

SRA Business Plan 2022-23 Quarter Three Update

Our Strategic Objectives

Strategic Objectives 1 - We will set and maintain high professional standards for solicitors and law firms as the public would expect and make sure we provide an equally high level of operational service.

Strategic Objective 2 - We will actively support the adoption of legal technology, and other innovation, that helps to meet the needs of the public, business community, regulated entities and the economy.

Strategic Objective 3 - We will continually build our understanding of emerging opportunities and challenges for the users of legal services, the legal sector and our role in effectively regulating it.

Our business plan for 2022/23 is available on our website [here](#).

Annex 1 shows the activities within each objective.

Progress against activities in our annual planned work programme

This is the third quarter reporting against the activities in our 2022/23 business plan and the final year of the 2020-23 Corporate Strategy.

Annex 1 shows the RAG status of all the activities under the three objectives, together with the previous quarter's status. A summary of these ratings is as follows:

Status	Green	Amber	Red	On Hold/ Not started
Objective 1	40	2	0	0
Objective 2	13	1	0	0
Objective 3	18	0	0	2

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

We have detailed our achievements in quarter three in the table beginning on page 3. There are three activities that are not currently on track, all of which are considered amber, a further two will no longer be completed this year as a decision has been taken to move them to the next business plan year. These were reported to the Board in the previous quarter.

Those activities considered to be 'amber' are 1.2, 1.5 and 2.2.

Activity 1.2 relates to the monitoring of equality considerations within SQE results. The first annual report published in March 2023 did not raise any concerns, however we are in ongoing discussions with Kaplan regarding their handling of requests from disabled candidates asking to use assistive technology in the SQE. There were some issues with the assistive technology used in a recent assessment which we expect to be addressed for the next assessment at the end of August.

Activity 1.5 relates to Continuing Competence and is currently considered to be 'Amber'. As we have progressed with this work we have decided to explore different ways to analyse the data. This has slowed progress a little, but we expect to get back on track and to satisfy commitments made in our action plan year. It remains 'Amber' until we have finalised our approach to using the data and taken some operational decisions. Good progress has been made in the third quarter but there remains much to do.

Activity 2.2 is to 'Convene a roundtable involving 'social good' investors to build and share understanding around any potential for legal services designed to improve access to justice to attract investment'. This is not currently progressing because of insufficient interest from our original contacts. We are in discussion with the MoJ funded Lawtech UK about their forthcoming programme which will likely cover the investment activity we were planning on delivering.

Activity 1.4 related to Continuing Competence was Amber (Q2) and is now Green following the publication of our first annual assessment of competence. The report included the outcomes of our enhanced data analysis through which we identified the practice areas most likely to generate complaints to us and the aspect of competence most frequently associated with complaints.

Activity 1.14 was also Amber at the end of quarter two and is now back on track as the LSB approved our application for approval of alteration to existing regulatory arrangements relating to Financial Penalties and Adjudication.

Achievements in the last period

	Objective 1	Objective 2	Objective 3
Achievements	<ol style="list-style-type: none"> 1. We published our first annual assessment of competence. The report included the outcomes of our enhanced data analysis through which we identified the practice areas most likely to generate complaints. 2. In June we published new guidance to help firms understand the obligations of the Proceeds of Crime Act 3. Literature reviews for both EDI research projects published and discussed with the respective External Reference Groups. 	<ol style="list-style-type: none"> 1. We published our evaluation reports on both our unbundled and quality indicators pilots. The user guide for unbundled services is currently being tested with consumers. 2. Responded to the Government's consultation on a "pro-innovation approach to AI regulation" and continue to meet with the Office for AI, a unit of the Department of Science, Innovation and Technology, to inform their work and maintain our sectoral input in helping to shape their final response. 3. We ran two Innovate events and received the highest ever attendance since we began running the programme in 2016, with extremely positive. Our attendance at the Legal Geek Growth event focussed on small firms gave us an opportunity to engage with a larger cohort in the lawtech sector and hear market feedback. 	<ol style="list-style-type: none"> 1. We published the findings of our research project looking at the unreserved market, primarily that conducted by unregulated providers. This project illustrates the size, make-up and likely trajectory of the unreserved market and is focused on providers that offer tailored legal advice to individuals and businesses. 2. We have liaised with the Welsh Government to finalise an updated data specification for our BETA interactive tool mapping deprivation and legal service provision. This will enable a full refresh during Q4, to improve the accuracy and useability of the tool. 3. We held an extended Cross Regulators Risk Forum discussion on AI and risk / opportunities in July, which was identified as one of the biggest priority risk areas by our Horizon Scanning programme. This included attendance from the other legal regulators, ICO, CMA, Lawtech UK, Ofcom and Ofqual.
Impacts and Outcomes	<ol style="list-style-type: none"> 1. Publication of the report fulfilled a commitment we had made in response to the LSB's policy statement on on-going competence. 2. The guidance applies to all firms we supervise, not just firms in scope of the money laundering regulations. 3. The final reports will add to the understanding we and others have about these important issues and inform our future plans. 	<ol style="list-style-type: none"> 1. Using consumer testing to ensure we have the biggest impact in helping people understand different options when engaging legal services. 2. Helping to shape the development of regulatory activity and Government policy in a joined up manner as well as supporting innovators. 3. Increased the number of contacts with both firms and innovators. The Innovate events allowed us to highlight and showcase lawtech development and case studies of where it is being successfully applied by small firms. 	<ol style="list-style-type: none"> 1. This research has helped to provide an in-depth understanding of legal services provision within the unreserved market, which in turn helps us to understand the wider ways in which consumers can engage with the provision of legal services. It also provides us with an estimated market size, details on its make-up and us helps to understand satisfaction levels, as well as decision drivers for consumers in this market. 2. By involving a key stakeholder it has been possible to identify a number of improvements to the way the web-reading works, which will improve the overall accuracy of the interactive tool. It has also been

	Objective 1	Objective 2	Objective 3
			<p>possible to incorporate a number of suggested improvements into the updated specification.</p> <p>3. The exercise helped to position us an authoritative voice in this fast moving and high-profile area. It was well received by attendees and has created a number of relationships, proving helpful in terms of the development of a Cybersecurity / AI session at the Compliance Conference later in the year.</p>

Annex 1

Objective one – setting and maintaining high standards for the profession and ourselves		
We will set and maintain high professional standards for solicitors and law firms as the public would expect and make sure we provide an equally high level of operational service.		
Solicitors Qualifying Examination		
Activities	Previous (Q2) RAG rating	Current (Q3) RAG rating
1. Progress our evaluation of impacts of the SQE’s introduction on standards and pathways to qualification, including: <ul style="list-style-type: none"> - completing the first annual survey on qualifying work experience - completing a baseline perception study - Undertake an initial analysis of the cost of SQE training 		
2. Continue to monitor equality considerations within SQE results and to work with disabilities groups to deliver efficient and fair reasonable adjustment processes.		
3. Finalise our approach to publishing candidate performance data, including testing our online tool with: <ul style="list-style-type: none"> - candidates - education and training providers - researchers 		
Continuing competence		
4. Enhance our data and analysis to inform our approach towards assessing continued competency, including to identify and assess the impacts of appropriate interventions		
5. Pilot and evaluate any potential new interventions, including exploration of necessary policy and / or procedural changes.		
Advocacy standards and police station advice		
6. Continue our work to improve the criminal and civil Higher Rights of Audience assessments		
7. Improve our regulation and assessment of the Police Station Representatives accreditation scheme		
8. Introduce expected behaviours for solicitors providing police station advice		
9. Review the outcome of our magistrates and higher court training record audits and consider whether further audits are required		

10. Continue to identify practice challenges and risks through our Advocacy Reference Group and update our advocacy resources to reflect practice challenges		
11. Explore how we can further support solicitor advocates to better engage with vulnerable clients		
12. Consider how we can support solicitor advocates to maintain their ongoing competence, for example, working with stakeholders to set up peer-to-peer networks or communities of interest.		
Our Standards and Regulations		
13. Implement changes to our Standards and Regulations, informed by our years one and three evaluation process and subject to consultation		
14. Finalise, introduce and embed post-consultation outcomes from our consultations on: - health and wellbeing - our fining framework - our publications policy for regulatory decisions		
15. Consult on rules to protect consumers from excessive charges related to certain financial service claims		
Anti-money laundering		
16. Continue to strengthen our approach to preventing money laundering and financial crime, including through proactive supervision, and investigation and enforcement activities		
17. Respond to changes set out in HM Treasury's review of AML and supervision		
18. Lead projects to understand areas of responsibility that we may receive through new legislation, potentially ensuring quality of suspicious activity reports		
19. Check the client lists of a sample of firms with exposure to the Russian market for potential sanctions breaches		
20. Undertake a thematic review into compliance with the financial sanctions and licensing regime to seek to understand the challenges faced by law firms and whether we can helpfully provide guidance in this area		
21. Respond with agility to changing national and international sanctions and any other relevant changes to the external environment		
22. Continue to refine our risk rating methodology for firms through our capture of new information about money laundering risks, allowing us to proactively target our supervision		
23. Undertake two AML-focused thematic reviews to build understanding of how firms are dealing with specific issues, identified in year, in practice		
24. Build our supervision programme to increase numbers of law firm inspections and desk-based review activity		

Equality, diversity and inclusion		
<p>25. Develop an EDI evaluation framework supported by improved capture and publication of diversity data we hold about firms and individuals in the profession:</p> <ul style="list-style-type: none"> - gathering more granular data about the diversity at the most senior levels of law firms - increase firm compliance with requirement to publish a summary of their diversity data - increase individual diversity data declaration rate on mySRA - consider whether to add additional EDI reporting requirements for larger firms. 		
<p>26. Take forward initiatives designed to support retention and progression for underrepresented groups, with particular focus on large law firms, including:</p> <ul style="list-style-type: none"> - a survey of law firms within the scope of the Regulatory Management team to identify good practice - piloting an exit questionnaire to explore how we can track reasons for moving to in-house roles or leaving the profession. 		
<p>27. Complete EDI research projects looking at the overrepresentation of Black, Asian and minority ethnic solicitors in our enforcement work, as well as the attainment gap in professional assessments and reporting back outcomes and potential next steps.</p>		
<p>28. Provide guidance and resources to encourage fair treatment and high ethical standards in the workplace in relation to EDI including on professional health and wellbeing by reviewing and updating our Principle 6 guidance and supporting resources.</p>		
Our work in Wales		
<p>29. Participate and deliver events and activities within Wales, including attendance at Welsh political party conferences in order to build our understanding of Welsh issues and how we can target our regulation accordingly</p>		
<p>30. Progress initiatives that support us to build our understanding of consumer experiences in Wales</p>		
<p>31. Pursue opportunities to further increase our use of the Welsh language and continue the phased introduction of the SQE in the medium of Welsh.</p>		

Our people, our customers, and our resources		
32. Deliver the third year of our Resources Strategy, focused on getting the most from our people, processes, technologies, data and information		
33. Build on our technology transformation to ensure we realise the benefits from our investment, increase our efficiency and effectiveness, and continue to improve the customer experience		
34. Maximise the benefits of our early move to a hybrid working model, new work spaces and improved workplace culture		
35. Maintain our Institute of Customer Service accreditation		
36. Strive to be better in what we do through the on-going delivery of our Continuous Improvement programme and embedding of our Continuous Improvement culture, including: - further reducing the time taken to investigate complaints through our improved investigation and supervision processes		
37. Applying our continuous improvement capability to our authorisation process		
38. Working to scope potential further improvements to our Solicitors Register to make sure that it provides information about individuals we regulate in an accessible way, and in line with any changes to our publication policy.		
Public legal education and information for consumers		
39. Deliver a programme of focus groups and roundtables/workshops with our stakeholders to strengthen our understanding of the information needs of individuals and groups that advise them, and to develop resources and support where needs are identified		
40. Drive forward the third year of the Legal Choices website's development plan to improve available consumer information, test that information, and evaluate its impact		
41. Support consumers who are potentially at the 'point of need' of legal support/advice, through targeted social media campaigns, and through partnership working with support organisations		
42. Progress public legal education around steps consumers can take to compare indicators of quality, drawing from the evaluation of our quality indicators pilot		

Objective two – technology and innovation

We will actively support the adoption of legal technology, and other innovation, that helps to meet the needs of the public, business community, regulated entities and the economy.

Strengthening our partnerships and promoting access to justice

Activities	Previous (Q2) RAG rating	Current (Q3) RAG rating
1. Continue our collaboration with Ministry of Justice (MoJ) and BEIS programmes on access to justice and technology adoption, including proactively seeking funding opportunities for consortia work that delivers new concepts in access to justice	Green	Green
2. Convene a roundtable involving ‘social good’ investors to build and share understanding around any potential for legal services designed to improve access to justice to attract investment	Yellow	Yellow
3. Support the development of new technology solutions to regional access problems, as identified in our Regulators’ Pioneer Fund access to justice programme in Wales / Southwest England	Green	Green
4. Promote and embed benefits of innovation and technology in relation to unbundled legal services and providing consumers with quality indicators to help them identify and choose a legal services provider, as identified through our pilot activity in these areas	Green	Green
5. Work with government departments and other regulators to influence initiatives to maximise their effectiveness and any benefits for this sector, such as: <ul style="list-style-type: none"> - being a bridge between legal services providers and BEIS and Industrial Strategy smart funding - supporting the Department for Digital, Culture, Media and Sport’s Digital Identity framework programme - contributing to the Regulator AI working group led by the Information Commissioner’s Office 	Green	Green
6. Enhance our Expert Panel by adding at least one further lawtech representative	Green	Green
7. Continue to support the Government Agile Nations international regulatory cooperation initiative, which we chaired the lawtech strand of in 2021/22 - its inception year.	Green	Green

Evolving our SRA Innovate programme to support lawtech and understand risks

<p>8. Promote and refine our SRA Innovate programme, highlighting the support we offer to firms and lawtech developers. This includes SRA Innovate roadshows in 2023, dedicated sessions at our annual Compliance Officers Conference and other events</p>		
<p>9. Continue to promote and refine our ‘front door’ service for innovators and lawtech developers based on the feedback that we receive, including an improved route for startups to access bespoke advice</p>		
<p>10. Provide sector wide learning by regularly publish case studies and lessons learned from those that we support through SRA Innovate. We will also broaden the reach and impact of our technology update newsletter which provides the sector with insight into how this area is developing</p>		
<p>11. Provide guidance on key barriers to the development and adoption of lawtech identified through our research and engagement, such as attracting investment and helping small firms identify compliant and effective technology</p>		
<p>12. Monitor and deliver targeted research into emerging technology and innovation risks identified through the SRA’s Horizon Scanning Programme to shape effective regulatory responses</p>		
<p>13. Build on the successful pilots by considering other potential areas that may benefit from safe and controlled exploration within an SRA convened network.</p> <p>Develop our ‘proof of concept’ offering for startups to safely test new products and services against our regulatory framework. This could help proof of concepts to be developed and produce empirical evidence of business benefits and risk mitigation</p>		
<p>14. Continue to support Lawtech UK as a lead member of the Regulatory Response Unit. Here we can explore additional measures to support the development and emergence of consumer-focused lawtech, such as sandbox approaches or accelerator programmes.</p>		

Objective three – anticipating and responding to Change

We will continually build our understanding of emerging opportunities and challenges for the users of legal services, the legal sector and our role in effectively regulating it.

Research and analysis

Activities	Previous (Q2) RAG rating	Current (Q3) RAG rating
1. Build on our research into consumer segmentation, including working with the MoJ and others to identify, target and assess interventions for groups who are most at risk of not receiving access to justice		
2. Refine and rerun our pilot web-scraping exercise to map unregulated legal service provision. This will include a focus on the changing shape of the provision and the interplay with the regulated market to help identify emerging opportunities and challenges for the regulated sector and our role in effectively regulating it		
3. Design and publish regular and authoritative market insight assessments that make innovative use of data about the legal sector and forces impacting on it. For example, the incorporation of legal need and advice service mapping capability, developed in conjunction with the University of the West of England, and overlaying additional datasets		
4. Conclude and publish findings and responses deriving from our research projects. This will include our co-delivered quantitative analysis of the Professional Indemnity Insurance market and an econometric analysis of insurance premiums data that will assess law firm and consumer impacts		
5. Complete a public affairs analysis that explores views and perceptions from members of the public and opinion formers	Deferred to 2022/23	Deferred to 2022/23
6. Further embed outcomes from our research with the University of Oxford that address barriers to lawtech. We will also use targeted research to publish a series of ‘myth-busting’ reports for consumers and solicitors on key subjects. For example, the differing perspectives on artificial intelligence which will actively support firms with the adoption of legal technology and demonstrate our understanding of emerging opportunities for the legal sector		
7. Complete and publish our three-year evaluation of our Standards and Regulations, and of the SRA Transparency Rules, to provide empirical evidence of the impacts of our reforms and areas that may require improvement in order to best meet our objectives		
8. Refine and publish our Risk Outlook products in response to stakeholder feedback about relevant hot topics. This will enable us to share our understanding of market shaping trends with firms and other stakeholders and support firms to assess their own risks		

9. Deliver a 'deep dive' exercise with stakeholders into one of the biggest priority risk areas identified through our horizon scanning work. This will then provide sector wide understanding and shape an appropriate response in partnership with relevant stakeholders where appropriate		
10. Continue to lead debate on legal sector research and risk priorities through our chair role of the regular Legal Regulators' Research Forum and the Cross Regulatory Risk Forum. This will enable us to share best practice and our understanding of market shaping trends with other regulators, to ensure better outcomes for consumers of legal services.		
Leading debates and speaking up		
11. Identify opportunities to host - and take part - in events that facilitate discussion on strategic issues in the legal sector and beyond		
12. Place opinion and discussion pieces in the media and other outlets to spark debate and stimulate discussion		
13. Deliver four face-to-face engagement events with local law societies across England and Wales with our Executive team and Board members		
14. Deliver an event looking at the future development of regulation in the legal sector, bringing together key voices to look at priorities	Deferred to 2022/23	Deferred to 2022/23
15. Increase the reach for our face to face and virtual events programme, focusing on areas such as anti-money laundering, the SQE, innovation and technology and continuing competence		
16. Continue to lead work across the immigration and asylum sector to raise standards, help the public access quality legal advice where needed and complain where the service that they receive falls short		
17. Explore approaches to help improve how the public and clients report concerns to us		
18. Deliver our annual Compliance Officers Conference		
19. Undertake work to understand the views of our stakeholders as part of our work to plan for our next corporate strategy		
20. Invite members of the public and groups that represent them to meet Board members in different areas of England and Wales.		