

CILEx Regulation Business Plan 2017/18

The quarterly performance summary shows:

- high level progress on key planned business activities to deliver the five strategic priorities in CILEx Regulation's Strategy 2017-20 (last reviewed by the Board on 8 November 2017);
- RAG (Red/Amber/Green) ratings for the last quarter with comparison to previous quarter; and
- next quarter milestones.

Where business activities are managed through associated delivery plans updates to these are shared in the Board member secure online area. Delivery plans and plan owners/sponsors currently in place are as follows:

Diversity Action Plan: Jill Durham, Director of Policy and Enforcement (jill.durham@cilexregulation.org.uk)

Educational Standards Review Project Plan (in development): Victoria Purtil, Director of Authorisation and Supervision (victoria.purtill@cilexregulation.org.uk)

Entity/ABS Delivery Plan: Victoria Purtil, Director of Authorisation and Supervision

Competition and Markets Authority Legal Services Market Study Action Plan: Jill Durham, Director of Policy and Enforcement

Contact for questions: Clare Harper Smith, Research and Performance Analyst
(Clare.harpersmith@cilexregulation.org.uk)

Key:

Red: Project not progressed or on hold

Amber: Project partly progressed, milestones partly met

Green: Project progressing as planned with milestones achieved

Abbreviations:

ALC: Admissions and Licensing Committee

CRM: Customer Relationship Management (system)

SMT: Senior Management Team

SRC: Strategic Risk Committee

QE: Qualifying Employment

WBL: Work-based learning

Strategic Priority	Q3 2017 (July to Sep)	Priority project	Q4 2017 (Oct to Dec)	Progress in Q4 2017	Q1 Milestones 2018 (Jan to Mar)	Forward look
1. Ensure the needs of the consumer inform all our work		A set of new high level business objectives to extend the focus on the Board's consumer strategy are proposed separately (see cover report), with a range of options for activities to deliver these. Subject to Board approval for these high level objectives, a detailed activity plan will be developed for discussion at the July 2018 consumer focussed strategy planning day, and once agreed these will be reflected in the Board's Strategy 2018-2011. Activities will be scheduled for delivery and progress reported quarterly from Q4.				
2. Minimise barriers to entry for practitioners (cost and bureaucracy)	A	Transition to a targeted risk based supervision process for regulated individuals by December 2019 (linked to introduction of new CRM)	A	<ul style="list-style-type: none"> SRC has reviewed the risk matrix and provided advice on changes 	<ul style="list-style-type: none"> SRC approval of risk matrix 	Risk matrix will come to Board for approval. Implement with new CRM ¹
	A	Introduce online application and assessment schemes for individual and entity authorisation by Dec 2019 (linked to introduction of new CRM)	A	(Part of the Group CRM project)	<ul style="list-style-type: none"> CRM project start – based on project plan owned by Group IT Sprint Zero workshop for CRL (20 February 2018) 	Priority 1 for implementation of new CRM
	A	Develop and implement targeted engagement plan to address anti-competitive practices in relation to entity authorisation including monitoring and annual review	A	<ul style="list-style-type: none"> SRA rule change approved by LSB. Switching protocol near completion with SRA Impact of ICAEW decision assessed and discussed with LSB – assessed as low risk Responses from 1st two statutory consultees to the ABS application appear to confirm that application will not be viewed in same way as the ICAEW decision Meeting held between CRL/BSB and FCA to discuss DPB. FCA will review information once received 	<ul style="list-style-type: none"> Regulator switching protocol agreement with SRA LCJ ABS consultation response review and action planning Review of CMA response on CRL representations on anti-competition issues and action planning 	

¹ The new approach will include the actions from QASA which will not now be implemented. Action for this element will be required by Q3 2018 and can be utilised as proof of concept

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				<ul style="list-style-type: none"> from CRL – CRL awaiting information from broker to forward to FCA Four organisations contacted in relation to Lender Panel access Discussion with Conveyancing Association to garner support for CRL regulated entity access to Lender Panels Engagement plan drafted 		
	G	Comply with revised LSB Diversity Guidance on delivering regulatory objective to encourage diverse provider base	G	<ul style="list-style-type: none"> As update on accompanying Diversity Action Plan External consultant briefed to support 	<ul style="list-style-type: none"> 2017 Diversity survey report published Recommendations to achieve better progression outcomes from BME applicants agreed Scoping exercise for external consultancy completed 	Next formal assessment by LSB due Aug 2018
3. Grow opportunities for CILEx practitioners	G	Develop education standards and review training arrangements to deliver fit for the future regulated community	G	<ul style="list-style-type: none"> Researcher met with Board Additional feedback from JET provided to researcher 	<ul style="list-style-type: none"> 1st and final drafts of research received Detailed action plan developed Further engagement undertaken with Institute for Apprenticeships to enable application approval (Q1 and ongoing) Next steps on joint working with CILEx agreed 	Links to risk/evidence based supervision approach and E&D activities

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	G	Development of ABS/entity regulatory arrangements, including intervention by Q2 2018 and forensic investigation by end Q4 2018	G	<ul style="list-style-type: none"> Policy and procedures work commissioned and new project plan developed Draft Orders commissioned Advice sought in relation to intervention Alignment of appeals processes to be completed once ABS application approved 	<ul style="list-style-type: none"> As accompanying delivery plan 	
	NEW	Implement newly restructured AML supervision in line with Government timetable Note: joint project with CILEx	G	<ul style="list-style-type: none"> Guidance awaiting HM Treasury approval Plan for comms to affected regulated community in progress Fee proposed at £5k, moderate impact on regulated community – this was delayed by OPBAS CRL responded to OPBAS consultation on levy 	<ul style="list-style-type: none"> Sector guidance approved by HM Treasury Comms plan and guidance with regulated community implemented Fees included in 2019 PCF calculations (Q1-Q3) 	Further discussions ongoing with HM Treasury and OPBAS re criminality check requirements (Q2)
4. Practical collaboration with other regulators	G	Deliver CMA legal services market study recommendations	G	<ul style="list-style-type: none"> As progress update on accompanying CMA Action Plan Responses to consultation on transparency requirements reviewed 	<ul style="list-style-type: none"> Transparency proposals agreed in response to consultation outcomes – see Board paper 	As published Action Plan
5. Address anticipated changes in the operating environment	G	Align costs modelling, review fees and PCF to achieve a self-sustaining funding model by 2019	G		<ul style="list-style-type: none"> Proposed PCF fees reported to Board (21 Feb) 	Review non-PCF fees ready for 2019 fees (Q3)
	A	Redevelopment of protocols for new CILEx Group Governance structure	G	<ul style="list-style-type: none"> Proposals reported separately 	<ul style="list-style-type: none"> Service Level Agreements developed with Group Service Company (when incorporated) – Board update will be provided 	

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	R	Practice rights and entity regulation growth interim objectives, pending consideration of options for re-branding	A	<ul style="list-style-type: none"> ○ New Spindogs website commissioned ○ Identification of groups for targeted marketing of practice rights ○ Entity Away Day created draft marketing strategy for targeted marketing of entity regulation ○ Interim marketing proposals developed and agreed with LF/DG 	<ul style="list-style-type: none"> ○ New CRL website developed through Spindogs – see Board paper ○ Draft practice rights and entity marketing strategy developed ○ Entity marketing plan implemented– separate document (Q1 and ongoing) – see Board paper 	Under review