restoring the annual keeping of the roll exercise

Response ID:531 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. A small administration fee maybe justified in the event of notification of a change in contact details.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment.

Restoring the annual keeping of the roll exercise

Response ID:533 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

While I accept that you have a need to maintain your records, I would think that this exercise should be performed every 3 to 5 years only.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I would think that a charge of £20 should suffice for an online-based exercise.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

not known

Restoring the annual keeping of the roll exercise

Response ID:535 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, seems to be a reasonable requirement

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The previous fee was £20 adjusting for inflation the proposed fee is of the right order

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Agree that needs to be dealt with objectively and sympathetically to cover all groups of membership

Restoring the annual keeping of the roll exercise

Response ID:538 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. The proposal would reverse the long standing SRA approach (no keeping of the roll exercise considered necessary) to one of extreme consequence and significant impacts (annual checks at a £30/40 cost and time cost to all on the roll, pay or be struck off with forfeited status and practising rights). It will unlawfully indirectly discriminate in relation to age, sex, race and disability. Unfortunately, the consultation document lacks detail and cogency. The EIA is similarly very limited. None of this in my view would get off the ground as justification for discrimination. There are less intrusive, less costly and more proportionate approaches to meet the SRA's objective and to reduce the discriminatory impact.

The consultation document explains the first reason to reverse the 2014 decision is the GDPR. However a) that came into force 4 years ago; b) it was already long-established law, the DPA, to keep data accurate and up to date; and c) it is not a legal requirement to do an annual exercise. The frequency of accuracy checks/keeping living people's data up to date is far less prescriptive. Is the SRA saying it has been in breach for many years? The reason at paragraph 8 and 14 (to contact members) is of minimal relevance, significance or cogency. The vast majority of members are rarely if ever directly contacted by the SRA or Law Society.

If the new IT system is considered to make a keeping of the roll exercise less administratively burdensome (para 7), why is an annual charge even incurred by the SRA? The charge level isn't explained nor what nature of costs with what would mainly be individuals prompted to confirm their my SRA details, pay the fee or not and automatic chaser emails for non-reply.

Benefits: proportionately very few members vote in relevant elections or can avail themselves of the Chancery Lane premises (less so if you live outside London).

The document proposes April for annual returns (para 32). On the basis all aspects of the annual PC renewal are completed by then. That doesn't take into account that the PC can be renewed at any time during the year. I have done this several times, according to when I've needed it. People could be required to pay once to stay on the roll in April and again to renew the PC in May or later in the same PC year.

Paragraph 32 refers to the SRA will ensure sufficient contact centre support and other parts of the document state the SRA have an effective and modern IT system for data handling. My own experience evidences the contrary. This year I reported a failure in My SRA, whereby I (and possibly others) were unable to change their ethnicity data. 6 weeks later, I've had no fix, no substantive explanation and have chased twice.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, as above. The nature and level of these costs are not identified or explained. Presumably, as with PC renewals, this process would be entirely automated. Once the software is in place, there should be little time or other costs for the SRA in most instances. Once the SRA do the first exercise, it will have an "immunising" effect ie be valid for several years, particularly by

removal of those deceased and those who leave the roll due to the charge. Every three years would be more than sufficient, strike a better balance, reduce the burden and cost for the SRA and members and be more proportionate. Build in a roll renewal charge exemption for those who do not need a pc who but who are working (eg the GLS) and those who do not need a PC due to unemployment, career breaks, parental leave, disability/ill health or otherwise those who are on a low income. A similar exemption should be considered for practising certificate renewal charges: there are very limited exception categories there.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No, yes and yes. The EIA relies on limited member data in certain respects and there's a very limited EIA. It suggests there "might" be an age and sex impact. We can take some judicial notice here, based on the data and what we know. There will clearly be these particular adverse impacts: age. 32% of those affected are stated to be over 50. Further, those older/retired groups are more likely to be white, from times when the legal profession was less diverse. That would mean indirect racial adverse impact, on white solicitors, not recognised in the document. The document tentatively says there "might" be an adverse impact on those on maternity leave or career breaks. We can go further. Clearly there will be, principally women. Women more typically have the primary child care role and are more likely to be on career breaks and to be carers. Given this and the continuing changing solicitor gender demographics (majority women at the entry-level onwards), there'll be growing impact on them year by year with this process. Those with disabilities and ill health are less likely to be employed full time and/or employed at all and struggle harder to get back into practice. Ditto those trying to return to practice after career breaks. I'd recommend much more careful consideration of the serious impacts of the proposal, more data on the charges, and those affected. I disagree that the SRA approach would be proportionate for the reasons given. I'd also recommend the SRA consider the 2017 Supreme Court decision on ET fees, albeit a very different context. Note their scrutiny and analysis around adverse impact, justification and the evidence required. I'd reiterate this proposal ultimately involves people being struck off the roll, so a very cogent justification is needed. Particularly given the change to the status quo and, to the extent the GDPR is prayed in aid, I repeat my earlier observations.

Restoring the annual keeping of the roll exercise

Response ID:542 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The costs are incurred by a measure that is unnecessary - namely the revision of the roll on an annual basis. Given that most non-practising solicitors' individual details and professional circumstances are fairly stable on average and do not change on an annual basis, it seems disproportionate to make these changes for an exercise that is likely to bring little benefit to non-practising solicitors. Charged data update exercises should perhaps be undertaken every 5 years instead to ensure the register is kept reasonably up to date.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I do not have data to disagree.

Restoring the annual keeping of the roll exercise

Response ID:548 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. The vast majority of respondents to the 2014 consultation supported the abandonment of the annual exercise, a move I supported. The proposal now to reverse the decision made then is not justified by either of the reasons put forward. The first reason, the alleged GDPR requirement, is a complete red herring. The requirement to maintain a roll of solicitors dates back to at least 1974 (and probably much earlier) and this was not seen as a problem in 2014. GDPR itself has been around for several years but the SRA has seen no need to act before now. The justification for change now is the second reason put forward - a modernised IT system. But my own experience in completing this consultation shows that this system has flaws - I was unable to access the saved part-completed consultation through the email link I was sent and had to begin again; and when I tried to log-in to my SRA account I received the message "A problem has occurred" (this I eventually traced to a change about which I had not been notified to the requirements for passwords). In short, the new system is itself likely to throw up problems. By reintroducing an unnecessary annual exercise, the SRA will therefore have placed both a regulatory and financial burden on non-practising solicitors.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. If the IT system is as simple and efficient as claimed, its running costs must be minimal. I suggest a fee of no more than £5.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No. The existing arrangements have worked well. If solicitors wish to keep abreast of the SRA's doings they can do so - it does not require the SRA to chase them. And as I have described above, the SRA's existing communication leaves something to be desired. The negative impact of introducing an annual fee and some associated bureaucratic exercise has not been mitigated against at all - the proposed fee is not "low" and the negative impact is real not "potential." My reluctant conclusion is that the proposal is an ill-judged attempt to increase revenue and nothing more.

Restoring the annual keeping of the roll exercise

Response ID:549 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

make it cheaper please.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Impact on those having career change and finding it difficult to return to legal career. Meanwhile, they are in lesser paid and voluntary roles to try to keep their skills going and earn some money. They certainly want to remain on the roll in the meantime.

Many women fall into this category. Might want to liaise with the organisation Returning Women for more information.

Restoring the annual keeping of the roll exercise

Response ID:559 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Automation

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:561 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. As a retired solicitor, I would be happy to complete the form and update my details, but would not do that or remain on the roll if I had to pay an administration charge (of the amount suggested) for it.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:567 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes -this appears sensible.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not regard £30-40 as a reasonable charge for this exercise. Half this charge would be reasonable or a fee every two years.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:568 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. Too cumbersome and time consuming. Definitely not for non practising solicitors (includes retired solicitors).

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Some non practising solicitors are not working for various reasons - ill health retired, unemployed etc. Finances are tight. In the event of a charge, a token sum of £10.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:569 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, I do not agree with there being a charge for this exercise. It is an electronic update which will not cost anything once the process has been incorporated into the IT systems. The SRA will have a reduction in its costs of locating non practising solicitors due to all having to update every year and that benefit to the SRA should be used to pay for the one-off system update to enable the non-practising annual update process.

Another source of funding that the SRA is forgetting about is the reduced compliance costs with GDPR it will incur as well as mitigating the risk of fines for not complying properly with GDPR.

To charge a fee would negatively impact more women than men and also significantly more carers (such as myself) for whom money is incredibly tight. I should not be forced to remove myself from the roll that I worked so hard to get onto just because my life circumstances have changed and I now need to prioritise.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

In general yes as the EIA states that you are unclear of the impact on particular groups such as carers, disabled solicitors etc. I believe that there is a significant negative impact on those groups especially as they are often too busy surviving to fight increases in costs such as this. Why should anyone be forced to leave the roll that they worked so hard to be put onto just because their circumstances have changed and they now need to reduce their costs.

Restoring the annual keeping of the roll exercise

Response ID:571 Data

2. About you

8.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

9.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

10.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

There is zero cost to online updating. Zero.

11.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.

Restoring the annual keeping of the roll exercise

Response ID:572 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I oppose the proposal.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I consider that the charge is unfair as the annual roll keeping exercise is unnecessary. The amount is unfair for the unwaged or those in low wage economies.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:574 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, but the charge seems a little high, especially where there is no change to the information. If there is no change a fee not exceeding £20 sounds reasonable, with £30-40 a reasonable figure if a change is needed (except where the change was notified before and was nevertheless erroneously not made to the roll).

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree

Restoring the annual keeping of the roll exercise

Response ID:583 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I in principle have no objection to the proposal.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It's important to keep the administration charge as low as possible.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Agree

Restoring the annual keeping of the roll exercise

Response ID:585 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Absolutely NOT

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No

There needs to be complete transparency around the cost.

£30-£40 per solicitor p.a. for a simple administrative task of confirming data is prohibitive.

The only benefit put forward of remaining on the roll is being able to "refer to themselves as a non-practising solicitor or access the associated benefits this title brings." (What are these "associated benefits"?)

I WILL NOT pay £30 p.a. to do this.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:586 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No thank you, my details have not changed and I'm happy to authorise The SRA to keep my details in line with GDPR. I am happy to sign a declaration to notify the SRA if my details ever change. Non practicing solicitors can ensure their details are kept up to date on an online system and amend where necessary by passing some sort of security.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Non practicing solicitors can sign a declaration to ensure their details are kept up to date on an online system and amend where necessary by passing some sort of security. The fee or an annual requirement is not a fair reflection of how often personal data changes.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:587 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No it has no real purpose.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I do not consider it fair and proportionate to charge directly for this exercise. There are other means of raising revenue such as charging the fee to lawyers who resume working as a solicitor.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.

Restoring the annual keeping of the roll exercise

Response ID:592 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. Many retired solicitors do not have unlimited funds.

Subsidise the cost. Charge the big corporate firms more The profits they make are obscene.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.

No.

No.

Restoring the annual keeping of the roll exercise

Response ID:593 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:594 Data

2. About you

7.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

8.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

9.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Agree with direct charges

10.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree

Restoring the annual keeping of the roll exercise

Response ID:601 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The situation should remain as it is. No annual exercise and no cost.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:602 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Given that this is likely to be a simple box ticking exercise via the online portal it is difficult to see how such a fee is justified. I do not currently hold a PC as I am bringing up my children. It is not currently financially viable for me to return to work. A fee of £30 plus a year to effectively prove that I am what I say I am seems both unfair and unreasonable. A doctor who retires or ceases work does not lose their ability to call themselves a doctor. A person holding military rank on retirement holds the right to use that previous rank by the addition of "retired". If I don't pay the fee what happens? After after years of practice, completion of a training contract, degree etc do I completely lose the right to any recognition for what I have achieved? In many circumstances that feels like hitting a person when they are already down.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:604 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

This is unacceptable. Retired solicitors will be penalised, having to use pension income simply to retain their name on the Roll. For many retired solicitors, inclusion on the Roll is an honour and an enduring record of achievement. Not all are enjoying an affluent retirement however, and it is distressing to put people in a position where they may have to give up the evidence and satisfaction of a lifetime achievement because they need to prioritise their wellbeing and cannot afford an annual administrative charge. Please think again. At least allow an exemption for solicitors who declare that they have retired from all employment.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:608 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

If it required for GDPR

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The fees are way to high. If this is just an administrative exercise the fee should be around £10. With the cost of living, especially fuel cost, there are going to be a vast number of retired solicitors unable to afford this annual fee. The level of fees seems more like a money grab rather than a realistic administration fee.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

See above - those who are retired are unable to be able to afford to pay the fees proposed.

Restoring the annual keeping of the roll exercise

Response ID:609 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I don't think it's fair and proportionate to charge £30 to £40 for me once a year to confirm my email address which is the medium through which you communicate with me. I've been on the roll since 1976 and surely have paid enough so far to allow me to remain on it without further cost for the most simple of administrative exercises.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have nothing to say about your equality impact assessment.

Restoring the annual keeping of the roll exercise

Response ID:613 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

This is fair but should not cost any more than £20

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree

Restoring the annual keeping of the roll exercise

Response ID:617 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Objectively unnecessary - death or some other reason apart why would one want to not be listed? Changes - including coming off roll - can be submitted.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Unfair to charge retired solicitors. Given system is likely fully automated personal attention only needed if there is an exception report, actual cost should be very low and charge unnecessary or nominal way under £5.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Assessment of retired solicitors - difficult to contact - is patronising and arrogant. Email, post, is that difficult? The supposed "benefit" is marginal at best.

Restoring the annual keeping of the roll exercise

Response ID:619 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I am totally and utterly opposed to this pointless proposal. The SRA has taken steps to ensure the accuracy of its information in getting a declaration from me when I first gave up my practicing certificate. If it changes I will tell the SRA. I'm retired and I have no intention of messing about with passwords and paying to re-certify the same information every year. It is of no benefit to me whatsoever to be able to certify the public's documents, passport applications etc as a retired solicitor but there is a wider public benefit which has not been considered. I would probably delete my SRA online account and insist it is done on paper.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Absolutely not. (a) It is expressly prohibited to charge for rectifying personal information unless the subject is making a request that is "manifestly unfounded or excessive" (please see ICO website). (b) I am not aware of any other organisation of any kind that charges a processing fee to keep personal information up to date, so there does not seem to be any disagreement over this. (c) If there is a genuine concern about information being kept up to date, the very last thing you would want to do is charge for changes. (d) I personally would not be prepared to pay a penny to re-certify the same information. (e) I do not believe for one second that the true cost is anywhere near £30-£40 - the DVLA issues photocard driving licences for £14 and they are issued free to over 70s on the basis that people broadly of retirement age should not have to pay at all.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

This proposal puts an unacceptable cost on retired solicitors.

Restoring the annual keeping of the roll exercise

Response ID:622 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

In part. I agree with the keeping the data up to date, but I do not agree with the fee being proposed. In your consultation you mention advances in technology which suggest the administration burden would be less, and thus would this mean very little cost involved? If anything, surely the process could be automated?

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I do not agree with any fee being charged for this. The process could be largely automated via email (thus no postage fees). Registration should remain until the person applies to be removed from the roll. Fees may (and probably will) have been paid to the SRA at some point during the career of the solicitor in terms of practicing certificates, which could subsidise this.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I think the consultation does not consider the current costs of living increase. Those on maternity pay/career breaks for example, may struggle to meet a yearly fee to maintain their status on the roll. Thus providing a barr to reentry to the profession in due course.

Restoring the annual keeping of the roll exercise

Response ID:627 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:630 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. The premise behind the reintroduction is flawed. As with any other regulator the duty/onus is on the person on the register to inform the holder of the register of any changes in details held by the SRA. To suggest that an annual re-entering of the data is necessary would entail unnecessary work for the SRA. My details have not changed in 25 years. If I were required to make an annual declaration at a cost of £30-40 pa for the next 25 years the total received by the SRA would be £750-1000. Far simpler, efficient and value for money would be a on-off initial payment of say, £20 for every non-practising solicitor to confirm or provide their details and only be required to contact the SRA again in the event of a change in those details (for which a small administration fee could be charged).

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Neither fair nor proportionate- see answer 1) above.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:631 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I would prefer a charge of £ 30

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree with the conclusions. I don't have any information or evidence.

Restoring the annual keeping of the roll exercise

Response ID:632 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. I think you can achieve your aims without reimposing the burden on the non-practising solicitors. You can easily and without much administrative cost set up an automatic periodic email to all those on the roll without PCs reminding them to ensure that their details are up to date and that they will remain on the roll unless they ask to be removed. This would be much less burdensome and cheaper whilst still achieving your goal.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The administrative burden is on the solicitor not the SRA. If you simply sent an automatic email reminding people to ensure their details were updated and saying that they will remain on the roll unless they request otherwise your aims would be met and there would be hardly any administrative burden on the SRA meaning no charge is necessary. Even if you did reintroduce some sort of mandatory yearly update there should be no burden on the SRA which requires a fee to be paid as the solicitors simply require to update the system themselves through the mySRA portal. Introducing a fee increases your own costs and burden to administer the fee. In addition, the burden of fees would fall disproportionately on those with exemptions or who are not working; imposing a fee on government, government lawyers or the unemployed or retired is not reasonable.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No. From your own assessment the fee would fall on Government, Government lawyers (who are paid significantly less than a lot of their private practice colleagues) or those who are unemployed or retired. It is not reasonable or appropriate to impose an unnecessary fee on these groups, especially when the aim could be achieved without much of a burden on the SRA meaning no fee would be needed at all

Restoring the annual keeping of the roll exercise

Response ID:634 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:636 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Not fair as people such as myself who are fee paid judges will not be able to get our employer to repay this cost. Make this a free exercise. Increase the practising certificate fee slightly to cover any costs.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:641 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, it appears to be reasonable

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If the exercise is carried out online, is the cost of doing so really £30-£40? You refer to levying a charge of £39 to check suitability if a solicitor wishes to be restored to the roll. That suggests to me that the true cost of admin for keeping the roll is rather less.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comment on your conclusions as to the EIA.

Restoring the annual keeping of the roll exercise

Response ID:648 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The figure is too high. £25 would be more appropriate, especially if registration is online.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment.

Restoring the annual keeping of the roll exercise

Response ID:650 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The proposed charge is reasonable.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no strong views on the EIA.

Restoring the annual keeping of the roll exercise

Response ID:661 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes although I'm not sure that an annual exercise is necessary. This seems like a useful way for the Law Society to raise revenue.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

A fee limited to £30 (a minimal amount to cover admin costs only) would probably be acceptable but any more than this will actively discourage non-practising lawyers from registering. The vast majority of non-practising lawyers like myself make no use of law society facilities and in my view there is little difference between calling oneself a former solicitor instead of a non-practising solicitor. I would not bother to register if the fee were increased.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:662 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. The exercise is not mandated by any "recent legislation" as has been claimed.

Charging retired solicitors will simply cause them to come off the roll, and so you will incur the same IT costs for managing increasingly fewer registrations

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No the cost is excessive.

The task is easily automated and the costs should be minimal.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Not relevant

Restoring the annual keeping of the roll exercise

Response ID:663 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

£30 would seem reasonable. It was only £10 last time you charged for this service!

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Not relevant to the current exercise.

Restoring the annual keeping of the roll exercise

Response ID:664 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, but if data protection law requires it, I see no alternative

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I suppose that some charge is inevitable, but £30-40 seems high on an annual basis. Surely once the system is set up, the running costs would be much less? Also, I think it unfair that retired solicitors, on pensions, should have to pay the same as those still earning. It might also help if the sum could be paid by a monthly DD so as to spread the cost, as many charities do.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No opinion, save as expressed above about retired solicitors

Restoring the annual keeping of the roll exercise

Response ID:665 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not agree. The cost is far too high for retired solicitors. It should be met from the practising certificate fee

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment to raise

Restoring the annual keeping of the roll exercise

Response ID:667 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:671 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. Despite the assertion made by the SRA it is an administrative burden, it also comes with the risk of being removed from the role if for some reason the deadline for confirmation is missed. The timing of this move is strange, the policy of the present government as set out in the statements surrounding the Queen's Speech is to remove unnecessary regulation and in particular to re-visit the requirements of GDPR, why seek to belatedly become compliant just when the requirements are about to change again? There seems to be no logic in an annual exercise, this is a randomly chosen period, 3, 5 or 10 years could equally well be chosen and would reduce both admin and cost.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The estimate is £30 - £40, such is the way of these things that you can be sure it will be £40. The proposed charge is double the £20 that previously applied despite the SRA saying that there is now an improved IT system that makes the process more efficient. Why would a more efficient process require a higher fee in a non-profit environment?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Nothing to add in this section.

Restoring the annual keeping of the roll exercise

Response ID:673 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes - but the annual charge seems to be high.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The charge of £30 - £40 seems to be excessive given that the consultation paper refers to there being in place a new IT system making the exercise of annual registration not burdensome for the SRA or for solicitors.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree with the conclusions.

Restoring the annual keeping of the roll exercise

Response ID:675 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I am very disappointed at this proposal coming on top of the proposal to remove the insurance protection run off cover from retired solicitors . It feels like a concerted attack upon those who have conscientiously served their clients and profession for a lifetime. No I do not agree.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Surely this is something the profession as a whole should bear .After all we all must retire at some time and face a diminution in our income.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No Comment

Restoring the annual keeping of the roll exercise

Response ID:678 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. For non practising solicitors this look like an excuse to raise money. More unnecessary red tape.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If it is as simple as you say for those on the roll to keep their information up to date then all you need do is make it an obligation on those who are on the roll to update their information if it changes. There does not need to be a charge for this.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

no

Restoring the annual keeping of the roll exercise

Response ID:679 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Thirty to forty pounds is a lot to confirm details. Have you done a costing as to how much it would actually cost for this exercise to be completed? What are the costs? You used to have to send in a paper form with a cheque for, say £20. But surely the cost of keeping the roll has gone down with so many details now being on computer records? I would say don't charge at all.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I haven't read the equality impact assessment

Restoring the annual keeping of the roll exercise

Response ID:682 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Not really. Not annually. I agree it should be updated sometimes.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No . I suggest the cost is over-estimated, You say in your consultation document how much easier it will be to do this and then want to charge £30-£40 per person. These statements are inconsistent. If it is merely updating information that should be possible , with passwords , for each individual to do on their own There is no way it should cost this much. Suggest you get new IT advisors.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes the conclusions in that regard make sense

Restoring the annual keeping of the roll exercise

Response ID:684 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:686 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Agree to fair administration charge.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No opinion

Restoring the annual keeping of the roll exercise

Response ID:696 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I consider that for those who are still working in some related capacity for which an annual fee of £180 is already paid to the Law Society, no further charge should be made (e.g Lexcel or other accreditation assessors)

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

yes

Restoring the annual keeping of the roll exercise

Response ID:700 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Only if there is no cost to non-practising solicitors to stay on the Roll

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The Consultation says" We also anticipate that among solicitors without practising certificates there will be people who are on a career break, and among this group there might be women who are on maternity leave and parents on a career break to look after children or have other caring responsibilities. We will explore this further through our consultation on these proposals."

I am in this category and an annual fee, even if only £30/£40 p.a. would impact my ability to remain on the Roll and thus potentially return to practice once my caring responsibilities for children and elderly relatives make this possible.

The wording in the Consultation plainly acknowledges that insufficient thought has been given to the impact of this proposal on people in my position and this is extremely disappointing. What is the point of running expensive "return to work" courses/ initiatives if you fail to make it possible for people with no income (as is the case for many carers) to remain on the Roll during the years that they are doing unpaid work. I appreciate that there are admin costs associated with this exercise and these could, if necessary, be met by those who are actually earning an income from the profession.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

See comments above, reproduced below for your convenience...

The Consultation says" We also anticipate that among solicitors without practising certificates there will be people who are on a career break, and among this group there might be women who are on maternity leave and parents on a career break to look after children or have other caring responsibilities. We will explore this further through our consultation on these proposals."

I am in this category and an annual fee, even if only £30/£40 p.a. would impact my ability to remain on the Roll and thus potentially return to practice once my caring responsibilities for children and elderly relatives make this possible.

The wording in the Consultation plainly acknowledges that insufficient thought has been given to the impact of this proposal on

people in my position and this is extremely disappointing. What is the point of running expensive "return to work" courses/ initiatives if you fail to make it possible for people with no income (as is the case for many carers) to remain on the Roll during the years that they are doing unpaid work. I appreciate that there are admin costs associated with this exercise and these could, if necessary, be met by those who are actually earning an income from the profession.

Restoring the annual keeping of the roll exercise

Response ID:702 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. If you want to ensure that the information you hold about solicitors without practising certificates is up to date, then all you need to do is to ask/require those solicitors to ensure that they keep their information up to date via the SRA portal. You could introduce a requirement that these solicitors visit the portal for that purpose at least once a year, say. You could require that they tick a box to say that they have done so. All of this could be done electronically and simply. There's no need to overcomplicate what could be a very straightforward process.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The proposed level of the £30-£40 'administration' charge has not been explained or substantiated. Given that it is the solicitors without practising certificates who will be doing the administration of the data by entering the required information on to the SRA IT system and that 'maintaining the data' will be an automated function within the SRA IT system, the administration fee is unjustified.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No observations

Restoring the annual keeping of the roll exercise

Response ID:704 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:705 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I am neutral on this - I live and practice outside England and Wales, but wish to keep my name on the roll, so don't object to the reintroduction of the annual exercise.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes, I consider it fair and proportionate to charge an administrative fee.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:706 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

yes

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree with the conclusions. I do not have any information about the impact of your proposals on any other groups.

Restoring the annual keeping of the roll exercise

Response ID:707 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I am happy to pay a nominal fee but astonished at what you imply is the cost. Most retired solicitors will have no annual changes to their details so surely your computers could be programmed to flag for you any changes that need addressing - and where there are no changes, it would mean zero cost to you.

You could charge a higher fee where there are changes.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:708 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I don't think this is reasonable. I have not practised for over 15 years. My details have never changed and I have remained on the roll. I don't think it's fair on people like me (and there are many) to have to pay to keep our names on the Roll (or any other register) in order for our professional qualification to be registered, especially when no changes need to be made. If details were changing continuously and amendments needed to be made to our registration regularly then a small administration fee would be acceptable (no more than 20 pounds). However, if we just had to confirm our details by ticking box then an admin fee is unreasonable.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:710 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I do not agree that such a level of ongoing charge is reasonable. An initial charge of £30 to £40 might well be reasonable to cover the costs associated with updating and ensuring the accuracy of the SRA records however the collection and collation of subsequent annual return information should not incur the same level of costs and shouldn't result in the same level of charge. An ongoing charge of £10 could be more reasonable and reflective of the lower level of costs incurred.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comments.

Restoring the annual keeping of the roll exercise

Response ID:711 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Yes it's fair

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes I agree

Restoring the annual keeping of the roll exercise

Response ID:716 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. The cost should be absorbed by the general SRA funds.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

n/a

Restoring the annual keeping of the roll exercise

Response ID:723 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not think the charge is justifiable, just for information to stay the same. Perhaps there could be a nominal charge if changes are made. The current proposal will discriminate against women and disabled who are more likely to have gaps in employment.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

You may give a discount for maternity leave but many women will have longer career breaks or need periodic breaks to balance family life and caring responsibilities. So many of us have older parents to care for as well as children. Many solicitors I know have taken breaks due to poor mental health but won't want to declare it. None of the solicitors I know who have had mental health problems have declared it.

Restoring the annual keeping of the roll exercise

Response ID:726 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Given the overwhelming support from solicitors without practising certificates last time around to scrap the annual exercise and your own statement that you make no use of the data thus collected, reimposing an annual exercise seems excessive. I get that the data needs to be "up to date" but anything less than a daily exercise will result an element of outdatedness so a balance needs to be found. Clearly given the above this is updating for the sake of updating with no discernible value to solicitor or SRA, so I would suggest that instead members be periodically reminded that they need to keep their SRA record up to date perhaps reinforced with a hard SRA lead data refresh every 5 years.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The cost seems excessive. Surely with IT systems as sophisticated as they now are/ should be an automated email could be sent to each non practising solicitor with the data you currently hold with a confirm or update option. You could set a time for response (45 days??) failing which the non- responder's name would be removed from the roll, but restorable at the £39 cost. Those responding within the 45 day period should bear no cost as the process from SRA perspective would be automated. Indeed I would wager that the bulk of your proposed annual charge of £30-40 is driven by the cost of invoicing and reconciliation of payments to SRA numbers

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:729 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I think that your administration charge is reasonable

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes. I don't have any information about the impact of your proposals on any other groups.

Restoring the annual keeping of the roll exercise

Response ID:730 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not consider it proportionate for retired solicitors who wish to keep their name on the roll. I would be happy to pay up to £20

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:735 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes. Please may I ask what the SRA plan to do if individuals have not updated their personal profile details and have left their old firm contact details? Would the SRA seek to involve that firm in contacting that individual?

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It think it is fair

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:738 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I don't object to it per se; my comments relate purely to cost

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do object to the cost. Firstly, it feels quite high for what should essentially be an automated box ticking exercise. Secondly, my own experience is that taking even a relatively short career break to pursue additional qualifications is coming with already not insignificant costs of either maintaining existing memberships, or anticipated costs to "reboot" memberships when I return to the profession as I hope to do in the medium term. I appreciate £40 isn't a huge amount but for people in my position who are already taking a significant cut to finances, every little helps!

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comments here

Restoring the annual keeping of the roll exercise

Response ID:740 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No I do not I do not think there needs to be an annual application if you do not require a practising certificate to do your work as the information will often be the same for many years so your paying £30 - £40 as a tick boxing exercise

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:742 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes but with the caveat that the proposed fee will be a substantial disincentive. You should realise that many retired solicitors will not pay on principle therefore lose the right to call themselves non practising solicitor notwithstanding many many years spent qualifying then practising. That appears patently unfair. You make a point of the technology now being simple but make no effort to explain how you have arrived at the £30/40 fee which sounds on the high side given the work already done to simplify the process. You make an assumption about quantum referring to it as modest but know nothing about the means of individual members. My feeling is that for an almost automated process a fee of £10/20 would be more than sufficient to cover your costs and modest enough to encourage all who want to remain on the register to do so. Thank you.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Difficult to answer without knowing what the actual costs are and to able to judge if they are wholly and exclusively attributable to this exercise alone and that such work is reasonably necessary to comply with the data regulations.

It might be that you incur more costs eg when the solicitor first becomes non practising in which case an increased fee at that initial stage might be justified and might be more affordable for the solicitor and thereafter as it seems to be a more or less automated exercise to apply a nominal fee.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:762 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, it should be enough for people to keep their own details up to date, and perhaps to be asked annually to do so.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, I do not. You already have enough from the profession to meet all regulatory needs. This will be a computer generated issue if you go ahead with it and your proposed cost is disproportionate.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I am neutral on this.

Restoring the annual keeping of the roll exercise

Response ID:763 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The previous charge of £20 seemed the right amount to me. Given the process will be automated, more than £25 seems disproportionate to the value of remaining on the Roll.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Agree.

Restoring the annual keeping of the roll exercise

Response ID:764 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not have any earned income. I have a very small investment income. I am not a tax payer. Therefore I do not look forward to having to pay this charge. I may be forced to remove myself from the roll so as not to waste money.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:770 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Given the comment in the consultation document -

'Since then, we have introduced a new IT system that has improved any updates or notifications of changes of status. The result is the process is no longer administratively burdensome for solicitors or for us. Our new approach allows solicitors to update their records easily using mySRA' - the fee proposed appears to me to be excessive. The previous fee was £20 when the admin required would have been actual admin. Given it is the solicitors themselves who will be updating following what I assume will be a bulk mailing it's hard to see how a fee of £30 to £40 can be justified. Won't the 'admin' be automated once set up? How has the fee been costed? It seems given the large percentage difference between the two figures suggested that they have been plucked out of the air.

If the updating isn't considered by you to be 'burdensome' for either you or us I would suggest a much more modest fee or none at all would be fair and proportionate.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes

Restoring the annual keeping of the roll exercise

Response ID:771 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. I do not see the need. I am not convinced by the data protection argument.

I think you should be notified of a significant event eg death, loss of mental capacity and you could make that a requirement but otherwise I do not see why it is necessary. Certainly not on an annual basis which is onerous for all concerned.

After 6 years of study and training and a considerable number of years in the profession, I strongly object to my professional status being removed from me for what I perceive as the flimsiest of reasons.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

You imply that £30-40 is not much but for retired solicitors it is more significant as they have a fixed income. Also, given that there are around 61,000 non practising solicitors this would raise over £2.4 million! I don't believe that this is how much the exercise would cost to administer annually, so it seems to be a money making exercise.

My suggestions 'to meet these costs', which are not specified, are:

a) do not introduce this annual review = no cost

b) if you remain convinced that you have to follow this exercise do it on a 5 or 10 yearly basis for £10 which would still net £610,000, a significant sum of money.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have nothing to add

Restoring the annual keeping of the roll exercise

Response ID:774 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

I do not agree as this appears to be a money-making exercise that has been justified by GDPR. In my own case, I have been a solicitor for more than 35 years and have retired to a new, non-legal, role in commercial life. I had always assumed that I had earned the right to remain on the roll, but as I was not providing legal services that require a practising certificate (and currently no legal services at all), I did not need a practising certificate. Under this proposal, that is only possible if I pay a rent to the SRA annually, for the questionable benefit (which should not be in the SRA's gift) of voting in Law Society elections. I therefore view this as a misconceived exercise.

It is unlikely that I will return to private practice, and inconceivable that I would enter practice as an employed solicitor, but if I do I should not need to go through a fitness test.

I note that the Irish Law Society has no such requirements as you propose.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not regard this as either fair or proportionate and to the contrary consider it my basic right to remain on the roll without having to pay this fee. I note that the Irish Law Society has no such requirement as you propose.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

This will favour those with money to spend, and to that extent at the margins this will exacerbate inequality in the profession.

Restoring the annual keeping of the roll exercise

Response ID:778 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The amount should be lower for retired solicitors

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No

Restoring the annual keeping of the roll exercise

Response ID:786 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. Please see 2 & 3 below.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not agree there should be an annual keeping of the roll fee of £30-£40.

Such an amount is excessive on an annual basis for what should be a largely automated online exercise.

It may also discriminate against non-practising solicitors in occupations that command low levels of remuneration or retired solicitors whose personal circumstances mean they are living on state-provided income.

I suggest this as an alternative approach to moderate this cost:-

Charge a fee of £30-£40, but carry out the keeping of the roll exercise only every two or three years (so that the fee will not become chargeable again for two or three years).

(A different alternative would be to place even more of the responsibility on the registrant and make the annual process even more automated, with the objective of reducing the annual fee to £15. However the above suggestion may be considered more straightforward.)

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The proposal to make an annual keeping of the roll fee of £30-£40 should be assessed as having a negative impact upon EIA (please see 2 above).

Restoring the annual keeping of the roll exercise

Response ID:790 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

A one-off fee.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:791 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, in principle - I accept that the SRA needs to ensure that the Roll of Solicitors is updated on a regular basis in order to comply with the General Data Protection Regulation (the GDPR).

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, not on the basis of the limited information contained in the SRA's Consultation Paper as published on the 22nd March 2022.

I note the following extracts therefrom with particular interest:

1) Para. 7 "We now have a modernised IT system, particularly the user interface. This will make the process of maintaining personal records considerably less arduous for solicitors than it was."

2) Para. 15 "Our proposed approach, enabled by advances in our IT systems, will be quick, simple to use and delivered through the mySRA portal. It offers data accuracy and is a proportionate option. We will provide support for users who are not familiar with mySRA."

3) Para. 27 "Since then [2014], we have introduced a new IT system that has improved any updates or notifications of changes of status. The result is the process is no longer administratively burdensome for solicitors or for us. Our new approach allows solicitors to update their records easily using mySRA. These changes ensure accuracy and completeness of our records, which is fundamental to our role as a regulator."

4) Para. 32 under the heading "Basis of our charging principles" the following two points:

a) "[To] [e]nsure a predictable income to meet the cost of regulation" and

b) "[To] [e]nsure that, where possible, the costs of processes that are not of general application should be borne by those making such applications as far as possible, on a cost-recovery basis."

I would, in view of the above, expect the SRA to answer the following three questions specifically when announcing the results of this consultation process:

i) How and/or on what basis has "the [current] cost of regulation" referred to at Point 4) a) above been calculated/estimated or, in other words, how does the SRA justify the proposed fee of £30.00 to £40.00 per annum?

ii) Given the four extracts from the Consultation Paper cited above and that all those Non-Practising and/or retired Solicitors who wish to remain on the Roll will be updating their own data via MySRA themselves i.e. doing much, if not all, of the SRA's job, then why should they have to pay any fee for the right to continue referring to themselves as a Non-Practising or retired Solicitors?

iii) Simply put, precisely what administrative work will the SRA be undertaking in order to justify charging any fee at all, let alone one in the £30.00 to £40.00 band as currently proposed?

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes, in broad terms... However, as a Solicitor who had to take early retirement on health grounds, being able to refer to myself as a Non-Practising or retired Solicitor remains very important to me and is a fundamental part of my identity - that, therefore, prompts this question: if a fee is to be charged, then perhaps the relevant Regulations can be changed so that the fee is only payable by those who describe themselves as Non-Practising Solicitors and waived where the Solicitor is genuinely retired i.e. in receipt of his or her State Pension.

Restoring the annual keeping of the roll exercise

Response ID:795 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not object to an annual charge in principle but cannot understand how an "administration" charge of £30-£40 is anticipated, nor do I think such a charge reasonable. Surely the majority of responses can/will simply confirm no change to a person's details and could therefore be dealt with automatically within system. I derive no income currently from practising law in any capacity, nor do I personally benefit from membership of the Law Society: I would simply not be willing to pay such a charge merely to remain on the Roll.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes.

Restoring the annual keeping of the roll exercise

Response ID:803 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Restoring the annual keeping of the roll exercise

Response ID:810 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Fee is fine , consider concessions for retired, trainee etc.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I agree

Restoring the annual keeping of the roll exercise

Response ID:827 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Not really. Although I understand the need for you to have up to date records, it is burdensome and irritating to go through this exercise each year, especially for those of us whose contact details have not changed for many years and are unlikely to change in the foreseeable future. I would be in favour of reminding and emphasising the need to notify you of changes. Given that solicitors are responsible people with an understanding of procedures and the need for accurate record-keeping, I feel the proposal to require an annual exercise is disproportionate.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No. I am retired and on a relatively low income: the figure of £30-£40 represents a significant amount to me. I do not practise but I need to stay on the roll in order to obtain an important benefit from my local Law Society.

If (as I hope it will not be) the proposal is implemented and the exercise can be carried out online, it should not incur significant administration charges. If required to do so, I would confirm my details online - therefore at no or minimal cost to you - and it would be extremely unfair if people like me ended up subsidising any administration costs of corresponding with those unwilling to use an online process.

As it is presumably easier for you if people use an online process, I would suggest that it should be free of charge, with perhaps a modest charge for those who wish to use a paper-based process; that would be fairer and might encourage more people to go online.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I have no comments on this.

Restoring the annual keeping of the roll exercise

Response ID:837 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, I do agree as it now seems appropriate to do so.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If the new IT system is as good as stated in the consultation and those costs have already been incurred, the admin fee should be no more than £10. A significant number of the solicitors concerned appear to be retired and are therefore on a limited or fixed income. Given the present state of affairs regarding the economy, inflation and the expected further rises in basics, the timing of the proposed introduction of the admin fee is poor.

In addition, solicitors should be contacted by both email and post as email contact alone is not a failsafe means of contact. A lack of response to an email should not be used to infer the recipient is happy for their name to be removed from the Roll.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

There is insufficient information available for me to comment on the EIA.

Restoring the annual keeping of the roll exercise

Response ID:839 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes. I think that this is a useful exercise.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

It is not clear what numbers of solicitors this would cover but the proposed charge seems high for an annual basis particularly as this will mostly apply to retired solicitors who in most cases will have been paying for their practising certificates for many years. Presumably the greater administrative cost would be in the collection of the fee and not the maintaining of the data itself.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I do not have a view on this point

Restoring the annual keeping of the roll exercise

Response ID:847 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No I do not agree with the proposal. The rationale given for the proposal is "recent changes to data legislation." The most recent legislation was the Data Protection Act 2018 which is hardly recent. Furthermore, the Data Protection Act 1998 required data to be kept accurate and up to date long before that. I cannot see how there would be any genuine detriment to anyone if the details of a non-practising solicitor were not up to date. The public would only have an interest in those solicitors who are in practice. Surely it is perfectly adequate for it to be left to non-practising solicitors to keep their details up to date simply for their own benefit to receive SRA and Law Society updates and if they did not do so they would be the only ones to suffer any loss.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not think this exercise should be carried out and therefore there should be no charge.
If the exercise is carried out the cost should depend on the income of the individual concerned - with no charge at all in the case of income below a certain level. I appreciate that the argument may be raised that obtaining evidence of income would be a further costly administrative burden so I would suggest that this would be a matter of trust (after all the people concerned are solicitors even if not practising and are therefore of "good character").

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

I believe that there would be an unfair impact upon women as more women are carers - (whether of children, elderly parents or other family members) and consequently are not currently in practice.
Another group upon which these proposals will have a particularly negative impact are those who have ceased to practice - whether for good or temporarily - due to mental health issues brought on wholly or in part from working in the profession. These may not meet the legal definition of a disability and therefore there may not be a legal requirement to consider the impact upon this group but in fairness there should be such consideration.
It is likely that those people I mention who have left practice i.e. carers (the majority of whom will be women) and those who have suffered/ are suffering from mental health issues will have a smaller income or no income and so find it harder to cover this extra annual cost especially in the face of the cost of living soaring.
The key advantage as I see it of being able to remain on the roll is being kept up to date with legal updates from the Law Society and the SRA. This is a help to those who are currently no longer practising but may wish to return to practice. Denying people this access to information because they cannot afford an annual fee would be unethical.

Restoring the annual keeping of the roll exercise

Response ID:849 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes, in principle, though consideration could be given to doing the exercise less frequently but at regular intervals - perhaps 2-year or 5-year intervals. This would save costs and administrative hassle for people who are content with their non-practising status.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

Potentially, but the proposed cost is too high and, given the SRA's assertion that the process will be more cost-effective than in previous years, appears to be disproportionate. I would suggest carrying out the exercise less frequently, which perhaps might justify a higher cost, or lowering the cost to make it more palatable.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Yes. It is already considered, but the perhaps highest impact is likely to be on groups taking a career break (perhaps particularly parents, which inevitably means more women), as they are the people with the most interest in retaining the opportunity to go back to practice (as opposed to retirees, who could come off the roll without it changing their options).

Restoring the annual keeping of the roll exercise

Response ID:850 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No, this seems to be an exercise that is only necessary because a proportion of those on the Roll who are not practising are not keeping their contact information up to date in mySRA.

While that is disappointing to hear, I do not see why it is necessary to "punish" those non-practising solicitors who do keep their information up to date by requiring an annual exercise that most lawyers are undertaking without the need for an annual "reminder" to do so.

If a keeping of the roll exercise is needed, my view would be that this could be accomplished with a process that took place every five years. So that this wasn't all non-practising solicitors in one year which could be an administration burden for the SRA, the process could be split with those with a surname from A-F in Year 1, G-K in Year 2, etc. or in some similar manner.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

The proposed amounts seem very disproportionate, especially considering the SRA have indicated that the process of renewal would be automated and not a burdensome process for non-practising solicitors. I have already expressed my viewpoint that this should not be an annual process, but if it was to be so, I feel that at most a £5 charge would be acceptable. If the process was e.g. every five years then I think a £30-£40 fee could be acceptable. My own personal view is that there should be no charge. If non-practising solicitors are using services such as the Law Society Hall and library, maybe they should be asked to pay for those services, rather than having those services subsidised by other non-practising solicitors.

In addition, a £30-£40 annual charge can be a significant amount of money for some solicitors who are not working or who are practising in other jurisdictions where salaries may not be as high.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The conclusions do seem well considered. I would only add that those solicitors not practising may find a £30-£40 annual charge to be significant depending on their earnings. There is a "prestige" and a pride to remaining on the roll that non-practising solicitors would be disappointed to have to lose to save a needed £30-£40.

Restoring the annual keeping of the roll exercise

Response ID:852 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. I believe it is a bureaucratic means of maintaining records and that it imposes an annual charge on a group of solicitors many, if not most of whom no longer derive an income from the legal profession. Moreover, compliance with the GDPR regulations is cited as part of the background to the proposed changes, but in the present political climate it is far from clear that the current GDPR regulations will remain in their present form.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If imposed, I do not consider that this level of charge is justifiable for what is in effect, a simple confirmatory exercise. I believe that the onus could be placed on non-practising solicitors to forward an annual confirmation of their details without the need for reminders, and that it could be made clear that failure to provide this confirmation unprompted would justify the removal of names from the roll.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment to make.

Restoring the annual keeping of the roll exercise

Response ID:854 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Not on the terms proposed.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

1. Your consultation paper did not detail the number of solicitors on the roll who do not hold practising certificates. In response to my enquiry you informed me that this number was approximately 60,000. If all wished to remain on the roll, this would equate to total charges of £1,800,000-2,400,000 per annum. I appreciate not all will respond but if, say, half wish to remain on the roll then total annual charges would be £900,000-1,200,000. These sums are surely far more than is necessary to cover the administrative costs of your proposed annual exercise.

2. The data you keep is minimal (and indeed, under GDPR, you should only keep such data as you need to carry out your functions). For the vast majority of those solicitors without practising certificates who wish to remain on the roll, your annual check will involve them responding to an email confirming that they wish to remain on the roll, that they are still alive and that no details have changed.

3. If you do proceed with your proposal to charge an annual fee of "£30-40" then the fee for those solicitors who respond promptly to your first email enquiry should either be waived or be reduced to not more than, say, £10. Your initial annual email could make it clear that if the recipient does wish to remain on the roll but does not respond within, say, 28 days, then the discounted rate will not apply and the full "£30-40" will be payable.

4. It is not fair or proportionate that those who respond promptly (thereby minimising your administrative burden) should have to subsidise those who do wish to remain on the roll but only respond after a number of reminders, presumably by email and subsequently post.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No comment

Restoring the annual keeping of the roll exercise

Response ID:856 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I do not believe that an administration charge of £30-£40 is proportionate:

1. If the database is set up efficiently, reminders to those on the database to update their information would be issued automatically with little or no intervention, and therefore the cost would be minimal. Commercial organisations are able to maintain GDPR-compliant databases of their customers; they never charge for doing so.
2. £30 - £40 is a substantial annual outlay for a retired person on a small pension, such as mine.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No.

1. For those who wish to continue to remain on the roll, the impact is not "potential"; it is actual: they will not be potentially paying the fee, but actually paying the fee!
2. Those who, like me, keep their information up to date will not benefit from having a more accurate record of their status; their record is already accurate.
3. Your approach is not proportionate.
4. The proposal is discriminatory against older people. Among those who would be required to pay this fee, there is a higher proportion of older people than there is among those who would not be required to pay it. The proposal is a burden on older people, who will typically have substantially lower incomes.

Restoring the annual keeping of the roll exercise

Response ID:860 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No - I do not consider your plan to be fair and proportionate. The amount is excessive and does not take into account that some of the retired Solicitors might well be aged, infirm, or impecunious or at least struggling in these difficult times. I am personally aged almost 84 and trying to live on State Pensions and a miniscule private pension (which I had to fund myself with no employer contribution). Administration of the proposed charge should be kept to an absolute minimum, and funded from your present income. I, like many others, have spent literally a lifetime trying to serve the Law, and now it feels as if we are being thrown aside.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

No - I do not agree. The perceived impact on the aged group of which I am a member is minimised beyond reasonable recognition. I do not see how we would benefit from 'having a more accurate current record' of our status. To have our professional standing and status removed because some of us cannot afford to pay your proposed annual fees is an insult. We all earned and maintained our qualification and standing through hard work and study, and then a lifetime's dedication to our work, and now you seek to remove these even where the sole cause of our personal problem is our age and inability to fund your proposed annual fees, or endure financial hardship as a result. It may come as a surprise to many of you to hear that there are those of our profession to whom having to pay £30-£40 a year (with no tangible benefit whatsoever) could amount to a hardship, but I can assure you that it is true.

I have no evidence of the effect of your proposals on other groups, save for my own experience.

Restoring the annual keeping of the roll exercise

Response ID:862 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Yes

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I agree with charging, but £30-40 seems too high. I think £25-£30 would be more proportionate.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Don't know.

Restoring the annual keeping of the roll exercise

Response ID:868 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If you decide to impose a charge, I suggest that retired solicitors be exempt from payment.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

As a working class woman who was admitted when only around 7% of solicitors were women, I have followed the discussion about equality and the attempts to provide help to minorities and have realised belatedly what an achievement it was for me to have become a solicitor. It was difficult to obtain articles without connections and lacking a basic knowledge of firms to apply to in the days before the internet. When I had children I found it very difficult to obtain family friendly employment and spent the rest of my working life working for a charity. The pay was low and I was unable to build up an adequate pension. I know that I am not the only person in this position and this is the reason I am suggesting that retired solicitors be exempt from the charge. I am proud of my achievements and it is important to me to remain on the roll.

Restoring the annual keeping of the roll exercise

Response ID:870 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. Please refer to response to question 2.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

No, I do not consider the proposed charge appropriate, fair or proportionate. The consultation paper states, "We now have a modernised IT system, particularly the user interface. This will make the process of maintaining personal records considerably less arduous for solicitors than it was." It also states, "The result is the process is no longer administratively burdensome for solicitors or for us. Our new approach allows solicitors to update their records easily using mySRA. These changes ensure accuracy and completeness of our records, which is fundamental to our role as a regulator." As solicitors would be updating the information themselves through the website which is streamlined, it is not clear why the charge is proposed to be double what it was before. I suggest the exercise be carried out every two years at no cost or at the original cost of £20, by contacting solicitors to confirm information on the website. If someone inadvertently misses a communication by email, which is a very real possibility these days due to extremely high volumes of email, it is not appropriate for them to be deemed delinquent and charged further fees for an additional character or other assessment/application to be reinstated to the roll. The proposed approach is not consistent with other professional licensing standards for inactive members. The approach I suggest would be more consistent with such standards as well as applicable regulations, reflecting an appropriate balance of interests. Thank you for your consideration.

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

Consistent with my response to question 2, I believe the proposed approach would unfairly impact non-practising solicitors and those who, for reasons related to their non-practising status, may miss an email communication, and therefore be inadvertently harmed.

Restoring the annual keeping of the roll exercise

Response ID:871 Data

2. About you

10.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

11.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

Partly. The problem is that there is no description that suitably covers retired solicitors. If you are described as "a former solicitor" or and "ex solicitor" there is an implication that you have left the profession discredibly. However if you are not on the Roll of Solicitors should you describe yourself as a solicitor albeit a retired one.

12.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

I would like to think that for retired solicitors the current profession who must benefit from the legacy of the earlier generation could subsidise this cost

13.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

For the reasons set out in 1 they would impact on retired solicitors

Restoring the annual keeping of the roll exercise

Response ID:873 Data

2. About you

9.

How should we publish your response?

Please select an option below.

Publish the response anonymously

3. Consultation questions

10.

1) Do you agree with our proposal to reintroduce the annual keeping of the roll exercise in April 2023?

No. It is time consuming.

11.

2) Based on our plan to reintroduce an annual charge to cover the cost of running the keeping of the roll exercise and maintaining the data, do you consider it fair and proportionate to charge directly for this exercise? We anticipate the unsubsidised administration charge amount will be no more than £30-£40. If not, what alternative would you suggest to meet these costs?

If you have to reintroduce the annual roll exercise or majority support it. The costs should be between £25-£30 per person.

12.

3) Do you agree with the conclusions in our equality impact assessment (EIA)? Do you have any information about the impact of our proposals on any other groups? Do you have any evidence to support this?

The conclusions shows the challenges women face as a group and is commended for taking steps to mitigate this.
