

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 website¹

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

Progress against commitments in our annual planned work programme

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

Annex 1 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	9	-	1	-
Priority 2	4	-	1	-
Priority 3	2	-	-	1
Priority 4	5	-	-	2

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' commitments are 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.

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

- **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. Before we launch a campaign to encourage greater disclosure of diversity data by regulated individuals, we are working to improve the IT behind the diversity questions on mySRA. This will provide a better user experience and allow people to provide their own descriptions for all questions where there is an option to select 'other'.

Four commitments that were previously reported as 'red or amber' have moved to 'green' and these are:

- Priority 1: we will consult on improvements and potential additions to our transparency requirements to make them more focused and better able to facilitate choice and comparison, alongside mechanisms to underpin long-term engagement with legal services comparison sites
- Priority 2: 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.
- Priority 2: 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.
- Priority 3: We will work with small law firms and technology providers to produce a map of the specific areas where more resources and support are most needed and deliver pilots focused on particular technologies and themes.

There are three commitments that were deferred and one that was partially 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 2 (amended) – We will establish a framework to evaluate our progress around EDI.
- 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 are focusing this year on scoping the review and we intend to then conduct it next year]
- 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.

We have noted our key achievements in the year to date to July 2024 in the table below.

Achievements in this period

	Priority 1	Priority 2	Priority 3	Priority 4
Achievements	<ul style="list-style-type: none"> We enabled the entirety of the SQE to now be taken in Welsh. We published a well-received report on the differential outcomes for candidates from Black, Asian and minority ethnic backgrounds in professional assessments. We successfully met or exceeded measures in the investigation and enforcement action plan. 	<ul style="list-style-type: none"> We attended the FCA data conference and the first Data Strategy workshops with staff have produced the draft vision and principle statements. We have constituted a new Risk Intelligence Group (RIG) and supporting working group to draw together our proactive views on risk. We have completed the first full round of sanctions inspections and commenced a data collection exercise, (Aug to Sept 2024) with all firms, requesting data on AML, sanctions and suspicious activity reports. We increased desk-based AML reviews of firms by 350% and AML site inspections by 34%. 	<ul style="list-style-type: none"> We organised workshops with over one hundred participants to understand what the barriers and solutions are to increasing online dispute resolution (ODR) use. We commissioned Bangor university to develop a GenAI tool to identify legal needs and direct users towards appropriate ODR tools. 	<ul style="list-style-type: none"> We are focussing on a more holistic approach where our AML communications deliver co-ordinated and sustained impacts across broader themes and issues. We met or exceeded all established four timeliness targets for Investigations and Enforcement work in a sustained way, since February 2024, for the first time. We undertook continuous improvement (CI) reviews for HR and Finance processes. We received a gold award for the third successive year from Stonewall's top 100 Index. We completed the first wave of CI white belt training for 15 members of staff.
Impacts and Outcomes	<ul style="list-style-type: none"> Delivers on an element of EDI in the profession, and helps with positioning our focus on Wales regulation we are able to have positive conversations with a range of stakeholders following reporting on EDI leading to a summit to 	<ul style="list-style-type: none"> Opportunities to enhance information sharing with the FCA have been identified and are being pursued. Risk Intelligence Group will ensure a strong governance approach to proactive risk identification, 	<ul style="list-style-type: none"> Our Online Dispute Resolution (ODR) project will help identify how ODR providers can meet the needs of vulnerable users, and identify what 'good' looks like . 	<ul style="list-style-type: none"> We are developing a range of new measures, informed in part by insight from our stakeholder perceptions research, which we will be publishing later this year. We had a 6% AML engagement rate on AML campaign, three times the previous rate.

	Priority 1	Priority 2	Priority 3	Priority 4
	<p>develop an action plan to improve issues.</p> <ul style="list-style-type: none"> Increased public protection and service delivery to the profession. More older cases referred to the SDT in comparison to prior years means reduction in sense of justice delayed. 	<p>bringing together leaders from across the relevant areas of the SRA to discuss analysis of relevant data and intelligence.</p> <ul style="list-style-type: none"> Our AML team's increased number of completed inspections and of desk-based reviews, take us closer to the objective of all firms in scope of AML rules being visited within an appropriate timescale. 		<ul style="list-style-type: none"> We reduced investigation cases over 24 months old by c63%, over 18 months old by c40% and over 12 months old by c21%, which should mean more satisfied (or fewer dissatisfied) individuals subject to investigation, and complainants as well as swifter action to protect the public. Improved payment speed for suppliers, leading to improved relationships, and prompter response times for staff, leading to a more content workforce. We are confident we can in future without external support take forward our work to promote a diverse and inclusive organisation. We have increased the knowledge and expertise of staff in continuous improvement and how we deliver change.

Annex 3a

Priority one – We will deliver high professional standards		
This means setting, upholding and promoting high professional standards for those we regulate, in a way that is fair, proportionate and robust.		
Commitments	Previous RAG rating	Current RAG rating
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.	Green	Green
We will finalise our work to deliver the entirety of the SQE in the Welsh language	Green	Green
We will make data about candidate performance available to help aspiring solicitors make informed choices about how they prepare for the assessment.	Yellow	Red
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.	Green	Green
We will consult on improvements and potential additions to our transparency requirements, informed by evidence of their impacts, to make them more focused and better able to facilitate choice and comparison, alongside mechanisms to underpin long-term engagement with legal services comparison sites.	Yellow	Green
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.	Green	Green
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.	Green	Green
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.	Green	Green
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.	Green	Green
We will monitor the impacts of the improvements made to date, deliver training to fully realise benefits and deliver further opportunities to improve the way we work.	Green	Green

Priority two – We will strengthen our risk based and proactive regulation		
This means delivering and supporting better regulation through proactive and risk-based activity using robust evidence based on our data, insights and intelligence.		
Activities	Previous RAG rating	Current RAG rating
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.	Yellow	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	Red
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.	Yellow	Green

Priority three – We will support innovation and technology		
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.		
Activities	Previous RAG rating	Current RAG rating
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.	Red	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: <i>further reducing the time taken to investigate complaints through our improved investigation and enforcement processes.</i>		
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: <i>applying our continuous improvement methodology more widely across the organisation.</i>		