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This paper will be published

# SRA Business Plan and budget for 1 November 2025 to 31 October 2026 and reprioritisation

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| Reason for paper                           | This paper summarises:   |
|  | <ul> <li>consultation feedback and how it will be addressed in<br/>the final Business Plan and budget for 2025-26</li> </ul>   |
|  | reprioritisation post-consultation, and taking account of<br>the wider context including the published LSB<br>directions and increased reports of concerns   |
|  | next steps and publication.  |
| Decisions(s)                               | The Board is asked to:   |
|  | a) discuss and agree re-prioritisation and areas of focus for 2025-26  |
|  | <ul> <li>b) delegate to the Chair and Chief Executive approval of<br/>the final Business Plan and budget 2025-26 for<br/>publication, taking account of this discussion</li> </ul>   |
|  | <ul> <li>c) comment on the risks and opportunities set out in<br/>annex 4, including approvals in relation to our budget.</li> </ul>   |
| Previous Board and committee consideration | At its meeting on 29 April 2025, the Board approved a draft Business Plan and budget for 2025-26 for consultation.   |
|  | At its meeting on 30 June 2025, the Board considered initial summaries of feedback in relation to the draft budget, feedback on the Equality Impact Assessment (EIA) related to the budget from the consultation process and approved our budget for 1 November 2025 to 31 October 2026.   |
|  | At its meeting on 7 July 2025, the Board considered consultation responses we received in relation to our proposed workplans and activities, level of practising fees, Compensation Fund contributions, and feedback on the EIAs related to these. It also approved the determinations of the individual practising certificate fees, entity turnover based fees, and Compensation Fund contributions for 2025-26. |

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| Next steps | We will:  |
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|            | taking account of this discussion, update the Business<br>Plan and budget 2025/26 for approval by the Chair and<br>Chief Executive for publication  |
|            | <ul> <li>following approval, publish the Business Plan and budget 2025-26 by the end of October 2025, along with the associated consultation feedback report and two equality impact assessments (on the commitments of our Business Plan and budget for 2025-26 and on the regulatory portion of the practising certificate fee, and compensation fund contribution for 2025-26).</li> <li>also publish the findings from the stakeholder perception 'one year on' pulse survey before the end of October 2025.</li> </ul> |

If you have any questions about this paper, please contact: Aileen Armstrong, Executive Director – Strategy, Innovation and External Affairs, <a href="maileen.armstrong@sra.org.uk">aileen.armstrong@sra.org.uk</a> or Liz Rosser, Executive Director – Operations and Resources, <a href="maileon.liz.rosser@sra.org.uk">liz.rosser@sra.org.uk</a>

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# SRA Business Plan and budget for 1 November 2025 to 31 October 2026 and reprioritisation

#### **Summary**

- 1 We have considered all responses to our consultation both written responses and views received through our wider engagement activity.
- During the consultation period there have been a number of developments. These include continued growth in the number of reports we are receiving and need to consider and fresh issues and cases emerging in relation to high volume consumer claims. In addition, we received 'one year on' pulse results on stakeholder perceptions and our Strategic Performance Indicators in August.
- During the consultation period we also received <u>Directions from the Legal Service Board</u> following its review of the regulatory events leading up to our intervention into Axiom Ince. We have now <u>agreed an implementation plan</u> to address these.
- We need to update our Business Plan for 2025-26 to account for all of these issues. This means taking stock of what we have said we plan to do over the year, considering again our priorities for our programme of work, and reprioritising where necessary.
- This paper sets out options for agreement by Board for further reprioritisation of work compared with the <u>draft plan set out for consultation</u>.
- The Board has previously approved the budget for 2025/26 and all of the options for reprioritisation discussed in this paper are set within that context. There are a number of uncertainties around how our priorities will develop in 2025/26 and we have considered the risks and opportunities in annex 4.
- Our Business Plan and budget for 2025-26 will be updated as necessary following this discussion. We are asking the Board to delegate approval of these further changes to the Chief Executive and Chair. It will be published before the end of October alongside:
  - a consultation feedback report, and a summary report of all responses received
  - an equality impact assessment (EIA) of practising fees and Compensation Fund contributions
  - an EIA of our business plan workstreams.

#### **Background**

8 Our consultation on our draft Business Plan and budget 2025-26 ran between 8 May and 19 June 2025, and we sought feedback about our proposed workplans and activities. The Board considered feedback from the consultation process at

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its meetings of 30 June and 7 July 2025. At the meeting of 30 June, the Board approved our budget for 2025-26, and at the meeting on 7 July 2025 the Board approved the determinations of the individual practising certificate fees, entity turnover based fees, and Compensation Fund contributions for 2025-26.

## Stakeholder feedback on the draft Business Plan and Budget

- 9 We received a range of feedback about our work proposals through a number of channels, including written consultation responses from:
  - three solicitors and one local law society
  - the Association of Consumer Support Organisations (ACSO); and
  - the Legal Services Consumer Panel (LSCP) the Law Society (TLS).
- During the consultation period, we carried out a range of engagement activity to raise awareness of our consultation and get wider feedback. These activities included broadcasting an on-demand webinar, engagement through our social media channels, polling and focus groups with members of the public, and roundtable discussions with local law societies, sole practitioners, legal representative groups, consumer groups, and in-house solicitors.
- A full summary of the feedback is provided in annex 3. Overall feedback was generally supportive for our workstream proposals, projects and commitments for 2025/26 and how we were proposing to prioritise our work. In its response the Law Society highlights the 'shifting priorities and emerging areas of work' as being necessary, and a 'logical and welcome approach.'
- 12 There was broad support, and little opposition to our proposed increased budget. In this context though, some stakeholders, including the Law Society and LSCP, felt that we should provide further detail on our ongoing plans for reporting on progress across the year including through Board and the LSB to demonstrate how we are using our resources, including impact this is having for consumers and access to justice. We have made this clearer in our updated Business Plan and budget 2025-26, including quarterly reporting to the LSB about progress on the implementation plan relating to the Directions.
- There was also feedback from some stakeholders that we should be clearer about the scale and scope of the work that the LSB Directions will necessitate. The Law Society stated in its response that it felt our 'immediate priority ... should be to focus on each of the requirements' with funds and resource 'redirected accordingly for the next 12 months'. This feedback is in line with what we are proposing for the year ahead through our reprioritisation exercise.
- We received notable support for our key priorities for the year ahead, including high volume consumer claims, and on our Risk and Data programme. On the former, in response to feedback, we will highlight in the business plan the importance of working with others and seeking input from third parties.

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- Looking at how different stakeholders responded, members of the public were particularly supportive of our work to improve how we use data to spot new risks, and our programmes of work on high-volume consumer claims, client accounts and ethics. Members of the public generally agreed with our draft plans to deprioritise certain areas of work which they viewed as being less important overall.
- There were also calls to look again at some of the areas we were proposing to deliver in 2025-26. In relation to our work on ethics, the Law Society caution against 'committing to a significant programme of work until it is clear what direction of travel the LSB will be taking following its consultation on upholding professional ethics'. The LSCP similarly called on our ethics work to align with the work the LSB is doing in this area. This aligns with what we are proposing as part of our reprioritisation and has been reflected in our updated Business Plan.
- 17 On continuing competence, some did not feel this was an issue of particular concern, with one local law society stating it felt competence of most qualified solicitor practitioners is not a significant issue. However, there was strong support for ongoing assessment from others, including members of the public.
- There were mixed views in relation to our work on transparency. The Law Society was supportive of our plans for evaluation. The LSCP was also supportive, but said it wants us to go further and expand our requirements for law firms into new and additional areas. Conversely, one local law society said it felt imposing additional transparency rules is not a high priority and will serve only to burden the profession. Together this lends weight to our reprioritisation proposal to carry out the evaluation exercise in the coming year but then pause to take stock and not carry out any further work at this stage. This would be reflected in the updated Business Plan.
- 19 Some feedback indicated a need to give greater prominence to our work focusing on smaller firms, including support in relation to lawtech. The importance of considering impacts on small firms as part of our ongoing decision-making was also highlighted. We have updated the Business Plan to highlight how we work to engage with and support our regulated community, including small firms.
- 20 There was little substantive feedback on the detail of our draft EIAs. We did however hear widespread support for continued focus and work on EDI issues overall.

## Stakeholder perceptions 'one year on' pulse survey

During June 2025 Thinks Strategy and Insight carried out a 'one year on' pulse survey following on from our in-depth stakeholder perceptions research

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<u>published last year</u>. Surveying more than 3,400 stakeholders, it aims to provide insights on whether there have been changes in stakeholder perceptions in relation to:

- our strategic performance indicators (SPIs), which cover themes of confidence and trust in legal services and perceptions of how well they are regulated
- the main drivers of confidence and trust in legal services

and which of those drivers stakeholders think we play a key role in.

- The pulse survey findings are summarised in annex 2. Overall, the results continue to support our strategic priorities, with a focus on high professional standards, and do not suggest we need to make any significant changes to our business plan. One area that we will update in the business plan is to reflect the survey finding that more consumers are saying they are experiencing malpractice, and greater importance is being placed overall on us taking action against it.
- As part of this work, we also got feedback from consumers on our planned budget increases. They show a mixed picture on the principle of us increasing our budget. However, when presented with specific reasons from our draft business plan for regulatory budget increases (eg recruiting more investigators, improving use of data, dealing with more misconduct reports), at least three in five consumers agreed these justified budget increases.

#### Reprioritisation of our work in the Business Plan 2025-26 year

- 25 Since the publication of our draft Business Plan and budget for 2025-26 there have been a number of developments that are placing new and further upward pressure on our resources. These include a continued growth in the number of reports that we are seeing and needing to consider, fresh issues and cases emerging in relation to high volume consumer claims.
- We have also received the <u>Directions published by the Legal Service Board</u> following its review of the regulatory events leading up to our intervention into Axiom Ince and we have an <u>agreed implementation plan</u> to address these.
- We have already accelerated work in certain areas in the current business plan year (2024-25) to reflect these developments. This includes our Risk and Data Programme, actions in relation to high volume consumer claims, and aspects of our work in relation to client money. We need to maintain, and in some cases further accelerate, this over the course of this next Business Plan year (2025-26), along with other specific work and actions as set out in this plan.
- There are also new areas where we are establishing projects such as assessing potential for harm to consumers arising from firm's financial stability.

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- We are also dealing with the significant and sustained increase in reports of solicitor misconduct. Since the last update to the Board, in July, the challenge continues to increase. July 2025 saw record level of reports being received.
- We have taken some immediate measures to address this increase (which we have set out in the performance report and scorecard). A strategic improvement project has also been approved, with work underway to support Investigation and other teams which are also seeing an impact. This will continue into the 2025-26 Business Plan year.
- This comes alongside dealing with a more complex and varied caseload, and ongoing high-profile cases such as the those coming out of the Post Office Horizon scandal. The workload in relation to high volume consumer claims continues to grow too. We are continuing to respond to fresh issues and open new cases, which could potentially impact large numbers of clients.
- We therefore need to consider whether there are workstreams we had put forward in our draft Business Plan for 2025-26 which may need to be stopped, paused or reframed so we can focus on key areas of work. In addition, whether there are other areas of ongoing work that we could stop or do differently to create more space for greater priorities.
- We have identified these areas and set these out as options in detail in Annex One which will enable us focus on the key areas of delivery for 2025-26.

#### **Attachments**

- An outline of our reprioritisation is attached at annex 1.
- 35 A summary of the results of the Thinks Insight 2025 'pulse survey' of stakeholder perceptions and key drivers of confidence and trust is provided at annex 2. A more detailed written report of the findings is being finalised and will be shared with the Board by circulation.
- Our consultation feedback report is attached at annex 3. This is a draft and specific changes to the business plan will be confirmed and inserted following Board discussion and agreement on re-prioritisation and areas of focus.
- 37 Risks and Opportunities in the 2025/2026 budget is provided in annex 4.

#### Recommendations: the Board is asked to:

- a) discuss and agree re-prioritisation and areas of focus for 2025-26
- b) delegate to the Chair and Chief Executive approval of the final Business Plan and budget 2025-26 for publication, taking account of this discussion. They will also approve the final report on findings from the stakeholder perceptions research.

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c) comment on the risks and opportunities as set out in annex 4, including approvals related to our budget.

#### **Next steps**

- We will publish the final approved Business Plan and budget for 2025-26, alongside the consultation feedback report, consultation responses we received, and the EIAs, before the end of October 2025.
- We will also publish the findings from the stakeholder perception 'one year on' pulse survey before the end of October 2025.

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#### **Supporting information**

## Links to the Corporate Strategy and/or Business Plan and impact on strategic and mid-tier risks

This paper describes our post-consultation position and approach for finalising and publishing our Business Plan 2025-26 and confirms its connection points to the SRA's Corporate Strategy 2023-26.

#### How the issues support the regulatory objectives and best regulatory practice

The Business Plan and budget confirms our workstreams and commitments. They have been developed in ways that support us to meet the Legal Services Act 2007's regulatory objectives, and to achieve consistency with the Better Regulation principles.

#### **Public/Consumer impact**

Our Business Plan commitments aim to improve consumer experiences and make sure there are strong protections in the legal services sector – including circumstances when members of the public are our customers.

## What engagement approach has been used to inform the work and what further communication and engagement is needed?

- 43 A draft version of our Business Plan and budget was published for public consultation. A feedback report is attached in annex 3. We will continue to engage with stakeholders regarding feedback they provided during this process.
- Where feedback is relevant to particular workstreams it has been provided to the applicable teams to ensure that it is considered and incorporated into their workstreams and policy development processes, including reprioritisation.
- There will be further consultation processes undertaken as part of ongoing programmes of work, including high volume consumer claims.

#### What equality and diversity considerations relate to this issue?

46 Equality, diversity and inclusion are central to our business activities, and our workstreams describe a number of projects and initiatives targeted in this area. We have consulted on equality impact assessments of our workstreams and our fees and will finalise these.

#### How the work will be evaluated

Our Business Plan and the workstreams we commit to are subject to ongoing monitoring and evaluation activity. We will report our progress to the SRA

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Board regularly throughout the Business Plan's 12-month lifespan. We will continue to conduct a range of evaluation activities to ensure that we understand the impact of our work in relation to delivering our regulatory objectives.

| Annexes |  |
|---------|--|
| Annex 1 | Proposed areas for further reprioritisation of work in 2025-26 following LSB Directions  |
| Annex 2 | Slides summarising the key findings from Thinks Insight of 2025 one year 'pulse survey' of stakeholder perceptions research on key drivers of confidence and trust |
| Annex 3 | Consultation feedback report   |
| Annex 4 | Risks and Opportunities in the 2025/26 budget  |