

Appendix 5 - CMA Action Plan Q2 (April to June) 2018 progress update

	Action	Q2 2018	Q2 Progress	Q3 2018 Milestones
1	Engagement with firms to raise awareness of CMA transparency requirements.	G	Completed in Q1.	N/a. Engage with conveyancing and probate firms re price presentation templates.
2	Provision of Client Care Letter guidance on website and series of Journal articles.	G	Completed in 2017 Q1.	N/a.
3	Develop communications plan.	G	Engagement sought with entities and taken up with conveyancing firm to gain views on price templates and presentation.	Comms relating to Rules consultation and encouraging entities to whom the Rules will apply to prepare/develop their websites.
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 responses and our response published on website end of April and linked in RM. Launched consultation on the proposed CILEx Regulation Transparency Rules on 22 June with closing date 3 August 2018. Meetings attended with SRA and CLC, see 5 below. Attended RPIG on 12 April. All regulators provided a progress update.	Attend LSCP contextualising complaints data roundtable 5 July 2018. Close Transparency Rules consultation 3 August. Analyse the responses and finalise the Rules. Present Rules to Board at 20 September meeting for decision to approve. Lodge Rules with the LSB for approval.

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5	Develop transparency Rules and Guidance and collaborate with other regulators to work towards developing similar requirements, where appropriate. Progress work to roll out Rules and Guidance by January 2019, including rules consultation and LSB submission. Formerly: 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.	A	<p>Meeting with SRA and CLC 18 April to discuss the areas of law they will cover, the transparency requirements they have decided to progress and timetable for implementation.</p> <p>Prepared draft guidance. SRA, CLC and CRL shared respective draft guidance.</p> <p>Meeting on 21 May with SRA and CLC to discuss draft guidance and possible collaboration on consumer testing. Production of closer aligned draft guidance, if practicable, discussed.</p> <p>Prepared draft Rules and forwarded these, together with draft guidance, to LSB for steer ahead of Rules consultation. LSB indicated that they are happy with the draft rules. LSB found it helpful to have draft guidance to add context to rules.</p> <p>SRA led focus group consumer testing of conveyancing and probate templates on 25 and 26 June.</p> <p>Attended and participated focus group on 25 June.</p>	<p>Consider findings from the consumer testing focus groups and review templates/presentation is the draft guidance in light of the findings.</p> <p>While reviewing the Transparency Rules and guidance following analysis of the consultation responses, liaise with CLC and SRA regarding the responses to their consultations.</p>
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.	A	<p>Soft launch of smart logo to authorised entities with comms (including Regulation Matters and social media) for entities, stakeholders and website consumer pages.</p> <p>New members of in-house consumer members continue to be invited to take the PII and compensation fund matrix survey. Analysis of responses considered when drafting guidance.</p>	<p>Feedback following soft launch of the soft logo.</p> <p>Analysis of further responses will be considered when finalising the guidance.</p>

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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	See 4. No further action required at this point.	
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.	Not due		
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.	
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.		See 5 above.	
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).		Communicated to CILEx progress with the draft Transparency Rules, draft guidance, intention to consult on these at the end of June and offered further information and meeting if required.	
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.		Draft guidance addresses these elements.	

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13	We will continue to play an active editorial role in the Legal Choices website.	G	Research and digital provision companies engaged to develop the website.	Participate in meetings of Governance Board, 17 July, and Steering Group, date tbc.
14	Consult on publishing enforcement information. This may require changes to our Publication Policy.	A	Responses summarised and analysed.	
15	Monitor developments in the sector (provision of data for comparison sites) and keep this under review.	n/a	N/a in Q1.	N/a in Q2.
16	We will work with other regulators to develop collection of consistent data across the sector.	A	In abeyance.	
17	We will continue to work with the other regulators to explore the development of a single digital register.			
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	Attended Steering Group meeting 5 June. Participated in two-day ideation workshop with Alterline and IE Design on 13 and 14 June. Generated about 100 ideas to commence the work to develop four digital applications over the next 18 months with the aim of securing two million unique visitors to LC website over two-year period.	Review timelines and progress from the LC development partners: IE design and Alterline.
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	See 13 and 18	See 13 and 18