

## Annex 3 - SRA Business Plan 2023-24 update

### Our Strategic Priorities

*Strategic Priority 1* - We will deliver high professional standards.

*Strategic Priority 2* - We will strengthen our risk based and proactive regulation.

*Strategic Priority 3* - We will support innovation and technology.

*Strategic Priority 4* - We will be an authoritative and inclusive organisation, meeting the needs of the public, consumers, those we regulate and our staff.

Our business plan for 2023/24 is available on our website<sup>1</sup>

Annex 3a shows the business plan commitments within each priority.

### Progress against commitments in our annual planned work programme

This is the third report against the business plan commitments in our 2023/24 business plan, which reflects the first year of the 2023-26 Corporate Strategy.

Annex 3a shows the RAG status of all the commitments under the four priorities. A summary of the status evaluation is as follows:

Status	Green	Amber	Red	Deferred
Priority 1	8	-	1	1
Priority 2	4	1	-	-
Priority 3	2	-	-	1
Priority 4	5	-	-	2
<b>Total</b>	<b>19</b>	<b>1</b>	<b>1</b>	<b>4</b>

Relates to objective status based on progress to date:

Green (G) – means in line with expectation and overall delivery is expected;

Amber (A) – means generally in line although a challenge to maintain progress and deliver the overall objective;

Red (R) – means progress behind expectation and we will not succeed without direct action;

The 'red' commitment is considered below.

**Make data about candidate performance available to help aspiring solicitors make informed choices about how they prepare for the assessment.** We have not yet fulfilled our commitment to publish data linking SQE candidate outcomes with how they prepared for their assessments. It has taken time to accumulate sufficient data for any publication to be useful for candidates. We are contracting with an external supplier to support the development of a tool to enable the data to be published in an interactive way. Pending the availability of that tool, we are considering the arguments for and against publishing the data currently available to us in a report format. There is a possibility we will be challenged, whatever our decision. Some training providers oppose us publishing data. Other training providers, SQE candidates and wider stakeholders are pressing us to do so.

<sup>1</sup> <https://www.sra.org.uk/sra/corporate-strategy/business-plans/business-plan/business-plan-2023-24/>

The amber commitment is considered below:

**We will publish our firm diversity data with its new insight into the diversity breakdown at the most senior levels in law firms and improve the diversity data we hold for individuals.** The first limb of this commitment has been completed but we have not been able to improve the diversity data we hold for individuals. We have updated the timelines for IT work to better support the diversity data we hold on individual solicitors and anticipate delivery to the new timeline in May 2025. Following this we will start a campaign to support improvements to the data we hold for individuals.

In the May performance paper, this commitment was reported as including the establishment of a framework to evaluate our progress around EDI. The October performance paper noted that the establishment of such a framework would be deferred, to be delivered in the 2024/25 business plan. The amber evaluation on this commitment is based on the reduced commitment for 2023/24.

There are three commitments that were deferred following our reprioritisation exercise linked to our Consumer Protection Review. These were reported to the Board in the previous performance report, and were:

- Priority 3: we will deliver a proof of concept to test demand and likely effectiveness of a new regulatory sandbox.
- Priority 4: we will review how we communicate in Welsh and consider opportunities to expand our offering. [We remain committed to this work, but we were focused during 2023/24 on scoping the review and we intend to then conduct it during 2024/25.]
- Priority 4: we will produce regulatory position statements about access to justice and environment, social and governance expectations. This will set out our analysis of the issues, the role of our regulation in relation to them and our regulatory expectations.

One further commitment under priority one to make improvements and potential additions to our transparency requirements was reported in the October Board performance report as having moved from Amber to Green. This was an error. The report should have said that the commitment had been reprioritised to the 2024/25 year's business plan. The Board's agreement to this should have been sought, to formalise the implicit approval reflected in the published 2024/25 business plan. The updated sections from the published 2024/25 business plan now read:

*“Although we paused some work during the first year of our Corporate Strategy to accommodate other key priorities including the Consumer Protection Review, we plan to recommence work in this area in light of the importance of information for consumers in supporting confidence and trust – supported by the insights provided in our, soon to be published, stakeholder perceptions research which emphasised how crucial transparent cost structures are. This could include reviewing and revising specified formats for information provision, and whether our rules around costs transparency could be extended into other areas of the law.*

*Between November 2024 and October 2025, we will:*

*Build on the work we have already done to improve information available for consumers on legal services, focusing on how we can drive improved information around costs and how that interacts with quality indicators.”*

This commitment has therefore been removed from those under priority one in this report.

We have noted our key achievements in the period since the last Performance report in the table below.

## Achievements in this period

	Priority 1	Priority 2	Priority 3	Priority 4
Achievements	<ul style="list-style-type: none"> <li>We commissioned independent experts to undertake the first independent evaluation of the SQE, completing a theory of change review and a revised logic model to drive the evaluation. Work is on track to complete the survey of candidates, employers, and training providers in early 2025.</li> <li>We published our independent research findings on the overrepresentation of solicitors from Black, Asian and ethnic minority backgrounds in reports made to us and in our enforcement process.</li> <li>The timeliness of our investigations and enforcement continued very considerable improvement, with 94% of cases concluded within 12 months, 98% within 24 months, and 60 cases over 24 months, as against 162 a year ago.</li> </ul>	<ul style="list-style-type: none"> <li>We assessed the organisation's data maturity and held a series of workshops and interviews with c10% of staff to understand key challenges and priorities around data. This enabled development of our vision, principles and workstream objectives for our data strategy.</li> <li>We updated our financial sanctions guidance, enhanced our data collection on those firms in scope of AML regulations, and exceeded our full year target for AML reviews and visits of firms.</li> <li>We continue to add capability and capacity into our Data Science team and have developed and deployed a number of machine learning analytical products. We have also started to focus our activities on understanding and incorporating the latest thinking on AI ethics into our data science work.</li> </ul>	<ul style="list-style-type: none"> <li>We have commissioned research on small law firms and technology providers to produce a map of the specific areas where more resources and support are most needed. We appointed a supplier and the research is underway, including interviews with legal professionals and tech providers.</li> <li>We have created a detailed table of online dispute resolution (ODR) providers across relevant areas of law, and successfully conducted the engagement phase of our Regulators Pioneer Fund project, involving key stakeholders and gathering critical feedback. A GenAI tool for legal triage and diagnostics has been developed, offering innovative support for vulnerable individuals. We have started drafting guidance outlining ODR good practice, focusing on accessibility, usability, and inclusivity.</li> </ul>	<ul style="list-style-type: none"> <li>We have delivered the Voice of the Customer programme, to embed our core values of being customer-focused, accountable, and proactive. Innovative dashboards have been developed to offer insights into customer sentiment, segmented by customer type and root cause across people, processes, and technology.</li> <li>In October, we published stakeholder perceptions research, which involved around 3,400 stakeholders. The research aims to benchmark our corporate strategy and offer insight on what drives trust and confidence in legal services for key stakeholders.</li> <li>We by the end of 2023/24 completed three waves of Lean Six Sigma white belt training for 42 members of staff. Our project management training continues to be available for all staff, together with a process for effectively assessing and progressing new ideas for change.</li> </ul>

	Priority 1	Priority 2	Priority 3	Priority 4
<b>Impacts and Outcomes</b>	<ul style="list-style-type: none"> <li>• Our following of best practice for evaluations will ensure we have the most robust possible basis to understand the impacts of the SQE, which will safeguard stakeholder buy in to the findings. The evaluation report will be published in summer 2025.</li> <li>• We have a better understanding of the potential causes of the overrepresentation, to use to inform an action plan whose impact over time we will monitor. The independence of the academic authors and the robust methodologies used give stakeholders assurance on the findings and actions. We can consider the action plan with the findings from the differential outcomes research earlier in the year.</li> <li>• Those being investigated see the investigations being closed as promptly as is possible, while ensuring the quality of the work.</li> </ul>	<ul style="list-style-type: none"> <li>• Clear vision and principles will ensure we focus on the right priorities to support proactive regulation. We are now onboarding key resource to enter the discovery stage in January.</li> <li>• The increase in inspections and reviews of in-scope firms will with the effective guidance help reduce non-compliance with money laundering requirements and financial sanctions.</li> <li>• This capacity and these capabilities sit at the heart of increasing our programme of understanding risk to power proactive regulation.</li> </ul>	<ul style="list-style-type: none"> <li>• We are building our evidence of the barriers that small-sized firms face in adopting technology and innovation, an important step in identifying our role, and that of others, in supporting them to overcome them for the benefit of consumers. The research conclusions are due in early 2025.</li> <li>• We have an enhanced understanding of existing ODR resources, and insights into market gaps. The ODR providers table enables stakeholders to better navigate available tools. Insights have informed strategies to address barriers to adoption, particularly for vulnerable groups. The GenAI tool introduced a pioneering approach to triage, simplifying access to justice and empowering individuals and agencies. The draft guidance will establish clear standards, fostering trust, accessibility, and inclusivity in the development and use of ODR tools.</li> </ul>	<ul style="list-style-type: none"> <li>• For the first time our Authorisation, Contact Centre and Professional Ethics teams have real-time measurement of customer effort scores and feedback, which provide invaluable opportunities to enhance the customer experience and celebrate positive customer sentiment.</li> <li>• We have used the results to inform our business planning for 2024/25, as well as our approach to engaging with stakeholders.</li> <li>• This is increasing the knowledge and expertise of staff in continuous improvement and how we deliver change.</li> </ul>

## Annex 3a

<b>Priority one – We will deliver high professional standards</b>		
<b>This means setting, upholding and promoting high professional standards for those we regulate, in a way that is fair, proportionate and robust.</b>		
<b>Commitments</b>	<b>Previous RAG rating</b>	<b>Current RAG rating</b>
We will develop and commission the first independent evaluation study of the SQE. This will focus on understanding its market impact, including any equalities and qualifying work experience impacts.		
We will finalise our work to deliver the entirety of the SQE in the Welsh language		
We will make data about candidate performance available to help aspiring solicitors make informed choices about how they prepare for the assessment.		
We will publish our annual report outlining the most significant risks around competence, and we will undertake thematic work to understand the levels of competence and any regulatory action required to address this in high-risk areas.		
We will deliver any changes required by the Economic Crime and Corporate Transparency Bill, should it be enacted, bringing in a new regulatory objective relating to economic crime and giving us new fining and information gathering powers.		
We will publish our research findings for wider discussion in relation to the attainment gap for candidates from Black, Asian and ethnic minority backgrounds in professional assessments.		
We will publish our research findings for wider discussion in relation to overrepresentation of solicitors from Black, Asian and ethnic minority origin backgrounds in reports made to us and subsequently our enforcement process.		
We will develop a programme of work to encourage large firms to tackle retention and progression in particular for women and people from Black, Asian and ethnic minority origin backgrounds.		
We will monitor the impacts of the improvements made to date in our investigation and enforcement work, deliver training to fully realise benefits and deliver further opportunities to improve the way we work.		

<b>Priority two – We will strengthen our risk based and proactive regulation</b>		
<b>This means delivering and supporting better regulation through proactive and risk-based activity using robust evidence based on our data, insights and intelligence.</b>		
<b>Activities</b>	<b>Previous RAG rating</b>	<b>Current RAG rating</b>
We will develop a data strategy which improves the quality of our data and maximises the benefits we get from it, including our ability to monitor by diversity characteristics.	Green	Green
We will enhance and expand our data analysis capability and expertise to identify opportunities for increased proactive monitoring.	Green	Green
We will increase our ability to quickly review newly emerging risks by expanding our capacity to deliver thematic activity.	Green	Green
We will publish our firm diversity data with its new insight into the diversity breakdown at the most senior levels in law firms and improve the diversity data we hold for individuals.	Red	Yellow
We will reduce non-compliance with money laundering requirements and financial sanctions by extending our proactive work; enhancing our data collection to secure a market wide view of compliance and carrying out more, well targeted inspections and desk-based reviews.	Green	Green

<b>Priority three – We will support innovation and technology</b>		
<b>This means that we will keep up to date with and actively support innovation and technology that improves the delivery of legal services and access to them, particularly for individuals and small businesses, as well as supporting small firms to use technology effectively.</b>		
<b>Activities</b>	<b>Previous RAG rating</b>	<b>Current RAG rating</b>
We will work with small law firms and technology providers to produce a map of the specific areas where more legal resources and support are most needed and deliver pilots focused on particular technologies and themes.	Green	Green
We will deliver our Regulators Pioneer Fund project on dispute resolution technology solutions while expanding the profile of our national deprivation and legal services mapping tool.	Green	Green

## Priority four – We will be an authoritative and inclusive organisation, meeting the needs of the public, consumers, those we regulate and our staff

This means that we place our customers at the heart of all we do, working as an authoritative, inclusive and responsive organisation.

Activities	Previous RAG rating	Current RAG rating
We will commission a full review of the impact and effectiveness of our current communications approach.		
We will work to maximise the performance of our people, processes, technologies, data and information, and to enhance the customer experience.		
We will demonstrate we are a diverse and inclusive organisation by delivering our action plans to increase diversity in senior roles, maintaining our status as a Stonewall Top 100 Employer and exploring other relevant external schemes.		
We will work to be better at what we do through the on-going delivery of our Continuous Improvement programme and embedding of our Continuous Improvement culture, including: <b><i>further reducing the time taken to investigate complaints through our improved investigation and enforcement processes.</i></b>		
We will work to be better at what we do through the on-going delivery of our Continuous Improvement programme and embedding of our Continuous Improvement culture, including: <b><i>applying our continuous improvement methodology more widely across the organisation.</i></b>		