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International Bar Association

# Bar Issues Commission: Unregulated providers of legal services



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# Unregulated providers of legal services

## Introduction

This information paper seeks to describe how unregulated providers are playing a part in the legal services market worldwide and, also, to lay out the issues which arise when such providers are present. The phenomenon of unregulated providers, described in more detail below, provokes different responses in different jurisdictions, given that what is permitted by law varies so widely across jurisdictions around the world.

This paper follows a consultation by the Bar Issues Commission of the IBA's member bars in late 2019/early 2020, where there was agreement that an information paper would be produced.

The paper also seeks to give assistance to bars when considering how they should respond to the phenomenon in their own jurisdiction, for instance if they are engaged in discussions with decision-makers regarding the treatment of unregulated providers. It seeks to take account of changes that have taken place as a result of the Covid-19 pandemic and that might take place in the future as a result.

## Background to unregulated providers of legal services

Many jurisdictions are witnessing an increase in the provision of unregulated legal services, whether by providers in person or through electronic platforms, or combinations thereof, and other forms of information technology (IT) owned wholly or in part by non-lawyers. In many instances, these individuals and platforms are not regulated by those responsible for regulating the legal profession. A number of bars are discussing whether such legal services, or the entities providing them, should be regulated and, if so, how. In other words, there has been a fundamental change in the means of delivery of legal services and their providers. Whereas previously the term 'legal services' immediately triggered the image of a lawyer, that is now not always the case. Whether or not this new provision of legal services may be considered, in some jurisdictions, unauthorised practice of law is often not yet clearly defined.

At the same time, various types of legal technology are entering the market and are utilised in the provision of legal services. Within the broad nomenclature of 'artificial intelligence' (AI) are a multitude of software and other digital means, ranging from rote functionality to software using true AI and deep learning. Blockchain technology is one example that is being used in a variety of economic sectors. These technologies are operated both by lawyers and non-lawyers, and pose their own specific challenges. Whether or not existing rules of professional conduct (ethics) cover the challenges involved is one of the urgent questions facing bars.

Despite the IBA not itself being a regulator, it nevertheless published *International Principles on Conduct for the Legal Profession* (hereafter called the '*Principles*') in 2011,<sup>1</sup> subsequently amended in 2018. The *Principles* are clearly aimed at lawyers alone. The title, introduction and content make that clear. They bypass unregulated (non-lawyer) providers altogether.

As for the scope and content of legal services, this has specifically not been defined in this paper because there is no definition which would cover all jurisdictions. In some jurisdictions, there is a relatively small area of work which is expressly reserved to lawyers. In others, the meaning of 'legal services' and 'what lawyers do' is synonymous, so that there cannot be any lawful provision of unregulated legal services. Readers are asked, therefore, to assume the definition which applies to their own jurisdiction. Additionally, no definition of 'unregulated providers of legal services' is given in this paper. In some jurisdictions, these providers may sometimes be governed by some regulation, varying from strict to loose, but the paper's assumption is that they are not regulated as lawyers.

As further background, the following should be kept in mind:

1. The IBA continues to believe that the public interest and the interests of clients are best advanced when legal services are delivered by lawyers who are licensed or otherwise authorised, with the protections that usually attach to a lawyer's licence: high standards of preliminary and continuing training; an ethical code which is enforced; discipline and removal from the right to practise where appropriate; professional indemnity insurance; and other guarantees.
2. The IBA should not be seen as endorsing the provision of legal services relating to unregulated providers in jurisdictions where such provision is unlawful or otherwise constitutes the unlawful practice of law, or where it could be damaging to the public interest and the interests of clients in the short or long term. However, the reality is that such provision is taking place now in a wide variety of jurisdictions.
3. The provision of legal services by unregulated providers, in certain circumstances, can help to address the difficulties faced by many in trying to access legal services,<sup>2</sup> and has been embraced by certain in-house legal departments and, therefore, may have various advantages.
4. Any publication relating to unregulated legal services should not subject the IBA to criticism for merely serving lawyer self-interest.

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1 [www.ibanet.org/Document/Default.aspx?DocumentUid=1730FC33-6D70-4469-9B9D-8A12C319468C](http://www.ibanet.org/Document/Default.aspx?DocumentUid=1730FC33-6D70-4469-9B9D-8A12C319468C) [<https://perma.cc/W62Y-4ZU2>].

2 See for instance: <https://worldjusticeproject.org/our-work/research-and-data/global-insights-access-justice-2019> [<https://perma.cc/A93X-7FGA>].

## National initiatives on unregulated providers

A number of jurisdictions have adopted regulatory objectives (Australia, Denmark, England and Wales, India, Ireland, New Zealand, Scotland, several Canadian provinces and at least two United States jurisdictions). These often have a similar content and cover all providers of legal services, whether regulated or not. A link to one example is given below in the section related to developments in the US.

### United States

The American Bar Association's (ABA) *Model Regulatory Objectives for the Provision of Legal Services*<sup>3</sup> are a classic example of the genre. They were adopted by the ABA House of Delegates with the specific aim of helping state regulators to cope with the rapidly changing regulatory landscape, including the unregulated.

In addition, the ABA has adopted *Best Practice Guidelines for Online Legal Document Providers* and urged online legal document providers (OLPs) to adopt them.<sup>4</sup> The commentary to the *Guidelines* addresses arguments about whether a lawyers' professional body should issue guidelines to those who are not regulated providers of legal services and gives reasons for doing so as follows:

- the ABA is a voluntary professional association and not a regulator – its role is not just to serve its members but to focus on the needs of the public;
- lawyers have substantial and longstanding experience with ensuring that legal and law-related services are delivered in ways that protect the public;
- it is lawyers who will address any problems that result when OLPs create faulty documents or provide for inadequate dispute resolution mechanisms; and
- the public gains when all those providing legal services to the public – lawyers, OLPs and other legal services providers – work cooperatively rather than antagonistically.

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3 The background paper explaining the changes can be found here: [www.americanbar.org/content/dam/aba/images/office\\_president/final\\_regulatory\\_objectives\\_resolution\\_november\\_2015.pdf](http://www.americanbar.org/content/dam/aba/images/office_president/final_regulatory_objectives_resolution_november_2015.pdf) [https://perma.cc/YL9L-4AWW]. The final regulatory objectives can be found here: [www.americanbar.org/content/dam/aba/events/professional\\_responsibility/2017%20Meetings/Conference/conference\\_materials/session13\\_policy\\_process\\_prevention/aba\\_model\\_regulatory\\_objectives.authcheckdam.pdf](http://www.americanbar.org/content/dam/aba/events/professional_responsibility/2017%20Meetings/Conference/conference_materials/session13_policy_process_prevention/aba_model_regulatory_objectives.authcheckdam.pdf) [https://perma.cc/3QFF-HM5J].

4 [www.americanbar.org/content/dam/aba/directories/policy/annual-2019/10a-annual-2019.pdf](http://www.americanbar.org/content/dam/aba/directories/policy/annual-2019/10a-annual-2019.pdf) [https://perma.cc/3UJJ-TC92].

Various US states are moving to open up legal practice beyond lawyers, as follows:<sup>5</sup>

1. Utah has approved the provision of certain legal services by 'limited license technicians' and has approved and launched a 'regulatory sandbox' that will vet and permit delivery of legal services by non-traditional providers that may be partly owned by non-lawyers.
2. Arizona has adopted new rules allowing alternative business structures, creating licensed and regulated legal para-professionals, significantly amending its rules relating to sharing fees between lawyers and with regard to advertising/solicitation.
3. The California State Bar Board of Trustees approved further study of a 'regulatory sandbox' to allow non-lawyer ownership and fee-sharing.
4. The Minnesota Supreme Court launched a licensed para-professional pilot program that allows these individuals to provide limited legal services under supervision of a lawyer in landlord/tenant and family law.<sup>6</sup>
5. The New York City Bar issued a formal opinion on '*Ongoing Relationships with Alternative Legal Business Entities*',<sup>7</sup> and the New York State Bar's Working Group on Regulatory Innovation issued a report which recommended against the consideration of alternative business structures in the state.<sup>8</sup>
6. A Connecticut State Bar task force is exploring, among other things, if alternative business structures could reduce legal costs and help lawyers practise in a more sustainable and consumer-centred manner.
7. Other US jurisdictions considering regulatory changes include the District of Columbia, Florida, Illinois, New Mexico, North Carolina and Oregon.

The ABA has also responded to the Covid-19 pandemic by approving a policy that encourages state regulators to allow 2019 and 2020 graduates of ABA-approved law schools to practise under the supervision of a qualified lawyer if the bar exam in their jurisdiction was cancelled or postponed due to the pandemic.<sup>9</sup> State regulators have taken a variety of approaches (see more detail in footnote below).<sup>10</sup>

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5 <https://iaals.du.edu/knowledge-center> [<https://perma.cc/738Y-7J7D>].

6 [www.mncourts.gov/Implementation-Committee.aspx](http://www.mncourts.gov/Implementation-Committee.aspx).

7 [www.nycbar.org/member-and-career-services/committees/reports-listing/reports/detail/formal-opinion-2020-1-ongoing-relationships-with-alternative-legal-business-entities](http://www.nycbar.org/member-and-career-services/committees/reports-listing/reports/detail/formal-opinion-2020-1-ongoing-relationships-with-alternative-legal-business-entities).

8 [www.nycourts.gov/LegacyPDFS/publications/RWG-RegulatoryInnovation\\_Final\\_12.2.20.pdf](http://www.nycourts.gov/LegacyPDFS/publications/RWG-RegulatoryInnovation_Final_12.2.20.pdf).

9 [www.americanbar.org/news/abanews/aba-news-archives/2020/04/bog-action-law-students](http://www.americanbar.org/news/abanews/aba-news-archives/2020/04/bog-action-law-students) [<https://perma.cc/A6DP-TM2K>].

10 [www.ncbex.org/ncbe-covid-19-updates/july-2020-bar-exam-jurisdiction-information](http://www.ncbex.org/ncbe-covid-19-updates/july-2020-bar-exam-jurisdiction-information) [<https://perma.cc/HDA5-W2KP>].

This new policy would apply only to first-time bar takers, who would have until the end of 2021 to practise without passing the bar exam. It is a temporary measure, conditional on the applicant actually taking and passing the bar exam by the end of 2021.

Among other restrictions, the ABA urges that regulators include disclosure provisions so that clients, courts and the public are aware of the limited nature of the licence granted to the student. In addition, the law students should register with, and pay appropriate fees to, the regulator concerned.<sup>11</sup>

## **United Kingdom**

The Covid-19 pandemic has given an impetus to reconsideration of the role of unregulated providers in England and Wales (all that follows applies to that jurisdiction alone).

The overarching regulator, the Legal Services Board (LSB), has already indicated that in a post-crisis world there may well be a pressing case to make changes to the 'reserved activities' (activities that only regulated lawyers can undertake) to meet the public need better. As a result, it is actively looking into changes to the reserved activities.

At the same time, an influential report<sup>12</sup> was published into the future regulation of the legal profession by Professor Mayson of University College London. The report is divided into two sets of recommendations, long-term and short-term, and its short-term recommendations are devoted specifically to the problems which are expected to arise post-pandemic.

Its conclusion is that, post-pandemic, law-tech providers will probably be better funded, financially more resilient, and more entrepreneurial than many law firms. Second, if law firms are going to go out of business, consumers will probably be drawn even more to currently unregulated providers and unregulated technology-based legal services. Therefore, says Professor Mayson, it is even more important that unregulated providers are brought within the scope of regulation in the short-term.

Professor Mayson's preferred short-term solution is for the LSB to establish a public register of currently unregulated providers of non-reserved activities to consumers, whether for reward or as part of a commercial activity. He says the LSB should then decide if any compensation and indemnification arrangements should be attached to those registered.

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11 [www.americanbar.org/content/dam/aba/administrative/news/2020/04/bog-040720.pdf](https://www.americanbar.org/content/dam/aba/administrative/news/2020/04/bog-040720.pdf) [https://perma.cc/6WUX-4WXL].

12 [www.ucl.ac.uk/ethics-law/sites/ethics-law/files/irlsr\\_final\\_report\\_final.pdf](https://www.ucl.ac.uk/ethics-law/sites/ethics-law/files/irlsr_final_report_final.pdf) [https://perma.cc/39Z7-T7B4].

Shortly afterwards, the UK's Competition and Markets Authority published a report called '*Review of the legal services market study in England and Wales*',<sup>13</sup> which followed a similar path on the same topic, but called rather for the Ministry of Justice (rather than the LSB) to create, or empower the creation of, a mandatory public register for unauthorised providers as a short-term solution.

## **Poland**

Under a free legal aid law of 2015, half of the legal aid centres in any area must be run by non-governmental organisations (NGOs) and such NGO-run legal aid centres can be staffed by non-lawyers: tax advisers, who may advise clients on matters of tax law other than matters related to business activity; and law graduates of Polish or foreign universities (the foreign diplomas must be recognised in Poland) – the graduates must also (among other things) show at least three years' experience in carrying out activities that require knowledge of the law and are directly related to the provision of legal services.

## **Germany**

Germany (and possibly other countries as well) allows certain specified legal services to be carried out without any licence (eg, in a family or personal relationship context) or on the basis of a limited licence (eg, collection of accounts receivables and giving advice in pension and social insurance law or in a foreign law). The sole prerequisite for obtaining such a limited licence is evidence of sufficient expertise in the area of law in question at a level that is far below the level of access to the legal profession. The rendering of the legal service itself is basically not regulated. A growing number of unregulated legal tech-based providers of legal services are operating in Germany on the basis of such limited licences for collection activity.

The courts have interpreted permitted collection to include the giving of legal advice prior to eventual collection. What has happened after that may be considered typical of the complex situation. Many members of the legal profession, as well as most, if not all, bars, considered the light regulation of these providers of legal services to be unfair discrimination as against the closely regulated legal profession and asked the courts to bring the level of regulation of these providers up to the level of lawyers. The courts have refused to do this. The unsuccessful lawyers and bars then hoped that the legislator would move against these providers of legal services. However, they were disappointed a second time.

The German Ministry of Justice published a draft bill, in early October 2020, that takes a different approach. With respect to non-lawyer legal service providers, the draft bill sets out access requirements requiring higher expertise

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13 [www.gov.uk/cma-cases/review-of-the-legal-services-market-study-in-england-and-wales](http://www.gov.uk/cma-cases/review-of-the-legal-services-market-study-in-england-and-wales).

(but still much below that of a fully-fledged lawyer), and includes information obligations vis-à-vis the clients, in particular with respect to fee agreements and collection financing agreements (including success fees). The draft bill also calls for some degree of ongoing supervision by the judicial administration.

Further, the draft bill aims to improve the competitive situation of fully-fledged lawyers, by allowing them to work on the basis of success fees in cases involving claims of up to €2,000. It is reported that Parliamentarians have for a long time seemed to consider most parts of the legal profession, and in particular the bars, as ultra-conservative, caring more for their own benefits than for the benefit of consumers. It is assumed that at least the essence of the draft bill is likely to be adopted by Parliament. If it comes to pass in this way, this may show the considerable effect that the provision of legal services by non-lawyers can have on the legal profession, both in terms of competition and regulation.

## Developments relating to legal technology

A number of different bodies have been looking, in particular, at the impact of AI on the delivery of legal services. What is striking is how similar are their resulting conclusions.

For instance, a working group of the European Commission for the Efficiency of Justice, which is part of the Council of Europe, published a *'European ethical Charter on the use of Artificial Intelligence in judicial systems and their environment'*.<sup>14</sup> It highlighted the following important principles:

- **respect for fundamental rights:** ensure that the design and implementation of AI tools and services are compatible with fundamental rights;
- **non-discrimination:** specifically prevent the development or intensification of any discrimination between individuals or groups of individuals;
- **quality and security:** with regard to the processing of judicial decisions and data, use certified sources and intangible data with models conceived in a multi-disciplinary manner, in a secure technological environment;
- **transparency, impartiality and fairness:** make data processing methods accessible and understandable, authorise external audits; and
- **'under user control':** preclude a prescriptive approach and ensure that users are informed actors and in control of their choices.

The European Union Fundamental Rights Agency (FRA) also published a report, drawing attention to the fact that when algorithms are used for decision-making, there is potential for a breach of the principle of non-discrimination enshrined in

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<sup>14</sup> <https://rm.coe.int/ethical-charter-en-for-publication-4-december-2018/16808f699c> [https://perma.cc/YJZ6-FYN9].



Article 21 of the EU Charter of Fundamental Rights.<sup>15</sup> Its paper explains how such discrimination occurs and suggests possible solutions.

The FRA report is based on previous work by the Council of Europe (*'Guidelines on the protection of individuals with regard to the processing of personal data in a world of Big Data'*)<sup>16</sup> and the European Parliament (resolution on fundamental rights implications of big data: privacy, data protection, non-discrimination, security and law-enforcement).<sup>17</sup>

The FRA recommends that a number of steps be taken:

- authorities should be as **transparent** as possible about how algorithms are built;
- **fundamental rights** impact assessments should be conducted to identify potential biases and abuses in the application of, and output from, algorithms;
- the **quality** of data should be checked, including collecting metadata, that is, information about the data itself; and
- authorities should ensure that the way the algorithm is built and operates can be **meaningfully explained** – including, most importantly, which data were used to create the algorithm – to facilitate access to remedies for people who challenge data-supported decisions.

The European Commission has launched its ethics guidelines for trustworthy AI.<sup>18</sup> Although it surveyed the entire field of AI and not just its use in legal services, the seven key requirements that it identified are rather familiar from the previous two lists above:

- human agency and oversight;
- technical robustness and safety;
- privacy and data governance;
- transparency;
- diversity, non-discrimination and fairness;
- environmental and societal well-being; and
- accountability.

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15 <http://fra.europa.eu/en/publication/2018/big-data-discrimination> [<https://perma.cc/SEN4-8Q9U>].

16 <https://rm.coe.int/16806ebe7a> [<https://perma.cc/PWP3-7EA2>].

17 [www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2017-0076+0+DOC+XML+V0//EN](http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2017-0076+0+DOC+XML+V0//EN) [<https://perma.cc/95B9-P6XN>].

18 <https://ec.europa.eu/digital-single-market/en/news/ethics-guidelines-trustworthy-ai> [<https://perma.cc/2D6P-9A5Y>].

Finally, but not exhaustively, the Law Society of England and Wales sponsored the publication of a report by the Technology and Law Public Policy Commission on '*The use of algorithms in the criminal justice system*'.<sup>19</sup> Its conclusions were in favour of:

1. **Oversight:** a legal framework for the use of complex algorithms in the justice system. The lawful basis for the use of any algorithmic systems must be clear and explicitly declared.
2. **Transparency:** a national register of algorithmic systems used by public bodies.
3. **Equality:** the public sector equality duty is applied to the use of algorithms in the justice system.
4. **Human rights:** public bodies must be able to explain what human rights are affected by any complex algorithm they use.
5. **Human judgement:** there must always be human management of complex algorithmic systems.
6. **Accountability:** public bodies must be able to explain how specific algorithms reach specific decisions.
7. **Ownership:** public bodies should own software rather than renting it from tech companies and should manage all political design decisions.

There are doubtless other studies from other continents (the IBA has itself recently undertaken a comprehensive study of all the research in this field)<sup>20</sup> but the conclusions of the few recent reports cited show a common pattern, from which useful conclusions can be drawn for the purpose of unregulated legal services providers. The conclusions are made on two assumptions:

- that, even if other studies on AI are conducted in the future, the same common features are likely to be shown; and
- that it is likely that there will be carry-over from studies on AI to conclusions about the treatment of other technologies when considering them in the context of the delivery of legal services, for example, by blockchain or bots.

## Drawing conclusions for unregulated legal services in legal technology

Using the reports and conclusions above, including the assumptions but avoiding repetition, the following list can be drawn up for the provision of unregulated legal services.

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19 [www.lawsociety.org.uk/support-services/research-trends/algorithm-use-in-the-criminal-justice-system-report](http://www.lawsociety.org.uk/support-services/research-trends/algorithm-use-in-the-criminal-justice-system-report) [https://perma.cc/CV4H-YXQF].

20 [www.ibanet.org/Document/Default.aspx?DocumentUid=B1A8F41C-1428-4945-B1A2-AEAF4B1D2A32](http://www.ibanet.org/Document/Default.aspx?DocumentUid=B1A8F41C-1428-4945-B1A2-AEAF4B1D2A32) [https://perma.cc/E6R2-TTTL].

It will be noted that these same conclusions can be used for regulated legal services, too, but this paper is focused solely on the area of unregulated legal services, where it is proposed that the same criteria should be used. When unregulated legal services are concerned, there will first have to be a decision made as to whether a legal service is being provided at all and, if so, whether it can be performed only by a regulated lawyer.

1. **Accountability:** a named legal person must be responsible for the operation, oversight and/or supervision of the product or services, with contact details given.
2. **Human agency and oversight:** one or more suitably qualified people (which does not necessarily mean legally qualified, but qualified to understand and handle the technology and its consequences) must be identified who manage the technology.
3. **Respect for human rights:** this includes non-discrimination, diversity, fairness, environmental rights, and the right to privacy and data protection.
4. **Transparency:** the way the technology is built and operates must be able to be meaningfully explained, including both which data were used to create an algorithm and also the legal basis for the use of the technology, to facilitate access to remedies where an outcome is challenged.
5. **Quality:** there need to be agreed minimum standards on the quality of data to be used in the delivery of legal services.

## Standards to be considered

Some bars will not wish to engage with decision-makers on how unregulated providers of legal services should be treated, believing that their mandate applies only to lawyers. Others will wish to engage.

When considering whether to engage on how non-lawyer providers of legal services should be treated, bars may wish to include in their deliberation the issue of whether the absence of any regulation of non-lawyer legal services, or the existence of a regulation that is more lenient than the regulation of lawyers, may, as far as the rendering of identical legal services is concerned, undermine for reasons of coherence the existing regulation of lawyers for such services, be it under the law (as, for instance, in the EU), or because the lawyer members of the bar may complain about unjustified regulatory discrimination.

For the group that wishes to engage with decision-makers, the following standards may be considered useful as a checklist to bear in mind when explaining what is important in the delivery of legal services by those not regulated as lawyers:

- A. Protection of the public.
- B. Advancement of the administration of justice and the rule of law.

- C. Meaningful access to justice for all, regardless of economic situation, and information about the law, legal issues, and the civil and criminal justice systems
- D. Transparency regarding the nature and scope of legal services to be provided, the credentials of those who provide them and the availability of regulatory protections.
- E. Delivery of affordable and accessible legal services, with the means suiting the needs.
- F. Efficient, competent and ethical delivery of legal services.
- G. Protection of confidential information and, where applicable to the provider-client relationship, privileged information.
- H. Independence of professional judgment.
- I. Accessible civil remedies for negligence and breach of other duties owed by providers of legal services, and sanctions for misconduct.
- J. Appropriate controls for money held on behalf of customers.
- K. Diversity and inclusion among legal services providers and freedom from discrimination for those receiving legal services and in the justice system.

Where legal technology is used in the delivery of legal services, the following additional aims are included in the list:

- L. Accountability and appropriate levels of supervision in the form of a named legal person to be responsible for the product, with contact details given.
- M. Human agency and oversight in the form of one or more suitably qualified people (not necessarily legally qualified, but qualified to understand and handle the technology and its consequences) to be identified to manage the technology.
- N. Respect for human rights, including non-discrimination, diversity, fairness, environmental rights, and the right to privacy and data protection.
- O. Transparency in the way the technology is built and operates so that it can be meaningfully explained, including both which data were used to create an algorithm, and also the legal basis for the use of the technology, to facilitate access to remedies where an outcome is challenged.
- P. Agreed minimum standards on the quality of data to be used in the delivery of legal services.

## **Conclusion**

The topic of the unregulated provision of legal services is changing rapidly and is likely to see more change arising out of the consequences of the coronavirus pandemic. Therefore, this paper can only reflect the position at a particular moment of time. Nevertheless, it is hoped that the information it contains is of use to the IBA's member bars.

## **Annex A**

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