

# CILEx Regulation Corporate Plan 2025

# 1. Introduction

CILEx Regulation Limited (CRL) provides independent regulation of CILEX's 7,600 authorised members, as well as around 9000 paralegals and other non-authorised members.

We are focused on delivering a high standard of specialist regulation of CILEX members which is risk-based, proportionate and operates in the public and consumer interest. We are proud of our strong governance, independent and cost-effective operational structure, and productive engagement with our regulated community.

This document sets out CRL's plan for delivering the first year of its new three-year strategy.

Our priorities for 2025 include:

**Education:** a full review of new education standards, and implementation of our ongoing competence plans to ensure those we regulate operate to the highest professional standards.

**Consumer Information:** implementation of our new transparency requirements and working with others so consumers get better and fuller information.

**Enforcement:** process improvements to improve efficiency and reduce timescales for handling misconduct cases.

**Governance:** updating our governance structures with new arrangements to monitor risk.

Equality, Diversity and Inclusion: a refreshed EDI Strategy.

**Legal Regulation:** contributing actively to the debate on the future shape of regulation, including organising a Roundtable in the Spring on unregulated legal providers.

In addition, we will continue to seek clarification of the lawfulness of CILEX's proposals to redelegate CRL's responsibilities to the SRA and make the case for

fully independent regulation which we believe is in the interests of consumers and the profession.

# 2. Our mission and purpose

Our mission is to be a high performing and responsive regulator that protects and promotes consumers' interests through strong evidence-based regulation.

Our purpose is to ensure high standards of professional conduct and competence, protecting and promoting the public and consumer interests, enhancing respect and understanding for CRL qualifications and maintaining the integrity and trust of the legal profession.

We do this by overseeing the education, qualification, and continuing competence of the people and entities we regulate. We set standards, oversee compliance with those standards and investigate allegations of non-compliance – taking action where we need to.

Our approach to regulation is proportionate and constructive, promoting the nine regulatory objectives set out in the 2007 Legal Services Act. Members of our regulated community can deliver legal services in the way they think best, provided their decisions and actions are in the interests of their clients and the wider public.

# 3. Our strategy

In November 2024, CRL published its <u>new three-year strategy for 2025-2027</u>. The new strategy builds on the achievements of the previous 2022-2024 strategy and sets out our priorities for the next three years and where we expect to be at the end of the three year period.

To deliver CRL's core work of protecting consumers' interests we have developed four key strategic objectives:

- Standards and public trust
- Access to justice and consumer empowerment
- Independence and sustainability
- Be an authoritative, inclusive and capable organisation

The 2025 Corporate Plan reflects on the progress we have made during 2024 in delivering the final year of the 2022-24 strategy and sets out our priorities for 2025 against each of the four key strategic objectives. A key focus of our plan for 2025 is to continue to develop CRL's capability and capacity, make our qualifications as accessible as possible whilst not diluting standards, pursue innovative models to minimise regulatory burden, champion fair access and enhance the information available to consumers to improve accessibility to legal services.

We will also contribute actively to the Legal Services Board's (LSB) work, for instance on ongoing competence, technology, updating the Internal Governance rules, and empowering consumers, as well as learn from other regulators.

# 4. Achievements in 2024

CRL's 2022-24 strategy has been delivered against a backdrop of continuing uncertainty caused by CILEX's announcement in early 2022 of its intention to redelegate regulation of CILEX members to the Solicitors Regulation Authority. CILEX's proposals have required CRL to devote significant time and resource to respond to the existential threat facing our organisation.

Despite operating in an extremely uncertain environment much has been achieved to deliver benefits to consumers and the regulated community. The fact that CRL has continued to deliver quality regulation and deliver its strategic objectives is testimony to its leadership and the resilience of its staff.

Key achievements in 2024 include:

- Extending our transparency requirements to cover all areas of law, and to align more closely with the LSB Statement of policy on empowering consumers. Improving the quality of CRL's statutory rule change applications which ensured the transparency rule change application could be considered within the 28-day period.
- Continuing to be a significant collaborator and partner in cross sector joint initiatives, such as the work that delivered the Beyond Buzzwords Equality, Diversity and Inclusion (EDI) research.
- Publishing a literature review to understand the gaps in the regulatory market from the perspectives of consumers and the regulated community. A roundtable meeting of key stakeholders to further discuss the findings of our research is planned for the first quarter of 2025.
- Extending our engagement with the regulated community and other stakeholders through consultation events, webinars, monthly newsletters and social media channels. This included our corporate strategy consultation and Artificial Intelligence (AI) webinars of which each attracted over 20,000 views.
- Leading the debate on emerging themes and issues such as the impact of Artificial Intelligence in the sector including holding a webinar with an industry partner for CRL's regulated community.

- Implementing a progression route to enable Chartered Legal Executives to obtain Higher Rights of audience.
- Embedding the prevention and detection of economic crime into the supervision programme and monitoring of CRL Authorised Firms, including the publication of our Anti-Money Laundering (AML)Supervision Report for 2023/24.
- Strengthening CRL's reputation through positive media coverage and positioning itself as a thought leader. This included a CRL thought piece on the role of regulators in promoting EDI in the legal profession published in the Solicitors Journal.
- Improving our regulatory performance which has included a 25% reduction over the past year in the number of open misconduct cases as well as concluding many of the oldest cases.
- Contributing to the development of the Legal Choices website (a comprehensive online resource for consumers).
- Collaborating with other regulators to progress the development of a Regulatory Information Service in line with the LSB's Statement of Policy on Empowering Consumers.
- Continuing to improve the consumer experience on CRL's website, including making key information in Welsh.
- Strengthening and consolidating the Executive Team and the benefit of the strong and stable leadership and governance that this delivers.
- Improving staff retention with continuity being achieved through minimal need for recruitment, engaging with staff effectively and adding more resource and resilience where needed.
- Further enhancing the transparency of our own governance arrangements increasing our openness in the way that we do business, through a publication scheme more open than many other regulators including the publication of Board papers in advance of meetings.
- Ensuring CRL's regulatory approach provides value for money through delivering efficiencies and productivity improvements whilst keeping PCF increases to a minimum. Examples include Continuing Professional Development (CPD) compliance and ongoing competence work.

# 5. CRL's priorities in 2025

# **Core Regulatory activities**

We will continue to deliver our core authorisation, supervision, and enforcement regulatory activities – looking always to refine and improve the way in which we deliver regulatory services in the public and professional interest. These activities are often referred to as 'business as usual', however, they represent a significant proportion of CRL's annual workplan. Our priorities for delivering our core regulatory activities next year are:

# **Education standards**

Keeping the standards for authorisation under review, accrediting training providers, acting as External Quality Assurer for the Chartered Legal Executive apprenticeship, and carrying out an annual review of accredited providers and exemptions.

#### **Deliverables**

- Review of Advocacy Qualification Scheme.
- Introduction and delivery of internal and external Quality Assurance strategy.
- Full review of the new education standards to ensure they are accessible and remain rigorous.
- Review of ACCA and CPS delivery and assessment materials.
- Implementation of Advocacy training and assessment.
- Feasibility study into offering standalone Litigation practice rights.

# Authorisation

Authorising individuals and firms as authorised persons (includes assessment of qualifying employment, competence for admission and oversight by committees).

#### **Deliverables**

- Process the Qualifying Experience and Work Based Learning authorisation applications in line with agreed Key Performance Indicators (KPIs).
- Complete the review of:
  - the Practitioner Authorisation and Supervision (PAS) Manual
  - o application forms, and
  - o applicant facing website content.

# Supervision

Ensuring competence of individuals through CPD activity monitoring and firm supervision via annual returns and visits.

# **Deliverables**

- A robust system of CPD compliance. This will include design and implementation of 2024/2025 CPD sampling strategy including randomly selected members, non-compliant CPD members and those CILEX practitioners scoring 17 or above in the Risk Matrix.
- Further development of the Risk Matrix so we focus our regulatory efforts on those posing the highest risk to consumers.
- Implementation and compliance monitoring of new transparency requirements for ACCA Probate entities and CRL entities giving consumers much more information than ever before.
- Review risk assessment of CRL Firms based on annual returns submitted by CRL entities in 2024.
- AML compliance:
  - Preparation for the Office for Professional Body Anti-Money Laundering Supervision (OPBAS) inspection
  - Risk assess AML Statements submitted by CRL AML supervised firms
  - Update AML Sectoral risk assessment to ensure it aligns with the National Risk Assessment 2025
  - AML Supervision Report.

# Enforcement

Includes review of the annual prior conduct declarations and investigations of misconduct together with oversight from enforcement panels.

#### **Deliverables**

- Continue process improvements to reduce the overall case load and the length of time to conclude cases.
- Recruit, induct and train new roles.
- Confirm revised KPIs and develop a performance monitoring dashboard for misconduct cases.
- Develop and implement revised practice guidance.

# Business planning, risk management and compliance

Includes engagement and communications, Board meetings and preparation, risk and performance management, strategy and business planning, stakeholder engagement and compliance activities.

#### **Deliverables**

- Respond to consultations including LSB and Legal Ombudsman (LeO) annual business plans.
- LSB Regulatory Performance information request.

- Board self-evaluation and effectiveness.
- Lay Board member recruitment.
- Implement the extended remit of the Strategic Risk Committee to consider CRL's risk appetite statement and strategic risk register.
- Continue to improve the accessibility of CRL's website.
- Survey preparation and EDI data collection and analysis.
- Corporate complaints reporting.

# General management

HR (including 3<sup>rd</sup> party provider). Finance activities including calculation of the practising certificate fee, professional fees not covered in other activities, expenses, networking, CRM development and business support and wellbeing

#### **Deliverables**

- Pay and grading review.
- Develop a contracts database and ensure all contracts are reviewed to ensure they provide Value for Money.
- Preparation for 2026 budget, PCF and Compensation Applications.
- Review Shared Service level agreement.
- Evaluate suitability of current HR provision.
- Implementation of 2024 Staff survey action plan.

# **Strategic Objectives**

This section of the Corporate Plan sets out what CRL intends to achieve in the first year of its 2025-2027 Corporate Strategy against each of the four strategic objectives.

# **Standards and Public Trust**

#### Objective

We will promote high quality professional practice that enables the individuals and entities that we regulate to meet our standards, so they are able to adapt to changes in the delivery of legal services and utilise the benefits of innovation and law tech which meet the needs of consumers.

#### In 2025 we will:

• Follow up the outputs of the IRN research on <u>unregulated legal providers</u> and hold a roundtable with key stakeholders including the Legal Services Board and Legal Services Consumer Panel.

- Engage with the policy outputs from the LSB's Professionalism, Ethics and the Rule of Law (PERL) work.
- Develop an action plan to implement the outcomes of CRL's own review of enforcement practice and the LSB's thematic review.
- Enable the development of innovative approaches to service in legal regulation through the adoption of new technology including AI. Engagement through Innovation and Tech LSB Group, comms with regulated community on AI, access to justice, supporting entities.
- Complete a lessons learnt review from the LSB's report into the SRA's handling of Axiom Ince and SSB.

# Access to justice and consumer empowerment

# Objective

We will champion fair access to all in the legal services market. We will continue to improve the information available to consumers to improve accessibility to legal services, so they are able to make informed choices and have confidence in the legal professionals they engage with.

# In 2025 we will:

- Undertake a gap analysis against the LSB's Statement of Policy on First tier complaints.
- Continue to contribute to the development of Legal Choices including refreshing CRL's content.
- Continue to input as a project member of the development of the Regulatory Information Service (RIS) as it moves into the design and delivery phase in 2025, with a Beta version being available in the Spring. This includes provision of CRL data.
- Continue to work with the Bar Standards Board (BSB), Council for Licensed Conveyancers (CLC) and Institute of Chartered Accountants in England and Wales (ICAEW) on research into digitally excluded consumers of digital services.
- Advance CRL's work on increasing consumer information including the RIS project and collaborating with other regulators on standardising information and Digital Comparison Tools (DCTs).
- Implement the revised transparency rules for ACCA-Probate and CILEX entities.

# Independence and sustainability

#### Objective

Promote the value and importance of independent, specialist regulation, ensuring CRL is able to work without fear or favour and its independence is protected.

# In 2025 we will:

- Contribute to the LSB's review of the Internal Governance Rules (IGRs) and any wider review of the operation of the Legal Services Act 2007.
- Develop an updated People Strategy which includes capacity and capability requirements in order to invest in those areas of operation which are most important to consumers, the regulated community and regulated entities.
- Continue to engage with, and, where appropriate, challenge CILEX's proposals to redelegate regulation to the SRA where we believe it is necessary and in the public interest.
- Publish a Corporate and Social Responsibility Policy and associated actions.
- Develop an investment policy depending on the transfer of contingent reserves from CILEX.

# Be an authoritative, inclusive and capable organisation

#### Objective

The organisation is resilient and has the capacity and capability to quickly adapt to changes in the external environment. Continue to champion fair access for all in the legal services market.

#### In 2025 we will:

- Publish CRL's biennial Diversity Data report.
- Working with the Bridge Group, utilise data collected to analyse the progression of the CRL regulated community within the legal profession and identify actions to improve progression.
- Refresh our 2022 EDI Strategy, including developing an action plan in response to the *Beyond Buzzwords* research
- Commission further research into the unregulated legal services market, following outputs from the planned roundtable event.
- Embed CRL's new corporate values into appraisals and personal development plans.

# **Budget and Costs**

This Corporate Plan will be delivered predominantly from the Practising Certificate Fee for 2025, and the charges CRL levies for particular services (eg payment for assessment of Qualifying Experience and Work-based learning). For 2025, CRL has proposed a 3% increase in its budget to reflect additional costs bringing our budget to £1.99m, having kept our fees more or less level since 2017 representing an £80 reduction in real terms. Through its Board papers, CRL regularly publishes a detailed breakdown of the costs of each of its key workstreams. We will continue this practice in 2025.

# **CILEx Regulation Values**

Integrity	We are honest and take responsibility for our decisions. We listen to the regulated community and other stakeholders but remain independent.
Excellence	We are a learning organisation, committed to improvement and innovation.
Fairness	We respect people and treat them without prejudice.
Transparency	We are open about how we work and how we reach decisions.
Efficiency	We keep things simple, timely and cost effective.