

SRA Business Plan 2022-23 Quarter Two 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 second 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	36	4	0	2
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 two in the table beginning on page 3. There are five 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.

The first of these activities is activity 3.5 which was to 'Complete a public affairs analysis that explores views and perceptions from members of the public and opinion formers'. Upon review, we have decided not to complete this analysis this business year. Instead we plan to carry out more comprehensive analysis of stakeholder and public perceptions in 2024. By doing this next year, we will be able to test and baseline perceptions against our new strategic objectives, ahead of assessing progress with a similar analysis post 2026 – the end of the new strategy period.

Activity 3.14 was to 'Deliver an event looking at the future development of regulation in the legal sector, bringing together key voices to look at priorities'. Given a busy events schedule, we have decided to hold off doing this event in 2023, and look to do next year on the back of the finalisation of our new corporate strategy.

Those activities considered to be 'amber' are 1.2, 1.4, 1.5, 1.14 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.

Activities 1.4 and 1.5 both relate to Continuing Competence and are 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.

While part of activity 1.14 on health and wellbeing rules has been delivered, the LSB extended their statutory deadline for approving our rule change application in relation to financial penalties amendments and had asked far reaching questions and detailed questions about the changes. We have mitigated by providing full responses to all queries. We have also proactively contacted the LSB and asked whether we can do any more to help their understanding. The LSB has indicated that there is not and the application is "well progressed".

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 undertaking further work to identify specific issues, different routes to investment / funding and how best to progress the targeted action.

Achievements in the last period

	Objective 1	Objective 2	Objective 3
Achievements	<ol style="list-style-type: none"> 1. Initial analysis of costs of SQE training published and first annual SQE report published in March 2023 that included analysis of the performance of candidates across a range of diversity characteristics. 2. Launch of the new Keeping of the Roll form on our new ICT platform on time and to budget, providing a great and reliable customer experience. 3. We have now finalised the evaluation report from our quality indicators pilot which will be published in the next few weeks along with research that supported the pilot. 	<ol style="list-style-type: none"> 1. We showcased our innovation approach at a cross jurisdictional (Canadian and US regulators, academics, consultants and rep bodies) regulatory cooperation roundtable looking at the use of sandboxes to help access to justice tech development. 2. Approached by 10 startups, of which 7 are in the process of taking advantage of our regulatory advice service. 3. Drafted an internal deep dive report on the regulatory challenges that we may face from the rapid growth of artificial intelligence in the legal market. We have also published a CEO thought leadership piece on AI. 	<ol style="list-style-type: none"> 1. We have successfully re-platformed our (BETA) interactive deprivation and legal services mapping tool enabling enhancements and the incorporation of additional datasets and functionality. 2. Taken part in Industry and Parliament Trust discussion on 'principles of law' with MPs and Peers; Welsh party conference discussions on access to justice (Labour and Conservatives), with planning well advanced for UK party conference discussions in Q4. 3. We held a dinner in Leeds, with members of our Board and senior team, and key stakeholders from the area including consumer groups and charities representing a diverse range of members of the public. 4. Publication of the report on our in house thematic review, and holding our first in house conference
Impacts and Outcomes	<ol style="list-style-type: none"> 1. SQE costs analysis illustrates the range of SQE training options and the range of associated costs and the SQE report provided a well-received overview of the first year of SQE implementation. 2. Allows us to refresh the roll for non-practising solicitors in a smooth and timely way. 3. Quality is now seen as an area of information consumers can and should have access to when comparing providers 	<ol style="list-style-type: none"> 1. Continued to raise our profile internationally as a leader in developing a regulatory approach to support lawtech. 2. Positive feedback received from those using the front door service in relation to help them develop their products / services. 3. Informing the risk outlook and public messaging as well as internal planning. 	<ol style="list-style-type: none"> 1. The interactive legal services mapping tool has been well received by stakeholders and is an important way which we can help make sense of access to justice. 2. These events and discussions both make sure that key stakeholders and others understand our work, as help inform our future policy development. 3. This engagement enables us to gain deeper insights into the experience of a diverse range of consumers and members of the public, their experiences of legal services, priorities, and the issues and opportunities around access to justice. 4. Raising awareness of issues relating to in house practice and engaging directly with the in house community.

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 (Q1) RAG rating	Current (Q2) 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 (Q1) RAG rating	Current (Q2) 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	Green	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: - 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		
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		
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		
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		
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		
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		
13. Build on the successful pilots by considering other potential areas that may benefit from safe and controlled exploration within an SRA convened network. 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		
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.		

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 (Q1) RAG rating	Current (Q2) 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 2023/24
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 2023/24
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.		