

SRA Business Plan 2020-21 Quarter One Update

Our Strategic Objectives

Strategic Objectives 1 - We will set and maintain high professional standards for solicitors and law firms as the public would expect and make sure we provide an equally high level of operational service.

Strategic Objective 2 - We will actively support the adoption of legal technology, and other innovation, that helps to meet the needs of the public, business community, regulated entities and the economy.

Strategic Objective 3 - We will continually build our understanding of emerging opportunities and challenges for the users of legal services, the legal sector and our role in effectively regulating it.

Our business plan for 2020/21 is available on our website [here](#) ¹

Annex 1 shows the activities within each objective.

Progress² against activities in our annual planned work programme

This is the first quarter reporting against the activities in our 2020-21 business plan, the first year of the 2020-23 Corporate Strategy. As such there is no reconciliation to the previous quarter's report this time. The table below shows that in quarter one there is one activity that has been reported as Red, which is explained in detail in the following section. There are a couple of activities that have not yet started which are marked in Black, as they are scheduled to begin later in the year.

¹ <https://www.sra.org.uk/sra/corporate-strategy/business-plan/business-plan-2020-2021/>

	Objective 1	Objective 2	Objective 3
1	●	●	●
2	●	●	●
3	●	●	●
4	●	●	●
5	●	●	●
6	●	●	●
7	●	●	●
8	●	●	●
9	●	●	●
10	●	●	●
11	●	●	●
12	●	●	
13	●		
14	●		
15	●		
16	●		
17	●		
18	●		
19	●		
20	●		
21	●		
22	●		
23	●		
24	●		
25	●		

² Relates to objective status based on progress to date: Red (R) – progress behind expectation and will not succeed without direct action; Amber (A) – generally in line although challenge to maintain progress and deliver overall objective; Green (G) – in line with expectation and overall delivery is expected; Black (B) – in line with planned delivery schedule work not yet started.

Exceptions: Updates on Amber and Red activities

Activity 2.7

We will look at how the planned second round of the Regulators’ Pioneer Fund, which will provide £10m of funding subject to the outcome of the Government Spending Review, can contribute further to increasing access to justice.

Rationale for rating

HM Treasury has delayed the second Pioneer Fund due to the Spending Review and the funding may be downsized significantly.

Update and corrective action

Due to the suspension, we continue to wait to see if money is released. If not, we would not be able to find an alternative way to fund our original plans. We are looking at alternative sources of funding and working with others, such as the Department for Business, Energy and Industrial Strategy, and participate in all regulator forums.

We are proactively developing our stakeholder engagement to focus on our immediate priorities including with Business Schools and regional agencies.

We are also looking at other ways to develop some of the proposals we might have presented as part of our Regulators Pioneer Fund 2 proposal as well as collaborating with others to explore immediate tech-related issues. This includes our Lawtech UK work, including collaborative work to look at ways to assist solicitors choose Digital ID tools that would be accepted by HM Land Registry and across the conveyancing process as well as scoping a collaborative pilot with Swansea University Innovation Hub.

Achievements in the last period

	Objective 1	Objective 2	Objective 3
Achievements	<ol style="list-style-type: none"> 1. We have a final version of the Welsh SQE requirements and an agreed set of key documents for translation. 2. We have introduced new standards for candidates taking the Higher Rights of Audience, which the training providers are using to assess their candidates, from 1 Feb 2021. 3. Pandemic-related articles on the Legal Choices website were viewed 1.2 million times from February to December 2020, with users spending on average more than 3 minutes, reading each article. Legal Choices exceeded its three-year target of 2-3 million visits, recording 3.1 million visits between November 2017 and October 2020. 4. On 31 December 2020, we formally served notice on our datacentre and commenced the process of decommissioning and exit, closing the centre by the end of January 2021 as originally planned, with minimum business disruption. 5. We achieved Cyber Essentials Plus Certification 6. The retention 2020 project concluded. 7. We delivered RegOps 2 Case Management System on time and to budget. 8. PCRE remediation planned and progressed. 9. SQE ICT Phase 1 commissioned and delivery on track. Tender progressed for Phases 2 & 3. 10. We published the findings of our diversity monitoring work in the 2018/19 annual Upholding Professional Standards report, 	<ol style="list-style-type: none"> 1. Our horizon scanning work has tracked Covid-19 impacts on access and the wider market, building on existing Covid-19 analyses. 2. We have built on the discussion in our Innovation and Technology Compliance Conference session to bring together a reg tech provider and law firms for a pilot into how tech can best help firm compliance. 3. We have drawn on expert input to analyse cyberdefence, including engaging with National Cyber Security Centre, the Cross-Sector Security Coordination Forum, and cyberdefence specialists, in particular working directly with NCSC in drafting the relevant chapter in the Risk Outlook and holding a workshop with cyberdefence company Mitigo (who are strategic partners for Law Society of Scotland and others). 	<ol style="list-style-type: none"> 1. The Risk Outlook includes a Market Landscape analysis of the wider factors driving the risk faced by firms, broken down into economic, regulatory/legal, consumer and market/firm drivers. It was published in November 2020, as planned. We are scoping out how we can develop the Risk Outlook into a more agile and thought-leading publication that best supports our work and the profession. 2. We are leading quality indicator pilots, we are taking an evidenced based approach, using our own research to develop solutions which we will then test. We will continue to collect data and reach out directly to consumers as we seek to learn and adapt during the project. 3. We have convened a session with the Home Office, with Ministry of Justice officials in attendance, to get their view of new immigration processes post Brexit to build understanding of the role of legal advice and any regulatory issues.

	Objective 1	Objective 2	Objective 3
	with a supporting report containing the detailed analysis and a report highlighting the work we have done since we published Professor John's Independent Comparative Case Review about the overrepresentation of Black and Asian solicitors in our enforcement processes.		
Impacts and Outcomes	<ol style="list-style-type: none"> 1. Candidates will be able to choose to attempt SQE through the medium of Welsh. 2. We will set high professional standards for solicitors undertaking advocacy, and support solicitors to maintain the standards 3. The Legal Choices website made a major contribution to public legal education and access to legal services during a difficult time, providing critical information about consumer rights and employment rights to hundreds of thousands of users in the context of the pandemic. 4. The process of decommissioning and exiting will deliver significant financial savings, as well as reducing our legacy technology risks. 5. Improved security controls and assurance to stakeholders. 6. Compliant with GDPR requirements. 7. Our new modern casework system replaces our old systems and integrates with RegOps1 (our new authorisation system), bringing our information together in one place and making it easier for our staff to do their jobs. It also completed the move away from our old legacy software and databases. 8. Remediation activities executing to agreed planning (Feb '21). 9. SQE Phase 1 development completed during Jan '21, as planned. Phase 2 & 3 	<ol style="list-style-type: none"> 1. Our horizon scanning and risk outlook work is seeing us provide analysis and an authoritative voice on the impacts on the Covid-19 impacts on regulation and the market. 2. Exploring opportunities to work with others will support the development of a network of relevant contacts and relationships and allow us to share lessons from their experiences. 3. Feedback from firms on our work exploring cyber -attack prevention methods has been positive and said our input has helped to clarify how firms are targeted for email modification fraud, has confirmed the threat of ransomware to client data, and has enabled us to analyse the threat and share the latest security advice through the Risk Outlook and Compliance Conference. 	<ol style="list-style-type: none"> 1. The Market Landscape analysis included in the Risk Outlook provides the framework for a truly embedded organisation-wide horizon scanning process, in line with Objective Three. This will help to make sure that we can anticipate opportunities and challenges, develop our understanding, and respond effectively and in a timely fashion. 2. Quality Indicator pilots in Conveyancing and Employment Law as agreed with the Board are underway. Notable partners such as TrustPilot engaged. 3. Our horizon scanning has brought to light unexpected issues for access, such as temporary demand surges from governmental policy of housing asylum seekers together.

	Objective 1	Objective 2	Objective 3
	<p>architecture and Discovery planning approved by SRA Futures (portfolio forum).</p> <p>10. Our publication of the findings from our diversity monitoring work, attracted extensive coverage and debate across the legal media, with the Law Society Gazette also publishing an opinion piece authored by our Chair, The Legal Services Board issued a statement welcoming “the openness and leadership shown by the SRA in publishing equality, diversity and inclusion data, while several BAME representative groups recognised our commitment to tackling these issues and agreed to work with us as we moved forward looking at related issues.</p>		

Ref	Objective
Objective one – We will set and maintain high professional standards for solicitors and law firms as the public would expect and make sure we provide an equally high level of operational service.	
Solicitors Qualifying Examination and solicitor competence	
1.1	We will continue to work with key stakeholders, the profession, academics and education and training providers to develop the Solicitors Qualifying Examination SQE ahead of its introduction in autumn 2021.
1.2	We will work with our assessment provider to make sure we can introduce the SQE in Welsh in an incremental way, helping to meet the needs of the profession and the public in Wales.
1.3	We will also undertake a strategic review of our approach to regulating solicitors' continuing competence which is likely to be a programme of work that continues over several years.
1.4	We will build on our work supporting the profession to attain high standards in advocacy and supporting solicitors working in the youth justice system and the young people involved.
1.5	We will continue to authorise providers of the Police Station Representatives Accreditation Scheme qualification and we want to enhance our quality assurance of this qualification by reviewing current arrangements this year-
Anti-Money Laundering	
1.6	We will continue working with the profession and others, such as the Law Society and we are committed to meeting our obligations in legislation to preventing money laundering that involves the solicitors and firms we regulate.
1.7	We will expand our Anti Money Laundering (AML) visits to visit all high-risk firms on a three-year rolling basis, along with visiting a sample of lower risk firms. Every month we will call in and analyse a sample of firms' AML policies, procedures and controls, or their risk assessments, and we are planning to undertake a thematic review into tax advice. We will publish what we learn from the reviews, as well as other guidance as needed to help firms get it right, including our work to support the implementation of the Sixth Money Laundering Directive.
1.8	As part of making sure we meet high standards ourselves, and those required by Office of Professional Body Anti-Money Laundering Supervisors (OPBAS), we will start to review the methodology we use to risk rate firms and target our AML oversight, so that we can make changes in future.
1.9	We will report transparently on our AML work, directly to OPBAS and HMT, and through our Board, making sure we are fully accountable to the public and the profession.
Our regulatory model, Standards and Regulations and Transparency Rules	
1.10	We will work with the Competition and Markets Authority (CMA) to provide evidence for their review of the effectiveness of the pricing and transparency requirements we set for firms, and of the clickable logo we brought in to help the public understand the consumer protections regulated firms provide.
1.11	We will continue our rolling programme of firm website reviews and enforcement and we will increase the resourcing of this work.
1.12	We will continue to work with the other regulators to develop the joint consumer website, Legal Choices. We will report on progress against our target of two to three million visitors at the start of this business year and work with the legal regulators to set out the plan for the 2020–2023 period.

1.13	We will start our evaluation of our new Standards and Regulations, which we introduced in November 2019. As part of our commitment to mainstreaming equality diversity and inclusion (EDI) throughout all our work, our evaluation approach will include an assessment of the EDI implications for both the public and the profession.
1.14	We will improve the monitoring of our investigation and disciplinary work by establishing an in-house 'arms-length' quality assurance team for all our disciplinary work
1.15	Subject to LSB approval we will implement the changes to the Compensation Fund following public consultation.
Equality, diversity and inclusion	
1.16	We will continue the collection and sharing of diversity data on protected characteristics and socio-economic status so that all those with an interest, including government, the judiciary, charities and the Law Society can see how the profession is developing.
1.17	Utilising the improvements that our new IT systems have brought, we will work to increase and the diversity data capture rates on mySRA offering an enhanced picture of the profession.
1.18	Building on our 2019/20 we will work to analyse and report on the profile of solicitors in our disciplinary processes, we plan to look at how best to understand the factors that bring the profession into our processes. We will publish any research so that interest groups and the profession can join with us and others to address any underlying factors.
UK-EU exit	
1.19	We will continue to monitor how the March 2020 UK exit from the EU will change the way solicitors and law firms work. In order to do that, we will work closely with the government and other agencies, including EU and international regulators, to ensure a smooth transition to any new arrangements.
Developing our work in Wales	
1.20	We will establish an increased presence in Wales.
Continuous improvement	
1.21	We are committed to working as efficiently and effectively as possible while providing good customer service. In order to do that, we are reviewing key areas of our supporting resources, for example, our premises strategy.
1.22	We will scope out a programme of work to undertake a full review of the fees we charge solicitors and law firms and develop an updated approach to our regulatory fees model for introduction in subsequent years.
1.23	We will continue our Modernising IT programme of work which will include a new case management system, updated support for our disciplinary processes and building on the IT that we need for the introduction of the SQE.
1.24	We will build on our 2019/20 work with the Institute of Customer Service to develop an organisation-wide approach to understand what our service users think and to improve customer experience across everything we do.
1.25	We will commission independent surveys of a cross-section of our stakeholders, including the profession, the public and opinion formers, as well as asking the organisations with which we work most closely for their views

Objective two - We will actively support the adoption of legal technology, and other innovation, that helps to meet the needs of the public, business community, regulated entities and the economy.	
2.1	We will continue to look at the how technology can transform the way the profession works and how legal services are delivered, contributing to the regulatory objectives to increase access to justice, to promote competition in the provision of services and to promote the consumer interest.
2.2	We will look closely at how Covid-19 has and will affect access to justice. We, like others, also need to consider how best innovation and technology can help people, recognising that digital access and skills vary
2.3	We will take forward research that looks at how best technology can help those with limited or no access to digital services, and work to facilitate more publicly available data law firms and the justice system, which is often cited as one of the key barriers to the development of legal technology.
Increase our understanding of the use of technology in the legal sector	
2.4	We are committed to supporting fair, accessible and inclusive legal technology that has the potential to increase access to justice. In order to add value, we will undertake research to segment the market, with a focus on where and at what level the adoption of new technology is taking place.
2.5	We will look at what benefits and risks there might be for consumers, including the vulnerable (both long term and situational), those in digital poverty and small businesses, from new technology. This will also consider the impact on legal service provision that innovation and technology has had to date and the changes already brought about by the global Covid-19 pandemic.
2.6	We will work with existing UK and international networks – including the Better Regulation Executive’s Regulator Forum, Innovation Network, Tech Nation and Innovate UK and the legacy of the Legal Access Challenge (LAC) network – and build new ones as needed. Part of that will be exploring and scoping the need for a specialist innovation and technology panel. We will also explore opportunities to join up with business schools, charities and others to develop collaborative innovation-based projects, and we will look at international developments in this area
Develop specific initiatives to promote and develop the use of legal technology and innovation	
2.7	We will look at how the planned second round of the Regulators’ Pioneer Fund, which will provide £10m of funding subject to the outcome of the Government Spending Review, can contribute further to increasing access to justice.
2.8	We will review how the SRA Innovation Space is working and use information from our first-year evaluation of the new Standards and Regulations to look at how best to develop its focus and operation.
2.9	We will explore the opportunities to work in partnership with others, including law firms that have already adopted technology effectively, to ensure that the profession can put their ideas into practice.
2.10	We will also work to increase our guidance and support materials for the both the profession and the public. Building public trust in lawtech solutions is an important component of increasing access to justice.
2.11	We will explore cyber -attack prevention methods and how other industries/regulators/jurisdictions have responded, as well as working with key stakeholders to undertake a review of how losses linked to cyberattacks and fraud can be better prevented using technology and innovation.
2.12	We also recognise that technology and innovation crosses national boundaries and impacts on people from every community. We will build this into our engagement on the EU exit and work with international authorities, including through the International Conference of Legal Regulators, whose website ICLR.net we run.

Objective three - We will continually build our understanding of emerging opportunities and challenges for the users of legal services, the legal sector and our role in effectively regulating it.	
3.1	We will build on our current sector risk analysis, publish through our Risk Outlook, and work across boundaries to support consumer protection and to speak up in line with the regulatory objectives where it is necessary to do so.
Improving our understanding	
3.2	We will also work with others to develop our understanding of the legal services market from a longitudinal and economic perspective, so that we improve our understanding of consumer concerns and requirements.
3.3	We will commission research, including reaching out directly to consumers to listen to their needs, and monitoring the findings of research undertaken by others. We will share our data and publish authoritative reports on key issues.
3.4	We will analyse the impact of the Covid-19 pandemic on the structure of the legal market over several years and any implications for how services are accessed by consumers.
Speaking up	
3.5	We will work to address relevant public protection and public policy issues, using clear criteria, including consumer protection, to assess where we can add value.
Public legal education	
3.6	We plan to develop a strategy for 2020–2023 to help us to identify opportunities to work with others to increase our provision of public legal education building on our work to date.
Immigration and asylum services	
3.8	We will continue to look into issues around the accessibility and quality of immigration and asylum legal advice.
3.9	We will carry out a thematic review into the quality of service delivery and ensure that those who need immigration and asylum services can access quality advice.
Understanding patterns of attainment in education and training	
3.10	We will continue to review the attainment gap and ensure that everyone meets the same high standard however they learn and contribute to a truly diverse profession by making it easier for people from every background to become a solicitor.
3.11	We plan to share our data, commission research and work with others to increase understanding of the difficult issues around the attainment gap, including how protected characteristics and social mobility intersect, and what might be done.