

RPA 2022 Action Plan – Update September 2023

	Theme	Issues	Actions	Responsibility	Progress
1	Introduction of new standards	How old framework maps to existing standards and CRL’s view of compliance with the new standards	<ul style="list-style-type: none"> <li>Mapping old framework to new requirements</li> </ul>	DoG	<ul style="list-style-type: none"> <li>Completed 01/2023, though limited benefit</li> </ul>
			<ul style="list-style-type: none"> <li>Keeping records against new requirements to ensure compliance or working towards compliance and report at each Board meeting via DoG report</li> </ul>	DoG	<ul style="list-style-type: none"> <li>LSB Sourcebook re-purposed as record linking to evidence of compliance with new requirements – complete 01/2023</li> </ul>
2A	Transparency	Publication of Board papers	<ul style="list-style-type: none"> <li>Write February Board papers and minutes in line with assumption of publication unless for a reason outlined on the agenda</li> </ul>	All	<ul style="list-style-type: none"> <li>Completed 02/2023</li> </ul>
			<ul style="list-style-type: none"> <li>Publish CRL Business Plans, Risk Heat map and revised performance data and update after each Board meeting</li> </ul>	COO	<ul style="list-style-type: none"> <li>To complete after February Board meeting, and then update following each subsequent Board meeting – continuing</li> <li>May 2023 - Papers <a href="#">published</a> following February Board meeting</li> </ul>
2B		Board papers consider resourcing and regulatory objectives	<ul style="list-style-type: none"> <li>Update template for Board to include impact on regulatory objectives</li> </ul>	COO	<ul style="list-style-type: none"> <li>Completed – 01/2023</li> </ul>
			<ul style="list-style-type: none"> <li>Resourcing is already included in the impact assessment –</li> </ul>	COO	<ul style="list-style-type: none"> <li>Completed – 01/2023</li> </ul>

			include impact assessment on all papers		
3A	Regulatory approach	Rule change applications require additional information on evidence base and understanding of current regulatory approach/ future approaches	<ul style="list-style-type: none"> <li>• Create end-to-end policy document setting out actions required to complete rule changes</li> </ul>	COO	<ul style="list-style-type: none"> <li>• Completed Q2 2023</li> </ul>
			<ul style="list-style-type: none"> <li>• Amend template for submission to LSB</li> </ul>	COO/DoO	<ul style="list-style-type: none"> <li>• Completed Q2 2023</li> </ul>
			<ul style="list-style-type: none"> <li>• Amend QA approach to include more challenge in relation to changes to regulatory approach</li> </ul>	DoG/COO	<ul style="list-style-type: none"> <li>• Completed Q2 2023</li> </ul>
			<ul style="list-style-type: none"> <li>• Review other rules changes submissions from other regulators and learn from successful submissions</li> </ul>	DoG/COO	<ul style="list-style-type: none"> <li>• Completed Q2 2023</li> </ul>
3B		LSB statements of policy	<ul style="list-style-type: none"> <li>• Include in our policy document and in impact assessment table for Board papers to ensure they are also discussed as part of the impact assessment of the Board papers</li> </ul>	COO	<ul style="list-style-type: none"> <li>• Completed 01/2023</li> </ul>
3C		Evaluation and monitoring of rules changes	<ul style="list-style-type: none"> <li>• Review all historic rules reviews and create a schedule for evaluation and monitoring as well as publication of results</li> </ul>	DoO/COO	<ul style="list-style-type: none"> <li>• Completed Q2 2023</li> </ul>
			<ul style="list-style-type: none"> <li>• Remote hearings data collection</li> </ul>	DoO	<ul style="list-style-type: none"> <li>• To be incorporated into Enforcement Annual Report 2023 onwards</li> </ul>

			<ul style="list-style-type: none"> <li>• QE data collection</li> </ul>	DoO	<ul style="list-style-type: none"> <li>• To be incorporated into Admissions &amp; Licensing Annual Report 2023 onwards</li> </ul>
			<ul style="list-style-type: none"> <li>• Effectiveness of consumer empowerment objectives</li> </ul>	DoG	<ul style="list-style-type: none"> <li>• To complete Evaluation <del>Q3</del> Q2 2024 to take advantage of learning from LSB's consultation on complaint handling and allow for completion of CILEX review of the delegation of regulatory functions</li> </ul>
4	Enforcement	Based on reading of assessment of other regulators, review the potential for issues to be identified and addressed prior to any external assessment by the LSB as part of its business plan	<ul style="list-style-type: none"> <li>• Continue with reducing old and serious complaints, including: <ul style="list-style-type: none"> <li>○ drafting a policy to formalise approach</li> <li>○ creating a regular scheduled review of cases on hold</li> <li>○ keeping complainants informed</li> <li>○ understanding and managing backlogs</li> </ul> </li> </ul>	DoO	<ul style="list-style-type: none"> <li>• As at end Q2 2023 procedures now in place for: <ul style="list-style-type: none"> <li>○ creating a regular scheduled review of cases on hold</li> <li>○ keeping complainants informed</li> <li>○ understanding and managing backlogs</li> </ul> </li> <li>• Policy to formalise approach re-scheduled to Q3 2023</li> </ul>
			<ul style="list-style-type: none"> <li>• Review KPIs to ensure they remain fit for purpose</li> </ul>	DoO/COO	<ul style="list-style-type: none"> <li>• Completed Q2 2023 – KPI report in new format included in July 2023 Board papers</li> </ul>

			<ul style="list-style-type: none"> <li>Utilising risk matrices to inform prioritisation of complaints</li> </ul>	DoO/COO	<ul style="list-style-type: none"> <li>Process actioned Q1 2023</li> </ul>
			<ul style="list-style-type: none"> <li>Publication of information on treatment of enforcement cases for benefit of consumers and the regulated community – ensure it is user friendly and outcomes-focused and includes indicative timescales</li> </ul>	DoO	<ul style="list-style-type: none"> <li>Completed Q1 2023</li> </ul> <p>See</p> <ul style="list-style-type: none"> <li><a href="#">Problems and Complaints</a></li> <li><a href="#">FAQs Problems and Complaints</a></li> <li><a href="#">Problems and Complaints Infographics</a></li> </ul>
			<ul style="list-style-type: none"> <li>Progress the planned enforcement rules review set out in the business plan</li> </ul>	DoO	<ul style="list-style-type: none"> <li>Handbook to be drafted <del>Q4 2023</del>–Further progress deferred into Q2 2024 until after CILEX have concluded their review of the delegation of regulatory functions</li> </ul>
5	Consumer		<ul style="list-style-type: none"> <li>Review consumer information on others' websites to inform CRL's approach</li> </ul>	DoG	<ul style="list-style-type: none"> <li>Completed Q2 2023</li> </ul>