

Foreword by Jodi Berg OBE

This year's annual report was prepared by my colleague Elizabeth Derrington whose term of appointment as ICR came to a close at the end of February. The information within the report was prepared by Elizabeth and the ICR team but has been brought up to date to cover the end of year period when I have been carrying out the role of Independent Complaints Reviewer.

Elizabeth Derrington has carried out the role of ICR with distinction for the last 10 years. Under her stewardship, the ICR office has gone through a period of dramatic change in terms of IT advances, communication methodology and office moves. She has throughout been a calm presence in the eye of the storm. She has remained focused on the task in hand, the quality of the ICR service provided for complainants and HM Land Registry, and the lessons to be learned from the complaints she has reviewed over the years. HM Land Registry has benefitted from her wise counsel and complainants have experienced her thorough and painstaking approach to investigations and analyses. I am grateful to her for leaving the ICR team in good heart and ready to take on the challenges ahead. We wish her well in her retirement.

This year also marks the 20 year anniversary for the ICR office. During that time the office has provided the highest quality of service for HM Land Registry and its customers. We have also played our part in the development of the ombudsman and complaint handling community in the UK, and we take pride in our role within administrative justice. My thanks go to all past and current members of the ICR team for making this possible.

Introduction by Elizabeth Derrington

I am about to retire after ten years as ICR for HMLR so it is a time for reflection – about HMLR and its customers and about the role of the ICR and its impact.

I have seen big changes at HMLR since 2008. It has become a much slimmer, more modern organisation, with fewer staff and fewer offices, and it has made important progress in using new technology, both to deal with applications and to make data on property prices freely available to the public. It is reassuring for HMLR customers that, on the evidence of the complaints I have investigated, HMLR staff have amidst all this change maintained a strong commitment to customer service. While my own work has focused on customers who are dissatisfied, HMLR's own data continues to show that the great majority of customers are pleased with the service they receive.

As ICR I have had two main aims, first to look at complaints about HMLR with a fresh, independent pair of eyes and give an expert opinion on how to resolve them, and second to help HMLR use complaints to identify and correct weaknesses in its systems.

A key test of the success of ICR reviews is whether they achieve closure – for customers and for HMLR. Although the ICR has no power to decide legal disputes, I have always tried hard to understand the problems that cause complaints – seeing them through the eyes of the customer and of HMLR - and to explain in clear and simple language what the customer can expect in terms of help from HMLR. Even if a complaint is not upheld and no redress recommended, I aim to make sure that the customer recognises my conclusions as reasonable and knows the options available for dealing with any remaining issues. With this in mind the ICR team recently completed a project to measure continuing contact after an ICR review either with HMLR or with my office. I found the results very encouraging. In over 80% of cases my final report brought correspondence to a close. Of the remaining 20% of cases, approximately half were referred to the Parliamentary and Health Service Ombudsman and were not upheld. This is strong evidence of the effectiveness of

the whole ICR team - both in achieving closure and in robust decision-making. It is especially impressive if one takes into account that some customers, before they brought their complaints to me, had been in correspondence with HMLR for over 20 years.

There is, however, a small proportion of customers who, despite going through the whole complaints process, remain dissatisfied and are extremely persistent in expressing their dissatisfaction, sometimes becoming threatening or abusive. I know how much distress these cases can cause to the customers themselves and their families and also to HMLR staff. It is in the interests of all to avoid this distress, and in my experience the best method is to follow a clear complaints pathway - identifying and escalating a complaint promptly, answering it directly and fully, giving information about options for taking matters further and then bringing correspondence to an end.

ICR recommendations may be for HMLR to address specific failures – for example by apologising or offering a consolatory payment – or for changes that will benefit customers in general. Recommendations frequently ask for action by HMLR to help the public understand complex procedures and tricky legal concepts like the state guarantee of title, rectification of the register, indemnity and determined boundaries. They also propose process improvements to help HMLR deliver the outcomes customers want. As ICR I have recommended improvements to many HMLR procedures, from notifications to property owners of applications they may have an interest in to arrangements for verifying the identity of applicants. Cases I reviewed in 2017-18 led me to highlight room for improvement in HMLR practice on recording and explaining the reasons for decisions, handling correspondence, avoiding customer confusion when the same word is used in different senses, telling customers how to make contact and checking for easements when registering titles based on adverse possession or “squatters’ rights”.

ICR reports, by identifying places where the nuts and bolts of HMLR's systems seem to be coming loose, aim to prevent more serious breakdowns. All recommendations are carefully considered on behalf of HMLR by the Independent Complaint Reviewer Evaluation

and Study Team (ICREST) and the great majority are accepted and implemented. New measures introduced in 2017-18 to monitor the speed of HMLR's responses to ICR recommendations have added extra accountability and focus to ICREST's work. It is good to hear from the Cross Government Complaints Forum that other public bodies have recognised that HMLR has an established and effective mechanism for learning from complaints and are keen to find out more about how this works.

Over the 10 years I have worked on HMLR complaints I have seen real improvements in two areas that are very important for customers. HMLR is less quick to make assumptions about what customers want and tries instead to understand and respond to each customer's individual questions and concerns. There has also been progress – to which I am pleased to have contributed - in developing simple explanations of complex legal concepts and how they affect customers. I welcome the fact that that HMLR's strategic plan for 2017-22 builds on the progress in both these areas and sets the ambitious but very worthwhile goal of simplifying all HMLR's interactions with customers.

Facts and figures on my work 2017-18 can be found later in this report together with examples of the cases I have considered and feedback the ICR team has received from customers. The issues raised in complaints were very varied. If there was a "topic of the year" it was rights of way and HMLR's role in "guaranteeing" such rights. There were also some continuing issues with the identification and escalation of complaints. As the year ended, however, there were clear signs that HMLR's hard work to improve performance in this area has had an impact. HMLR also decided to appoint a Board member to take the lead on complaints. This should send to staff and customers a clear message that HMLR is an organisation that values its customers and their feedback and also help consolidate improvements in complaint handling.

The ICR office sets itself high standards, both for customer service and for efficiency and I am proud to report that the average time taken to complete investigations has reduced dramatically during my time as ICR and in 2017-18 was 13 weeks. Bearing in mind the

complexity of many complaints and the time spent by the ICR team making sure that they understand the reasons for the complaint and the outcome the complainant wants, I regard this as exceptionally good performance. We have also worked hard - and successfully - to minimise costs. Total costs in 2017 – 18 were significantly lower than in 2008-9. And while not all customers are happy with the results of investigations, we receive a steady stream of very positive feedback.

I hope that my successor will enjoy the challenges of the role as much as I have done, and will continue the process of improvement and modernisation.

Finally, I should like to say a big "thank you" to the members of the ICR team, who always do their best to help customers, and work tirelessly to get to the bottom of the most complex and challenging cases.

February 2018

The ICR service for HM Land Registry's customers

Our mission

To seek a fair resolution of complaints.

Our purpose

To provide a free, effective and impartial complaints review and resolution service that settles complaints in a proportionate manner and makes a positive difference for future HMLR customers.

People can expect from the ICR team:

- courtesy
- honesty
- respect
- objectivity
- plain language.

The principles of good complaint handling

The Ombudsman Association's principles of good complaint handling underpin the process I carry out when reviewing a complaint. They are:

- clarity of purpose: each review includes a clear statement of its purpose, intent and scope
- accessibility: the service is free, open and available to all who need it
- flexibility: procedures are responsive to the needs of individuals
- openness and transparency: we provide public information that demystifies our service
- proportionality: the process and resolution are appropriate to the complaint
- efficiency: the service strives to meet challenging standards of good administration
- quality outcomes: complaint resolution leads to positive change.

When I carry out a review, I also take into account the 'FREDA' principles of human rights: fairness, respect, equality, dignity and autonomy.

Our office

It is vital to my independence that I am not part of HMLR or a civil servant. The service I provide is under the terms of a contract and service level agreement with HMLR, and I am personally responsible for all conclusions and recommendations that come from complaint reviews. I am supported by a small team of staff seconded from HMLR but directly line-managed by me. These staff bring to the office the benefit of their knowledge of HM Land Registry's practice and procedure and the legislation under which HMLR operates.

Our remit

Anyone who has made a complaint to HMLR and is dissatisfied with the outcome can ask me to review the matter. However, I cannot review or overturn HMLR's legal decisions, or investigate issues that are subject to proceedings before the Property Chamber or any other court. In addition, I will not generally be able to accept a referral made more than six months after the date of the final complaint response from HMLR.

Initial enquiries

Before a complaint is accepted for review, a preliminary investigation is carried out to determine whether or not the complaint is one that falls within my remit. This may involve discussion with the complainant to find out more about his or her continuing areas of dissatisfaction, and to gain an understanding of the outcome the complainant is hoping to achieve. It may also be necessary to make enquiries of HMLR in order to clarify that its internal complaints procedure has been fully completed. If the complaint is not one that I can consider, we will offer advice to the complainant on options for pursuing the matter.

Full review

Where there is a full review, a summary of the issues is sent out to the complainant for agreement. This is to make sure there is a clear, shared understanding at the outset of the areas to be addressed. A copy of the summary is also sent to HMLR. All the available information is then analysed in detail and I consider whether the concerns that have been raised are justified.

The outcome of the review is a report sent at the same time to the complainant and to HMLR, giving my conclusions and any recommendations. The aim of a report is to set out, in as clear and straightforward a manner as possible, my opinion on the way in which matters have been handled by HMLR, and to provide redress in appropriate cases. Both the complainant and HMLR have the opportunity to comment on a draft before the report is finalised.

Redress

I have three main forms of redress at my disposal and these are:

- that HMLR should take specific action to help put things right for the customer – for example by apologising or providing extra information or explanation
- that HMLR should make a consolatory payment (maximum £7,500) in recognition of distress and inconvenience experienced as a result of shortcomings in the service provided by HMLR
- that HMLR should consider practical changes to improve customer service and reduce the risk of similar problems in future.

In deciding when to consider making a consolatory payment, I have regard to the ICR office's *Financial Redress Policy*. The sums paid are relatively small sums to reflect the distress and inconvenience an individual may have suffered. They are fixed according to the seriousness of any service failures identified, as well as the particular circumstances of the individual complainant.

Facts and Figures 2017/18

The table below gives an overview of the work of my office in 2017/18 compared with previous financial years.

	Complaints received	Complaints resolved through intervention	Complaints investigated	Investigated complaints reported on	Investigated complaints reported on: fully or partly upheld	Investigated complaints reported on: not upheld
2017/18	99	5	60	22	7	15
2016/17	105	15	78	24	13	11
2015/16	142	6	59	29	16	13
2014/15	139	11	42	28	15	13
2013/14	127	13	29	22	13	9

As can be seen from the above table, most initial contacts do not lead to an investigation and fewer still proceed to a full review. The reasons for this include:

- the complainant may not have received a final response from HMLR. In these circumstances, we will refer the complaint back to HMLR to provide one
- the outcome sought by the complainant may not be one that the ICR can provide and may be achievable only by taking action in the courts
- the complainant may have referred the complaint for review after the normal six-month time limit has expired, or
- we may be able to secure an acceptable outcome for the complainant without the need for carrying out a full review (resolved through intervention).

We also receive complaints that are not about HMLR. In those circumstances, my staff use their knowledge of the wider complaints resolution sector to guide the complainant to

the most appropriate organisation that may be able to assist.

Independent Complaints Reviewer (ICR) for HM Land Registry

Annual report 2017/18

The following table compares the number of specific complaint issues and their outcomes with those of previous years.

Year	Investigated complaints reported on	Total issues	Issues upheld or partially upheld	Issues not upheld
2017/18	22	69	09 (13%)	60 (87%)
2016/17	24	66	26 (39%)	40 (61%)
2015/16	29	68	20 (29%)	48 (71%)
2014/15	28	72 ¹	23 (32%)	45 (63%)
2013/14	22	55	18 (33%)	37 (67%)

Recommendations

My recommendations to HMLR are designed to provide redress to individual customers and also to help HMLR improve its systems and procedures to reduce the risk of similar

complaints recurring in future. During 2017/18, I made 23 recommendations to HMLR and they fell into the categories in the table below.

Recommendation type	2017/18	2016/17	2015/16	2014/15	2013/14
Apology	35%	35%	37%	36%	35%
Consolatory payment	13%	17%	20%	32%	23%
Review procedures/guidance	22%	15%	14%	14%	11%
Remind staff of existing procedures/guidance	22%	13%	9%	7%	16%
Review/improve public information	-	5%	9%	7%	11%
Other	8%	15%	11%	11%	4%

HMLR has continued to respond positively and has given serious consideration to all my recommendations – even where, in the case of recommendations for systemic improvement, it has ultimately decided that the action proposed would be impracticable. ICREST continues to facilitate and monitor the implementation of systemic recommendations. I have been impressed by ICREST's ability to draw lessons from all aspects of my reports, even regarding issues which had not formed part of the actual complaint.

This year my recommendations have led to changes to HMLR's customer information and changes to staff guidance, and reminders to staff of the procedures they must follow. I was interested to read a report on research carried out by HMLR in response to one of my recommendations – the research was about the circumstances in which HMLR altered or replaced registered title plans and whether reasons for HMLR's decisions had been properly recorded. One of the report's findings:

¹ No decision was made on four complaint issues.

“This evidence supports the feedback received from the ICR around the lack of audit trail or record of decisions made/actions taken during the registration process. A weakness in practice that is leaving HMLR open to criticism and potential financial risks when we are unable to justify why casework decisions have been made or why a process has not been followed.”

demonstrates the value of the independent review procedure in assisting HMLR to strengthen its own procedures.

Feedback from customers

Feedback for the ICR office – as for HMLR – is fundamental to improving the quality of the service we provide. Since we launched our new website in February 2016, our service users have had the opportunity to complete an interactive form to provide online feedback although we still provide paper questionnaires to those who prefer not to use computers. It remains the case that we rarely receive feedback through these structured routes. More commonly our service users provide comments in emails or letters responding to reports. Sometimes, even though I have not upheld a customer’s complaint, my report has helped to shed light on what has happened and why or has assisted in bringing closure: this is reflected in some of the examples quoted below.

“I must convey my very grateful thanks to you both for the transparent manner and the work involved in providing ICR conclusions, although the outcome has not been favourable some knowledge has been obtained... I close confirming closure and reiterating my very sincere thanks.”

“We are happy with the result, in particular that the process is being

scrutinised. It was only ever our intention to prevent any other property owner from ending up in the same situation that we found ourselves.”

“We have had help from my MP’s [office] to carry out the appeal. However we feel that we cannot commit any more time and any occurring expense to take the argument any further. We will be writing to the Land Registry to accept their offer of £500 as you advise and put behind us this lengthy, expense and unpleasant affair.”

Customers dissatisfied with my conclusions can ask for a final review by the Parliamentary Ombudsman’s office. These reviews involve expert external scrutiny of the ICR office’s work. I am pleased to report that once again the Ombudsman has not upheld any complaints about either HMLR or my office.

Our speed of service

While we seek to provide a swift response to all enquiries, formal investigations can be extremely time-consuming. We look at all the paper and electronic files relating to a complaint; they are often large and extend over many years. We also need to allow time at each stage of the process for the complainant and for HM Land Registry to provide comments. Our published target is to complete a formal investigation within 26 weeks from the date that I have agreed the complaint is within my remit.

The table below shows the average time (in weeks) taken to complete an investigation and, as mentioned in the introduction, I am pleased to report that the average completion time for 2017/18 has decreased still further to 13 weeks.

ICR completion times	2017/18	2016/17	2015/16	2014/15	2013/14
No of weeks	13	14	17	19	20

Financial information

As already mentioned, my office is managerially independent from HMLR.

The following table compares expenditure over the last five years and demonstrates our continuing efforts to manage our budget as effectively as possible and provide good value for money

ICR running costs	2017/18	2016/17	2015/16	2014/15	2013/14
Staff costs	£210,010	£202,832	£199,753	£190,547	£181,857
Administration ²	£17,232	£199 ³	£20,035	-£276 ⁴	£42,556
Total	£227,242	£203,031	£219,788	£190,271	£224,413

² Includes accommodation costs.

³ This figure includes an adjustment to allow for an over-estimation of rent in 2015/16.

⁴ This includes a refund of rent paid for our former office.

Case Studies

Rights of way

Rights of way are important to property owners, and disputes about them can be very upsetting. HMLR “guarantees” rights of way when it enters them in the register, takes care that the registers of different titles affected by the same right of way are consistent and that rights are properly recorded when part of a registered property is sold. However, it does not have power to check or enforce the use of rights of way. Several cases I investigated in 2017-18 illustrated how important it is for HMLR to check rights of way when properties are registered or sold.

Mr A complained that a right of way was shown on his and his neighbours’ title plans in different places and that this had caused a dispute. HMLR accepted that the plans did not match but said it had based the plans on information provided by the applicants when the properties were first registered. It admitted, nonetheless, that it should have spotted the inconsistency, and as well as apologising, tried hard to agree a solution with Mr A and his neighbours, paid Mr A’s legal costs and offered him consolatory payment in recognition of Mr A’s distress. While it was clear that the inconsistency had contributed to a very distressing dispute I was satisfied that HMLR had taken appropriate responsibility for its error and done as much as it could to put things right.

When a right of way exists, there is a property that has the benefit of the right and another property that is subject to, or “burdened” by the right. When HMLR is planning to add the burden of a right of way to a registered title it should inform the owner of the title and give the opportunity for any objection to be raised. Mr B complained that HMLR had added a right of way to his title without informing him. While HMLR said that an objection by Mr B could not legally have stopped it adding the right of way, it admitted it had made a mistake, apologised to Mr B for its mistake and made a consolatory payment in recognition of the distress caused. I concluded, in all the circumstances, that this represented appropriate redress.

Mrs C had a right of way over a lane at the rear of her house. HMLR granted an application by her neighbours Mr and Mrs Z for registration of part of the lane based on adverse possession or “squatters’ rights. It failed, however to check Mrs C’s title to see if there were any rights over the lane, and as a result Mrs C’s rights were not entered on the new title. This led to a serious dispute between Mrs C and her neighbours about use of the lane. Mrs C complained that HMLR’s actions had led to the dispute and that when she had applied for the mistake to be corrected HMLR staff had been unhelpful, caused delay, and acted unfairly by failing to complete the application even when her neighbours withdrew an objection. I upheld Mrs C’s complaint and recommended that HMLR should apologise, make a payment in recognition of Mrs C’s distress and also consider reimbursing her solicitors’ fees.

Simple language

Land registration is a complex business and it is very difficult to explain the technical details in simple terms. If HMLR does not rise to this challenge, however, it misses opportunities to resolve problems and risks undermining customer confidence.

Two complaints I investigated in 2017-18 led me to highlight the risk of confusion when the same words are used by HMLR with different meanings. Mr D’s complaint was about the fact that HMLR had cancelled agreed notices placed on the register to record a third party interest in a registered property. One of the points he made was the result of confusion between the cancellation of **applications** and the cancellation of **notices**, and led me to suggest that HMLR should look at ways of reducing confusion about what is meant in different contexts by the word “cancel”. In another case (Mr E) I commented on the potential confusion caused by the fact that that HMLR uses the word “notice” in two different senses. It may refer to a specific type of entry in the register or alternatively to a letter sent to inform an individual of an application. So when an application is made for a “unilateral notice” HMLR staff send an “information notice” to the registered owner of the property concerned. While I recognised that HMLR has to work with the terminology of the legislation within which it operates, I observed that this is another

potentially confusing use of the same word to mean different things.

In another case I found that HMLR had repeatedly offered explanations in technical language which ordinary customers could not be expected to understand. Mr and Mrs F complained that HMLR, when registering a sale by their neighbours (Mr and Mrs Y) of part of their garden, had mistakenly recorded on the new title a right of way for the new owners over a shared access road. HMLR tried to explain that there had been no mistake, that the right had been granted for the benefit of Mr and Mrs Y's property, rather than for the Ys personally, and therefore that it continued to benefit both the part of the property sold and the part retained. Mr and Mrs F also complained that HMLR, before recording the right on the new title, should have consulted them and other neighbours who shared responsibility for the maintenance of the access road. HMLR tried to explain that as the maintenance agreement was a personal agreement rather than an agreement about the use of land it was not relevant to the registration. Although I was satisfied that HMLR had based its responses on its own published guidance on rights of way, I was concerned that in spite of a number of attempts, it had not managed to explain the situation to Mr and Mrs F in language they could understand, and I recommended an apology for poor communication. I am pleased to report that, after reading my report, Mr and Mrs F, while still unhappy with the situation, said they understood the reason why HMLR had handled the rights in the way it had.

Where there is no record of the reasons for a decision

It is always much easier for an organisation to respond to later challenges if it has a record of the reasons for its actions. Mr G complained about the way in which HMLR had handled an application for registration of a piece of land which he believed was his. He pointed out that the document HMLR had accepted as evidence of ownership of the land had transferred only such "*estate, right or interest*" as the sellers had. HMLR accepted that the decision had been unusual, and was unable to explain the reasons for it as the original documents had not been retained. HMLR maintained, however, that there was no reason to think the decision had been wrong. I could

not comment on the decision, but I found nothing to indicate that HMLR had not followed proper procedures and therefore did not uphold the complaint. I commented, however, that it would have been much more satisfactory if HMLR had been able to explain its decision, and I suggested that HMLR should remind staff of the importance of recording reasons for decisions, especially when a decision is unusual and likely to be questioned.

Amending the register

HMLR has limited powers to change the register and in previous years I have reported on the disappointment of customers when they find that HMLR cannot amend the register to correct what they believe is a mistake. This year a case illustrated the potential dangers if HMLR does change the register without considering the points of view of all the property owners who will be affected by the alteration.

Mr H and Ms I approached HMLR about the position of a boundary. The problem had arisen because part of a neighbouring title had been sold and the plan for the new title showed the boundary at an angle which did not match the angle on Mr H and Ms I's title plan. There was also a dispute about the position of a garage the owners of the new title were planning to build. HMLR said that it would have to get the files so that it could consider the matter, but then a few days later, after telephoning the solicitors acting for Mr H and Ms I - though without written confirmation either from the solicitors or from Mr H and Ms I - amended Mr H and Mrs I's plan. The effect of the change was to show the boundary in the very position Mr H and Ms I disputed. I found that HMLR had acted over-hastily in making the amendment, especially as it appeared that there was a boundary dispute. Although, as HMLR said, the amendment did not affect any legal boundaries, I could not fully understand why Mr H and Ms I were not happy with the result. Although I did not uphold the complaint because the amendment had not, in fact, had any effect on Mr H and Ms I's title, I recommended that HMLR should acknowledge that it would have been better if it had checked more carefully before acting and should apologise for the unintended distress caused by the amendment.

Lost documents

HMLR handles about 2 million applications a month and it is probably inevitable that documents sent in by customers will go missing from time to time. It is important, however, that HMLR should respond appropriately in such situations. The documents lost are often of great value to its customers. It is necessary for HMLR while taking all reasonable steps to recover the documents, also, to do what it can to ensure that the application is not compromised.

In the case of Mr J HMLR had lost documents sent to support an application for first registration. With the help of Mr J's solicitors HMLR obtained copies of the documents and was able to complete the registration. Mr J, however, was very distressed at the loss of his original documents, and complained that HMLR had been unhelpful and had failed to make appropriate efforts to recover the documents. I found that HMLR had concentrated on completing with the application rather than taking the immediate steps required by its policy on lost documents, and that by the time it carried out relevant searches it was too late for there to be a realistic chance of finding the documents. I recommended that HMLR should review its policy on lost documents taking into account Mr J's experience and also its own current registration practice and priorities.

Delays

Delays by HMLR are bound to be frustrating for its customers. It is important, when they occur, for HMLR to keep customers informed and also to be mindful of the impact the delays may have.

Mr and Mrs K complained about delay and bias in HMLR's handling of their application for an indemnity payment. Mr and Mrs K said that their property had been transferred fraudulently and they were entitled to compensation from HMLR. The facts were complex and HMLR had spent three years investigating the matter before deciding that there was no mistake on the register and so Mr and Mrs K were not entitled to an indemnity. I found no evidence of bias, but was concerned about the length of time taken to reject the application. I recognised that the

matter was complex, that indemnity payments come from public funds and that HMLR must be satisfied on a balance of probabilities that the legal requirements for payment are met. Bearing in mind, however, that HMLR does not have power to make judicial decisions and that if it rejects an application for an indemnity payment the applicant is entitled to apply to a court, I felt that it would have been better if HMLR had made its decision more quickly so as to give Mr and Mrs K much earlier the option of going to court. I suggested that HMLR should consider giving guidance to staff on the length of time to be spent making a decision on an indemnity claim before giving the applicant the option of applying to court. Mrs L's complaint was also about delays by HMLR in making a decision on an indemnity payment. The causes of the delay, however, were different. The decision itself had been made promptly. The delay in informing Mrs L happened because of administrative errors at HMLR. HMLR had openly admitted its error and offered sincere apologies. I recommended that it should, in addition, review its procedures for handling correspondence to reduce the risk of similar delays in future.

Finally...

The ICR and her team would like to thank all those members of HM Land Registry staff who have co-operated in our reviews by providing information, commenting on drafts and carrying out the recommendations in final reports. Without their help the ICR office could not operate effectively.