

## Annex 3 - SRA Business Plan 2024-25 update

### Our Strategic Priorities

*Strategic Priority 1* - We will deliver high professional standards.

*Strategic Priority 2* - We will strengthen our risk based and proactive regulation.

*Strategic Priority 3* - We will support innovation and technology.

*Strategic Priority 4* - We will be an authoritative and inclusive organisation, meeting the needs of the public, consumers, those we regulate and our staff.

Our business plan for 2024/25 is available on our website<sup>1</sup>. Annex 3a shows the business plan commitments within each priority.

### Progress against commitments in our annual planned work programme

This is the final report against the business plan commitments in our 2024/25 business plan, which reflects the second year of the 2023-26 Corporate Strategy.

Annex 3a shows the RAG status of all the commitments under the four priorities. A summary of the status evaluation is as follows:

Status	Green	Amber	Red	Total
Priority 1	7	4		11
Priority 2	5			5
Priority 3	3			3
Priority 4	7			7
<b>Total</b>	<b>22</b>	<b>4</b>		<b>26</b>

Relates to objective status based on progress to date:

Green (G) – means in line with expectation and overall delivery is expected

Amber (A) – means generally in line although a challenge to maintain progress and deliver the overall objective

Red (R) – means progress behind expectation and we will not succeed without direct action

We have four 'amber' commitments from our 2024/25 business plan considered below.

#### ***Deliver continuing competence commitments***

This was amber because we postponed the Board's consideration of proposed arrangements to strengthen the requirements due to other Board priorities. The Board considered and endorsed the Executive's proposals for no change to these requirements.

#### ***Develop a cross-regulator portal to help users of legal services identify suitable providers***

The build and test stage of the Regulatory Information Service (RIS) was completed in mid-July. During this stage user testing with consumers showed that the changes we made to the format and design of the site have made the purpose of the site clearer to consumers as a verification tool.

Due to issues with some of the data provided by some regulators, it was decided by the Legal Choices Governance Board to delay putting the platform into the public domain. A private version of the platform ran from 15 September to 31 October to enable frontline regulators, the Legal Ombudsman and the Legal

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<sup>1</sup> <https://www.sra.org.uk/sra/corporate-strategy/business-plans/business-plan/business-plan-2023-24/>

Services Consumer Panel to make sure the information provided on the platform was accurate and that the presentation of results met expectations. A number of significant issues have been identified that need to be resolved before the platform is ready to be made public, to ensure consumers can trust the data accuracy and have a high quality user experience.

***Take forward our plans to introduce an EDI evaluation framework***

We aligned the timing of this work with the LSB's plans to publish its policy statement on EDI, which was published in November 2025. Once implemented, the EDI evaluation framework will allow us to determine the most effective actions in driving diversity and use that in planning our strategic approach.

***We will continue to implement and embed improvements to our casework processes***

We have worked hard to continue to implement and embed improvements and efficiencies in our case work processes.

However, the rate of the increase in reports means that the number of cases in progress continues to grow, which is why we have reported this item as amber. In 2024/25 the average number of monthly reports received increased by 34%, from 1,024 to 1,375, compared to 2023/24. The investigation teams also experienced a significant (45%) increase in investigation cases, from 165 per month in the prior year to 239 per month in 2024/25.

**Incomplete commitments from our 2023/24 planned work programme**

We had a red commitment at the end of our 2023/24 year and will continue to report on this in business plan update annexes in the manner below until it is achieved. We are not including this prior year commitment in the RAG reporting in Annex 3a below, which is intended to solely be on 2024/25 business plan commitments.

***Make data about candidate performance available to help aspiring solicitors make informed choices about how they prepare for the assessment.***

We are committed to providing information to help candidates navigate the SQE training market. Data on candidates taking the SQE is growing. This is enabling more and better analyses of candidates' characteristics and of factors that are associated with their performance. For example, Kaplan has recently published reports on: the performance of solicitor apprentices, candidate characteristics and factors that influence SQE performance, a report that looks at four years of data and analysis from the SQE and more sample questions for SQE1 and SQE2.

Our growing understanding of the factors that appear to affect candidate performance has highlighted concerns that courses might have higher pass rates because of the quality of, and opportunities available to, the candidates rather than the quality of the course. As such, we believe that publishing pass rate data on its own can be misleading to candidates. This is why we want to take a wider approach and focus on publishing information that is useful to candidates, supports a healthy training market, and takes account of a wide range of factors.

We are changing the point at which we ask candidates to tell us how they have prepared for the SQE. This will improve the quality of the data we collect and its usefulness for candidates deciding how to prepare for their assessments. We will be exploring with external experts whether it is possible to contextualise data linking candidate performance with how candidates prepared for the assessments in a way that would be useful for candidates. We published a statement at the end of 2025 that sets out our approach in more detail.

## Achievements in this period

	Achievements	Impacts and Outcomes
<b>Priority 1</b>		
High volume consumer claims	We published a discussion paper in September on the high volume consumer claims market and conducted a large programme of associated structured engagement. This included roundtables and webinars with the profession and others, as well as small group discussions with practitioners, academics, consumer representatives, insurers and funders.	We received 56 written responses to the paper, which is more than double the response to our consumer protection review discussion paper, despite only a minority of regulated practitioners being involved in this market. The breadth of responses means we are well positioned for our analysis and development of options for consultation in mid-2026.
<b>Priority 2</b>		
Risk and data programme	<p>Our Risk and Data Strategy has been finalised and will now be communicated to staff internally.</p> <p>We have now entered the design phase of our migration to SharePoint.</p> <p>We developed an AI Policy which has been communicated to staff. We have also established an AI governance group to manage our adoption of new AI products and services.</p>	<p>The strategy is a central part of our work on developing our organisational culture to be more data driven and curious.</p> <p>The migration to SharePoint is a key part of the data driven operating model we are developing which will make sure we can get the right data to the right people at the right time.</p> <p>These governance arrangements will ensure consistency in our approach to AI usage across the organisation, and with how we regulate the adoption of AI in the legal services market.</p>
Expanding our data analysis	<p>We have been developing insight from assessment and early resolution metadata and begun work to derive insight from the text of reports.</p> <p>We have developed models to predict the flow of work through Authorisations and have developed a weighted indicator model to automatically triage responses to our high volume consumer claims declaration exercise.</p>	This work will support more efficient regulation and will also help us to develop insight and understanding more rapidly than we could do with manual processing.
<b>Priority 4</b>		
Customer service	Our "Voice of the Customer" feedback has remained consistently positive throughout the period. It has been expanded into more operational areas, in particular Client Protection and Investigations, as well as by internal facing teams such as Human Resources.	We are much closer to realising our objective of having a customer service culture across the organisation. Feedback is reviewed to consider improvements to processes and the information we provide to our customers.

Organisation capacity	<p>We have scaled up to meet the demands of a portfolio of projects that has doubled in size over the past year, with two major transformational programmes underway.</p> <p>We continued over the reporting period to invest the necessary time and other resources to increase our headcount, such that the full time equivalent headcount increased by 14% over the course of the 2024/25 financial year.</p>	<p>Timely delivery of the projects will enable the transformation we need in our systems, processes and ways of working to meet the requirements of the rapidly evolving legal services market we regulate.</p> <p>This headcount increase will help us to meet the increased demands on us and move towards the resourcing level committed to in our 2025/26 business plan.</p>
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## Annex 3a

<b>Priority one – We will deliver high professional standards</b>	
<b>This means setting, upholding and promoting high professional standards for those we regulate, in a way that is fair, proportionate and robust.</b>	
<b>Commitments</b>	<b>Current RAG rating</b>
We will deliver the year-three evaluation of the SQE.	Green
We will make both SQE components available in the Welsh language from January 2025.	Green
We will deliver commitments from our annual assessment of continuing competence process including undertaking training record reviews and a thematic review focused on family law and landlord and tenant solicitors and firms, to understand whether and how solicitors meet their professional obligations to maintain competence.	Yellow
We will build on the work we have already done to improve information available for consumers on legal services, focusing on how we can drive improved information around costs and how that interacts with quality indicators.	Green
We will continue to lead work with other regulators to develop a cross-regulator portal that will help users, and potential users, of legal services to identify a suitable provider for their needs.	Yellow
We will respond to the Legal Services Board's guidance around the new regulatory objective to promote the prevention and detection of economic crime, and to changes in money laundering regulations.	Green
We will consider the outcome of the Treasury's consultation on the future of AML supervision.	Green
We will progress actions arising from our research findings into differential outcomes in legal professional assessments and overrepresentation in our investigation processes and continue to encourage diversity at senior levels in law firms.	Green
We will take forward our plans to introduce an EDI evaluation framework.	Yellow
We will progress relevant actions from the early stages of our Consumer Protection Review.	Green
We will continue to implement and embed improvements to our casework processes.	Yellow

## Priority two – We will strengthen our risk based and proactive regulation

**This means delivering and supporting better regulation through proactive and risk-based activity using robust evidence based on our data, insights and intelligence.**

Activities	Current RAG rating
We will start to deliver our data strategy in light of reviews of data capability and maturity.	
We will undertake short term improvements to expand our use of data analysis, including the application of AI and machine-learning to additional areas.	
We will deliver our programme of proactive thematic reviews in key areas, including an AML review focused on source of funds, and a review on the roles of compliance officers.	
We will proactively respond to developments including new or amended money laundering regulations.	
We will undertake a data-based programme of proactive sanctions supervision, incorporating information received under our MoU with the Office of Financial Sanctions Implementation.	

## Priority three – We will support innovation and technology

**This means that we will keep up to date with and actively support innovation and technology that improves the delivery of legal services and access to them, particularly for individuals and small businesses, as well as supporting small firms to use technology effectively.**

Activities	Current RAG rating
We will develop our regulatory approach to AI so that our regulated community, and consumers of legal services, can keep pace with risks driven by this rapidly evolving area.	
We will develop our support for small law firms to adopt technology, based on findings from our research.	
We will progress recommendations and outcomes from our Regulators Pioneer Fund project focused on exploring how online dispute resolution (ODR) can help tackle the unmet legal need of individuals, consumers and micro/small enterprises.	

## Priority four – We will be an authoritative and inclusive organisation, meeting the needs of the public, consumers, those we regulate and our staff

This means that we place our customers at the heart of all we do, working as an authoritative, inclusive and responsive organisation.

Activities	Current RAG rating
We will extend our customer service plans and model into more operational areas, including our Client Protection team who – among other things – deal with interventions and compensation fund claims.	
We will progress our communications review to build on our stakeholder perceptions profiling work.	
We will continue to progress and evaluate our actions to increase diversity in SRA leadership roles and to close ethnicity and gender pay-gaps.	
We will develop and broaden understanding and knowledge within the SRA to grow and embed a culture of continuous improvement.	
We will continue to deliver on our internal ESG commitments, and work with key stakeholders on reducing our environmental impact.	
We will review and update our requirements for first-tier complaints.	
We will deliver the five year Transparency Rules evaluation.	