

<b>Date</b>	<b>25 September 2024</b>
<b>Item</b>	<b>05.00</b>
<b>Title</b>	<b>Chief Executive's Report</b>
<b>Author</b>	<b>John Barwick, Chief Executive</b>
<b>Purpose</b>	This report updates the Board on key activities and an overview of organisational performance since the last full Board meeting held in July 2024.
<b>Recommendation</b>	To <b>NOTE</b> the report and <b>DISCUSS</b> the results of the staff survey and draft action plan.
<b>Timing</b>	N/A
<b>Impact assessment</b>	None
<b>Impact on Regulatory Objectives</b>	<ul style="list-style-type: none"> <li>Section One provides an update on activities carried out by the CEO and senior managers and a summary of other areas of the business of which the Board should be aware. These affect all the regulatory objectives. More detail will be found in other reports presented at the meeting.</li> <li>Section Two covers strategic performance and risk. Monitoring performance of the organisation ensures that CRL is able to meet the regulatory objectives, in particular: protection of the public and consumer interest, access to justice, promoting competition and encouraging an independent, strong, diverse and effective legal profession.</li> </ul>
<b>Implications for Resources</b>	<ul style="list-style-type: none"> <li>This report covers staffing, operations and resource implications affecting CRL since the last Board meeting.</li> <li>CRL has healthy contingency and operating reserves which comply with the LSB and CILEX Group reserves policy.</li> <li>IT resourcing generally is satisfactory; however, the shared services element of the CRM remains unchanged.</li> <li>HR support has been brought in-house with specialist HR advice being outsourced to Croner and systems support via the Bright HR software.</li> </ul>
<b>Impact on Consumer Empowerment</b>	This report covers some high-level meetings linked to consumer empowerment. The consumer facing projects and issues can be found in the Director of Governance report.
<b>Impact on Ongoing Competence</b>	None
<b>Publication Status</b>	For publication
<b>Appendices</b>	<b>05.01</b> Strategic Implementation Plan <b>05.02</b> BAU plan <b>05.03</b> Strategic Risk Register 1 - 4 <b>05.04</b> Regulatory Performance Assessment Action Plan <b>05.05</b> 2024 staff survey results <b>05.06</b> Staff Survey Action plan <b>05.07</b> Operations Data including the Balance Scorecard <b>05.08</b> Board KPI Data Q2

## SECTION 1

### Legal Services Board

1. The CRL CEO attended a Professional Ethics and Rule of Law (PERL) Reference Group Roundtable event hosted by the LSB on 15 July. This was the third such event and was convened to facilitate a solutions-focussed discussion around supporting legal professionals to uphold the highest standards of professional ethical conduct. The PERL Reference Group comprises senior stakeholders across the legal regulators, representative bodies, legal professionals, academics, and civil society groups, to consider how regulation can support legal professionals to identify, navigate and respond to professional ethical issues and the role of leadership in the sector. The focus of the discussion was on:
  - a. Potential regulatory solutions to the ethical challenges encountered by legal professionals in the sector, including suggestions informed by a recent gap analysis of the existing legal regulatory framework.
  - b. Potential non-regulatory solutions to the ethical challenges encountered by legal professionals in the sector, for example, shifting cultural norms in the workplace and in senior leadership
2. The CRL CEO attended the MTCOG on 16 July. The meeting was attended by representatives from all the regulatory bodies and was the first meeting of the group since 26 July 2023. The LSB used the meeting to restate its expectation that all regulatory bodies would be compliant with the LSB's Empowering Consumers policy statement by 30 September 2024. CRL's proposed response is provided for consideration under Item 15.01. A progress update on the delivery of the Regulatory Information Service (RIS) was also provided along with an overview of the LSB's Prices research and Individual Legal Needs Survey.
3. THE CRL CEO, Director of Governance and Director of Regulation met with the LSB Relationship Manager on 13 August.
4. The Director of Regulation attended a meeting of all the Chairs and CEOs of the Regulatory bodies on 9 September 2024. The meeting included a presentation from the Legal Ombudsman and a discussion of the regulators' reflections and plans to comply with the LSB's requirements and statement of policy on first-tier complaints.
5. The CRL CEO met the new LSB CEO on 10 September 2024.
6. The application to the LSB for approval of alterations to CRL's regulatory arrangements relating to transparency was submitted on 20 August 2024 and approved on 16 September.
7. Further to the Board discussion at the 2 September telecon, CRL has submitted its response to the LSB's request for evidence as part of its review of the Internal Governance Rules.

### CILEX

8. As previously reported, both the SRA and CILEX Boards confirmed their intention to proceed with the proposals to redelegate regulation of Chartered Legal Executives from CRL at their respective Board meetings in June and July. The SRA's Board decision attracted considerable media attention. CRL reaffirmed its public position that it considers the proposals to be unlawful and is prepared to challenge this in the courts.

9. At the time of writing, we anticipate the CILEX Board will make a final decision as to whether to proceed at a Board meeting in October.
10. CILEX convened a SGM on 21 June where CILEX Fellows approved proposed amendments to the CILEX Royal Charter. The amended Charter will require Privy Council approval. A timetable for this has yet to be confirmed. CRL has written to both the Lord Chancellor and Privy Council to raise its objections.
11. The CRL CEO and CILEX Registrar met with representatives from the LSB, including their General Counsel, on 12 August 2024 as part of the regular progress update. The LSB indicated that it expected CRL to cooperate with any request for information from CILEX necessary to inform the CILEX application to the LSB.
12. Following the Board meeting in May, the CRL CEO wrote to CILEX regarding the transfer of the £700k contingent reserve and the Board's request for disclosure of the performance of the CILEX investment fund which holds the CRL reserves and payment of interest by way of compensation for the opportunity cost of not having the reserves transfer as expected by the end of March 2024. Interest calculations have been provided by CRL and we are awaiting receipt of the investment fund report. This is being actively chased.

### Consultations

13. CRL's consultation on the draft corporate strategy 2025-2027 is due to close on 14 September 2024.
14. CRL's consultation on the proposed Practising Certificate Fee for 2025 is due to close on 16 September 2024.

### Staffing and Operations

15. The Assessment Officer within the PAS team is leaving on 13 September. The Enforcement and Investigations Manager vacancy has not been filled. The Director of Regulation is using the opportunity afforded by the vacancies to review the allocation of responsibilities and resourcing requirements within both the PAS and Enforcement teams.
16. Additional resource to bolster the resilience of the finance and corporate support functions has been identified as this remains an area of vulnerability. A job description for a Finance Assistant is being developed and we will be recruiting in the next couple of weeks.
17. A successful all employee in person event was held on 11 July at Box End Park. The programme included: Presentation and discussion of the findings of the All Staff survey; engagement on the 2025-27 strategy and the opportunity to participate in a range of team building activities. An evaluation survey has been conducted with generally positive feedback received. There is an appetite from staff to meet in person as a whole organisation at least twice a year.
18. An all-staff survey was conducted between 15 May and 12 June. The last survey took place in March 2022. The survey provided staff an opportunity to comment on a range of aspects relating to working at CRL and contribute suggestions for improvement. A report on the findings of the staff survey and an action plan is provided at Annex 05.07. The key highlights are:
  - a. A 100% response rate
  - b. Positive comments around CRL's working environment and culture

- c. Significant improvements in communication since the last survey
- d. Areas for improvement include: objective setting and regular appraisals, effectiveness of 1-1s and training opportunities.

19. Actions relating to objective setting and appraisals have already been implemented.

#### Corporate Social Responsibility

20. Following the success of CRL's participation in the London Legal Walk a Corporate and Social Responsibility statement is currently being developed.

#### Shared Services

21. The contracts for the additional lay panel members and panel clerks for the Prior Conduct Panels and Disciplinary Tribunals have been reviewed in light of the outcome of the recent *Sommerville v NMC* case concerning the 'worker' status of these type of roles.

#### Public Affairs

22. Following the election of the new government the Chair and CEO have discussed with CRL Public Affairs advisers the utilisation of the remainder of the contract. The focus is on seeking meetings with the Minister and providing briefing to the new membership of the Justice Select Committee when appointments have been confirmed.
23. At the time of writing Andy Slaughter MP has been appointed the Chair of the Justice Select Committee.

#### External meetings















24. The CRL CEO met with the CEO of The Law Society on 30 August to discuss matters of mutual interest.
25. The CRL Chair met with the Chair of the Bar Standards Board on 27 August. The CRL CEO met with the Director General of the Bar Standards Board on 30 August.
26. The CRL CEO, Head of Education and Practitioner & Supervision Manager met with representatives from Barbri Altior on 30 August to discuss the training and assessment of Civil, Criminal and Family advocacy. This was, in part, in response to concerns regarding the availability of some of the advocacy courses, particularly family advocacy which had been causing frustration with some members. Barbri Altior confirmed that future dates for the family advocacy course have now been identified and would be available for members to book.

## SECTION 2

### Business Plan, Risk and Performance

#### Balanced Scorecard

27. The CRL balance scorecard is an assessment of the performance of CRL extracted from the various reports and tables presented to the Board at each Board meeting.

Finance (Information from Finance Paper)		Stakeholder	
PCF v other sources of income		External stakeholder relationships	
Reserves within target range		Regulated community	
Variance to budget		CILEX (including shared services)	
Internal Processes (Information from BAU update)		Staffing	
Practitioner		Vacancies	
Entity		Sickness	
Enforcement		Learning and Development	
Governance			
General Management			

#### Corporate Plan

28. The Business Plan is made up of two documents:

- a. The Strategy Implementation – Corporate Plan 2024 (**Appendix 05.01**), and
- b. The BAU Business Plan (**Appendix 05.02**)

#### *Strategy Implementation - Corporate Plan 2024*

29. To avoid unnecessary duplication of reporting, the Strategy Implementation Plan has been updated to reflect CRL's priorities for 2024 as set out in the published Corporate Plan.
30. The plan has been amended to reflect objectives that will not be progressed in 2024, notably developing proposals for enhancing entity regulation, which are dependent on CILEX cooperation and certainty regarding future regulatory arrangements in view of CILEX's re-delegation proposals.

#### *BAU Business Plan update*

31. A full update against the plan appears on the document itself. The following report sets out areas of note from the plan:

- a. Application to amend CRL transparency rules need to comply with LSB consumer empowerment statement of policy has been approved.
- b. Consultation on the proposed PCF for 2025 in progress. Weekly meetings taking place between CRL Finance Manager and CILEX CFO to progress the PCF application.
- c. Additional resource has been allocated to support the PAS team and CPD related activities.

## Risk

### *Strategic Risk Register*

- 32. This can be found at **Appendix 05.03** A deep dive will be undertaken annually, normally at the November Board meeting. The risk register will also be reviewed in light of the new strategy in November.
- 33. Following the reduction of SR3 risk in July there has been no change to the prevailing risk assessments.
- 34. The role of the Strategic Risk Committee is being reviewed with a view to extending its remit to consider CRL's strategic risks. Proposals will be presented to the November 2024 Board meeting.

## Performance

### *Strategic KPI data for Q1 2024*

- 35. CRL's financial performance for the year up to the end of July 2024 showed an operational surplus before tax and adjusting for exceptional costs and income of £84,668. This is in part due to the recognition of deferred income at the beginning of the financial year and the lower than forecast enforcement activity which has been due to Panel Clerk availability. Additional Clerk and panel members have been recruited to address this.
- 36. CRL's reserves position up to 31 July 2024 was as follows:

Description	Total £	Committed £	Uncommitted £
Total Reserves Working & Contingency	£1,256,009	£495,144	£760,864

- 37. A lot of the communications activity has focused on the three consultations: strategy, PCF and changes to the transparency rules. Webinars appear to be a popular media channel with good level of attendance at the two strategy webinars, the AI webinar run in conjunction with Lexus Nexis and Practice Rights webinars run in partnership with CILEX. The YouTube recordings of the AI webinar and Strategy webinar have received 17K and 22K views respectively.
- 38. CRL has not received any corporate complaints for Q1 2024.
- 39. The Practitioner team continues to perform satisfactorily with the average decision time for QE, WBL, Practice Rights and Advocacy applications remaining stable, having achieved a significant reduction in the length of decision time from the beginning of the year.

40. Regulated firms have stabilised, with 19 CRL firms and 38 ACCA-Probate firms regulated at the end of August 2024. Two ACCA-Probate firms are seeking authorisation.
41. With regards enforcement activity, the numbers of open and live cases remains stable following the positive reduction in the number of live cases in both the prior conduct declarations and misconduct complaints workstreams from the beginning of the year. Prior Conduct Panels have been held in August and one has been held in September. The recent successful lay Panel member and Panel Clerk recruitment will enable more Disciplinary Tribunals to be held, with the focus on further reducing the age profile of open cases. The reallocation of resources proposed by the Director of Regulation will also support improvement of performance against KPIs.

### **Recommendation**

42. The Board is asked to:
  - **NOTE** the update and **DISCUSS** the results of the staff survey and draft action plan.

## Strategy Implementation - Corporate Plan 2024

<b>UPHOLDING STANDARDS WHILST PURSING INNOVATIVE MODELS TO IMPROVE ACCESS AND MINIMISE THE REGULATORY BURDEN</b>	<b>Total Budget: £127,373</b>
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	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
1.1	Review regulatory model	Improved length of time for case progression.		Carry out a review of our Enforcement Rules and arrangements in line with any recommendations following the LSB review in 2024	Dependent on LSB business plan	Staff time (CEO, DoR, DoG)	DoR	Further substantive work on the review pending conclusion of the LSB Enforcement review
1.2	Review regulatory model  <i>(Links to LSB and SRA research into the unregulated sector and includes consideration of CLE work in unreserved areas)</i>	Identification of groups for CRL regulation in the future	TBC	Review of legal landscape Commission research to explore the legal services landscape to understand gaps in the regulatory market from the perspectives of the regulated community and consumers.  Convene a roundtable meeting	Q2	Staff time (CEO, DoR, DoG) (GP, SK, SC, SO)	CEO	Literature review commissioned with IRN. Report received. Feedback on the report structure was provided and a revised version of the paper has now been received.



	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
				with key stakeholders to examine the growing unregulated sector of the market.  Present findings to the Board.				
1.3	Review regulatory model  <i>Review the scope of reserved activity-based regulation against the requirements for delivering specialist legal services in practice</i>	Reduced complaints from practitioners in relation to operation of specialist authorisation in practice.	<i>0 complaints relating to activities that can be undertaken by specialist practitioners</i>	Research with regulated community to identify limitations of regulation by specialism v generalist authorisation  Recommendations for change presented to CRL Board  Publish guidance from Russell-Cooke on litigation following discussion with CILEX on impact on CLEs	March 2024  July 2024  January 2024	CEO, DoR (SO)	CEO, DoR	This is yet to be initiated. The focus of available resource has been on the transparency rules application.  In progress with Disciplinary Standards and Process (policy) Manager
1.4	Review regulatory model <b>NEW OBJECTIVE</b>	Increased applications for	<i>TBA individuals by end 2024</i>	Implement the authorisation of	Q3 2024	DoR	CEO, DoR	Meeting held with CILEX to consider the benefit of joint comms.

	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
	<i>Develop with CILEX a cohesive approach to the understanding of and encouraging the take up of practice rights.</i>	practice rights from individuals.		CILEX practitioners with litigation and advocacy rights to hold higher rights of audience. Develop with CILEX a cohesive approach to understanding and encouraging the take up of practice rights.	Then ongoing	MW & SO + PAS team		CRL website updated with information for prospective candidates.  Contract with the training provider is close to approval. Eligible applicants for higher rights are being advised of course dates to aid their planning.
1.5	Review Regulatory model	Meet LSB expectations in relation to new Economic Crime Objective		Continue to develop our approach to prevention and detection of Economic Crime			DoR	Prevention and detection of Economic Crime now embedded into supervision programme and monitoring of CRL firms
2.1	Embed culture of innovation at CRL  (External focus)	Attendance at external meetings and collaboration with other frontline regulators.	TBC	Collaboration with other front-line regulators, the LSB and other interested parties to promote the use of legal technology and innovation in the sector.  Further our understanding of the opportunities and threats to the delivery of legal	Ongoing  Q1 2024	DoG  DoG, DoR (SC, GP)	CEO, DoG  DoR	Paper on AI was considered at Board Strategy Day on 16 May.  Meeting with LSB to share thinking.  Webinars for CRL entities and members in partnership with legal AI provider held in July.

	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
				<p>services posed by the development of Artificial Intelligence and how the current model of regulation may need to adapt.</p> <p>Implement proposals in relation to unbundling projects to develop innovation in CRL firms</p>				
2.2	<p>Embed culture of innovation at CRL</p> <p>(Internal focus)</p> <p><i>This has been written assuming that 2022 CRM developments have been implemented during 2023</i></p>	CRM developments for CRL are implemented and effective	<p>Online applications</p> <p>Process improvements for enforcement and authorisation</p>	<p>Utilise technology and innovation within CRL and embed a culture of continuous improvement to aid delivery of best value legal regulation.</p> <p>Revisit online requirements with CILEX IT team to deliver all outstanding requirements including online application processes</p>	Dependent on outcome of CILEX review.	<p>CEO, DoR, (SO, GP, AA)</p> <p>And in conjunction with CILEX IT team.</p>	CEO	Piloting of AI software has been explored with the CILEX IT team but may not be possible using the existing shared platform. Alternative approaches to be considered.

	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
3.1	Enhanced approach to individual supervision  <i>Links to LSB's ongoing competence requirements</i>	Full risk profiles of CILEX membership available on CRM	Risk profiles available on all CILEX TBC: members (KPI = 99%)	<b>Further develop our approach to risk-based supervision and implementation of the LSB's policy statement for ongoing competence in line with our ongoing action plan.</b>  Using risk profiles, existing CPD information and working with other regulators, implement ongoing competence action plan provided to LSB in Jan 23	Rule change submitted Q1 2024 for Probate Education standards	Staff time DoG, DoR (SO)  Collaboration with LSB and front-line regulators	DoG	Consulted on changes to Probate Education Standards. LSB rule change application being prepared.
3.2	Introduce practice rules and guidance to support the CRL code of conduct	Enforcement Rules and Guidance consolidated in a handbook	Handbook drafted	Consultation released  Consultation analysis  Proposals developed and agreed with Board	Q1 2024  Q2 2024  Q3 2024  Q3 2024	CEO, DoR, (SM, AA)	DoR	Revised timetable to align with LSB Enforcement project has provided the opportunity for a review of guidance for the conduct of disciplinary proceedings and guidance on

	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
				Proposals submitted to LSB				misconduct issues for the profession
3.3	Review of regulatory arrangements	Create proposals for future of regulatory arrangements at CRL	Proposal submitted to CILEX	<p>Engage constructively from a position of insight and experience with CILEX and SRA on proposals to change the current regulatory arrangements to ensure the consumer and public protection interest remains paramount.</p> <p>Work with the LSB on its review of the Internal Governance Rules to encourage a further strengthening of regulators' independence.</p>	<p>Ongoing</p> <p>Dependent on LSB work plan.</p> <p>Q2-Q3</p>	<p>Executive Team</p> <p>Executive Team</p>	<p>CEO</p> <p>DoG</p>	<p>Response sent on 24 March to LSB request for input into the scope of their IGR effectiveness evaluation.</p> <p>Response to LSB call for evidence provided on 6 September.</p>

<b>ENHANCING THE INFORMATION AVAILABLE TO CONSUMERS TO IMPROVE ACCESSIBILITY TO LEGAL SERVICES</b>	<b>Total Budget: £127,373</b>
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	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
4.1	Improve the information available to consumers	Legal Choices development plan completed	By end of Q1	<u>Legal Choices Development Plan</u>  Continue to contribute to and engage with the development of the Legal Choices website and press for an impact assessment of its effectiveness to support its future development.	Q1 2024	DoG, (SC)	DoG	Funding agreed for 2024, including proposals for developing the RIS.  RIS progress update provided to MTCOG in July.
4.2	Improve the information available to consumers	BSB-led PLE sub-group of MTCOG actions implemented	Create Cymreag tab on website with first level of CRL website translated.	Participate in cross-regulator research into digitally excluded consumers of legal services to understand better the types and needs of digital exclusion and how these might be met by the professionals we regulate.	Linked to BSB digital exclusion research	CEO, (SC)	DoG	Research partner commissioned.
4.3	Improve the information available to consumers	Single Digital Register (now known as the Regulatory Information Service) or equivalent agreed to be in place  Quality Indicators Pilot evaluation completed and implementation action plan in place	Regulatory Information Service live  Actions agreed Actions implemented	<u>MTCOG subgroup</u> - Cost/benefit analysis - Product live  Contribute to the development of the Regulatory Information Service to provide a single point of information access for consumers provided this can be done cost effectively.	Lead by LSB, CRL will engage as required.  Q1 2024	CEO, (SC)  Staff time DoG (SC)	DoG, DoR	RIS discovery phase completed.

	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
				<p><u>Improving access to regulatory information</u></p> <ul style="list-style-type: none"> <li>- Review quality indicators pilot</li> <li>- Agree cross-regulator actions</li> <li>- Implement changes</li> </ul>				
4.4	Improve the information available to consumers	Key CRL information can be accessed in Welsh.		<p>Make key information on our website available in Cymraeg/Welsh to improve accessibility for Welsh speaking consumers, practitioners and firms and ensure that the distinctness and differences between operating in Wales and England is reflected in our service offer.</p>	Q3	Translation		Evaluating the potential use of translation software informed by the BSB's experience of using ReciteMe software.
5.1	Ensure that there are high levels of compliance with the minimum standard of transparency across the legal services sector	<p>ACCA firms compliant with transparency rules</p> <p>Success of Transparency Rules has been evaluated, to include:</p> <ul style="list-style-type: none"> <li>- Effectiveness of existing rules (e.g., should they be more prescriptive)</li> </ul>	ACCA firms compliant with Transparency Rules	<p>Guidance and support issued to all ACCA firms to ensure compliance</p> <p>Evaluation of Transparency Rules in accordance with gap analysis provided to LSB and participation in subsequent initiatives led by LSB (where instigated)</p>	<p>Completed</p> <p>Q1 2024</p>	<p>Staff time DoR SC, GP</p> <p>DoG (SC)</p>	DoG	

	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
		<ul style="list-style-type: none"> <li>- Extension to other areas of practice</li> <li>- Extension of information provided by firms (e.g., mix of staff, outcomes from QI pilot etc.)</li> <li>- Extension to regulated individuals</li> <li>- Provision of information to assist consumers in finding legal representation (e.g., digital comparison tools)</li> </ul>		Consultation on proposed changes to regulatory arrangements	Q2 2024			
6.1	Contribute to the development of new technologies	TBA		Continued involvement in legal tech forums and groups with focus on improving legal services for consumers		DoG	DoG	

<b>CHAMPIONING FAIR ACCESS FOR ALL IN THE LEGAL SERVICES MARKET</b>	<b>Total Budget: £127,373</b>
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	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
7.1	Improve the ability of aspiring lawyers to enter and progress in the profession	CRL regulated firms develop EDI policies, checked through entity annual returns		(i) Renewed EDI campaign reporting of learnings at CRL Entities Event, including discussion of	Dependent on outcome of CILEX review	CEO, DoG, DoR (GP, SC)	DoG	



	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
				EDI at CRL Entities Event (ii) review outcomes of soft EDI engagement with CRL entities  (iii) publish a second report of progression data  Following the agreement by the CRL Board of a working definition of progression, commission analysis of our diversity data to build an evidence-based understanding of how our regulated members progress through their careers		CEO, DoG, DoR (GP, SC)  SC		Approval to commission the Bridge Group to undertake further data analysis.
8.1	Use data effectively  Measure impact, chart progress and evaluate the effectiveness of equality actions to enable us to understand the outcomes for consumers and	Analyse the data from 2023 Diversity Data Survey by reference to previous data surveys to identify any new trends e.g.,:  - Cross-qualification to become a solicitor - Leavers - Review and implementation of LSB's research into		(i) publish the Data Diversity Report in similar format to 2021 updated to include benchmark progression data.  (ii) develop a plan to address any issues of concern which are identified and celebrate successes	Data Diversity Report published Q3 2023  Q1 2024	SC  DoG (SC)	DoG	

	Objective	Measurement	Target	Action Programme	Timescale	Resources	Responsible Officer	Current Position
	the regulated community	solutions for counter inclusive practices - Monitoring CPQ EDI data						
9.1	Improving access to legal services: identifying and working to resolve barriers faced by regulated community and consumers from diverse backgrounds to improve access to legal services	Research commissioned and findings analysed  <i>Research linked to with other strategic objectives:</i> - <i>Standards, and Consumer</i>  CRL is participating in cross-regulator research into digitally exclusion		(i) Initial research and scoping  (ii) Outreach to other regulators and stakeholders to identify areas where we can make a difference  <i>Work with other regulators to develop a fuller understanding of what career progression looks like within firms and other work settings.</i>	Completed  Q2 2024	£Budget required  +  DoG (SC)	DoG	Continued participation as a member of the Professional Bodies collaborative. Imminent publication of <i>Beyond buzzwords – Embedding a systemic approach to EDI across the UK professions</i> . Research conducted by the Young Foundation.

## Business as Usual and Shared Services Plan 2024

BUSINESS AS USUAL ACTIVITIES: 2024					Total PCF Budget: £991,422, plus £345,122 other income
Description of activity	Budget £	Regulatory Objectives	Owner	RAG rating	Update against KPIs
<b>Education standards:</b> <ul style="list-style-type: none"> <li>- accredit training providers,</li> <li>- act as External Quality Assurer for the Chartered Legal Executive apprenticeship,</li> <li>- annual review of accredited providers and exemptions</li> <li>- review of CLE apprenticeship</li> <li>- review of assessment methodology for CLE</li> <li>- review of Higher Rights of Audience</li> </ul>	35,392	<ul style="list-style-type: none"> <li>• protecting and promoting the public interest,</li> <li>• protecting and promoting the interests of consumers</li> <li>• encouraging an independent, strong, diverse and effective legal profession</li> </ul>	DoO & HoE		<ul style="list-style-type: none"> <li>- Annual review of CILEX (June 2024)</li> <li>- Annual review of Bloomsbury (November 2024)</li> <li>- Annual review of ULaw delivery (December 2024)</li> <li>- EQA of Chartered Legal Executive apprenticeships (June 2024)</li> <li>- Applications from training provider (as and when received)</li> </ul>
<b>Authorisation:</b> <ul style="list-style-type: none"> <li>- assess qualifying employment,</li> <li>- assess competence for admission</li> <li>- assess &amp; recognise overseas Professional Qualifications</li> <li>- assess firm applications</li> <li>- oversight by committees</li> </ul>	353,343	<ul style="list-style-type: none"> <li>• protecting and promoting the public interest,</li> <li>• improving access to justice</li> <li>• protecting and promoting the interests of consumers</li> <li>• encouraging an independent, strong, diverse and effective legal profession</li> </ul>	DoO & HoE		<ul style="list-style-type: none"> <li>- DPB authorisation process</li> <li>- Advocacy review (exemptions)</li> <li>- Review authorisation arrangements post LSB RPA of CRL.</li> </ul>
<b>Supervision:</b> <ul style="list-style-type: none"> <li>- ensure competence of individuals through CPD activity monitoring,</li> <li>- ensure firm supervision via annual returns and visits (inc. AML)</li> <li>- Implementation of risk matrices and ongoing competence agreed by LSB</li> </ul>	133,354	<ul style="list-style-type: none"> <li>• protecting and promoting the public interest,</li> <li>• protecting and promoting the interests of consumers</li> <li>• encouraging an independent, strong,</li> </ul>	DoO & HoE		<ul style="list-style-type: none"> <li>- Review supervision arrangements post LSB RPA of CRL.</li> <li>- Quarterly review of current individual supervision arrangements to meet ongoing competence expectations and targets.</li> </ul>

		diverse and effective legal profession			
<b>Enforcement:</b> <ul style="list-style-type: none"> <li>- review annual prior conduct declarations,</li> <li>- investigate complaints and identify misconduct</li> <li>- oversight from enforcement panels.</li> <li>- general rules review</li> <li>- remain aware of new risks such as AML, sanctions.</li> </ul>	404,614	<ul style="list-style-type: none"> <li>• protecting and promoting the public interest,</li> <li>• supporting the constitutional principle of the rule of law</li> <li>• protecting and promoting the interests of consumers</li> <li>• promoting and maintaining adherence to the professional principles</li> </ul>	DoR & Enforcement Manager		<ul style="list-style-type: none"> <li>- <b>Review enforcement arrangements post LSB RPA of CRL.</b></li> <li>- <b>Review annually EDI differential impacts</b></li> <li>- <b>Prioritisation of rules and guidance review</b></li> <li>- <b>EDI data collection for complainants</b></li> <li>- <b>Data analysis of complaints relating to regulated community and levels of engagement</b></li> <li>- <b>Regular communications to regulated community</b></li> </ul>
<b>Governance:</b> <ul style="list-style-type: none"> <li>- Board meetings and preparation,</li> <li>- review transparency of publication of papers</li> <li>- risk management,</li> <li>- performance,</li> <li>- strategy and business planning, and</li> <li>- liaison with other regulators and government.</li> </ul>	171,305	<ul style="list-style-type: none"> <li>• protecting and promoting the public interest;</li> <li>• supporting the constitutional principle of the rule of law;</li> <li>• improving access to justice;</li> <li>• protecting and promoting the interests of consumers;</li> <li>• promoting competition in the provision of services within subsection (2);</li> <li>• encouraging an independent, strong, diverse and effective legal profession;</li> <li>• increasing public understanding of the</li> </ul>	CEO & DoG		<ul style="list-style-type: none"> <li>- <b>Review governance arrangements post LSB RPA of CRL.</b> <ul style="list-style-type: none"> <li>○ Complete review of website to ensure consumer-friendly</li> </ul> </li> </ul>








		citizen's legal rights and duties			
<b>General management:</b> - Calculation of the practising certificate fee, - finance activities - networking, - CRM development, and - business support and wellbeing	236,536	<ul style="list-style-type: none"> <li>protecting and promoting the public interest</li> <li>encouraging an independent, strong, diverse and effective legal profession</li> </ul>	CEO & FM		- <b>PCF 2025, including full impact assessment</b> - <b>Wellbeing</b> - <b>Networking</b> - <b>CRM development</b>

<b>Shared Services</b>					<b>Total Budget: £181,982</b>
<b>Description of activity</b>	<b>PCF actual £</b>	<b>Regulatory Objectives</b>	<b>Owner</b>	<b>RAG rating</b>	<b>Update against KPIs</b>
<b>Shared services:</b> this includes reduced Finance, L&D, IT and Group insurance	181,982	<ul style="list-style-type: none"> <li>protecting and promoting the public interest,</li> <li>protecting and promoting the interests of consumers</li> </ul>	CEO		- <b>Review of service levels and payments for shared services and activities carried out on behalf of CRL by CILEX through permitted purposes.</b>

**CILEx Regulation Ltd Strategic Risks**

Strategic Objective	Strategic Risks – High level	Risk description	Current Risk	Target Risk
<b>High standards</b> We will uphold standards whilst pursuing innovative models to improve access and minimise the regulatory burden.	1. Our regulatory performance does not meet the expectations of our stakeholders and as a result stakeholders have negative experiences of our regulation. CRL's regulatory expectations are not appropriate or understood by the regulatory community.	This includes the inability to deliver the 9 regulatory objectives and meet the LSB's performance expectations as reflected in the annual Regulatory Performance Review. This includes the appropriateness of our performance measures, and requires awareness of new developments in the sector underpinned by strong stakeholder engagement to ensure expectations are met. This also includes the existential threat posed by the CILEX re-delegation proposals.	12	9
<b>Consumer empowerment</b> We will enhance the information available to consumers to improve accessibility to legal services.	2. We do not understand consumer needs and so are unable to be as effective a regulator as we can be.	This includes the ability to respond and influence external drivers for change for example, technological developments, the unregulated/unauthorised legal services sector, consumer empowerment and the development of entities.	9	9
<b>Equality, diversity &amp; inclusion</b> We will champion fair access for all in the legal services market	3. We do not have the data and/or harness the benefits of our data to understand the barriers to access and translate this into positive action.	This risk includes the management of stakeholder engagement and key relationships as well as reputation management.	9	6
<b>Build a resilient, healthy, capable and sustainable organisation</b>	4. The resources we require to achieve our strategy and deliver BAU activity are not in place or are not financially sustainable.	This risk includes not having the resources we need to be effective and/or not being efficient in our use of resources (resources include financial, knowledge, skills, culture and infrastructure). It includes the development of our culture, people and physical assets, our continued financial viability and the significant failure of key business process.	12	9

**Mitigation key**

	<b>Preventative</b>
	<b>Monitoring</b>
	<b>Detective</b>
	<b>Remedial</b>
	<b>Horizon scanning</b>
	<b>Best practice development</b>
	<b>Communication</b>

**Strategic Risk 1** – Our regulatory performance does not meet the expectations of our stakeholders

**Risk Summary**

This includes the inability to deliver the 9 regulatory objectives and meet the LSB’s performance expectations as reflected in the annual Regulatory Performance Review. This includes the appropriateness of our performance measures, and requires awareness of new developments in the sector underpinned by strong stakeholder engagement to ensure expectations are met. This also includes the existential threat posed by the CILEX re-delegation proposals.

**Current Risk Influencers**

+/-	LSB Performance report 2023 and action plan
-	Hard insurance market results in continued low entity numbers
-	LSB proposed workplan and potential impact on resources
+	Higher rights approval by the LSB
+	Technology/market changes lead to greater unregulated legal services market – opportunity to provide regulation to a wider area
-	CILEX continue to progress with regulatory redelegation proposals which creates uncertainty
-	Technology/ market changes, lead to greater unregulated legal services market - potential lower demand for paralegals leading to fewer CILEX members
-	Provision of advocacy training by 3 <sup>rd</sup> parties

**Mitigations in place**

	Legal advice obtained in respect of CILEX’s proposed changes
	Balance scorecard and KPI monitoring. Board review of Strategic and BAU implementation plans
	Observer at CILEX External Relations Working Group. Watching brief on LSB/MoJ decisions. Monitor LSB impact on resourcing.
	Obtain pipeline data for litigation and advocacy courses to better match demand with supply. Exploring an additional course supplier to supplement Barbari Altior provision and improve mitigations
	Ongoing monitoring of CILEX membership numbers
	Review LSB RPA for best practice and reflect in action plan
	Bi-monthly calls with CILEX and regular engagement with LSB and SRA. Publication of Corporate Plan

**Review Date**

September -2024

**Risk Owner**

CEO

	Impact	Likelihood	Risk Score
<b>Inherent Risk</b>		5	4
<b>Current Risk</b>		4	3
<b>Target Risk</b>		3	3
<b>(planned migrations in place)</b>			9

No Change

**Risk Appetite**

Regulatory - Minimal  
Communications and Profile – Seeks

**Planned Migrations 2024**

**Progress**

Planned Migrations 2024	Progress
CPD spot checks on those working in the highest risk areas	CPD sampling complete & publication of CPD report Development of PERL content and video
Enforcement review	Performance measurement dashboard developed.
Strategic review of unregulated sector.	IRN report commissioned.
Source additional educators to offer CRL regulatory services	Education provider confirmed availability of family advocacy courses.
Corporate Plan – Roundtable to examine growth of unregulated sector	Draft report received
Analysis of 2023 LSB RPA and action plan	RPA action plan approved
Higher rights comms. Public affairs strategy	Correspondence with Justice Select Committee Chair and MoJ

**Strategic Risk 2** – We do not understand consumer needs and so are unable to be as an effective regulator as we can be.

**Risk Summary**

This includes the ability to respond and influence external drivers for change for example, technological developments, the unregulated/unauthorised legal services sector, consumer empowerment and the development of entities.

**Current Risk Influencers**

-/+	LSB Business Plan and publication of statutory guidance on technology and innovation
-	LSB proposed workplan and potential impact on resources
+	Legal Choices and the development of the RIS
+	Technology/market changes lead to greater unregulated legal services market – opportunity to provide regulation to a wider area
-	Consumer detriment owing to lack of consumer knowledge of legal services market
-	Uncertainty created by CILEX proposals results in hard insurance market impacting entity numbers and barrier to growth
-	Digital exclusion prevents individuals accessing essential legal services

**Mitigations in place**

	AI and innovation paper for Board discussion.
	Review of LSCP and LSB consumer research eg Legal Needs survey. Member of Law Tech UK
	Increased emphasis on PLE – development of CRL website content
	DPD application. Liaison with Insurers to resolve barriers to potential CRL regulated entities.
	AI and Law tech paper and discussion at Board level to assess impact and regulatory response
	Cross regulatory working led by MTCOG and Legal Choices Governance Board
	Legal Choices and development of the Regulators Information System.

**Review Date**

September-2024

**Risk Owner**

DoG

	Impact	Likelihood	Risk Score	
Inherent Risk		5	5	25
Current Risk		4	3	12
Target Risk (planned migrations in place)		3	3	9

**Risk Appetite**

Communication and Profile – Seeks  
Reform - Seeks

**Planned Migrations 2024**

**Progress**

	Corporate plan – unregulated market literature review and roundtable	Literature review commissioned
	Continued engagement with MTCOG and Legal Choices	
	Response to SRA consultation and associated comms highlights consumer impact of CILEX proposals	SRA consultation response publish. Public affairs strategy. Concerns raised with MoJ
	Ongoing development of web content and comms collateral with a consumer focus.	
	Engagement with Lexis Nexus Gen AI product. Attend AI and Tech webinars to understand impact and opportunities relating to Law Tech	Ongoing. CRL attendance at SRA and LSB conferences. Engagement with Lexis Nexus and entities webinar.
	Digital exclusion collaborative research with BSB, CLC & ICAEW	Research launched with M-E-L research
	Legal Choices and development of RIS. Engagement with LSB on AI thinking.	RIS discovery phase complete. Options for delivery phase to be shared with Legal Choices governance Board in June. Joint CILEX/CRL Practice Webinars



**Strategic Risk 3** – We do not have the data and/or harness the benefits of our data to understand the barriers to access and translate this into positive action

**Risk Summary**

This risk includes the management of stakeholder engagement and key relationships as well as reputation management.

**Current Risk Influencers**

-	Quality and availability of data impacts career progression EDI research
-	Lack of effective Marketing and Communications leads to inability to promote CRL brand
+	Low brand awareness of CRL in the market place leads to lower growth and strengthens case for redelegation
+	Failure to deliver EDI action plan leads to reputational damage
+/-	Higher rights of audience approval by LSB and ability of CRL to implement in the 2024/25 academic year
+	No corporate complaints
+	Beyond Buzzwords collaborative EDI research published

**Mitigations in place**

	Increased transparency with the publication of corporate information including Board papers.
	Balance scorecard and KPI monitoring of website traffic and social media engagement
	Observer at CILEX External Relations Working Group. Watching brief on LSB/MoJ decisions. Monitor LSB impact on resourcing.
	Kysen contract extended
	Public affairs strategy
	DPMSG survey. Regulators forum and cross regulatory working
	CRL Firms diversity data collection report published Published article on EDI research

**Review Date**

September-2024

**Risk Owner**

CEO/DoG

	Impact	Likelihood	Risk Score	
Inherent Risk	5	4	20	No change
Current Risk	4	3	9	
Target Risk	3	2	6	

**Risk Appetite**

Regulatory - Minimal Communication and Profile – Seeks

**Planned Migrations 2024**

**Progress**

	Development of CRL comms plan	First draft complete. Digital Engagement and Communications Executive JD reviewed to include relationship management with comms third party suppliers and CSR plan.
	Continue to review KPI metrics and maintain momentum with EDI action plan including publication of next EDI report	EDI strategy progress update provided to Sept Board
	EDI career progression research	Engaging with the Bridge Group to explore options in context of currently available data
	Liaison with CILEX to widen scope of annual member data survey to include employer information. Review resourcing in policy team.	Issue of accessibility of the data form in the MyCilex portal raised with CILEX
	Ongoing engagement with key stakeholders including Select Committee and MoJ	Correspondence with the Chair of the Select Committee and Lord Chancellor. Regular meetings with LSB and TLS
	Develop CSR plan to improve CRL's external profile	CRL team participating in 2024 London Walk CSR Policy statement being drafted
	Higher rights comms and engagement with training provider on implementation plans	Contract with training provider awaiting final sign off.

**Strategic Risk 4** – The resources we require to achieve our strategy and deliver BAU activity are not in place or are not financially sustainable.

**Risk Summary**

This risk includes not having the resources we need to be effective and/or not being efficient in our use of resources (resources include financial, knowledge, skills, culture and infrastructure). It includes the development of our culture, people and physical assets, our continued financial viability and the significant failure of key business process.

**Current Risk Influencers**

-/+	SQE impacts future Fellow numbers and leads to reduced PCF income to CRL
-	High staff turnover due to uncertainty resulting from CILEX proposals impacts on corporate memory
+	Lack of access to reserves leads to financial instability
+	Lack of checks and balances on financial records leads to a risk of fraud
-	Limited funding restricts CRL's ability to regulate effectively
-	Reliance on shared services for delivery of IT results in poor service for CRL
-	Ability to recruit and retain sufficient PCP and DT panel members and Clerks to run hearings effectively
+	Operational surplus and transfer of inter-company balance by CILEX
+	CRL currently meeting CILEX Group and LSB reserves policy requirements
-	Single points of failure impact CRL's ability to deliver core services eg Finance

**Mitigations in place**

	Reconciliations prepared for all accounting entries, assets and liabilities. Conversion of FTC to Perms contracts. Updated staff handbook. Update process documentation and key tasks, esp Finance and HR.
	Balance scorecard. Monthly management accounts and reserves position regularly reviewed by Executive and Board.
	Seek new regulatory areas for expansion. Law firm in a box and research into unmet legal need and unregulated markets
	E&I Manager exploring other options for extending pool of Panel Clerks. Advertising for more panel members.
	Ongoing monitoring of CILEX membership numbers
	Ensure reserves position continues to meet reserves policy requirements
	Monthly all staff meetings and meetings with managers with a focus on successes and challenges

**Review Date**

September-2024

**Risk Owner**

CEO

	Impact	Likelihood	Risk Score	
<b>Inherent Risk</b>	5	4	20	No Change
<b>Current Risk</b>	4	3	12	
<b>Target Risk</b>	3	3	9	

**Risk Appetite**

Financial (investment) – Measured/Open  
 Financial (control/compliance) - Minimal  
 People – Open

**Planned Migrations 2024**

**Progress**

	Additional resource to support PAS team and CPD. Review of JDs for Digital Comms and EA. Consider need for finance administrator.	CPD and PAS Administrators in post. Draft budget for 2025 includes Finance Administrator. Recruitment has been brought forward.
	Annual staff survey.	Completed. Report due to September Board
	Strategic review of unregulated sector. Enhance monitoring of	Literature review commissioned and draft report received. Explore collaboration with LSCP.
	Request transfer of inter-company balance and inter-company reserves. Budget for salary increases and bonuses to support retention. Extension of notice periods from 1 – 3 months for critical roles	Positive response on inter-company balance. Need to consider options in view of CILEX's reserves position. FTCs made permanent plus permanent CEO appointment
	2025 PCF application	Consultation due to close on 16 September. Weekly meetings between FM and CILEX CFO to progress PCF application.
	Explore investment options for reserves and cash balance that maintain liquidity.	Interest yielding accounts identified although likely return will be less than anticipated due to low interest rates
	Corporate Plan. Cost transparency statement	Corporate plan published. Cost transparency

## Response and Actions for CRL arising from the RPA 2023

Standard	Issues	Actions	Responsibility	Progress
Well-led	Continued assurance that the recommendations and findings of the LSB investigation report are implemented.	<ul style="list-style-type: none"> <li>Regular contact between CILEX and CRL CEOs.</li> <li>Reconciliation of historic PCF payments.</li> <li>Transfer of contingent reserves.</li> <li>Sharing and scrutiny of communications.</li> </ul>	CEO	<ul style="list-style-type: none"> <li>A minimum of fortnightly meetings taking place between CILEX and CRL CEOs.</li> <li>Positive dialogue and awareness of CILEX's timetable.</li> <li>PCF reconciliation agreed. Offer made to CILEX to accept that 2020 cannot be reconciled.</li> <li>Formal request for the transfer of reserves made to CILEX.</li> <li>Regular update of Undertakings action plan and attendance at joint LSB progress review meetings.</li> </ul>
	Assurances given in 2020 by CILEX and CRL regarding compliance with the IGRs and IGR guidance indicated there may be weaknesses in technical governance.	<ul style="list-style-type: none"> <li>Review technical governance arrangements.</li> </ul>	DoG	<ul style="list-style-type: none"> <li>Complete by Q3 2024.</li> </ul>
	Transparency of decision-making	<ul style="list-style-type: none"> <li>Update the agenda format for Board meetings to make clear matters that are Public and those that are private.</li> </ul>	DoG	<ul style="list-style-type: none"> <li>Revised Board Agenda format agreed to be used</li> </ul>

Standard	Issues	Actions	Responsibility	Progress
		<ul style="list-style-type: none"> <li>Adhere to CRL’s publication policy by publishing Board papers in advance of meetings</li> <li>Invite questions from the public in advance of Board meetings.</li> <li>Extend the scope of papers that are published to include but not limited to: CEO performance report, Directors’ report, strategic implementation plan/ corporate plan progress updates, strategic risk register and policy papers.</li> </ul>		<p>from May 2024 Board meeting.</p> <ul style="list-style-type: none"> <li>Presumption now is that all papers should be published in advance. Reasons for papers to be considered in private and the exemption being applied will be clearly outlined. Papers to be published include: full CEO and Directors reports, the Finance report and strategic plan updates.</li> </ul>
	Improved reporting to the Board	<ul style="list-style-type: none"> <li>Further development of the assessment and reporting of strategic and operational risks.</li> <li>Confirm effectiveness of current performance metrics for core regulatory processes.</li> </ul>	<p>CEO, DoG.</p> <p>DoR</p>	<ul style="list-style-type: none"> <li>Risk appetite statement published February 2024.</li> <li>Proposals for risk reporting considered at Feb 2024 Board.</li> <li>New Strategic Risk reporting format implemented– May 2024.</li> <li>Performance metrics review. Proposals inc a dashboard to be presented to Sept Board.</li> </ul>



Standard	Issues	Actions	Responsibility	Progress
		charging the non- authorised/paralegals for regulation is dependent on CILEX charter change. <ul style="list-style-type: none"> <li>• Ensure significantly more clarity and transparency in the presentation of financial information in the next PCF application.</li> </ul>		progress 2025 PCF application.
	Financial resilience	<ul style="list-style-type: none"> <li>• Reconcile any PCF surplus or deficit using the method agreed with CILEX.</li> <li>• Ensure timely transfer of the contingent reserves.</li> <li>• Ongoing monitoring of CRL's financial performance.</li> <li>• Compliance with LSB and CILEX Group reserves policy.</li> </ul>	CEO & Board	<ul style="list-style-type: none"> <li>• 2023 PCF reconciliation agreed.</li> <li>• CRL now meeting both LSB and CILEX reserve policies.</li> <li>• Publication of Board Finance Report to inform LSB's understanding of CRL's financial position.</li> </ul>
Effective approach to regulation	Robustness, quality and accuracy of applications for approval of alterations to regulatory arrangements (and PCF)	<ul style="list-style-type: none"> <li>• Review other rules changes submissions from other regulators and learn from successful submissions.</li> <li>• Address the need to provide a better evidence base in support of applications.</li> <li>• Work with CILEX on ensuring accurate information is provided to the LSB in PCF applications and review</li> </ul>	DoG	<ul style="list-style-type: none"> <li>• Complete by Q2 2024.</li> <li>• Reflect on any feedback received from the LSB on the transparency rule change application.</li> </ul>

Standard	Issues	Actions	Responsibility	Progress
		<p>internal approval arrangements.</p> <ul style="list-style-type: none"> <li>Review the <i>Commencing &amp; Implementing Change</i> procedure, including for Board approval of LSB submissions.</li> </ul>		
	<p>Assurance of how CRL ensures its activities translate to effective consumer outcomes.</p>	<ul style="list-style-type: none"> <li>To provide better analysis and advanced research on how consumers will be impacted by changes in regulation or associated activities.</li> <li>Include consumer impact as part of the Board paper template.</li> <li>Consumer perspective to be included as part of 2025-28 strategy development.</li> </ul>	DoR	<ul style="list-style-type: none"> <li>Ongoing</li> <li>Complete by Q2</li> <li>Complete by Q3</li> </ul>
	<p>Consumer Empowerment</p> <p>CRL has committed to meeting the expectations in our statement of policy in this area by September 2024.</p>	<ul style="list-style-type: none"> <li>CRL is on track to be compliant with the LSB's statement of policy by September 2024, and on remote hearings in future.</li> <li>CRL will work with others within the sector with a view to ensuring consistency of standards and approach, whilst differentiating our</li> </ul>	DoG	<ul style="list-style-type: none"> <li>September 2024. Assurance statement provided to the Board for approval.</li> </ul>

Standard	Issues	Actions	Responsibility	Progress
		<p>requirements to the particular nature of the firms that we regulate.</p>		
	<p>Concerns that CRL had not been able to establish long-term compensation fund arrangements.</p>	<ul style="list-style-type: none"> <li>Given continuing uncertainty on regulatory arrangements, it has been confirmed that the current arrangement will now continue into 2024 with CRL and CILEX jointly underwriting the fund at the same level.</li> </ul>	<p>CEO</p>	<ul style="list-style-type: none"> <li>Letter sent to LSB confirming existing arrangements to continue until there is clarity regarding future regulatory arrangements.</li> <li>Actuary engaged to review and advise on the operation of the compensation fund.</li> </ul>





# Staff Survey 2024

## Briefing

## Covered in the presentation

- Response rates
- Areas of strength
- Some highlights
- Areas for improvement
- Next steps

## A reminder

- Survey ran from 15 May 2024 to 12 June 2024
- Previous all staff survey was conducted in March 2022
- A lot of change since 2022 which makes meaningful comparisons difficult plus some new questions
- Results confidential and anonymous
- Open to all staff including those off payroll

# Response rates

**2022:**  
18 out of 19  
staff



**2024:**  
23 out of 23  
staff



# What we do well

**The 2024 survey has shown many positives around what we do well including...**

Offering a friendly and welcoming environment

Good teamwork with no blame culture

Communicate well and promote inclusion

Commitment to tasks and doing the best we can for consumers and the regulated community

Clear understanding of CRL's core purpose

# Some highlights

## Highlights include...



**95%** responded positively that CRL has a positive culture



**90%** feel proud to work for CRL



**75%** would recommend CRL as a great place to work



**100%** know where to find corporate policies and **95%** HR policies



**85%** feel that they are provided with timely information regarding change

## Main areas of improvement since the 2022 survey



Communication within teams and across CILEx Regulation



Provision of timely information on changes within CILEx Regulation



Opportunities for training and career development have increased




No significant change in many of the satisfaction scores


# Areas for improvement




**55%** of staff feel fairly paid compared to **64%** in 2022




**55%** find 1-1s effective compared to **71%** in 2022



Although some improvement workload and work-life balance remain an area of focus



**30%** agreed annual appraisals are productive compared to **71%** in 2022



**45%** agreed they had been set clear objectives compared to **64%** 2021



## Other areas for improvement

- Training opportunities – 60% of staff agreed they had been offered training opportunities compared to 78% in 2022.
- Having a clear understanding of career development path **although improvement** in the belief there are good career and training opportunities within CRL.
- Managers being interested in my development.
- Receiving recognition when you've done a good job.
- Mixed view about the quality of the benefits package – Pension rated better than the previous survey but Medicash and Life Assurance having less favourable responses.
- EAP Health Assured - most respondents were neutral. Is this due to awareness or never needing to access the service?
- The mental health arrangements previously put in place have not been maintained – eg Mental Health First Aiders (MHFAs) have left or not had certificates renewed.
- A small number of staff don't feel they have the tools to work efficiently from home.
- No strong desire to have more opportunities for improvement.

## What are the quick wins?

- Everyone to have objectives, mid-year review and annual appraisal meeting
- Personal development plans in place to inform the corporate L&D plan
- More opportunities for informal (virtual) get togethers eg monthly coffee mornings?
- Everyone to have a 1-1 with their line manager at least once a month?
- Review induction programme
- Revive mental health and wellbeing support – eg training and certification of MHFAs

## Next steps

Staff meeting – initial discussion to consider priorities for progress and the how

Opportunities for discussion in team meetings and all staff meetings

Action plan for the September Board meeting

Track and monitor progress against action plan



**Your thoughts  
and questions...**



### Staff Survey Improvement Action Plan 2024

Area	No	Action	Lead	Indicative Timeline	Progress and measures of success
<b>Objectives and Appraisals</b>	1	Refresh and reissue objective/appraisal templates and guidance	CEO/BSM	By September 2024	
	2	Objectives set for the remainder of the year if not already agreed	All	By September 2024	Copies of objectives saved in Sharepoint
		Personal development plans (PDP) agreed identifying any immediate learning and development requirements	All	By September 2024	Copies of PDPs saved in Sharepoint
	3	Appraisal meetings held and objectives set for 2025 based on the new strategy and corporate plan and PDPs agreed	All	By end of January 2025	Copies of objectives and PDPs saved in Sharepoint Staff survey 2025
	4	Corporate learning and development plan developed, informed by individual PDPs	CEO/BSM	By end of February 2025	Staff survey 2025
	5	Everyone to have a 1-1 with their line manager at least once a month	Managers	Immediately 2024	Executive to check with Managers Staff survey 2025
<b>Induction and training</b>	6	Develop and document a CRL induction programme including onboarding	Executive/BSM	October 2024	Staff survey 2025

	7	Each team to develop an induction and training programme for every role.	Managers	As required as part of the recruitment process should a post become vacant	Staff survey 2025 Probation feedback
<b>Career development</b>	8	Develop and consult on a CRL secondment policy	CEO/BSM	December 2024	Staff survey 2025
	9	Formalise potential qualification and career progression pathways	CEO/DoR	March 2025	
<b>Understanding what we all do</b>	10	Develop a staff directory on Sharepoint which explains individual roles and responsibilities plus additional skills eg high level proficiency on IT packages	Managers/BSM	December 2024	Staff survey 2025
	11	Use all staff meetings for individuals and teams to showcase their work	Executive	From September 2024 (linked to internal comms plan)	Staff survey 2025 Meeting effectiveness evaluation
<b>Communications within CRL</b>	12	Develop an internal communications plan which includes: <ul style="list-style-type: none"> <li>• reviewing the frequency and effectiveness of staff and team meetings</li> <li>• increase opportunities for consultation and support</li> <li>• Using Teams to celebrate success and achievements.</li> <li>• Opportunities for informal virtual gatherings.</li> <li>• Circulate Board minutes and papers</li> </ul>	PC	By end of October 2024	Staff survey 2025
<b>Working arrangements</b>	13	We will review the organisation of SharePoint so that staff are clear where and when they can find	BSM	By the end of December 2024	Staff survey 2025

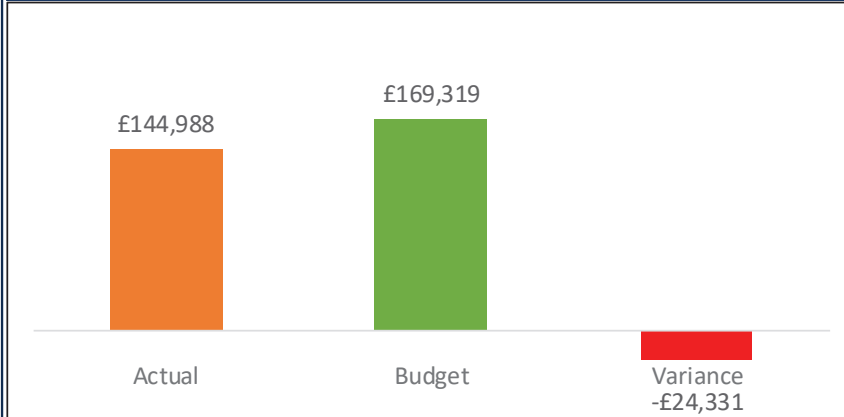
		information, especially on corporate policies			
	14	Hold in person all staff events twice a year	CEO/Executive	Xmas gathering	Staff survey 2025 and meeting evaluations
<b>Staff wellbeing</b>	15	Appoint and train mental health first aiders	Executive/BSM	December 2024	Staff survey 2025
	16	Appoint a well-being champion and Executive team sponsor to work with staff to develop further wellbeing initiatives and events	Executive	Invite expressions of interest at Sept staff meeting	Staff survey 2025
	17	Promote the existing Employee Assistance Programme (Health Assured) benefits at an all staff meeting	CEO/BSM	August 2025	Staff survey 2025
<b>Pay and benefits</b>	18	Conduct a pay benchmarking exercise.	Executive/Managers	March 2025	Staff survey 2025
<b>Monitoring progress</b>		Conduct annual staff survey plus pulse surveys where appropriate	CEO/SC	May 2025	

**CEO:** Chief Executive; **Executive:** CEO, Director of Governance & Policy and Director of Regulation; **Managers:** Abby Adamah, Gerry McCarthy, Siobhain O'Mahony, Mark Wood, Enforcement and Investigations Manager. **BSM:** Business Support Manager; **PC:** Comms Officer, Paula Charnock

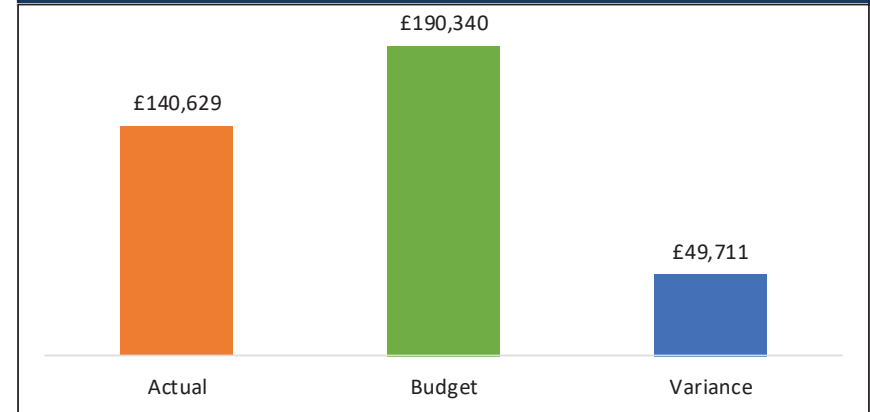
**Balance Scorecard Data – Q2 2024**

**Finance**

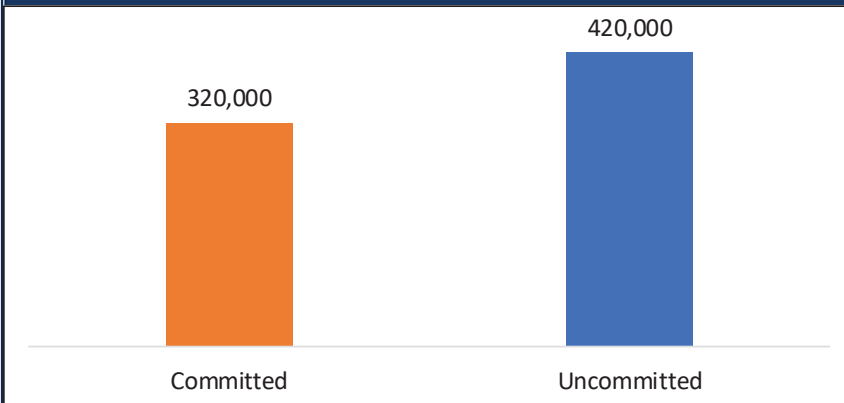
**Income Q2 2024**



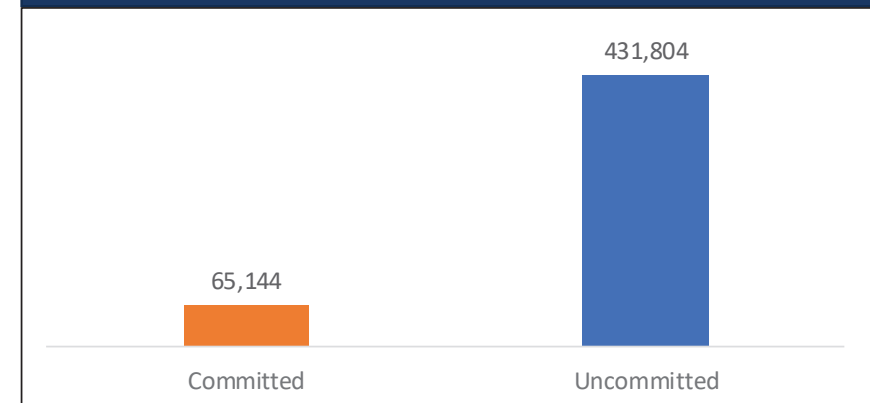
**Expenditure Q2 2024**



**Contingency Reserve Q2 2024**

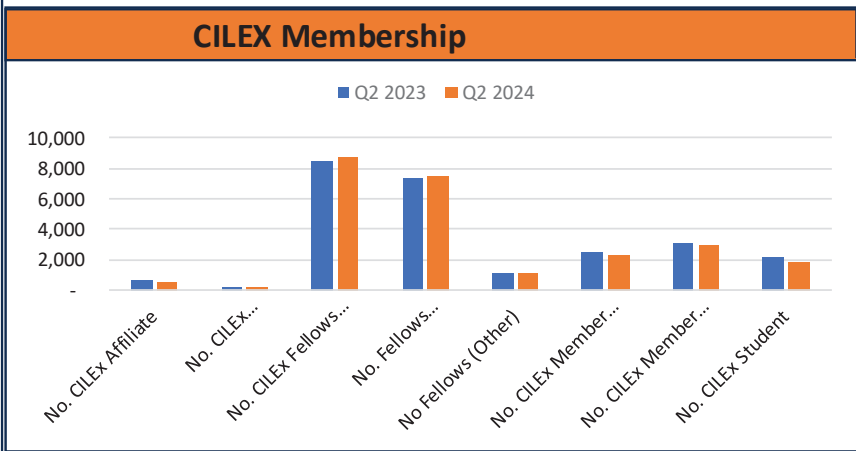
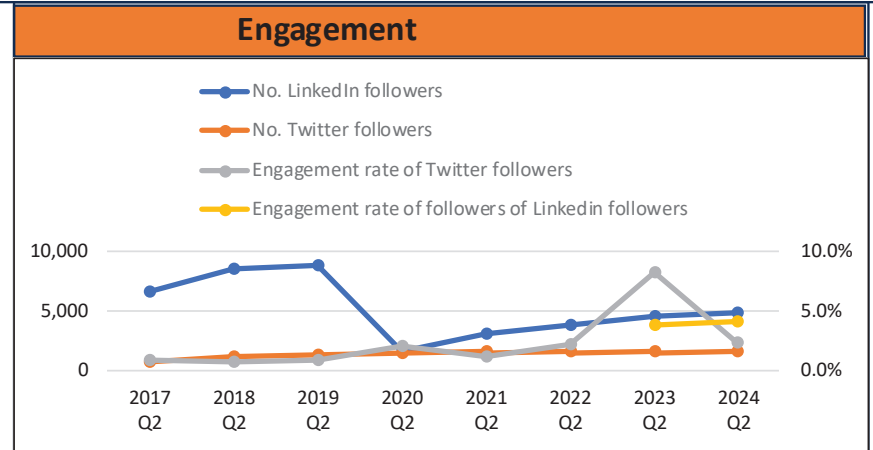
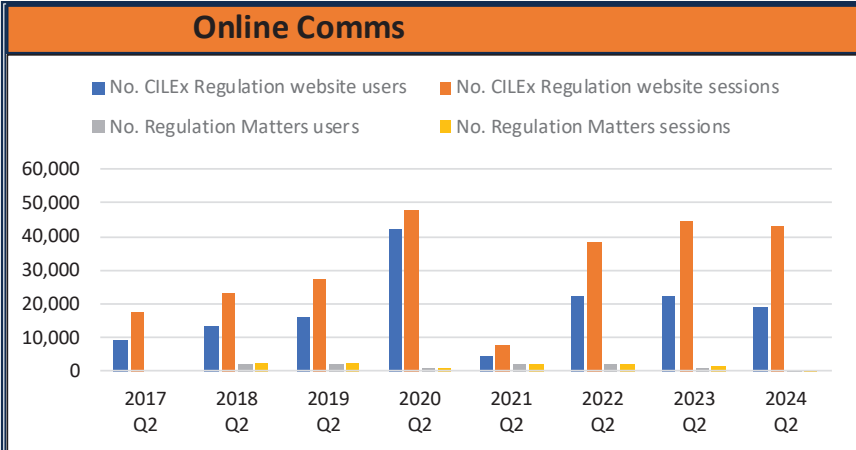


**Working Capital Q2 2024**



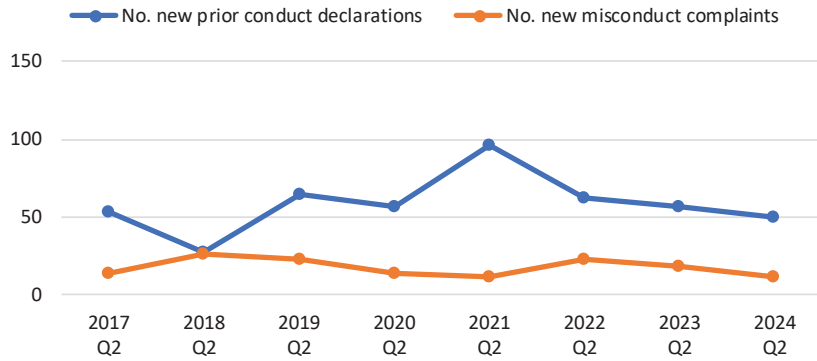


STAKEHOLDER/COMMS DATA

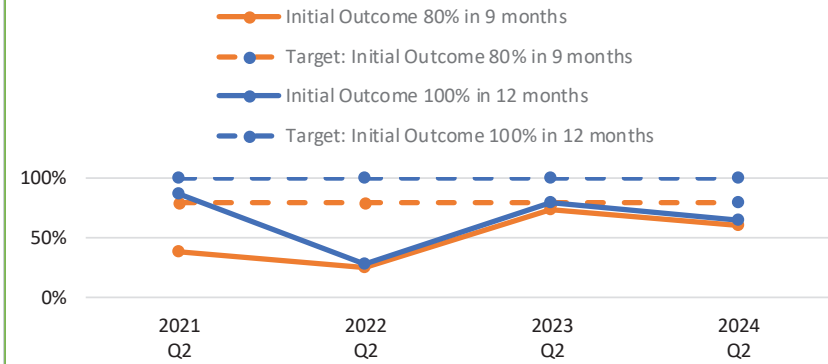


OPERATIONS

### Complaints

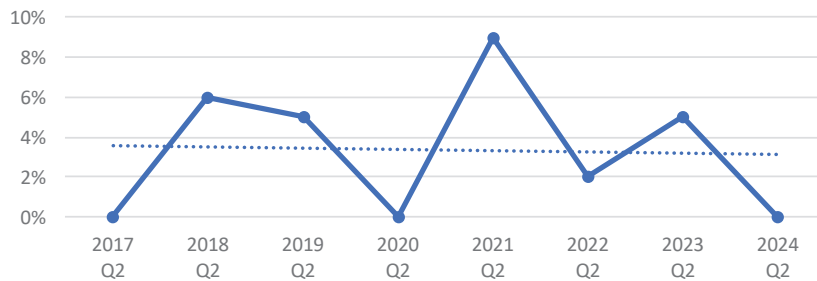


### Complaints - Outcome



### Staff Turnover

22 posts as at Q2, equivalent to 21.6 FTE  
0.50 sickness absence days per FTE for Q2 2024






**Authorisation:** Ensuring competence on entry to the profession

**Supervision:** Assuring maintenance of lifelong competence



OPERATIONS

**Practitioner**

Applications in Q1 2023 and Q1 2024		
	Q2 2023	Q2 2024
WBL	162	178 
QE	140	160 
Practice Rights/ Advocacy /ACCA	21	16 

**Practitioner**



Non-compliance figure at CPD as at 31/08/2024: 1,081 (2,537 for 2023)

CPD non-compliance in Q2 2023 and Q2 2024		
	Q2 2023	Q2 2024
Authorised persons	75	152 
Non-authorised	747	946 

**Entity**



No. of CRL firms active: 20 (19 in Q2 2023)

No. of ACCA firms active: 38

Firm authorisation data in Q2 2023 and Q2 2024		
	Q2 2023	Q2 2024
CRL firms authorised	1	1 
ACCA firms authorised	6	3 

**Entity**

No. of firms ceasing regulation with CRL: 0

Annual Returns in Q2 2023 and Q2 2024		
	Q2 2023	Q2 2024
CRL firms renewed	19	20 
Renewals authorised	5	4 

**GDPR Data:** Breaches reported/not reported to the ICO. (1 breach not reported in Q2 2024)

**KEY**

**Revised KPI sheet - Q2  
Board report**

CILEx Regulation Performance Data 2017-2024		2017 Q2	2018 Q2	2019 Q2	2020 Q2	2021 Q2	2022 Q2	2023 Q2
<b>OPERATIONAL</b>								
<b>PRACTITIONER AUTHORISATION</b>								
Qualifying employment	Av. no. weeks to overall	8	9	9	9	9	9	5
	% QE decisions made	19.0%	10.9%	16.0%	15.9%	15.5%	14.7%	9.8%
Work-based learning	No. authorisations	138	170	186	99	182	182	181
	Av. no. weeks to overall	11	10	9	9	13	14	12
Practice rights	No. authorisations	2	4	4	5	11	10	2
	Av. no. weeks to overall	50	25	36	37	36	40	46
Advocacy	No. authorisations	1	6	0	2	2	4	1
	Av. no. weeks to overall	51	25	28	36	37	39	41
<b>PRACTITIONER SUPERVISION</b>								
CPD non-compliance (CPD year 2018/19)	Fellows				377			
	Graduates				385			
	Associates				867			
CPD non-compliance (CPD year 2019/20)	Fellows					273		
	Graduates					499		
	Renews/Graduates with WPL reduction					34		
	Associates					1222		
CPD non-compliance (CPD year 2020/21)	Fellows						92	
	Graduates						260	
	Renews/Graduates with WPL reduction						26	
	Associates						687	
CPD non-compliance (CPD year 2021/22)	Fellows							75
	Graduates							164
	Renews/Graduates with WPL reduction							14
	Associates							569
CPD non-compliance (CPD year 2021/22)	Fellows							
	Graduates							
	Renews/Graduates with WPL reduction							
	Associates							
<b>ENTITY AUTHORISATION</b>								
Applications	Av. no. weeks to	15	5	5	5	4	2	2
	No. ABS			0	0	0	1	1
	No. of CILEX-ACCA						43	40
<b>ENFORCEMENT</b>								
Prior conduct declarations	No. live cases	63	123	53	150	269	139	84
	Age of oldest live							135
	No. of cases on hold							24
Conduct complaints	No. live cases	36	51	57	76	98	115	136
	Age of oldest live prior							<b>232</b>
	Target: Initial				89%	69%	96%	100%

2017 Avg	2018 Avg	2019 Avg	2020 Avg	2021 Avg	2022 Avg	2023 Avg	2024 Avg
2017 Total	2018 Total	2019 Total	2020 Total	2021 Total	2022 Total	2023 Total	2024 Total

2024 Q2	2017	2018	2019	2020	2021	2022	2023	2024	Change Q2 2017 to Q2 2022
5									
N/A									
148	503	694	735	537	352	741	708	280	
12									
36	7	10	13	18	17	46	113	102	
33									
2	13	16	15	11	2	6	13	3	
40									
152									
292									
9									
645									
N/A									
1									
38									
70	89	125	85	238	310	141	81	68	
183									
15									
103	39	49	58	77	97	120	137	113	
284									
20%									