Business Plan and budget 2025-26

Consultation responses

October 2025

Consultation responses

We received seven formal responses to our consultation, Business Plan and budget 2025-26, from:

- Three solicitors
- One local law society
- The Law Society
- Legal Services Consumer Panel
- The Association of Consumer Support Organisations.

Respondents who agreed we could publish their response in full are as follows.

Anonymous response

Q1. Do you have any comments on our proposed work commitments for 2025-26 under our first strategic priority?

Aligning with government policy, solicitors regulated by the SRA should have to be resident in England or Wales. Allowing solicitors to practise overseas presents a very grave risk to the reputation, integrity and standards of our profession, which has made it the most respected, trusted legal system globally. This is especially the case when admission standards and supervision have been watered down. The SRA should begin work straightaway to ensure that only our residents can practise our legal services.

Q2. Do you have any comments on our proposed work commitments for 2025-26 under our second strategic priority?

See prior comments regarding risks of allowing overseas residents to practise

Q3. Do you have any comments on our proposed work commitments for 2025-26 under our third strategic priority?

See prior comments

Q4. Do you have any comments on our proposed work commitments for 2025-26 under our fourth strategic priority?

See prior comments

Q5. Do you have any comments about our budget for 2025-26?

See prior comments

Q6. Do you agree that the SRA's required proportion of the practising certificate fee is reasonable and appropriate?

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Q7. Do you agree with the compensation fund contribution for individuals for 2025-26?

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Q8. Do you have any comments on the equality impact assessments of our proposed fees for 2025-26, or EDI-related work commitments in our proposed draft Business Plan for 2025-26?

-

Q9. Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?

See prior comments regarding residency requirement for solicitors practising in England and Wales.

James Gordon

Q1. Do you have any comments on our proposed work commitments for 2025-26 under our first strategic priority?

You have lost the confidence of the profession.

Q2. Do you have any comments on our proposed work commitments for 2025-26 under our second strategic priority?

You have lost the confidence of the profession.

Q3. Do you have any comments on our proposed work commitments for 2025-26 under our third strategic priority?

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Q4. Do you have any comments on our proposed work commitments for 2025-26 under our fourth strategic priority?

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No

Q9. Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?

You have lost the confidence of the profession. You might start to re-build confidence if you assemble a panel of practising solicitors whom you would meet every month. Minutes of the meeting(s) should be published on your website.

Martin Varley

Q1. Do you have any comments on our proposed work commitments for 2025-26 under our first strategic priority?

1. Regrettably, the proposed work commitments are not numbered, so making the task of responding more difficult than it needs to be. It is often a criticism of the SRA that things are made far more complicated than they ought to be.

2. As to the first item, some detailed work needs to be done to assess the effectiveness of the various paths to qualification. The evaluation of the Solicitors Qualification Examination must be in the context of the absence of clarity over how many people are undertaking work experience to count towards qualification, for example. This is a case where the regulator ought to be an effective registrar. The implementation of the new training regimes is quite lamentable.

3. The work on the second item is noted. However, this is work that is not of high priority. The competence of the majority of qualified Solicitor practitioners is not a significant issue. What is an issue is the number of ABS firms that have scores of paralegals who are not adequately supervised.

4. The third item is noted. However, imposing additional transparency rules is not a high priority and will serve only to burden the profession.

5. The fourth item, to strengthen our economic crime prevention and detection efforts, responding to increased expectations for our work, managing higher caseloads, and reducing aged matters, is the key issue to be addressed. The failure of the regulator to deal with cases such as Axiom Ince properly shows that much of the regulator's resources are misapplied. This is principally the area where the profession is judged by the users of legal services.

6. The role of the SRA should be to regulate the profession so that theft and fraud are effectively eliminated to the fullest extent. In the case of Axiom Ince the take-over of firms that were or ought to have been in intensive supervision by an inexperienced and much smaller organisation ought to have been a cause for deep investigation from the outset. Systems and controls need to be put in place and operated by the SRA to avoid this kind of thing occurring.

7. The public needs to feel that the profession does not allow fraudsters and thieves to operate as Solicitors. All the other areas of work proposed may have their virtues, but the SRA should focus on its key function, which is to prevent a loss of confidence in the profession.

8. The client money consultation which is the window on the SRA's proposals to interfere with arrangements which work perfectly well are an example of where the regulator is misapplying resources. Whilst some work on encouragement of diversity is always welcome, it is something that all well-run practices adopt.

9. Items five and six are low priority.

10. Item seven is a high priority, notwithstanding that there are several elements mixed together. They are all important for the regulator. As to the first element, continue to improve both the quality and timeliness of our investigation, enforcement and authorisation work, it seems that there must be a complete shift in what powers the SRA has given to itself to fine practitioners.

11. Penalties ought to be imposed only by the SDT. Where there have been regulatory failings, the alternative to prosecution before the SDT ought to be undertakings to expend money on improving the systems and controls that have resulted in the regulatory breach by the firm or individual. Removing money from a firm and paying it to the Treasury will not improve the service in the defaulter, whereas additional resources, training and effective supervision will. This is what an effective regulator would do: ensure the efficiency of the service to the public rather than remove capital from the profession.

12. Certainly, constant vigilance concerning technological advances and threats is very important and we would expect the regulator to be working closely with all the other regulators to share information and threat mitigation procedures.

13. New business models have been the cause of so many disastrous failures since the Legal Services Act 2007 introduced alternative business structures. New business models bring with them significant and expensive challenges to the regulator.

14. Item eight, to respond as appropriate to any directions from the LSB is a statutory requirement.

15. Item nine, to deliver on the outcomes from our Client Money in Legal Services consultation and communicate actions and next steps, is a complete waste of resources, as mentioned above. The proposals do nothing at all to strengthen the protection of the public and will inevitably increase overheads. The only winners from the SRA's proposals are the owners of big tech, whose lobbying of the SRA should now be made transparent.

16. Items ten and eleven are noted as being light on detail in the Draft Business Plan and Budget 2025-26.

Q2. Do you have any comments on our proposed work commitments for 2025-26 under our second strategic priority?

17. This is inevitably linked with Item four of the first strategic priority. The resources of the regulator must be focused on obtaining intelligence and then taking proactive, risk-based action.

Q3. Do you have any comments on our proposed work commitments for 2025-26 under our third strategic priority?

18. The third strategic priority appears to be very worthy. However, it is expressed in such vague terms that the actions to be undertaken in consequence are entirely unclear in the Draft Business Plan and Budget 2025-26 and the consultation precis. For example: 18.1. does supporting with guidance mean that a firm that does not follow guidance will be fined? 18.2. build on our insights that are not articulated in the Consultation. Indeed, page 17 of the Draft Business Plan and Budget 2025-26 express the insights in a particularly vague way; 18.3. the objective of support only for the benefit of consumers and the wider public misses the point that the regulated firms and individuals should be supported.

19. The vagueness of the third strategic priority suggests a lack of clarity in the plan.

Q4. Do you have any comments on our proposed work commitments for 2025-26 under our fourth strategic priority?

20. The SRA corporate strategy 2023-2026 was written in a very different context to that of 2025. Many of the priorities expressed have been exposed as immaterial to the functioning of an effective regulator. Many are laudable, such as to achieve NetZero and deliver our internal Environmental, Social, and Governance commitments. However, the focus of all resources has to be on protecting the public by taking positive proactive action where there is appropriate intelligence.

21. The statement that the SRA will continue to contribute to sector-wide workstreams, collaborating and partnering with others so that our contribution has demonstrable benefit for the public interest is worthy of testing. The regulator has demonstrably not collaborated with others to protect the public in high-profile cases of the failure of firms that had no viable business plan. The response of the SRA that it was not capable of evaluating the ability of merged forms to survive does not answer. If there is an absence of talent then that has to be bought in at the expense of ditching many of the SRA's other activities.

Q5. Do you have any comments about our budget for 2025-26?

22. The draft budget is far too high level for anyone to make a detailed commentary on it. It is unclear where the line is crossed between Investigation and Client Protection. Is Investigation wholly after the fact reporting on circumstances notified to the SRA as complaints or arising from inspections? Or do they relate to proactive intelligence gathering, which would appear to be in the sphere of Client Protection?

23. The increase in expenditure of 32% in investigation and enforcement from Â£46,220,000 to Â£61,220,000 is noted. But this appears to be at the expense of pro-active Client Protection (an increase of 15% from Â£17,500,000 to Â£20,080,000). Surely, more of the resource needs to be spent on Client Protection?

24. The SRA has not learnt from experience that throwing lots of resource at firms and individuals who have broken the rules can be avoided by having greater support for firms. More carrot and less stick is much more cost-effective.

25. I would have thought that trimming other budgets would result in substantial savings which can then pass to Client Protection. However, we have not been provided with granular detail.

Q6. Do you agree that the SRA's required proportion of the practising certificate fee is reasonable and appropriate?

26. This is a loaded question. Without transparency of detailed accounts, it is impossible to say that the SRA is not trimming excessive expenditure on certain activities, is employing too many staff with the wrong capabilities, etc.

27. The cost of the practising certificate has risen from £145 in 2021-22 to £164 in this year. The SRA proposes an increase of £24. This is a whopping 31% increase over four years and 16% over last year's practising certificate fee. In addition, firms are expected to pay an additional 2%.

28. The increase in the practising certificate fee has to be seen in the context of the increase in the contribution of individuals to the compensation fund of £30 since 2021-22, a 75% increase. And this was occasioned by the regulator being 'asleep at the wheel' on numerous occasions.

29. There is insufficient information about what the SRA proposes to do to increase efficiency and reduce wasteful expenditure. What might be seen as vanity projects must be shelved and the SRA return to its core responsibilities even before the current CEO departs.

Q7. Do you agree with the compensation fund contribution for individuals for 2025-26?

30. As noted in response to Q6, the increase in the contribution of individuals to the compensation fund of £30 since 2021-22 is a 75% increase. There is a decrease from the £90 contribution of 2024-25, but high levels of contribution have been occasioned by notable failures of the SRA to obtain information and take precautionary measures.

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32. Whilst it is necessary to be mindful of the impact on certain sectors, none of the five themes looks at the impact of increased costs of compliance on small firms. The majority of firms owned and managed by Solicitors from ethnic communities who serve those communities are small. Therefore the increased costs of the Practising Certificate and corporate contributions will have a disproportionate impact on such firms.

33. Access to justice is not confined to EDI issues. The principal barrier to individuals of modest means of using the legal system is cost. The Courts have had incredibly complicated rules imposed on them which make litigation impossible for any but the wealthy. Legal Aid is not available in most cases. The impact of criminal Legal Aid rates remaining years behind market rates is that there are very few Solicitors entering practice in the criminal sphere. These issues are not addressed.

34. I take the view that the budget for work on non-essential issues should be reallocated (in part) to the core issues for which the regulator was established.

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Dorset Law Society

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The Law Society

Law Society response:

SRA Business Plan and budget 2025-26 consultation

June 2025

Introduction

1. The Law Society is the independent professional body for solicitors in England and Wales. We are run by and for our members. Our role is to be the voice of solicitors, to drive excellence in the profession and to safeguard the rule of law. On behalf of the profession, we influence the legislative and regulatory environment in the public interest. At home we promote the profession, and the vital role legal services play in our economy. Around the world we promote England and Wales as a global legal centre, open new markets for our members and defend human rights.

2. We welcome the SRA's consultation on its business plan 2025/26 and the opportunity to comment on its proposed work. As a general principle, we would continue to strongly encourage the SRA to prioritise its focus on core activities, with regard to the regulatory objectives, and only undertake additional workstreams based on evidence of regulatory need, or specific gaps in responding to consumer needs. The SRA needs to ensure it focuses on its core compliance role if it is to regain public confidence and the trust of the profession it regulates. Regulation should enable and encourage services to be provided to the public at reasonable and proportionate cost Underscored with an approach that works with the profession to strike the appropriate balance between what's necessary and appropriate on the one hand, while respecting the position and role of solicitors as trusted advisors in the eyes of the public.

3. The independent investigation into the collapse of Axiom Ince[1] and the Legal Services Board's recent performance assessment of frontline regulators[2], in March 2025, showed that the SRA faces multiple challenges. This included core regulatory activities such as shortcomings in the SRA's authorisation, supervision, and enforcement processes. The review revealed failures in how the SRA supervises high-risk firms and provides protection for client funds. As a result, the LSB's directions, issued in May 2025, require the SRA to make measurable changes to its governance and approaches to risk and supervision within the next 12 months. This will likely require significant attention and dedication of resources, which must be considered when approaching the business plan for the coming year. The expected report into the SRA's regulatory actions leading up to the collapse of SSB Group may also identify other areas for reform.

4. Additionally, the LSB criticised the SRA for failings around the Solicitors Qualifying Examination (SQE), including delays in publishing provider pass-rate data for the SQE assessments, despite committing to doing so. This has resulted in an information gap for those seeking to be solicitors, meaning they must make crucial decisions about training providers and routes without necessary information. The LSB has set out expectations for this information to be made available by autumn 2025 at the latest.

5. As such, we are pleased to see a focus on work on the Solicitors Qualifying Examination (SQE), including issues leading to differential outcomes and barriers to entry, and improvements to the continuing competence system. The

[1] https://legalservicesboard.org.uk/our-work/regulatory-performance/targeted-reviews

[2] https://legalservicesboard.org.uk/our-work/regulatory-performance/current-regulatory-performance-assessments

development of a programme of ethics work, which will need to respond to the LSB's ethics statement, due to be published in the coming months, is also of prime importance.

6. We welcome the SRA's acknowledgement throughout the draft business plan that collaboration, co-operation, and collective action is needed to address many of the issues identified. We would encourage the SRA to use its convening powers to bring together stakeholders as appropriate but also so that our efforts are appropriately co-ordinated to ensure the most effective use of resources and avoid any overlap of work. We also welcome the need for information, data, and research references in the draft business plan. This sits well with our expectation that the SRA take an evidence-based approach to policy development and implementation. It is also important that such evidence is shared with stakeholders in a timely way, especially when it underpins consultation proposals.

7. While some increase in the SRA's share of the practising certificate fee is to be expected and has been well explained in the draft business plan, the SRA have outlined a significant increase. We appreciate efforts to reprioritise work, and the cost savings involved, at a time when firms are already facing rising costs. However, we would urge the SRA to be completely transparent on how this money will be invested and the extent to which the proposed outcomes are achieved.

Consultation

Q1. Do you have any comments on our proposed work commitments for 2025-26 under our first strategic priority?

<u>SQE</u>

8. We welcome the continued prioritisation and focus on the SQE at this critical point where many solicitors are engaging with the SQE for the first time, as the previous pathways end. Addressing the issues increasingly being raised by aspiring solicitors and members of the profession is essential for building confidence in the SQE and its overall success. We are pleased to be able to work with the SRA alongside other stakeholders, on the work into differential outcomes, which is currently being developed and suggest that a similar collaborative approach be adopted in tackling broader improvements to the qualification.

9. The confidence of both students and employers relies on a good understanding of the SQE, through the provision of clear information and guidance, as well as prompt action being taken to address issues as they arise. We contributed to the year-three evaluation and will look to continue to engage as those recommendations are acted upon and with the planned phase four evaluation.

10. Whilst we have been disappointed by the continued lack of available data on the SQE assessments and the relation of pass marks to providers, we note the intention of the SRA to meet the LSB's expectation that this be published in autumn 2025. We will review the data when provided and consider how it can be used as a tool to aid decision making for those considering pathways into the profession as well as in determining whether the SRA meets the diversity and inclusion expectations set out by the Legal Services Board (LSB) in its decision on the SQE. We look forward to further engaging with the SRA on this area as it develops.

<u>Continuing Competence</u>

11. The maintenance of high professional standards is key to the reputation of the profession, and we support training that enables professionals to maintain their knowledge and skills in all the areas required to provide a high level of legal services. We remain mindful of the existing pressures on the profession, both regulatory and financial and welcome the SRA's continuation of a proportional approach to engaging with the requirements set out by the LSB's policy statement on ongoing competence.

12. We look forward to engaging with the SRA on its consultation on ways to strengthen these requirements and support good practice, based on evidence from the annual assessments of competence. We note that the proposals are a continuation of last year's intention to make better use of the data gathered to demonstrate the competence of the profession and to identify and address any gaps or risks.

<u>Consumer information</u>

13. We look forward to engaging in the five-year evaluation of the Transparency Rules. This will be a timely opportunity to evaluate the success of the rules so far. We consider it essential that the SRA works closely with key stakeholders when it considers new rules and guidance for the profession and clients so that a balanced and proportionate approach is taken.

<u>AML and economic crime</u>

14. We welcome the SRA's continued focus on anti-money laundering, emphasizing the importance of a risk-based and effective approach. Given the evolving legislative landscape and expanding regulatory requirements, the Law Society stresses the need for close working between the SRA and the profession to ensure that solicitors have the necessary support to fulfil their AML obligations effectively.

15. While the Law Society acknowledges the importance of addressing economic crime, it cautions against an "over-zealous" approach that could disproportionately impact small firms. The Law Society therefore advocates that the SRA's economic crime prevention and detection efforts should be focused on engagement, efficiency, and proportionality with a detailed assessment of the impact on smaller firms' resources.

<u>EDI</u>

16. We agree with the SRA's continued focus on this key area and continue to work collaboratively where appropriate to avoid duplication and maximise impact. The SRA's use of convening powers has been useful in bringing together stakeholders to agree a joined-up approach. We welcome the use of research to underpin the programmes of work and the action plans to address differential outcomes by ethnicity and overrepresentation in enforcement processes. This is vital so that tangible and meaningful actions can drive positive change on EDI, particularly to address persistent EDI issues within professional examinations and the SRA's enforcement activities.

17. We welcome the development of evaluation frameworks to track progress and measure the impact of the action plans. To build confidence it is important that the action plans are published, and progress shared with stakeholders to aid understanding of what works, so successful actions can be replicated and drive positive change on EDI.

18. As noted above, we continue to engage in the work on differential outcomes in professional qualifications to agree programmes of work to address the collective actions and next steps agreed. It is essential that any pertinent findings are

incorporated into the SQE assessments as they evolve, to combat the continuation of the differential outcomes by ethnicity seen so far.

Investigation, enforcement, and authorisation work

19. As outlined in the introduction, we encourage the SRA to focus on its core regulatory responsibilities. We note the challenges faced by the SRA including dealing with increasingly complex cases, a changing market, and rising number of complaints. Whilst increases in resources may assist with volume, we would like further detail on what training the SRA is providing to its existing staff to deal with cases more effectively and efficiently. Our members have also raised concerns about the quality of some investigations, and we would like to understand how the SRA is tackling this.

20. We would like to know more about the significant increase in the volume of complaints received about solicitors' misconduct. For instance, what may be the possible reasons for the increase and how is the SRA proposing to deal with it?

New and additional deliverables

21. The draft business plan sets out that shifting priorities and emerging areas of work have led to necessary and ongoing prioritisation and reprioritisation. This is a logical and welcome approach, but we would caution the need to also see stability from the SRA in the work undertaken, particularly where it relates to core regulatory responsibilities.

22. A more proactive regulatory approach, in line with the risks identified is important. We are pleased to see the use of the Risk and Data programme as a resource to underpin these actions.

23. The Law Society welcomes targeted support to raise ethical standards across the profession. However, we would caution against the SRA 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. It is important that the efforts of the regulators are joined up if they are to be effective.

24. While we would caution against any knee-jerk responses on ethics, solicitors have raised concerns about the way in which ethics is taught and assessed through the SQE, with an acknowledgement that this is critical for future conduct. The SRA's Statement of Solicitor Competence places ethics and professional conduct at the front of its requirements but more can be done to ensure that solicitors maintain their knowledge and skills in this area of competence.

25. Similarly, before committing to work in relation to the in-house community, we would recommend that the SRA looks at the in-house ethical framework that has just been released in Beta form by the Law Society. Taken in conjunction with the SRA's suite of guidance for in-house practitioners, these outputs represent a serious body of work that needs to be allowed time to settle in and take effect. The SRA could support this work and encourage the profession to adopt this, alongside any additional SRA guidance.

26. In relation to Strategic Lawsuits Against Public Participation (SLAPPs) and issues related to the Post Office Horizon Scandal, we recently made the point in our response to the LSB consultation on upholding professional ethics that there is a danger in placing too much emphasis on high profile but exceptional incidents which have led to much press and commentary on declining ethical standards within the law. While it is essential that lessons are learned from behaviours and actions

that caused serious harm to the public interest, there is a danger in over-extrapolation from highly unusual situations, which in turn can have the potential to lead to overregulation, contrary to the objectives of the Legal Services Act. To mitigate this risk, it is essential that the SRA continues to work closely with the profession to develop resources and initiatives that build awareness of ethical risks and the skills and culture that support strong, ethical practice.

Consumer protection. Deliver on the outcomes of the client money consultation

27. The Law Society responded to the SRA's client money in legal services consultation in February 2025. We are pleased to note that the SRA has taken on board what we said in relation to the apportionment of Compensation Fund contributions. We look forward to the SRA taking on board our other insights and implement some of the helpful suggestions in our response.

Directions from the LSB resulting from the Axiom-Ince investigation[3]

28. As noted above, the recommendations of the independent investigation into the collapse of Axiom Ince have shown that the SRA must address core regulatory activities such as authorisation, supervision, and enforcement processes. We note that the draft business plan outlines that the SRA will respond as appropriate to any directions from the LSB on this matter.

29. Although the content of the LSB's directions have been known to the SRA for some time, there is a question as to whether the business does enough to sufficiently recognise the scope of the work that the directions necessitate. The Directions set out requirements, at high level only, for the overhaul of the most important aspects of SRA regulation, including its authorisation, supervision, and enforcement functions. The immediate priority of the SRA should be to focus on each of the requirements of the LSB. It follows that SRA funds and resource should be redirected accordingly for the next 12 months.

30. We await the required action plan from the SRA in June 2025, showing the work that the SRA will be undertaking to comply with the directions issued. We urge the SRA to engage in good faith with necessary changes for the benefit of the profession and other stakeholders. It may be that the SRA's business plan proposals will need to be revisited to ensure that appropriate proposals are in place.

31. We will also be looking to engage with the soon to be published report into the SRA's regulatory actions leading up to the collapse of SSB Group, which may also identify further areas for reform.

https://legalservicesboard.org.uk/our-work/regulatory-performance/targeted-reviews

Q2. Do you have any comments on our proposed work commitments for 2025-26 under our second strategic priority?

32. We welcome the SRA's intention to carry on proactively identifying and managing risk, using a data-driven approach to support this work. We are pleased to see that our previous feedback has been taken on board and that these processes are being improved. It is hoped that the SRA's focus on this area will help to ensure that issues are identified and managed appropriately in a timely manner.

33. We strongly encourage the SRA to coordinate its research efforts with the Law Society where possible to maximise our joint investment, learning and ability to conduct primary research with members to maximise participation. The Law Society's analytics knowledge and expertise underpins our role as the authoritative

source on data for the profession – notably through our Annual Statistics Report publication. We continue to expand the sophistication of our analytics capability to inform the Law Society's decision making and member-centric operations with a data driven approach – and welcome knowledge sharing with the SRA's data experts for the benefit of both organisations.

Q3. Do you have any comments on our proposed work commitments for 2025-26 under our third strategic priority?

Developing understanding and safe testing

34. We understand the SRA's reprioritisation in this area, as part of the seeking of efficiencies outlined in the draft business plan, leading to a pause on the development of a safe testing environment to better understand potential demand and benefits. We are pleased to see the SRA retain work on supporting the profession. As technological change continues at a rapid pace, it is essential that the SRA, in consultation with other stakeholders, seeks to understand what additional support is needed and to review and update existing support and guidance. We look forward to continuing to input into this work as it progresses.

Supporting small firms to adopt appropriate technology solutions

35. We continue to encourage the SRA's collaboration with small firms to support them to adopt appropriate technology to enhance their ability to meet consumers' needs., This continues to be an issue for our members, as outlined in the draft business plan, with many seeking support in navigating the changing landscape and adopting new and appropriate technologies. The rapid pace of technological innovation and associated financial and resource costs add pressure to this issue.

36. We look forward to reviewing the findings of the research to better understand the needs of small firms in adopting technology and the resulting plan. Small firms remain concerned about meeting their regulatory obligations and professional standards whilst increasing their offering to consumers through use of technology. Sharing of case studies and examples of good practice will be a vital component of keeping firms informed of relevant developments and scope for adopting tech solutions in the delivery of their work.

37. It should be recognised that in common with SMEs in other sectors, a package of incentives and support with investment for the take-up of new technologies will be an essential enabler of adoption and change. We explored successful forms of funding and investment for lawtech development and adoption, using examples from different jurisdictions, as part of our Industrial Strategy response.[4] We therefore encourage the SRA to work in partnership with us in making the case to government for this investment.

Collaboration

38. We are pleased to see the SRA take on board the need for leading on collaboration in this work, with the aim of reducing any unnecessary duplication and providing clarity for the legal profession to support the adoption of technology. This includes our direct involvement with the Online Dispute Resolution project.

39. With input from relevant legal and technology stakeholders, the SRA should continue to build its regulatory capacity and capabilities in relation to technology and innovation. This should include establishing overarching principles and sharing best practice, particularly around but not limited to areas such as accessibility, requirements around AI disclosure, guidance on standard clauses in AI contracts

and their interplay with professional obligations, and considerations for the responsible and ethical adoption of AI tools.

40. With the publication of the government's AI Opportunities Action Plan earlier this year, and an update expected in summer 2025, the SRA should also aim to directly emphasise the important role the legal profession has in furthering AI innovation and adoption for the UK economy.

Q4. Do you have any comments on our proposed work commitments for 2025-26 under our fourth strategic priority?

41. We support the SRA's continued commitment to embedding a culture of continuous improvement and to working collaboratively with the Law Society and other stakeholders, on sector wide areas, including the action plans relating to barriers to diversity in the profession. The continuation of this work in the public interest in key areas important to the profession, such as client protection, EDI, technology, and access to justice, as well as necessary work on high-volume consumer claims, must continue to be evaluated to ensure it is benefitting the public interest.

42. We agree with the focus on the core regulatory issues that require attention and appreciate the need to deprioritise some areas as a result, including the pause on producing a policy statement on ESG, whilst continuing efforts to deliver internal ESG commitments. However, the Law Society continues to pursue this critical area of policy work, and we remain keen to re-engage the SRA to support solicitors and law firms on climate change as resource allows. We therefore hope to see the SRA maintain its commitment to produce a policy statement in its forthcoming three-year corporate strategy, as continuing to deprioritise this important area of work may create further issues for the profession the future. The term 'ESG' is extremely broad and already covers several areas in which the SRA has already adopted a regulatory position. We would welcome the SRA's attention to maintaining clarity of what it intends to cover under this umbrella and what has been paused.

Q5. Do you have any comments about our budget for 2025-26?

Q6. Do you agree that the SRA's required proportion of the practising certificate fee is reasonable and appropriate?

Q7. Do you agree with the compensation fund contribution for individuals for 2025-26?

43. As noted above, the increase in the SRA's share of the practising certificate fee is to be expected and has been well explained in the draft business plan. We note the reduction in the contributions to the Compensation Fund as a key factor in reducing what would otherwise be a significant increase. We also understand the prioritisation/ de-prioritisation exercise that has been undertaken to identify areas where work can be paused, and where it must be expanded, so that resources are spent effectively.

44. We urge the SRA to be transparent on expenditure and to evaluate the work undertaken to ensure that money is being well spent. A reduction in contributions to the Compensation Fund has offset the significant increase in other areas this year, but contributions to the Fund have fluctuated a great deal in the past few years and may rise again in the future. To maintain the additional resource needed to deal with a changing market and increase in complaints and the scale and complexity of investigation work, but keep fees at an incremental level of increase, it will be necessary to expend resources only where they are proven to be effective.

Q8. Do you have any comments on the equality impact assessments of our proposed fees for 2025-26, or EDI-related work commitments in our proposed draft Business Plan for 2025-26?

Q9. Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?

45. We will be continuing to engage and collaborate with the SRA in this area, and we are particularly pleased to see the SRA acknowledge that the impacts must be managed across all areas of its work. We also welcome the acknowledgement that the SRA cannot solve the problems that exist alone but should lead this work and convene relevant parties to agree actions and achieve the necessary solutions.

Sent by email only to businessplan@sra.org.uk

Solicitors Regulation Authority's Business Plan and Budget 2025-2026

The Legal Services Consumer Panel (Panel) welcomes the opportunity to respond to the SRA's draft Business Plan and Budget for 2025/26. Our feedback is grounded in our commitment to protecting consumer interests, ensuring access to justice and promoting trust in legal services. While we acknowledge the SRA's efforts to address rising risks in the sector, we highlight key areas requiring stronger consumer-focused action, supported by evidence from the consultation documents and our previous work.

We acknowledge the SRA's efforts to address rising risks, such as misconduct reports and firm failures, but urge greater emphasis on preventative consumer protection, transparency and access to justice. Below we offer our recommendations to strengthen the business plan, leveraging evidence and past Panel work.

Strengthening Consumer Protection to Address Rising Risks

The SRA highlights a 40% increase in misconduct investigations and complex cases like the Post Office Horizon scandal. However, the plan should explicitly link deliverables to consumer outcomes, such as:

- transparency in enforcement: Publish data on case resolutions and redress for harmed clients. Publish full data on enforcement actions and their impact on consumer redress;
- proactive risk mitigation: the SRA should expand its use of data analytics (e.g., monitoring high-volume claims markets) and collaborate with third-sector groups to identify vulnerabilities, as recommended in our 2024 response on client money protections. The SRA should also expand scrutiny of firms with high complaint volumes to prevent systemic harm;
- the Plan's focus on professional ethics aligns with our 2025 call for the LSB to uphold ethical duties. We urge the SRA to publish clear metrics on how ethics training reduces harm.

Transparency and Consumer Empowerment

The SRA's past work on price transparency (e.g. 68% of firms now publish pricing data) has improved consumer decision-making. However, the 2025/26 Plan lacks ambition in this area. We recommend:

- working with other regulators to make prices comparable, e.g. collaborate with the Council for Licensed Conveyancers on conveyancing prices;
- expanding price transparency into contentious areas of law;

- pro-active development and sharing of implementable service quality indicators
- enhance Legal Choices: The SRA should explore, with other regulators, expanding the platform to include real-time complaints data and firm risk ratings.

Practicing Fee and Compensation Fund: Balancing Affordability and Adequacy
While the £6 net rise of the Practicing Fee is modest, the Panel is concerned about the reduction in Compensation Fund contributions (individuals: £90→£70; firms: £2,220→£1,950). This reduction risks underfunding protections given the 18% rise in intervention costs. There is a persistent lack of transparency on the basis for these figures, despite the SRA's assurance of offsetting fee increases. We recommend:

- evidence-based funding: the SRA should demonstrate the fund's capacity to cover rising intervention costs (e.g. firm failures), which have increased by 18%;
- firm accountability: maintain robust contributions from firms, given the importance of their role in mitigating systemic risks.

Data and Risk Intelligence: Closing Gaps in Consumer Harm Detection

The Axiom Ince collapses underscore systemic risks. The SRA's focus on data-driven risk identification is therefore commendable, but gaps remain:

- early-warning systems: Share insights with consumers/consumer groups (e.g. alerts on firms with high complaint volumes);
- reintroduce mandatory summary accountant reports for all firms, not just those with qualified audits;
- address delays in investigations, as highlighted in our 2024 response to the SRA's Consumer Protection Review.

Equality, Diversity, and Inclusion (EDI): Embedding Consumer Needs
While the SRA mentions EDI assessments, we urge:

- targeted support: Address disparities in access to justice (e.g. affordability and communication barriers not limited to marginalised groups). Explore incentivised education/training in areas with a paucity of providers or known advice deserts).
- consumer feedback loops: Integrate lived experiences into policy design (e.g. via surveys or focus groups).

We hope you find this feedback helpful. Please contact Lola Bello, Head Consumer Panel, if you have any questions pertaining to this consultation lola.bello@legalservicesconsumerpanel.org.uk.

Yours sincerely,

Tom Hayhoe

Chair, Legal Services Consumer Panel

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19 June 2025

Dear Sir/Madam,

The Association of Consumer Support Organisations (ACSO) welcomes the opportunity to respond to the Solicitors Regulation Authority (SRA) open consultation on its Business Plan and Budget 2025-26.[1] This letter constitutes our response.

ACSO represents the interest of consumers in the UK's civil justice systems and the reputable, diverse range of organisations who are united in providing the highest standards of service in support of those consumers. Individuals and organisations who are regulated by the SRA generally have a significant impact on consumers within the UK. In addition, as the consultation involves a change in fee structure to such individuals and organisations, it is imperative such changes remain proportionate and are effectively regulated. Therefore, this consultation is important to our work.

While we will not address every question within the consultation because some of it falls outside of ours and our members' interests and expertise, the below comments approximately follow the order of questions in the consultation.

1. **Do you have any comments on our proposed work commitments for 2025-26 under our first strategic priority?**

   In relation to *priority one,* ACSO welcomes any improvements to maintaining the delivery of high professional standards and understands that doing so leads to continued confidence and trust in the profession as a whole.

   While ACSO has commented on the SRA's commitments in relation to the Solicitors Qualifying Examination previously and notes that although this area does not generally affect consumers, ACSO welcomes any improvement in the routes to qualification and to ensure that access to the profession is not hindered by inappropriate assessment. Furthermore, ACSO continues to support the SRA actioning annual assessments of competence as this will ensure legal professionals are adequately trained and qualified to perform the services that consumers will receive. Assessing competency will maintain that a high standard of service is received by consumers.

ACSO welcomes the publication of the SRA's five-year Transparency Rules which will in turn uphold the rule of law and continuing trust and confidence for consumers.

[1] Business Plan and Budget 2025-26 consultation

In relation to economic crime prevention, ACSO supports any action which adequately deals with such issues and strengthening the framework of any efforts already in place. This will have a positive impact on consumers who will be adequately protected from economic crime and therefore maintain their trust and confidence.

ACSO welcomes the SRA progression in relation to the equality, diversity and inclusion considerations and how they address barriers into the profession. Removing such barriers should enhance a diverse representation of all groups of people and by doing so improve public trust in the profession.

By continuing to improve the quality and timeliness of the SRA's own investigations, including through use of technology and AI, more efficient and responsive action can tackle emerging risks. Identifying such risks early allows for swift action to safeguard consumers and ensure that issues are resolved efficiently and to a high standard.

ACSO supports the SRA's commitment to progressing its work programme on high-volume consumer claims, although ACSO would like more information in relation to the programme proposed, it acknowledges that consumers are at the heart of professional services.

ACSO also supports the SRA's commitment to developing a programme of professional ethics and a framework that can be used when conduct may go awry. This ensures that consumers should always receive high-quality legal services but in times when they may not, the individuals and/or organisations responsible can be held accountable.

2. Do you have any comments on our proposed work commitments for 2025-26 under our second strategic priority?

In relation to *priority two,* ACSO welcomes decisions focussing on areas which pose the greatest risk to consumers. Using a risk-based approach rather than a universal one allows consumers, the profession and the public to be at the forefront of regulators' minds and for risks to be identified effectively.

However, as mentioned in previous budget consultations, ACSO maintains that it is imperative that regulators are one step ahead of regulatory changes so they can adapt quickly to ensure the protection of consumers, the profession and the public. Therefore, ACSO would welcome any suggestion to ensure that risks are carefully calibrated, monitored and scrutinised where necessary as it remains crucial that such decisions are reviewed to ensure risks to consumers are kept at a minimum.

Furthermore, ACSO is supportive of regulators enhancing data quality and data governance frameworks through data insights and intelligence. ACSO supports the SRA commitment of using such action to inform decisions, provided that such decisions are based on current, reliable and representative data/intelligence to ensure that risks can be identified and resolved efficiently. Data governance can also enable a collection of systematic consumer feedback and complaints which can then lead to actionable insights. If this is what the SRA is proposing in relation to obtaining consumer data then this would enhance the quality of professional services.

In addition, insights which are based on high-quality data based on valid, credible and real-life evidence in turn leads to more reliable and trustworthy decisions, promoting public trust and confidence in professional services.

3. **Do you have any comments on our proposed work commitments for 2025-26 under our third strategic priority?**

   In relation to *priority three,* ACSO supports any contribution from other regulatory bodies in relation to improving professional services as a whole, provided that technology and innovation are used responsibly.

   ACSO has commented previously on the regulatory approach to technology, and continues to support the development of innovation and technology, including through AI. However, transparency and accountability should also be prioritised to protect the consumer interest and maintain trust. ACSO also supports the SRA's commitment to supporting small firms in adopting the use of technology and innovation.

   Furthermore, the SRA's commitment to build on insights to define what further support may be required will also enable high-quality legal advice to reach a wider community and challenge practices which may be outdated and not aligned with contemporary consumer interests.

4. **Do you have any comments on our proposed work commitments for 2025-26 under our fourth strategic priority?**

   In relation to *priority four,* ACSO has commented on the need to focus on vulnerable customers in the past and is pleased to see the SRA's commitments to making improvements to customer journeys, including client protection. However, ACSO would like to see further promotion of the needs of vulnerable consumers and how legal services can be more accessible for all.

5. **Do you have any comments about our budget for 2025-26?**
   Given the inflationary environment of recent years, ACSO understands that some costs have increased substantially, as have workloads in the ever-evolving legal sector. However, the SRA must ensure that where it asks for more resources, which will always ultimately be borne by the consumer, that it can show it is doing more, not just costing more. Therefore, ACSO would like to ensure that any increases (and any future increases) continue to be monitored and remain proportionate to need.

6. **Do you agree that the SRA's required proportion of the practising certificate fee is reasonable and appropriate?**

   As above, provided that the increase remains proportionate and necessary to SRA operations, ACSO takes no issue with the increased costs of the practising certificate. ACSO understands the increase is intended to help improve confidence and trust in legal services. However, such an increase in costs must be matched with an increase in action from the SRA to benefit legal services as a whole, with the impact on consumers are at the forefront of its thinking.

7. **Do you agree with the compensation fund contribution for individuals for 2025-26?** ACSO favours costs being kept to a minimum as they are ultimately borne by the consumer and as such ACSO acknowledges that in relation to the compensation fund, the SRA is proposing a decrease to offset the increases to the practice certificate fee. Therefore, ACSO welcomes the decrease to ensure that the change in fees are kept to a minimum.

8. **Do you have any comments on the equality impact assessments of our proposed fees for 2025-26, or EDI-related work commitments in our proposed draft Business Plan for 2025-26?**

   In relation to *theme one*, ACSO supports any adjustments which make access to qualification for different groups of people possible and how efficient monitoring of the SQE has had a positive outcome on those who may previously have struggled to access the profession.

   In relation to *theme two*, ACSO supports any suggestions which promote a fair and respectful working environment to ensure that people feel safe and included. ACSO would welcome any comment from the SRA whereby individuals can be encouraged to speak out when challenging any decisions which are not in line with the ethos of a fair and ethical workplace.

   In relation to *theme three*, ACSO supports diversity data and welcomes any improvements required to reduce the barriers that come with diversity.

   In relation to *theme four,* ACSO looks forward to hearing about how technology and innovation will improve access to justice. As discussed earlier in this response, we promote the use of innovation and technology in smaller firms for example to reach the wider community and therefore enable access to legal services for all groups of consumers.

   In relation to *theme five*, ACSO is particularly interested in how consumers view organisations that promote EDI and welcomes the SRA's independent audit and 'Voice of Customer' work to promote customers being at the pinnacle of professional services. ACSO supports and welcomes any additional comment in relation to progression on this theme.

9. **Do you have any information that will help us further build our understanding in relation to impacts on different groups of solicitors?**

   ACSO supports any recommendations which do not impede access to the legal services profession and justice and which consider the needs of different groups of people. However, we would ask that the SRA monitors potential barriers to access to the profession and would welcome additional comment on emerging challenges and how it intends to address them.

In conclusion, while ACSO does not take issue with the costs increases detailed in the consultation, this support is dependent on evidence of improved consumer outcomes. We would expect to see such evidence in future business plans.

We hope this submission assists you to finalise your proposals, but if you require any further detail on any of the points raised, or require any further information, please do not hesitate to contact us.

Yours faithfully,

Matthew J Maxwell Scott

Executive Director

The Association of Consumer Support Organisations

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