

Date	9 December 2025
Item	11.00
Title	Consultation Updates
Author	Jonathan Levack , Director of Policy and Governance
Purpose	<p>The paper also provides a first draft response to two consultations:</p> <ul style="list-style-type: none"> - Office for Legal Complaints, draft Business Plan and Budget 2026/27 - HMT Consultation on Anti-Money Laundering and Counter-Terrorist Financing Supervision Reform
Recommendation	To DISCUSS and APPROVE the draft consultation responses.
Timing	<p>Deadline for consultation responses are:</p> <ul style="list-style-type: none"> - 16 December 2025 - 24 December 2025
Impact assessment	None
Impact on Regulatory Objectives	N/A
Implications for Resources	Beyond the immediate resource impact of responding to the consultations, the transfer of AML supervision to the FCA will have resource implications both during and after that transition.
Impact on Consumer Empowerment	N/A
Impact on Ongoing Competence	N/A
Publication Status	Final Approved consultation response only
Appendices	<p>11.01 CRL Response to OLC Business Plan and Budget 2026/27</p> <p>11.02 CRL Response to HMT Consultation on Anti-Money Laundering and Counter-Terrorist Financing Supervision Reform</p>

Introduction

1. The Executive have drafted two consultation responses for Board consideration.

Office of Legal Complaints, Draft Business Plan and Budget 2026/27

2. This sets out CRL's response to the [OLC's consultation](#) on LeO's business plan and budget.
3. While we are supportive of the LeO and its role, the draft response sets out CRL's concerns that the 12% increase in LeO's budget sought on is not justified. This is based on:
 - Feedback from the regulated community
 - The proposal being the second significant increase in costs in two years
 - The draft not accounting for new first tier complaint handling regulations coming into force
 - The forecast increase in complaints being too speculative.
4. The deadline for responding is 16 December 2025.

HM Treasury: Anti-Money Laundering and Counter-Terrorist Supervision Reform – Duties, Powers and Accountability

5. HMT are [consulting](#) to enact the Government's decision to consolidate AML regulation under the FCA. CRL's draft response is attached.
6. Our response is generally supportive of the change but advocates for a proportionate, risk-based approach that takes account of the legal sector's specificities.
7. The deadline for responding is 24 December 2025.

Recommendation

8. The Board is asked to review the two draft consultation responses. We welcome comments and seek approval from the Board to submit these responses, subject to comment.