

CMA Action Plan Q4 (October to December) 2018 progress update

	Action	Q4 2018	Q4 Progress	Q1 2019 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	Comms to regulated community, via website, social media and Regulation Matters to raise awareness of requirements of the new rules and response to the rules consultation; and to announce LSB approval of the rules. Email directly to entities to advise rules with the LSB and coming into force in January 2019.	Comms to encourage entities affected by the new rules to prepare/develop their websites/offline information. Agenda item at the Entity event 26 January.
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. Develop roll out of transparency rules into other areas of law by identifying areas of need and developments in the legal sector following initial roll out by other regulators.	G	Draft Transparency Rules lodged with LSB 5 October.	Carry out work to identify and develop next area(s) of law for roll out of transparency rules.

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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>LSB approved the new Transparency Rules on 30 October. The guidance was fine-tuned following feedback and identification of additional information required. Final guidance published week of 5 November.</p> <p>There have been no further meetings with the SRA. Discussion with CLC about feedback from their members over implementation of rules ahead of their rules coming into force in December.</p>	Bring the rules into force in early January 2019.
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	The CILEx Smart logo continues to be taken up by our firms, with an additional firm adding the logo to its website. Analysis of responses to inhouse consumer panel survey considered when drafting guidance.	Firms will continue to be encouraged to adopt CILEx Smart logo. Firms which must have the smart logo will be required to do so from January 2019.
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	Completed	
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	Web-sweep of regulated firms' websites carried out January 2018 and further baseline work carried out ahead of Transparency rules coming into force in January 2019.	
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	Not due	N/a.	

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	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.			
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	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).	G	Informed CILEx of approval by LSB of Transparency Rules.	
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	Final guidance addresses these elements with link to CRL website information on reviews already published.	
13	We will continue to play an active editorial role in the Legal Choices website.	G	Attended Steering Group meeting 17 September and Governance meeting 25 September.	Participate in Steering Group in November, December and March and Governance Board meeting in January.
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. ¹	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.	A	In abeyance.	

¹ Flagged to ensure regular review

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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	Research by Alterline on consumer needs finalised in October. Digital work on website and widgets moving forwards with prototype development of 4 products by the end of Q4. Timelines being met and in budget. Work on bringing registers of all regulators together in one place on LC moving forwards.	Prototype development of products continuing through this quarter with feedback to Steering Group in December 2018 and March 2019.
19	We will continue our work to support 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

CMA Comms plan

COMMS TOOL		ACTION	Feb 2018	March 2018	April 2018	May 2018	Jun 2018	July 2018	Aug 2018	Sept 2018	Oct 2018	Nov 2018	Dec 2018	Jan 2019
CRL	CRL Soc media	output	weekly	Weekly	weekly	weekly major strands infographic	wkly	wkly	wkly	wkly	wkly	wkly	wkly	wkly
CILEx	CILEx Social media	Sarah will ask CILEx to retweet	weekly	weekly	weekly	weekly	wkly	wkly	wkly	wkly	wkly	wkly	wkly	wkly
CRL	Regulation Matters	Regular articles	How consumer friendly is your website?		Consultation responses/ CRL response	Infograph re main strands	Re rules consult	Infog sep strands	Infog sep strands	Infog sep strands	Re rules & guidance	Infog Rules & guidance	Infog sep strands	
							Tools to publicise and help firms such as videos/power point /direct emails							
CRL/ CILEx	Website page	Develop page		.	Link to consultation responses	Add infograh					Add draft rules & guidance	Add rules & final guidance		
CRL	Direct emails						firms request reply to consultation			Firms re rules & guidance implementation				26 Jan item at Entity event
CRL	Press release					Re response SC/ SB send to contacts (?)						News release re rule approval		
CRL	Direct engagement						Contact firms re rules consultation response							
CILEx	direct			Advised of Board decision / propose meet re comms	propose meet re comms	propose meet re comms and consultation	propose meet re comms and consultation			propose meet re comms and rules/ guidance				
										inform CILEx of LSB rule approval				

