

SRA Work Programme 2019-20 Quarter Four Update

Our Strategic Objectives

Strategic Objectives 1 - We will set and apply consistently high professional standards for the individuals and firms we regulate and make sure they are appropriate to meet the challenges of today and the future.

Strategic Objective 2 - We will make sure our regulatory requirements are proportionate, providing solicitors and firms with the flexibility to innovate and better meet the needs of members of the public and businesses, while maintaining appropriate levels of public protection.

Strategic Objective 3 - We will increase the availability of relevant and timely information to help people make informed choices in the legal services market.

Strategic Objective 4 - We will make sure that our regulatory arrangements work as effectively as possible for the public, businesses, solicitors and firms in the context of constitutional developments within the UK and any new relationship with the EU.

Strategic Objective 5 - We will work better together, and with others, to improve our overall effectiveness, our responsiveness and the delivery of our regulatory functions.

Our work programme for 2019/20 is available on our website [here](#) ¹

Annex 1 shows the activities within each objective.

Progress² against activities in our annual planned work programme

	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5
1	●	●	●	●	●
2	●	●	●	●	●
3	●	●	●	●	●
4	●	●	●	●	●
5	●	●	●	●	●
6	●	●	●	●	●
7	●	●		●	●

Note: The background represents the status in the previous quarter and the circle the status in the current quarter

² Relates to objective status based on progress to date: Red (R) – progress behind expectation and will not succeed without direct action; Amber (A) – generally in line although challenge to maintain progress and deliver overall objective; Green (G) – in line with expectation and overall delivery is expected; Black (B) – in line with planned delivery schedule work not yet started

In quarter three there were four activities rated as Amber, period four has seen this reduce to one, which is detailed below. This activity has been amber for the last two quarters.

¹ <https://www.sra.org.uk/globalassets/documents/sra/strategy/sra-work-programme-2019-20.pdf?version=4ac1fb>

Exceptions: Updates on Amber and Red activities

Activity 4.5

We will introduce a fee limit for solicitors and authorised firms carrying out claims management activities relating to financial products and services. We will develop regulatory arrangements that implement this. This is so that people who want to make claims about, for example, mis-sold financial services, get a good service.

Rationale for rating

There is no fixed timeline for this work, but there is an inter-dependency with the Financial Conduct authority (FCA) to align our approaches as much as possible to provide consistency across the sector and to assist us with data from which we can model potential fee limit options. The FCA's own work has been delayed, which has had a knock-on effect to our timetable. The risks of running ahead of the FCA, without good data, would be significant and we have therefore rescheduled consultation into next year.

Update and corrective action

We are continuing to work closely with the FCA and other legal regulators to develop an evidence base for setting fee limits and developing proposals for consultation. We are in regular contact with HMT and MoJ as sponsoring Departments, both of which are comfortable with our overall approach, progress and revised timings.

As part of our evidence gathering, we have arranged a workshop with lenders and law firms to better understand their business models, fee structures and the value provided by a law firm for different types of claims management work. Once we have the FCA's proposed approach and modelling we will be developing our consultation proposals.

Changes from Quarter Three

There were three activities last quarter that have moved from amber to green, they are outlined in more detail below.

Activity 3.3

We will monitor compliance with our transparency requirements and address issues where we do not consider firms are being transparent enough. We will also share best practice to encourage improvement in the information provided.

Update

Following a temporary pause of this work during the early stages of the Covid-19 pandemic, we have now re-commenced work to assess levels of compliance in this area. We wrote to 470 firms to ask them to provide a declaration of compliance exercise by the end of August. We plan to write to a further 2000 firms by spring 2021.

Activity 4.4

We will continue to work closely with government to manage and monitor the impact of the UK's exit from the EU and consider regulatory change or communication activity if necessary. We will continue to engage with EU regulators and affected parts of the regulated community.

Update

We have engaged extensively with the Ministry of Justice on their priorities for negotiating free trade agreements with different jurisdictions. We are awaiting outcomes of deal negotiations but are ready to amend our regulatory arrangements and operations accordingly. We will send further communications to affected members of the profession before the end of the transition period, accordingly.

Activity 5.3

Building on steps taken in early 2019, we will continue to implement changes to support good governance and improve the transparency of the work of our Board, ensuring that stakeholders can place confidence in what we do. That will include more information on how our Board works and a review of how we report our performance against our work programme.

Update

We have published 90% of Board papers, published a Chair's blog after every meeting. blogs and prepared LSB submission. The Board formally confirmed the content of the performance reporting pack, including the KPIs on [14 July](#) and we have provided this, along with a Chair's confirmation statement, and details of [Our Accountability Statement](#), [Decision-making Framework](#), delegation frameworks, [Transparency Statement](#) and [Our Board](#) area of our website in our 2019-20 performance assessment submission to the LSB.

Achievements in the last period

	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5
Achievements	<ul style="list-style-type: none"> We have enhanced our Legal and Technical Forum to bring together senior representatives from across the organisation to look at Standards and Regulations in practice, share learning from real cases and report on quality assurance activity. We secured final LSB approval for the SQE. We have published the one-year evaluation of our Transparency Rules. Mentoring has begun with firms sharing good practice and expertise on EDI, based on the LGBTQ+ focused model we piloted last year. The 7th Annual Risk Outlook was published and includes updated guidance for firms in light of Covid-19. 	<ul style="list-style-type: none"> The LawTech UK Sandbox has started its pilot and has invited applications for an expected 5 or 6 innovators to the Sandbox. We are supporting the launch through social media and other press activity. The 7th Annual Risk Outlook was published and includes updated guidance for firms in light of Covid-19. We involved more than 10,000 people on our Business plan consultation through a combination of virtual events, written submissions and online polls. We have achieved extensive coverage for the forthcoming implementation of the SQE - including positive coverage in The Times (with 400 largely supportive comments) and on BBC News - for the SQE changes. Coverage majored on our 	<ul style="list-style-type: none"> We have completed the three-year development programme for Legal Choices, exceeding our traffic target of 2-3m with 3.1m visitors, published a report on the work and agreed the funding for the future. We have achieved searches on the Solicitors Register 546,250 or almost 2,000 searches per day on average since Dec 2019. In this quarter we have run a range of webinars on topics including cybercrime, the SQE, our corporate strategy and key EDI topics, including race equality. We continued our programme of firm engagement on our transparency requirements and referred firms that were not compliant or that did not engage with us into our enforcement processes. As part of our evaluation research we engaged 	<ul style="list-style-type: none"> We gave oral evidence at House of Commons Committee on Standards inquiry on their code of conduct. We also discussed four key areas with international regulators at ICLR annual conference, including engagement with consumers; Covid-19 impacts on regulation; diversity in the profession and bullying and harassment in the workplace. We amended our Business Plan commitment to opening an office in Wales in light of current covid-19 constraints. We held three successful virtual events at the political party conferences, focusing on the theme of technology, with over 800 views (compared to around 	<ul style="list-style-type: none"> Our first practising certificate renewal window using our new IT and new remote based telephony opened on schedule at the start of October and ran to 20 November. Contact Centre staffing increased by 30% to support increased activity levels. The next stage of our IT programme, which brings in new case work systems is on schedule with a December target Go-Live December 2020. All targets for energy, travel and paper use were exceeded individually nearly halved at year end. Working group established to consider staff needs whilst working from home survey carried out. Responses to staff survey on working from home analysed and equipment and support requests actioned.

	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5
		<p>messages about diversity and routes to the profession.</p> <ul style="list-style-type: none"> • Firms and solicitors are taking advantage of new practising flexibilities. • We submitted a response to the CMA's call for evidence whom are currently reviewing the legal market's progress against the recommendations they made in their 2016 review of the sector. • We have tendered and received a number of high-quality bids for research into technology and innovation in the legal services market. 	<p>with over 2000 consumers and 1500 small businesses to explore and understand better how we can help them to make informed choices.</p>	<p>200 attendees the previous years).</p> <ul style="list-style-type: none"> • We have engaged extensively with MOJ on their work negotiating FTAs with different jurisdictions and their plans for the legal services sector post-transition period. • We are ready to amend our regulatory arrangements and operations in the light of the outcome of the EU/UK negotiations on our future trading relationship. 	
Impacts and Outcomes	<ul style="list-style-type: none"> • Improvements to our Legal Technical Forum has allowed us to analyse and respond to issues much more quickly and efficiently. Enabling staff members from across the organisation to feed into the process and quality assurance has also improved the quality of our decision making. • Broad EDI mentoring is an effective way of supporting inclusive legal workplaces which supports our work to 	<ul style="list-style-type: none"> • We have increased our engagement with insurers as the market continues to harden to help monitor any potential risks with regards firms being unable to renew their insurance and mitigate those risks within our existing insurance framework where possible. • Our involvement and support for the LawTech UK Sandbox helps to 	<ul style="list-style-type: none"> • Our one-year evaluation of our Transparency Rules identified encouraging trends from our reforms aimed at increasing consumer information. It revealed that most consumers are finding the information that firms publish on their website useful in helping them find and choose a legal services provider. 	<ul style="list-style-type: none"> • We increased visitors to ICLR.net by 3,246, up 5.15%; visits: 4,410, up 1.33% since last year, despite Covid-19 distraction. Top three locations of ICLR.net visitors: United States (23%), Norway (18%), China (18%). Extending the reach of ICLR.net makes a positive contribution to 	<ul style="list-style-type: none"> • Customer service in contact centre maintained during October despite increased volumes of calls • The pandemic has unexpectedly given the business some positive results which will support cost reduction and reduce the carbon footprint. • Homeworking survey designed to identify any staff wellbeing concerns and equipment needs at home.

	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5
	<p>increase diversity in the profession.</p> <ul style="list-style-type: none"> We raised awareness in the sector, of the application of AML regulations for tax advisers, through the publication of new guidance. We expanded our dedicated AML investigation team's work to handle an increasing number of cases where firms or individuals may have had breached the money laundering regulations or were facilitating money laundering. These cases totalled 135 live investigations into money laundering-related issues. We undertook a programme of proactive supervision to determine whether firms at a high risk of being used for money laundering had appropriate policies procedures and controls in place. We have shared good practice and areas of for improvement in our report on our findings from our first round of visits. We commenced our next round of visits to firms and are continuing with monthly desk-based monitoring. The SQE will provide assurance that all aspiring 	<p>position ourselves at the forefront of driving innovation in the sector. In preparation for our incoming corporate strategy it signals our intention of being a leader in this area and has also helped us to develop the networks that will enable us to reach this goal.</p> <ul style="list-style-type: none"> We have enhanced our understanding of the impact of Covid-19 on the profession through, a series of online polls which generated more than 1,000 pieces of feedback Our wide-ranging outreach on our Business Plan has secured useful feedback and improved our final Plan. At the end of July, we had authorised c.160 freelancers. We have also seen positive press coverage from firms taking advantage of new practising flexibilities. Our research into technology and innovation will identify areas where we can adjust our 	<ul style="list-style-type: none"> The results of the one-year evaluation of the Transparency Rules have allowed us to identify areas where further improvements could be made, best practise shared, and where expanding the reforms may be beneficial for consumers. We undertook independent perceptions of the SRA survey work with MPs and opinion formers which will feed into our future work programme and act as a benchmark for progress. More than ever it is imperative that we understand and support the needs of small businesses. Our evaluation research directly engaged with a large number of SMEs and shows, not only, that we are looking to support them, but also gives us the information to do so. Completing the three-year Legal Choices development programme has made a positive 	<p>communication and learning across jurisdictions and raises the profile of legal services regulation in England and Wales.</p> <ul style="list-style-type: none"> Undertaking events at the party conferences contributes to public legal education and raises awareness of key public interest issues. Giving evidence at parliamentary committees is an opportunity to share good practice and is an opportunity to align codes of conduct and standards across multiple sectors, which in turn increases understanding of regulation. It also increases our profile, 	<ul style="list-style-type: none"> Measures in place to support continued emphasis on wellbeing and working from home including a new wellbeing area on the recognition hub.

	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5
	<p>solicitors meet consistent, high standards at point of entry to the profession. It will also open up new and diverse routes to qualification. Our application and the decision notice itself show just how much work over very many years has gone into making sure the SQE is a world class, rigorous assessment.</p> <ul style="list-style-type: none"> • Our one-year evaluation report provides the evidence-base for our future work on transparency including our approach to developing quality indicators. Our commitment to, and publication of evaluation research has been welcomed by the CMA and has allowed us to evidence the positive impact of our reform programmes. • Our evaluation work has also been discussed and used externally by a range on stakeholders, including The Law Society. • In order to enhance our understanding of diversity in the profession, we are exploring how best to collect data on pregnancy and maternity as part of a wider piece of work on this topic to identify individual experiences of being pregnant and taking 	<p>regulation or support the specific areas of market in order to stimulate greater innovation.</p>	<p>contribution to public legal education and supported large number of consumers as they tried to resolve issues relating to the pandemic.</p> <ul style="list-style-type: none"> • Feedback on our programme of virtual events showed that they have provided support for firms against the backdrop of the pandemic. • The volume of traffic to our Register shows that it is meeting the needs of the public and of law firms, providing relevant and accessible information. 		

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	<p>maternity leave at work and good practice in law firms.</p> <ul style="list-style-type: none"> The Risk Outlook has generated a number of articles across the press and is being used by firms. This will help firms to practise in this difficult period and it also shows us as a progressive, proportionate and supportive regulator. 				

Annex 1 – Objectives

Strategic Objective One - We will set and apply consistently high professional standards for the individuals and firms we regulate and make sure they are appropriate to meet the challenges of today and the future.	
1.1	We will deliver the final parts of our new SRA Standards and Regulations. Building on our work to date, this will ensure a focus on high professional standards, moving away from lots of unnecessary rules. These rules add costs and get in the way of offering affordable, accessible legal services that meet people's needs. We will implement and embed the new Standards and Regulations in November 2019. We will make sure that we have the systems, processes, knowledge and trained staff to support this and to provide a good level of service for all our stakeholders, including those who are distressed or vulnerable.
1.2	We will continue our work with Kaplan (our chosen assessment organisation) and stakeholders to develop the SQE, ahead of its introduction in autumn 2021. The SQE will ensure all that all aspiring solicitors meet the same high standards at point of entry into the profession, regardless of which route they have chosen, ensuring public confidence and improving diversity. To support the introduction of the SQE, we will put in place SQE transitional arrangements and we will continue to manage the quality assurance system for the qualifications we currently regulate.
1.3	Money laundering is how criminals use the profits from some of the worst crimes in society, for example, drug trafficking, people trafficking and arms dealing (which often affect the most vulnerable in society). This is why we take our duties as an anti-money laundering supervisor very seriously. We will support firms to comply with anti-money laundering regulations and further strengthen our approach as a supervisory body, including through visits to firms to understand, document and feedback on relevant processes and procedures. We will make sure that we, and the profession, are prepared for the implementation of the Fifth Money Laundering Directive, which will introduce additional requirements. We will do that through ongoing dialogue with the Office for Professional AntiMoney Laundering Supervision, partnering with others to raise awareness and revising our own processes where we need to.
1.4	We went out to consultation in summer 2019 on assuring advocacy standards. We proposed changes to Higher Rights of Audience arrangements and the provision of resources to help solicitors and to support reporting about advocacy standards. Subject to the outcome of that consultation, we will take steps to support the quality of advocacy to make sure that every community has confidence in these key services.
1.5	We will seek to understand the impact of our policy reforms for the public, the legal market and the profession, further developing our evaluation programme. As part of our strong commitment to mainstreaming Equality Diversity and Inclusion (EDI) throughout all our work, our evaluation approach will include an assessment of the EDI implications for both the public and the profession.
1.6	We will publish diversity data about the solicitors' profession, including the results of the 2019 firm diversity data collection exercise. This is so that we and the profession can see what is going well and where more needs to be done. We will further develop our data collection to make sure it is up to date and in line with best practice.
1.7	We will also continue to promote the diversity in the profession, so that it reflects, and is familiar to, the communities it serves. This will include building on the success of the LGBTQ+ mentoring pilot, supporting small firms, and running awareness campaigns on issues including disability awareness and wellness in the workplace.

Strategic Objective Two - We will make sure our regulatory requirements are proportionate, providing solicitors and firms the flexibility to innovate and better meet the needs of members of the public and businesses, while maintaining appropriate levels of public protection.	
2.1	We will continue to review consumer financial protection arrangements (professional indemnity insurance and the Compensation Fund). We will implement reform where appropriate to make sure they are fit for purpose and provide the right levels of protection when things go wrong. We will seek approval from the Legal Services Board for our proposed changes during the year.
2.2	We will maintain a regulatory approach that encourages positive innovation, while making sure we manage any potential risks for the users of legal services from every community. This will include delivery of our Legal Access Challenge, which is funded through the Regulators' Pioneer Fund, innovation roadshows and developing targeted support on aspects of legal technology. We will also work with other organisations as we develop our thinking on the implications of technology for the sector and on our regulation, collaborating where appropriate as we look ahead to our new Corporate Strategy.
2.3	We will also develop our SRA Innovate 'sand box' further, so that it can support firms to try new ways of working in a safe and managed environment that ensures public protection. And, we will build up our own in-house capability and expertise on legal technology. This is so that we are ready to deliver the commitment in our new Corporate Strategy to promote legal technology and innovation, which offers the potential to increase access to justice.
2.4	As part of keeping everyone up to date on how to maintain the standards we expect, we will continue to publish warning notices and information on risks in the legal sector. For example, solicitor involvement in the dubious investment schemes that take money from so many vulnerable people.
2.5	We will continue to deliver a co-ordinated programme of communication and meaningful engagement across all external channels. This will allow us to increase understanding and support all our stakeholders to shape our work and to benefit from any changes we introduce.
2.6	To make sure we are keeping up to date with people's experiences and expectations, we will also do more to enhance our understanding of the needs of consumers. We will commission targeted research, monitor the findings of wider research and reach out directly to consumers to listen to their needs.
2.7	In order to maintain public and professional confidence in our work to set and enforce standards, we will keep our procedures under review and ensure we have effective oversight of the quality and consistency of regulatory decision making across the business.

Strategic Objective 3 - We will increase the availability of relevant and timely information to help people make informed choices in the legal services market.	
3.1	We will continue our work to support people to identify legal need and find the services that will support them. We want to address the barriers that prevent people getting the help they need when they need it, and we know that the lack of useful information is part of the problem. Our Transparency Rules came into force in December 2018 and we will continue to work to embed our requirements throughout the profession. Under these Rules, the firms we regulate have to publish a range of information, including on price and service detail, if they offer services in specified legal areas.
3.2	We will introduce a mandatory clickable logo as part of the introduction of our Standards and Regulations on 25 November 2019. The logo is designed to help the public find out what consumer protections are in place when they use a regulated provider.
3.3	We will monitor compliance with our transparency requirements and address issues where we do not consider firms are being transparent enough. We will also share best practice to encourage improvement in the information provided.
3.4	We will continue to develop Legal Choices, the consumer-facing website and social media presence that we manage on behalf of the legal regulators. We will be introducing new products that will help people to identify whether they have a legal need and help them to get support. We will promote the new services as widely as possible with the public and small businesses. Our products should also help organisations that support people in difficulty who may not have online access. We will include a service designed in partnership with these groups to assist their advisers and staff to access relevant information on legal services for the people they work with.
3.5	We will deliver a coordinated and effective programme of events, helping the public, the profession and other stakeholders engage with and influence our work and to understand our regulatory approach and use our services. We will also provide dedicated events that support firms, especially small firms, to comply with regulation, including on anti-money laundering. The programme will include a series of public engagement events, specific diversity events, the Compliance Officers Conference 2020, an annual SQE conference and small firm events.
3.6	We will launch a Solicitors Register of all regulated firms and individuals as part of the move to our new Standards and Regulations. This will enable the users of legal services to find basic information about solicitors and their practice. We will develop and enhance this throughout the year.

Strategic Objective 4 - We will make sure that our regulatory arrangements work as effectively as possible for the public, businesses, solicitors and firms in the context of constitutional developments within the UK and any new relationship with the EU.	
4.1	The political and legal environment within which we and those we regulate work is changing rapidly. We will seek to make sure that the regulatory arrangements within the UK and across national boundaries work well, making it as easy as possible for firms to operate and support businesses and the public.
4.2	We will also horizon scan and do more to work with others to respond effectively to opportunities and challenges brought about by ongoing changes of all types, including societal and technological. This will be a key theme in our future Strategy.
4.3	We will develop a wider and deeper approach to capturing and reporting the views of our stakeholders, so that our Board and others can readily access their feedback. To do this, we will build on the success of our virtual reference communities, programmes of focus groups and digital outreach to make sure we are engaging with voices across all our stakeholders in order to understand the nuances of different groups' positions.
4.4	We will continue to work closely with government to manage and monitor the impact of the UK's exit from the EU and consider regulatory change or communication activity if necessary. We will continue to engage with EU regulators and affected parts of the regulated community
4.5	We will introduce a fee limit for solicitors and authorised firms carrying out claims' management activities relating to financial products and services. We will develop regulatory arrangements that implement this. This is so that people who want to make claims about, for example, mis-sold financial services, get a good service.
4.6	We will review our international work, including ensuring that the International Conference of Legal Regulators website supports the benefits of collaborative working across different jurisdictions.
4.7	We will continue our dialogue with the Welsh Government and others as we work to ensure that our regulation meets the needs of the users of legal services in Wales. As part of the development of the SQE, we will explore the provision of SQE in Welsh.

Strategic Objective 5 - We will work better together and with others to improve our overall effectiveness, our responsiveness and the delivery of our regulatory functions.	
5.1	We seek to continually improve our performance across all areas of the business. We will work to ensure our structures and processes are effective and efficient to deliver the best service and ensure value for money.
5.2	And we will work with the Institute of Customer Service to enhance the experience of all those who use our services, laying the foundations for this component of our 2020–23 Strategy.
5.3	Building on steps taken in early 2019, we will continue to implement changes to support good governance and improve the transparency of the work of our Board, ensuring that stakeholders can place confidence in what we do. That will include more information on how our Board works and a review of how we report our performance against our work programme.
5.4	We will complete the implementation of our Modernising IT work to improve our core technology, support our wider regulatory objectives and deliver a high-quality customer experience.
5.5	We will ensure our processes and procedures that deliver strong environmental management outcomes are reviewed to support the reaccreditation of the organisation with ISO 14001.
5.6	We will develop and implement a strategy for Information Governance and Security, risk and business continuity. This –encompasses ISO 270001 alignment, an enhanced assurance framework, refreshed risk management, and GDPR compliance.
5.7	We will develop and start to implement our new People Strategy. This will ensure our approach to pay and reward, recognition, leadership and management and training and development delivers the people and culture we need to support our objectives and align with our values. And we will continue to develop and deliver high-quality staff communications through a range of channels, maximising the benefits of our new digital workplace tools, refreshing our values and supporting a truly inclusive workplace.