

**Enforcement
2025
ANNUAL REPORT**



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Foreword: Helen Astle

Protecting the public and maintaining confidence in the legal profession remains at the heart of CILEX Regulation's enforcement work. Through the fair, proportionate and independent assessment of misconduct concerns and prior conduct declarations, the Enforcement team helps uphold professional standards and support public trust in those we regulate.

During 2025, the team managed increasing case volumes and greater case complexity while continuing to improve its processes and ways of working. This report provides an overview of our activity during 2025 and the progress we have made. While challenges remain, the foundations put in place during the year position us well to continue improving efficiency, consistency and outcomes throughout 2026.

I would like to thank the Enforcement team, our independent panel members and colleagues across CILEX Regulation for their continued professionalism, commitment and hard work throughout the year. Their contribution remains critical to the effectiveness of our regulatory work.



Helen Astle
Enforcement Lead

Introduction

CRL is designated to authorise both individuals and firms and sets the standards of professional and ethical conduct expected of its regulated community.

The Code of Conduct sets out the principles to which CILEX members, CILEX practitioners and CILEX authorised firms must adhere in their conduct, practise, professional performance, and the outcomes they must meet. CILEX ACCA firms and practitioners have their own Code of Conduct.

This report outlines the work undertaken by the Enforcement Team and the independent decision makers in 2025 and identifies areas for development of CRL's approach to enforcement.

2025 in review

Prior Conduct

Prior conduct refers to self-declared information about an individual's past behaviour or circumstances that may be relevant to an assessment of their suitability to become or remain a regulated CILEX professional. The Enforcement team is responsible for reviewing these declarations, assessing risk and determining whether regulatory intervention is required, including referrals to the PCP where there is no delegated authority. Through the timely and proportionate handling of prior conduct cases, the team supports the protection of the public and upholds confidence in the standards of the regulated community.

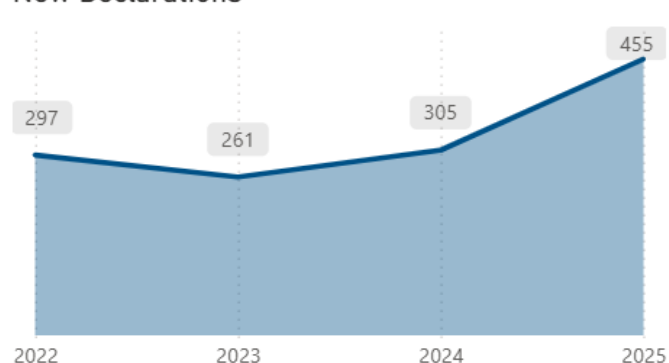
In 2025:

CRL continued to manage a high volume of prior conduct declarations, with 317 declarations received in 2025.

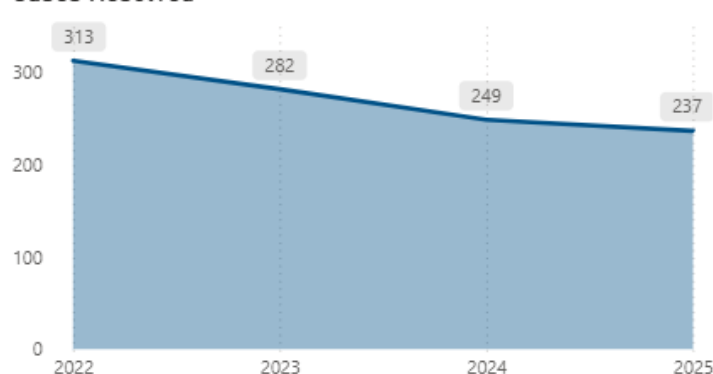
While volumes remained steady, the data shows a clear and consistent pattern: the majority of cases are routine, financial in nature, and resolved efficiently through delegated decision-making.

- 455 declarations were received during the year, a rise from 305 in 2024 and 261 in 2023.
- 71% of decisions were made through delegated authority, consistent with previous years.
- 294 cases were resolved, a decrease from 249 in 2024.

New Declarations



Cases Resolved



The introduction of standardised report templates, structured information requests, targeted training and clear internal guidance improved the timeliness and consistency of the Prior Conduct process. Process reviews identified further opportunities to increase efficiency. There is also scope to expand delegated decision-making powers, enabling lower-risk cases to be managed more proportionately and efficiently while maintaining appropriate regulatory oversight.

How cases were resolved

Delegated Decisions:

The majority of cases (71%) were resolved through delegated decision, enabling faster decision making and reduced pressure on Panel capacity.

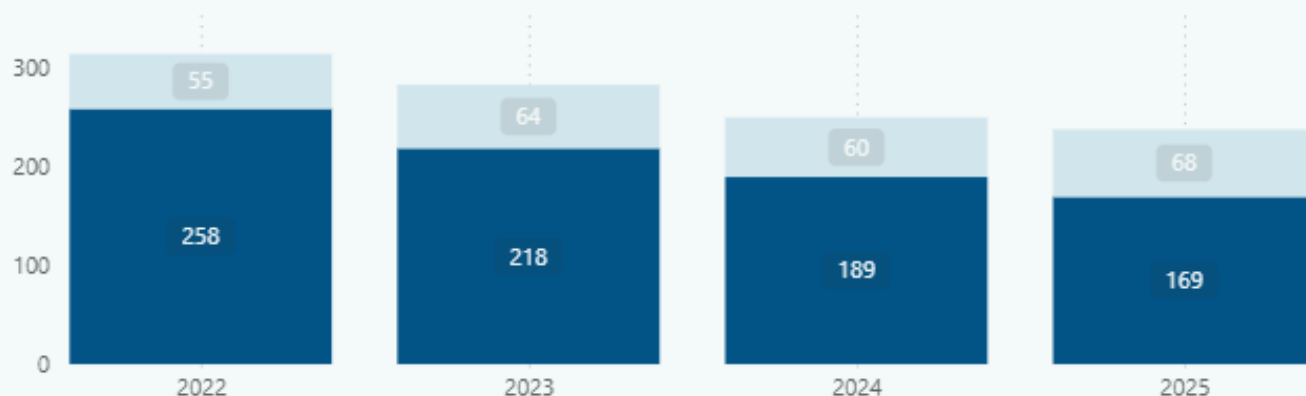
Delegated decisions were made mainly where declaration were of outstanding civil judgments or finance related.

Committee Decisions:

A smaller percentage of cases (29%) required consideration by the Professional Conduct Panel. These typically involved criminal convictions, findings by other regulators where independent assessment was required, and more complex or borderline cases.

Cases Resolved

Decision Type ● Delegated ● Committee



Timeliness

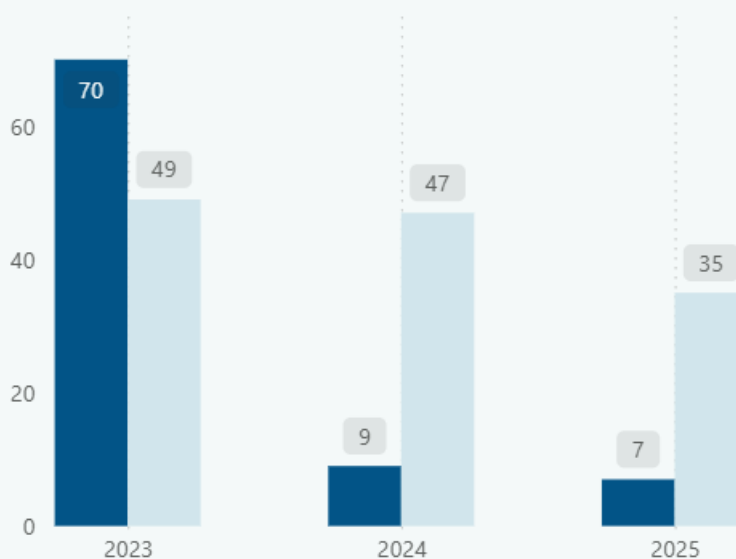
In 2025, it took an average of 7 weeks to reach a decision using delegated authority.

By the nature of Panel decisions involving more complex cases, committee decisions take longer to reach a resolution. In 2025, this was at an average of 35 weeks for cases closed. This is a significant improvement from previous years, and a 26% reduction from 2024.

Through both routes of decision making, 2025 saw a reduction in time taken of 33% in 2025 (18 weeks in 2024 to 12 weeks in 2025).

Weeks to Decision

Decision Type ● Delegated ● Committee



Misconduct

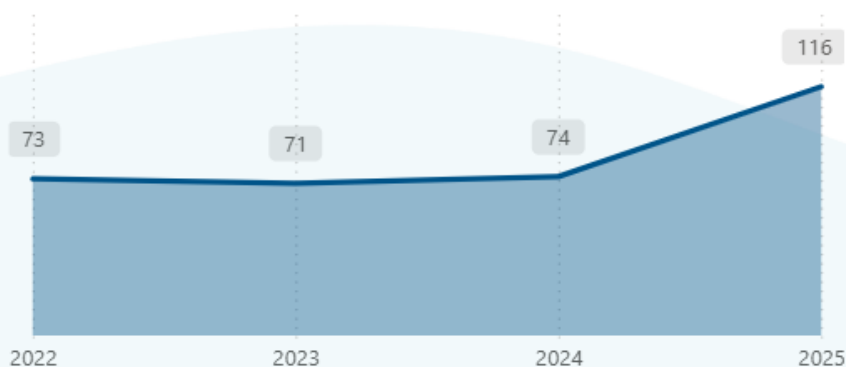
Misconduct cases arise where the conduct of a regulated individual or entity may have fallen below the standards required by the CILEX Code of Conduct. The Enforcement Team is responsible for reviewing concerns brought to its attention – typically by a third party – undertaking investigations where necessary and determining the appropriate regulatory response.

By ensuring that allegations of misconduct are assessed and resolved in a fair, proportionate and risk-based manner, the team plays a vital role in protecting the public, maintaining professional standards and supporting consumer confidence in legal services and the wider regulated community.

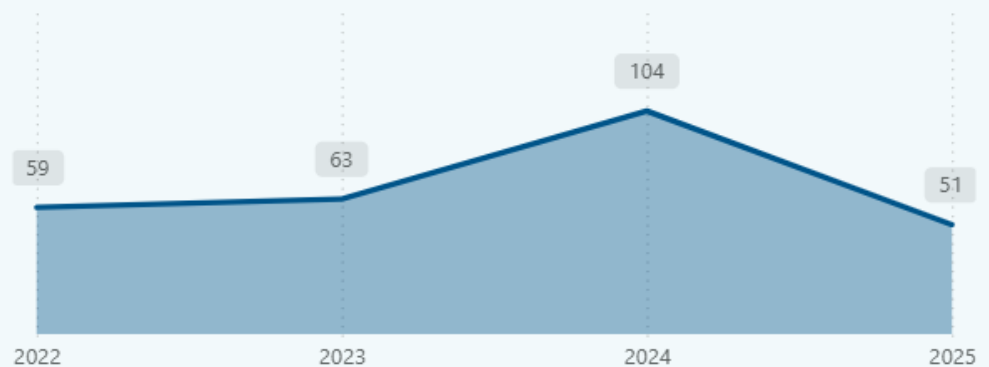
In 2025:

- 2025 saw a significant rise in misconduct cases (74 to 116).
- The largest rise in the source of complaint was from Third Party individuals.
- 2025 also saw a decrease in complaints being closed.

New complaints



Complaints Closed



How cases were resolved

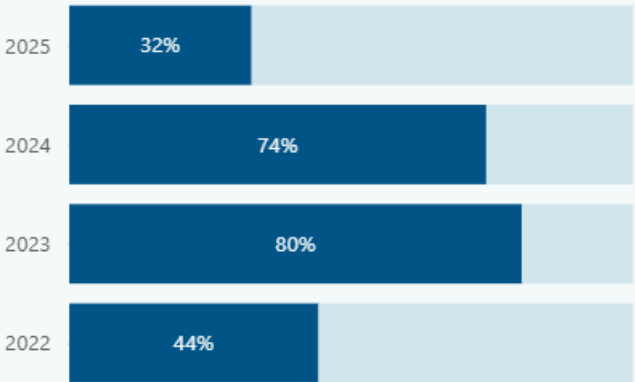
Delegated Decisions

Complaints are rejected where there is: no evidence available to substantiate an allegation; the facts alleged do not disclose misconduct; CRL has no jurisdiction; or where more than a year has elapsed since the conduct complained of took place. Once a complaint has been rejected by an investigator, complainants currently have an absolute entitlement to ask the PCP to review the investigator’s decision to reject an allegation. In 2025, the Investigators’ decision was upheld in all complaints that were subject to a PCP review.

PCP Decisions

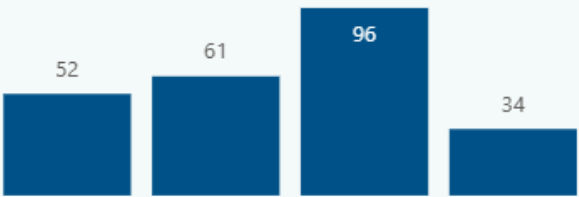
In 2025, 26 cases went to the PCP relating to 25 individuals. All cases that were referred to the PCP had decisions upheld.

Rejected Cases with Proceeding PCP Referral



Officer Decisions

Not Proceeded with



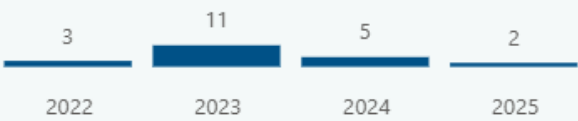
Disposal by DT



Disposal by PCP



DBC



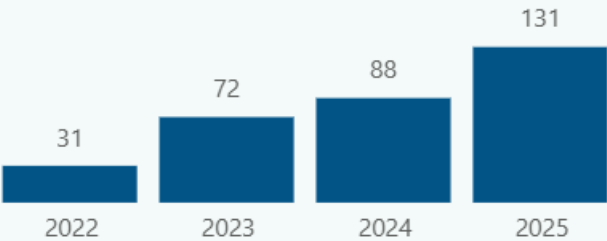
Timeliness

Case disposal times increased across most outcomes between 2022 and 2024, reflecting rising case complexity, increasing volumes, workforce changes, and matters involving multiple regulators or jurisdictional issues.

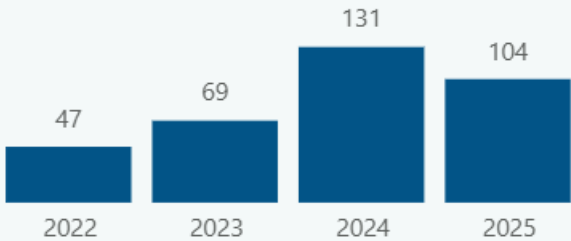
In 2025, average disposal times improved for cases concluded as Not Proceeded With, through the Professional Conduct Panel, and by the Disciplinary Tribunal, indicating early benefits from increased resourcing, process reviews, case prioritisation, and enhanced performance monitoring.

Determination by Consent cases continued to experience longer disposal times, reflecting the complexity of agreed outcomes. Reviews undertaken during 2025 also identified that reported case durations included periods outside CILEx Regulation's control. Work is underway to improve performance reporting by distinguishing internally managed activity from delays caused by external dependencies.

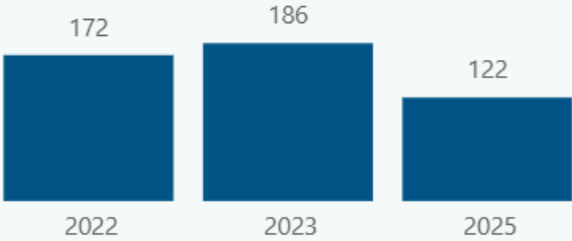
DBC - Weeks to Disposal



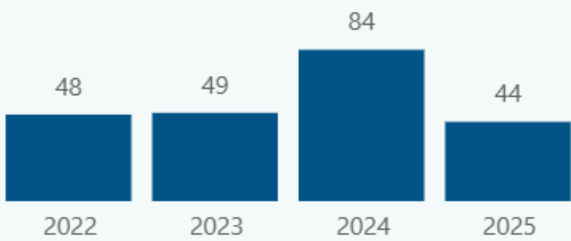
PCP - Weeks to Disposal



DT - Weeks to Disposal



Not Proceeded With - Weeks to Disposal



How we achieved our 2025 goals



Improving Case Resolution Times

Staff turnover, recruitment challenges and increased case complexity created pressures on case progression during 2025. In response, we increased team capacity, streamlined processes, improved hearing arrangements and restarted the review of the Enforcement Rules to support more efficient case resolution.



Review of the Enforcement Rules

The review of the Enforcement Rules will ensure the regulatory framework remains proportionate, efficient and capable of managing current caseloads.



Focus on those complaints causing greatest risk to the public

We strengthened our risk-based approach to enforcement by developing enhanced case categorisation and triage arrangements. These improvements will support the earlier identification of potential public protection risks. They will enable a more effective allocation of regulatory resources, which will support the early identification of risk to the public and improve operational efficiency.



Developed monitoring and reporting of misconduct cases

Monitoring and reporting of misconduct cases were strengthened through the development of new and improved reporting outputs.



Identified the need for digital transformation and continuous development

We commenced a wider review of enforcement systems and processes, supported by the development of a digital transformation plan. This work will modernise case management, improve data quality and support more effective reporting and decision-making.



Professional Conduct and Ethics Guidance

This work is now being taken forward having been paused in 2025 because of operational priorities.



Staff Development and Training

We invested in staff development through targeted training, regular one-to-one meetings and increased support for new team members. This has strengthened capability, accountability and consistency across the Enforcement team.

Priorities in 2026

- **Reducing Case Disposal Times.** We will continue to focus on reducing the time taken to conclude misconduct and prior conduct cases through improved case management, strengthened performance monitoring, early resolution where appropriate and a continued focus on older and more complex cases.
- **Developing Internal Tracking and Data Analysis.** We will further develop our internal tracking and analytical capabilities relating to misconduct and prior conduct cases. This will support evidence-based decision-making and help ensure resources are targeted to areas of greatest risk and impact.
- **Review of Enforcement Rules and Guidance.** We will review enforcement rules, guidance and operational procedures to ensure they remain proportionate, effective and aligned with regulatory best practice, while supporting consistent and transparent decision-making.
- **Staff training.** We will continue to prioritise professional development to ensure officers remain up to date with legislative requirements, best practice and emerging enforcement challenges, supporting consistent, proportionate and effective decision-making.
- **Panel recruitment to improve availability.** We will recruit and develop additional panel members to improve availability, increase operational flexibility and support the timely progression of cases, helping to maintain efficient and effective enforcement processes.

