

CMA Action Plan Q4 (October to December) 2017 progress update

	Action	Q4 2017	Q4 Progress	Q1 2018 Milestones
1	Engagement with firms to raise awareness of CMA transparency requirements.	G	Completed in Q1.	N/a.
2	Provision of Client Care Letter guidance on website and series of Journal articles.	G	Completed in Q1.	N/a.
3	Develop communications plan.	G	Plan developed and in place (attached). Bespoke engagement with entities to inform development of rules and guidance. Engagement with 42% of regulated entities	Engagement with entities at January 2018 entity event through: presentation and, exercise to gain views on price presentation
4	Consult on publication of transparency information by regulated firms providing services to clients in transactional legal services such as conveyancing and wills. Present consultation to September Board and publish end of Sep. Collaborate with other regulators in determining the initial relevant areas of law to roll out the transparency requirements to.	G	Consultation closed 21 December 2017. Responses from: 139 through on-line survey, LeO, LSCP, CILEx and Lawyer Checker	Summarise and publish consultation responses. Analyse responses to inform actions to develop transparency rules and guidance. Meet SRA and CLC 1 February 2018 to move forward from consultations, with a focus on price presentation
5	Develop transparency provisions for regulated firms, informed by consumer testing and collaborating with the other regulators to develop a consistent approach to transparency across the market.	Not due	Ran in-house Consumer Panel on-line survey on a consumer protection matrix as published within our online entity directory.	Review SRA transparency research due for publication end of Jan 2018 to gain insights. Consider in-house Consumer Panel responses to on-line survey about the consumer protections matrix published within our online entity directory.
6	Develop a regulator logo, or graphic representation that indicates a firm is regulated by us. We will continue our dialogue with other regulators to understand their approach to developing these to indicate such factors as regulation, PII and compensation arrangements. We will take this into account in our work with the aim of achieving consistency for consumers.	G	Decision in principle made to use Yoshki smart badge (digital verification tool). Ran in-house Consumer Panel on-line survey on key content for smart badge in addition to the consultation	Consider in-house Consumer Panel responses to on-line survey about key content for smart badge together with consultation responses.
7	We will consult on the application of Principles 5 and 6, and the current outcomes under them, to the transparency we will expect of our regulated community. Consultation outcomes will inform our thinking about whether and how we may need to change our Code.	G	Thinking evolved as part of the development of the draft consultation which proposes reliance on Principle 4 (compliance with rules and regulations).	Summarise consultation responses. Analyse responses to inform actions to develop transparency rules and guidance.

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8	Monitor the adoption of transparency provisions by regulated firms delivering services in the areas of law identified for initial roll out. We will do this at the point of new application by firms for regulation and annually. We will review our approach after Year 1.	G	Following web sweep of entities' websites, considered action to support entities moving their websites closer to CMA transparency expectations.	Offer extended to regulated entities for us to review their websites against CMA expectations.
9	Monitor and evaluate the effects of the transparency provisions in our regulated firms. We will continue our engagement with other regulators and stakeholders and take account of research and other available information to develop a wider understanding of the impact and consequences of the transparency provisions. We will evaluate this information when considering how, when and the potential impact of rolling out the transparency provisions in relation to additional areas of law. We will use this information to consider necessary amendments to our guidance to our regulated firms.	Not due	N/a.	N/a (timelines to be determined as roll out develops).
10	Work with other regulators - have opened dialogue with the SRA to understand their proposals. This will inform our approach to raising awareness amongst our regulated community working in SRA regulated firms.	G	Regulated members in SRA regulated firms have engaged with and responded to the consultation.	Liaise with CILEx on the changes that will affect their members working in SRA regulated firms
11	Raise awareness of consultations and transparency guidance in our Communications Plan - engage with CILEx, to achieve this, ideally through use of their member communication channels (including their branch network, social media outlets, CILEx Journal and special interest groups).	G	Completed as per Comms Plan (attached to Q3 update to 8 Nov 2017 Board)	Communicate key points from consultation responses analysis to CILEx
12	Our transparency guidance will include: <ul style="list-style-type: none"> • how to encourage and increase client feedback; and • how to interact/engage with online reviews. Aim to engage with on-line review site providers to develop our guidance. Our Communications Plan will raise awareness of these elements in our guidance.	G	Engaged with Conveyancing analytics, which use Trust Pilot within their on-line tool	Engage with on-line review site providers scheduled for 2018
13	We will continue to play an active editorial role in the Legal Choices website.	G	Participated in inaugural meetings of both the Governance Board and Steering Group. Participated in Advisory Panel inaugural meeting	Participate in meetings of Governance Board, Steering Group and selection of research and digital provision companies to develop the website.
14	Consult on publishing enforcement information. This may require changes to our Publication Policy.	G	Consultation closed 21 December 2017	Summarise consultation responses. Analyse responses to inform actions

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				to develop transparency rules and guidance.
15	Monitor developments in the sector (provision of data for comparison sites) and keep this under review.	n/a	N/a in Q4.	N/a in Q1.
16	We will work with other regulators to develop collection of consistent data across the sector.	G	Initial mapping across regulators completed. SRA led proposal to outsource options appraisal to be considered by regulators as a jointly funded proposal (total £24k). This will inform decisions about a single digital register or in the alternative a common published dataset. Decision taken, at Regulators' Forum, to review in Q2 2018.	n/a
17	We will continue to work with the other regulators to explore the development of a single digital register.	G	In progress – see 16 above.	Ditto.
18	Reviewing and developing content of Legal Choices. We are working with the other regulators to develop the content of Legal Choices and refine how we market it and engage with consumers. In doing so, we will, amongst other things, consider the CMA's detailed recommendations about content development and digital marketing.	G	As 13 above.	As 13 above.
19	We will continue our work to support of the SRA's three-year development plan for Legal Choices through our place on the Editorial Panel and financial contribution to Legal Choices.	G	Ditto.	Ditto.