

SRA BOARD
12 September 2023

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Legal Services Board Performance assessment update – August 2023

- 1 This paper provides an update on our assurance mapping against the Legal Services Board's (LSB) Regulatory Performance Assessment Framework Sourcebook of standards and characteristics.
- 2 In June 2023, the Board discussed the LSB's 2023 regulatory performance assessment and our approach to providing assurance to the Board on our progress against the LSB's regulatory performance framework. The Board will recall that this had followed a letter from the LSB's Chair in February that set out a suggested approach for how the Boards of regulatory bodies might seek their own assurance for how regulators were performing against the LSB's regulatory performance framework. The aim of this approach in the future is to reduce the amount of additional information the LSB requests of us during the assessment.
- 3 The Board agreed to regularly consider our assurance mapping work and updates to it as part of the performance reporting pack. This report covers updates for the period June to August 2023 (the Board considered the update to May as part of June discussion). This is set out below, with updates, where relevant, provided against each of the standards and characteristics in the LSB's regulatory performance assessment sourcebook.

Board discussion on each LSB standard

- 4 The Board also agreed in June that each time it considered the assurance mapping update, it would have a general discussion on one of the three standards and how the organisation was meeting it, taking each standard in turn over the course of the year. The Board is therefore asked to consider the first standard at this meeting:

'Well-led: Regulators are well-led with the resources and capability required to work for the public and to meet the regulatory objectives effectively'

- 5 There are eight characteristics that sit underneath this standard in the LSB's Sourcebook. Below is an extract from the Sourcebook that sets out the characteristics and some examples of the evidence the LSB would expect to see.
- 6 For our annual performance assessment submission in July 2023, we assessed ourselves as green against the well-led standard as a whole, and also green against each of the characteristics.

Extract from LSB regulatory performance assessment framework – Source book

Standard 1: Well-led - Regulators are well-led with the resources and capability required to work for the public and to meet the regulatory objectives effectively.

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Characteristics		LSB examples of evidence
1	A clear sense of purpose and strategy focused on regulation in the public interest and ensuring public confidence in the regulator.	<ul style="list-style-type: none"> • Strategy/vision • Values statement • Business plan • Board involvement in development and direction of strategy • Board away day • Comprehensive evidence base
2	Board takes ownership of and accountability for the organisation's performance and for meeting the regulatory objectives; holds its executive to account.	<ul style="list-style-type: none"> • Governance manual/handbook • Board and Committee attendance levels • Number of Board and Committee meetings • Board agendas and minutes – evidence of Board taking decisions • Progress against planned activity • Performance against KPIs • Complaints about the regulator • Board effectiveness reviews • Annual accounts and reporting of data to Board and publicly • Board and Executive meet regularly to foster collaborative relationships
3	Independent of the regulated professions but understands and collaborates effectively with the profession and representative groups to meet the regulatory objectives.	<ul style="list-style-type: none"> • Compliance with IGRs • Examples of collaborative work and attempts at collaboration • Examples of innovative work
4	Understands the needs of consumers and the public interest and assesses the impact of its work in meeting their interests.	<ul style="list-style-type: none"> • Research into public concerns • Research into levels of public confidence in the regulator • Assessment of impact of regulator's work in addressing concerns raised by and issues facing the public
5	Delivers high levels of transparency, including ensuring decisions are clear and accessible to all those with an interest.	<ul style="list-style-type: none"> • Publication policy • Annual Report • Annual accounts and reporting of data to Board and publicly • Board papers and minutes • Costs report • KPIs and performance reports • Complaints about the regulator • Regulator engagement with stakeholders • Process in place to ensure plain English approach to communications

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		<ul style="list-style-type: none"> • Consumer engagement strategy including vulnerable consumers • Diversity report • Clear terms of reference for the Board and associated committees (and for staff) • Consideration of diversity of the Board (and of staff) • Board review processes • Appointment processes and terms • Code of conduct (for Board and staff) • Disciplinary processes • Skills review processes • Internal/External Audit • Risk outlook • Risk policy • Risk assessment policy
6	Understands, secures and deploys the necessary resources to support meeting the regulatory objectives, including through collaboration where relevant.	<ul style="list-style-type: none"> • Numbers of staff assigned to regulatory activities against number of vacancies • Training available to staff and decision makers • Cost of regulation information • Practising Certificate Fee • HR monitoring of staff turnover rates • Contingency planning (to deal with resource pressures)
7	Understands the legislative and policy framework within which it operates; works constructively and in collaboration with the LSB, other relevant authorities and relevant stakeholders.	<ul style="list-style-type: none"> • Consideration and evaluation of Board engagement with the regulated community and others (eg OPBAS, CMA) • Horizon scanning • Feedback from stakeholders • Information about the market that is available
8	Has fit for purpose governance systems that align to best practice.	<ul style="list-style-type: none"> • Governance manual/handbook • Clear terms of reference for the Board and associated committees (and for staff) • Consideration of diversity of the Board (and of staff) • Board review processes • Appointment processes and terms • Code of conduct (for Board and staff) • Disciplinary processes • Skills review processes

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		<ul style="list-style-type: none">• Internal/External Audit• Risk outlook• Risk policy• Risk assessment policy
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LSB assurance mapping update (June – August 2023) - Standard 1: Well-led (characteristics 1–8)

Overall R/A/G status for standard: to be agreed prior to annual submission to LSB

Regulators are well-led with the resources and capability required to work for the public and to meet the regulatory objectives effectively.

	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
1.1	A clear sense of purpose and strategy focused on regulation in the public interest and ensuring public confidence in the regulator.	<ul style="list-style-type: none"> • Corporate Strategy (current and draft 2023 – 2026) • Published values • Business Plan (current and draft 2023 – 2024) • Board involvement in development and direction of strategy: <ul style="list-style-type: none"> ➢ minuting of Board involvement in Strategy development ➢ Chair's blog references • Evidence base visible in Board papers 	<ul style="list-style-type: none"> • Corporate strategy 2023-2026 consultation closed in August. Supported by engagement work, with Board members in attendance at events. Board considering responses and strategy at September meeting. • Business plan 2023-2024 consultation closed in June. Consultation responses discussed by Board on 27 June. Business plan to be considered by the Board in September.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
1.2	Board takes ownership of and accountability for the organisation’s performance and for meeting the regulatory objectives; holds its executive to account.	<ul style="list-style-type: none"> • Governance handbook, plus accountability statement, decision making framework and delegation frameworks - Governance Handbook recently updated, to be published once agreed. • Board attendance published in SRA annual report and financial statements, with Committee attendance to be published in future reports. Both also covered in Group annual report and financial statements. • Board and Committee meeting schedule published on our website. • Evidence of Board taking decisions – agendas, Board papers and minutes published • Organisational Performance pack reported quarterly including Business plan update, financial performance, Balanced scorecard (including KPIs and commentary) and Strategic Risk Register. • Complaints about our service reported in balanced scorecard and Independent Reviewer report, with supporting paper, to the Board. • Board effectiveness review – covered in Board minutes and updated Governance Handbook 	<ul style="list-style-type: none"> • Governance Handbook updated. • Annual operational reports 2021/22 published in July.



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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> Annual accounts and operational reports developed with Board and Audit and Risk Committee engagement, published and promoted; shared with The Law Society / Office for Professional Body Anti-Money Laundering Supervision Board and Executive meet regularly to foster collaborative relationships. Informal opportunities include: dinners, ‘meet the Board and staff market stall sessions, Directors observing Board meetings, joint attendance at events, issue specific briefings sessions 	
1.3	Independent of the regulated professions but understands and collaborates effectively with the profession and representative groups to meet the regulatory objectives.	<ul style="list-style-type: none"> Compliance with IGRs kept under review, exception reporting if required. Examples of collaboration and attempts at collaboration: <ul style="list-style-type: none"> ➤ reported through CEO report to the Board, including protocol on working with The Law Society on Anti-money laundering, Equality, Diversity and Inclusion and lawtech, work with range of professional groups in relation to SQE, collaboration as part of our research work and for events. ➤ consultation responses and engagement undertaken published on our website and summarised in relevant Board papers 	<ul style="list-style-type: none"> SRA events held on Innovation: making business ideas a reality (London and Bristol – June / July 2023). Consultations closed during this period on: 2023-2026 Corporate Strategy, 2023-2024 business plan and budget, and protecting consumers from excessive charges in financial service claims.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
			<ul style="list-style-type: none"> Engaged with 340 in-house lawyers in a variety of conferences, events, roundtables and bilateral discussions
1.4	Understands the needs of consumers and the public interest and assesses the impact of its work in meeting their interests.	<ul style="list-style-type: none"> Our own research into public concerns and needs, and wider evidence base underpinning policy thinking, as shared with Board in relevant papers. Research into levels of public confidence in us: <ul style="list-style-type: none"> ➤ customer experience feedback recorded in balanced scorecard and recognised in Institute of Customer Service accreditation ➤ regular stakeholder perceptions exercise, next due in 2023/24 as new Corporate Strategy baseline Assessing the impact of our work on the public: <ul style="list-style-type: none"> ➤ Repeat thematic reviews ➤ policy evaluation ➤ monitoring disciplinary complaints levels ➤ parliamentary mentions ➤ media sentiment 	<ul style="list-style-type: none"> Understanding the reserved market research published in June – highlights implications for consumers. Unbundled services pilot – final report published in June.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
1.5	Delivers high levels of transparency, including ensuring decisions are clear and accessible to all those with an interest.	<ul style="list-style-type: none"> • Publication policy • Annual reports • Annual accounts • quarterly performance reporting to the Board • Board papers and minutes • Annual Costs statement • Complaints about our service reported in balanced scorecard and Independent Reviewer report to the Board. • Regular engagement with stakeholders reported through: <ul style="list-style-type: none"> ➤ CEO report ➤ consultation and policy work • Process for ensuring plain English approach to communications: <ul style="list-style-type: none"> ➤ through Writing the SRA Way, supported by regular refresh and training ➤ plans for review in 2024/25 ➤ considering potential AI application 	<ul style="list-style-type: none"> • Annual operational reports 2021/22 published in July. • Writing the SRA Way mandatory e-learning for all staff completed in July and August 2023. • Governance Handbook updated • Risk outlook published in July on: managing regulatory risk during economic uncertainty.



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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> • Public Engagement Charter developed by Board working group, supported by engagement toolkit. • Proposals to follow consumer segmentation research with dedicated vulnerable consumer content • Diversity reporting through annual Public Sector Equality Duty report. • Behavioural competences and values for staff (range of HR policies, not externally published) • Consideration of diversity of the Board (and of staff): <ul style="list-style-type: none"> ➢ Board – diversity considered and advertised in recruitment, with targeted promotion ➢ Staff - annual report and pay gap reporting (gender and ethnicity) • Governance Handbook in place • Disciplinary procedures - published and reported against • Internal / external audit programme reported to Audit and Risk Committee and Board • Regular risk outlooks published 	

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> • Risk management framework and registers reported to Audit and Risk Committee and the Board. 	
1.6	Understands, secures and deploys the necessary resources to support meeting the regulatory objectives, including through collaboration where relevant.	<ul style="list-style-type: none"> • Numbers of staff assigned to regulatory activities against number of vacancies: <ul style="list-style-type: none"> ➢ detailed forecasting of staff resources ➢ shortfalls reported to Board. • Staff training reported on balanced scorecard • Staff turnover rates reported on balanced scorecard • Cost of regulation information: <ul style="list-style-type: none"> ➢ budget allocation consulted on annually ➢ reported on quarterly balanced scorecard • Practising Certificate fee application published. • Contingency planning to address resource pressures reported in budget and financial accounts and through risk registers where appropriate. 	<ul style="list-style-type: none"> • Practising Certificate fee application 2023/2024 submitted to LSB and published on LSB's website. • Compensation Fund contributions 2023/2024 application submitted to LSB and published on LSB's website.
1.7	Understands the legislative and policy framework within which it operates; works constructively and in collaboration with the LSB,	<ul style="list-style-type: none"> • Board engagement with regulated community through, for example: <ul style="list-style-type: none"> ➢ Board dinners, attendance at wide range of events (e.g Compliance Conference), SRA Innovate 	<ul style="list-style-type: none"> • July Board meeting held in Newcastle-upon-Tyne. Engagement with 50 stakeholders from across the region – see Chair's blog.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
	other relevant authorities and relevant stakeholders.	<p>roadshow, Parliamentary events, local law society meetings etc</p> <ul style="list-style-type: none"> ➤ covered in Board minutes and Chair’s blog ➤ LSB SRA Board to Board meetings <ul style="list-style-type: none"> • We work closely with OPBAS and CMA at Executive level and are inviting them both to speak to the Board • Executive horizon scanning programme: <ul style="list-style-type: none"> ➤ feeds into Strategic Risk Register, reported quarterly ➤ generates Risk Outlooks ➤ Board horizon scanning through engagement, research and Corporate Strategy sessions. ➤ Stakeholder feedback reported through consultation responses, research, perceptions surveys (next due in 2023/24) ➤ Information about the market is available through our research. Research of others is referenced as appropriate, for example, in literature reviews for our current EDI research projects. 	<ul style="list-style-type: none"> • Board members involved in engagement sessions on 2023-2026 Corporate Strategy. • Risk outlook published in July on: managing regulatory risk during economic uncertainty. • Updated sectoral risk assessment – Anti-money laundering and terrorist financing published in July. • Executive attendance at July Market Transparency Co-ordination and Oversight Group meeting, chaired by the LSB, to discuss progress against LSB’s empowering consumers policy statement. Plus, regular bi-monthly meetings at Chair, CEO and relationship manager levels.



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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
			<ul style="list-style-type: none"> • Understanding the reserved market research published in June. • Unbundled services pilot – final report published in June. • Literature reviews published in June on: <ul style="list-style-type: none"> ➤ Overrepresentation of Black, Asian and minority ethnic solicitors in reports to the SRA ➤ The factors influencing differences in outcomes by ethnicity in legal professional assessments
1.8	Has fit for purpose governance systems that align to best practice.	Please see commentary for section 1.5 above.	Please see section 1.5 above.

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Standard 2: Effective approach to regulation (characteristics 9–15)

Overall R/A/G status for standard: to be agreed prior to annual submission to LSB

Regulators act on behalf of the public to apply their knowledge to identify opportunities and address risks to meeting the regulatory objectives.

	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
2.9	Has a comprehensive understanding of the market it regulates, including the consumers of services, and proactively identifies risks to the regulatory objectives; has a clear programme of activity to address those risks	<ul style="list-style-type: none"> • Investment in research and research plan in place, covered in: <ul style="list-style-type: none"> ➤ CEO report to Board ➤ Board papers ➤ Quarterly performance reporting • Corporate Strategy (current and draft 2023 – 2026) • Business Plan (current and draft 2023 – 2024) • Risk Management Framework, Strategic Risk Register and Mid-tier Risk Register. Risk Management Framework owned by Board, regularly reviewed, including at Audit and Risk Committee. • risk outlooks 	<ul style="list-style-type: none"> • Research priorities for 2023 – 2024 discussed in Board workshop at July meeting. • Corporate strategy 2023-2026 consultation closed in August. Board considering responses and final strategy at September meeting. • Business plan 2023-2024 consultation closed in June. To be considered by the Board in September. • Risk registers and updated Risk Management Framework discussed by

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> • Sectoral risks assessed via thematic reviews, media and parliamentary monitoring, engagement with the profession, other regulators and interest groups, and through research • Description of evidence used to inform regulatory activity is set out in Board papers • Outcomes of collaborative work to understand consumers’ needs covered in: <ul style="list-style-type: none"> ➤ research findings published ➤ collaborative projects with others, for example immigration work, reported to Board. • Learning from other bodies experience and evidence: <ul style="list-style-type: none"> ➤ liaison with other regulators ➤ review of others’ arrangements feeds into Policy and our consultation material ➤ horizon scanning • Regulatory community engagement surveys in place, for example Regulatory Management firms on diversity; firms are engaged in research • Customer feedback across our services, for example: <ul style="list-style-type: none"> ➤ on events (in balanced scorecard). 	<p>Board on 6 June 2023 and Audit and Risk Committee on 23 May 2023.</p> <ul style="list-style-type: none"> • Risk outlook published in July on: managing regulatory risk during economic uncertainty. • Updated sectoral risk assessment – Anti-money laundering and terrorist financing published in July. • Thematic reviews published on: <ul style="list-style-type: none"> ➤ Lasting powers of attorney and deputyships ➤ Use of Non-disclosure agreements in workplace complaints • Understanding the reserved market research published in June.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> ➤ Institute of Customer Service accreditation is based on independent survey work (not published) ➤ through analysis of corporate complaints ➤ our regular stakeholder perception work • Consultation responses and decision documents published • Use of new and different channels to engage (Planning review in 2024/25): <ul style="list-style-type: none"> ➤ social media polling ➤ focus groups ➤ virtual events • Examples of stakeholder engagement and how they have informed decisions set out in consultation response reports, for example, Solicitors Indemnity Fund and consultation on arrangements for SRA run indemnity scheme. 	<ul style="list-style-type: none"> • Unbundled services pilot – final report published in June. • Quality indicators in legal services pilot project report published.
2.10	Engages proactively and meaningfully with a diverse range of interested stakeholders, including the public, consumers and regulated community to inform decisions.	<ul style="list-style-type: none"> • Public Engagement Charter developed by Board working group, supported by engagement toolkit and strategy for engaging regulated community • Proposals to follow consumer segmentation research with dedicated vulnerable consumer content 	<ul style="list-style-type: none"> • Engagement work, including Board members, undertaken with a wide range of stakeholders and the public as part of consultation on the Corporate Strategy 2023-2026.



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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> • Research and engagement with the public undertaken and published in our responses to consultation documents, and in our research work, for example, SQE year one – perceptions and experiences research • Institute of Customer Service accreditation is based on independent survey work • Analysis of corporate complaints, as reported to Board • Regular stakeholder perception work (next due in 2023/24) • Engagement with stakeholders is extensive and is reported in for example: <ul style="list-style-type: none"> ➤ Chair’s blog ➤ consultation responses, which go to the Board ➤ event material published ➤ reports to Board via Chair and CEO report. • Board engagement with regulated community and others through: <ul style="list-style-type: none"> ➤ Board dinners, attendance at wide range of events, such as Compliance Conference, SRA Innovate roadshow, Parliamentary events, local law society meetings etc 	<ul style="list-style-type: none"> • Consultations closed on: 2023-2026 Corporate Strategy, 2023-2024 business plan and budget and protecting consumers from excessive charges in financial service claims • Events held on: Innovation: making business ideas a reality (London and Bristol – June / July 2023) • July Board meeting held in Newcastle-upon-Tyne. Engagement with 50 stakeholders from across the region – see Chair’s blog. • Engaged with 340 in-house lawyers in a variety of conferences, events, roundtables and bilateral discussions

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> ➤ covered in Board minutes and Chair’s blog • Horizon scanning forum in place, which feeds into Audit and Risk Committee and Board consideration 	
2.11	Understands the range of formal (eg rules) and informal (eg influence) regulatory levers at its disposal and how to best make use of them; implements appropriate regulatory interventions and evaluates their impact, changing the approach where necessary to improve outcomes.	<ul style="list-style-type: none"> • Documented use of both formal and informal levers and evaluation of their respective impacts - embedded in our approach to consultation, consideration of consultation responses and covered in evaluation plans. • Issues and risks addressed (eg complaints on particular topics) - we report on topical matters to Board and identify themes in our Upholding Professional Standards report. • Examples where stakeholders have influenced thinking - covered in our responses to consultation responses, for example, Solicitors Indemnity Fund and new approach to financial penalties. • Our systematic approach to reviewing regulatory interventions and evaluations is planned and published, for example, Solicitors Qualifying Exam evaluation and evaluation of Standards and Regulations. • Responses to issues raised in between periodic reviews – we make amends as needed, example include updates to our Standards and Regulations 	<ul style="list-style-type: none"> • Upholding Professional Standards report for 2021/22 published in July 2023. • Proceeds of crime guidance published in June 2023. • Regulatory interventions into three immigration firms following allegations raised by the Daily Mail. Letter in response to Lord Chancellor, setting out our work and follow-up actions on immigration services, published. • Thematic reviews published on: <ul style="list-style-type: none"> ➤ Lasting powers of attorney and deputyships

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
			<ul style="list-style-type: none"> ➤ Use of Non-disclosure agreements in workplace complaints
2.12	Obtains and makes effective use of data, including by making it available to others, to inform how it meets the regulatory objectives.	<ul style="list-style-type: none"> • Full research reports are published, which cover the methodology and evidence base • Access to the data on our Register is provided via an API to a range of organisations, including digital comparison tools • Firm Diversity Data tool is published which allows users to compare firm performance • Surveys undertaken as part of consultations and research • Examples of data collected from regulatory community include: firm diversity data, my SRA diversity data, as used for our enforcement reporting and to support the SDT, the data on our ABS register, Check a solicitor and waivers listing, thematic reviews, Anti-Money Laundering information used for our reporting to OPBAS and our risk modelling • Performance against KPIs reported transparently through balanced scorecard 	<ul style="list-style-type: none"> • Understanding the reserved market research published in June. • Unbundled services pilot – final report published in June. • Quality indicators in legal services pilot project report published. • Firm diversity data collection for 2023 in hand. • Thematic reviews published on: <ul style="list-style-type: none"> ➤ Lasting powers of attorney and deputyships

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> Developing our data insight capability and capacity and proposing a specific related objective in our new Corporate Strategy. 	<ul style="list-style-type: none"> ➤ Use of Non-disclosure agreements in workplace complaints
2.13	Actively encourages innovation and innovators in the interests of improving access to services; identifies and mitigates risks appropriately without allowing them to become obstacles.	<ul style="list-style-type: none"> Innovation is a key strategic commitment – Corporate Strategy (current and draft 2023 – 2026) and Business plan (current and draft 2023 – 2024) Innovation and technology team in place Horizon scanning reported via Board papers, see also 1.7 in this document. Engagement with stakeholders through: <ul style="list-style-type: none"> ➤ innovation roadshows ➤ events ➤ social media ➤ research ➤ think pieces, for example, article on artificial intelligence SRA Innovate in place. Regulators Pioneer Funding awards, working with partners on projects to support innovation 	<ul style="list-style-type: none"> Innovation and technology discussed as part of July Board workshop on policy priorities for the next six months. Events held on: Innovation: making business ideas a reality (London and Bristol – June / July 2023) Unbundled services pilot – final report published in June.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> • Innovation pilots - Unbundled services pilot • Use of waivers and exemptions to facilitate innovation where needed and reported on website, while Standards and Regulations designed to reduce the need for waivers. 	
2.14	Committed to improving the diversity of, and reducing inequalities in, the profession at all levels and implements actions to reduce barriers to equality and inclusion.	<ul style="list-style-type: none"> • Equality, Diversity and Inclusion (EDI) woven throughout our work, Strategy and Business Plan and published accordingly, along with Equality Impact Assessments • We explicitly cover all protected characteristics and socio-economic background • EDI work reported annually in Public Sector Equality Duty annual report. • Equality Impact Assessments (EIAs) undertaken and published (alongside our consultation documents and Board papers, for example Assuring high standards in the police station EIA) • EDI in supporting information in Board papers • Diversity data collected from the profession: <ul style="list-style-type: none"> ➢ Firm Diversity Data exercise ➢ mySRA 	<ul style="list-style-type: none"> • Upholding professional standards - diversity monitoring - corporate report 2021/22 published in July. • Firm diversity data collection exercise 2023 in hand. • Literature reviews published in June on: <ul style="list-style-type: none"> ➢ Overrepresentation of Black, Asian and minority ethnic solicitors in reports to the SRA ➢ The factors influencing differences in outcomes by ethnicity in legal



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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> • Collaboration with others, for example: <ul style="list-style-type: none"> ➤ Chair of joint regulators EDI forum ➤ Work with Social Mobility taskforce on our data and resources ➤ Work closely with range of diversity groups on SQE, for example on reasonable adjustments and on the diversity monitoring • Aspirational goals set for the profession: <ul style="list-style-type: none"> ➤ robust public EDI commitment ➤ clear statements on inconsistent diversity by firm size and seniority, with associated work programmes ➤ resources published ➤ targets for ourselves • Value of EDI training promoted - included in online EDI resources • Importance of inclusive recruitment and working practices in the profession covered in guidance supporting principle 6 and our resources • Effective processes in place to deal with professional misconduct - themes reported on in Upholding 	<p>professional assessments</p>

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		Professional Standards report and disciplinary outcomes published via our Solicitors Register	
2.15	Committed to improving, and reducing inequalities in, access to services for the public and consumers in all their diversity.	<ul style="list-style-type: none"> • EDI policies published • Access to justice threaded through work – commitment made in Corporate Strategy. • Commitment to publish an access to justice policy statement in our draft 2023 – 2026 Corporate Strategy. • Policies kept under review, for example, recent review of trans and reasonable adjustments policies • Please see section 2.14 above 	<ul style="list-style-type: none"> • Please see section 2.14 above

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Standard 3: Operational delivery (characteristics 16–20)

Overall R/A/G status for standard: to be agreed prior to annual submission to LSB

Regulators’ operational activity (eg education and training, authorisation, supervision, enforcement) is effective and clearly focused on the public interest.

	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
3.16	Ensures that authorised persons have and maintain the right skills, knowledge, behaviours and professional ethics to practise throughout their careers.	<ul style="list-style-type: none"> • Published data on providers’ pass rates: <ul style="list-style-type: none"> ➤ annual monitoring of Legal Practice Course (LPC) report ➤ SQE provider data publication from quarter 4 2022/23. ➤ Data published on SQE • Information for students about choosing a training provider - published on website. • Statement of competence published • Quality assurance mechanisms to test rigour of entry and ongoing competence assessments: 	<ul style="list-style-type: none"> • Annual assessment of continuing competence – published in August 2023.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> ➤ SRA Quality Assurance report ➤ independent assessor reports all published ➤ Quality assurance role for LPC providers published • Authorisation information requirements on website • Ongoing competence plan published • Standards and Regulations published and promoted. 	
3.17	Maintains accessible and accurate registers of authorised persons, including information on disciplinary and enforcement action.	<ul style="list-style-type: none"> • Consumer-facing guidance about who is regulated and what this means is on our website • Solicitors Register online with information for consumers. Information on accessing Register is clear on our website • Solicitors Register - information on updating, accuracy and enforcement information clear on website. • Traffic and source of traffic to Register is monitored. • Register data feeds into Legal Choices 'help me to trust my lawyer' product. 	<ul style="list-style-type: none"> • Keeping of the roll exercise 2023 completed.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
3.18	Sets out clear, accessible criteria for taking decisions about the authorisation, supervision of authorised persons and enforcement proceedings against them to protect the public; adheres to the criteria when taking decisions.	<ul style="list-style-type: none"> Published authorisation, supervision and enforcement material on our website, with management and quality assurance processes in place to monitor adherence. We publish annual reports on all these areas. Continuous improvement programme in place to address challenges in our investigation and enforcement work – currently in progress 	<ul style="list-style-type: none"> Annual operational reports 2021/22 published in July. Investigation and Enforcement continuous improvement programme phase one changes have gone live. Focus now is on supporting staff and measuring and realising benefits.
3.19	Takes concerns raised by the public, the profession and other stakeholders seriously; pursues those concerns with appropriate rigour and pace under a transparent process.	<ul style="list-style-type: none"> Continuous improvement programme in progress to address timeliness and quality in our investigation and enforcement work. Information for handling complaints/issues published on website: <ul style="list-style-type: none"> ➢ for solicitors ➢ for the public ➢ complaints about us Various material on website to show how activity is focused on the public interest and the needs of vulnerable members of the public, including reasonable adjustments 	<ul style="list-style-type: none"> Investigation and Enforcement continuous improvement programme phase one changes have gone live. Focus now is on supporting staff and measuring and realising benefits. Upholding Professional Standards report for 2021/22 published in July 2023. Proceeds of crime guidance published in June 2023.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
		<ul style="list-style-type: none"> • Topic guides, assessment information, enforcement strategy and other material used by decision makers published on website • Annual Upholding Professional Standards and Office for Professional Body Anti-Money Laundering Supervision reports provide detail on regulatory action taken. Also covered in quarterly performance reporting pack. • Checks on processes and reviews through Quality Assurance team and local quality assurance in operational teams • Data from complaints used internally and themes covered in Upholding Professional Standards report • Follow-up activity in relation to thematic issues reported in thematic reviews and picked up in wider work • Guidance for the profession published regularly 	<ul style="list-style-type: none"> • Thematic reviews published on: <ul style="list-style-type: none"> ➤ Lasting powers of attorney and deputyships ➤ Use of Non-disclosure agreements in workplace complaints
3.20	Proactively seeks to maintain appropriate standards of conduct and responds to thematic issues arising from operational	<ul style="list-style-type: none"> • Data from operational activity used internally to identify thematic issues. Enforcement themes covered in Upholding Professional Standards report and themes from other areas, for example authorisation. 	<ul style="list-style-type: none"> • Upholding Professional Standards report for 2021/22 published in July 2023.

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	Characteristic	Commentary until the end of May 2023 (for July annual submission to the LSB)	June – August 2023 updates
	activity, including ensuring that those they regulate take action, where relevant.	<ul style="list-style-type: none"> • Follow-up activity in relation to thematic issues reported in thematic reviews; feedback from authorisation and elsewhere used internally to improve processes • Guidance for the profession published regularly. 	<ul style="list-style-type: none"> • Proceeds of crime guidance published in June 2023. • Thematic reviews published on: <ul style="list-style-type: none"> ➤ Lasting powers of attorney and deputyships ➤ Use of Non-disclosure agreements in workplace complaints • Follow-up activity on our 2022 thematic review on immigration services, and in response to allegations made by the Daily Mail, set out in our published response to the Lord Chancellor’s letter.