

## 2023 Business Plan

Ref	Activity	Regulatory Objectives	Strategic Objectives	Principal Risks	2023
1	Code of Conduct Review – based on revised Ethical Principles and informed by monitoring, inspection and enforcement work	1, 2, 4, 6, 8	1a, 1b, 2, 3	2, 6, 7	Consult on changes - Q1 Secure LSB Approval – Q2 Promulgate revised Rules - Q3 &4 Come into force - Q1 2024
2	Licensing Framework Review – to secure as much alignment and simplification as possible	1, 2, 4, 5, 8	2, 3	2, 6, 7	Explore extending licence – Q2 Consultation - Q3 Consider whether LSB approval is needed for any change – Q3 Wider alignment potential for review in - Q4
3	Growth: Target SRA firms to move to CLC regulation	1, 4, 5, 6	2, 3	1, 2, 4, 6	Finalise and distribute promotional brochure – Q2 Implement new engagement approach to firms interested in CLC regulation – Q2
4	Growth: Market CLC qualifications to employers	4, 5, 6	2, 3	1, 2, 6, 7	Develop and promote marketing material for conveyancing and probate firms, estate agents, managing agents - Q1 onwards
5	Promote lessons of the Quality Indicators Pilot	1, 4, 5, 6, 7	1a, 2	1, 6	Develop and promulgate guidance for CLC firms based on the findings of the 2022 pilot following adoption by Council – Q2
6	Support development of a single digital register for the legal sector	1, 3, 4, 5,	1a	-	Contribute to LSB task and finish group - Assist implementation of agreed approach - Ongoing
7	Implement revised Compensation Fund	1, 3, 4,	2, 3	1, 2, 4, 6	Council approval of changes for consultation - Q2 Consult on changes – Q3 Secure LSB approval of changes if needed – Q4 Ensure accessibility of consumer-facing content – Q4

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8	Implement revised Adjudication Panel Rules	1, 2, 3, 4, 7, 8	1b, 2	2, 6	Secure LSB approval – Q1 Independent AP will begin to use the new rules (with transitional arrangements) – Q4
9	Seek to reduce referrals to LeO	1, 4, 6	1a, 1b, 2	2, 6, 7	Review Regulatory Return data on complaints handling – Q1 Develop and deliver training with LeO for practices with disproportionate levels of LeO cases – Q2 onwards
10	Reassess risk profile of all regulated entities	1, 4, 8	1a, 1b, 2	1, 2, 4, 6, 7	Apply analysis of Regulatory Return data and other intelligence to update entity risk assessments – Q2
11	Ensure arrangements for the oversight and delivery of CLC qualifications are effective	1, 4, 5, 6, 8	1a, 2, 3	1, 2, 6, 7	Complete review provision of education – Q1 and ongoing Council approve new model – Q4
12	Promote Consumer Charter	1, 4, 5, 6, 7, 8	1a, 1b, 2	1, 6	Enhance Secure Badge content with Consumer Charter content – Q1 Promote Charter to firms and consumers – Q1
13	Improve conveyancing and probate services	1, 3, 4, 5, 6, 7, 8	1a, 1b, 2, 3	1, 2, 6, 7,	Drive and facilitate innovation in policies, procedures tools and their adoption – Ongoing engagement with key stakeholders will establish interim targets during the year
14	Promote inclusion and diversity in the regulated community and the provision of legal services	1, 2, 4, 6, 8	1a, 1b, 2	1, 2, 3, 6, 8	Submit changes to LSB – Q1 Implement revised Equality Code – Q2 Analyse and report on the profile of the regulated community Develop enhanced guidance for practices and individuals to support the development of inclusive workplaces and the inclusive delivery of legal services – Q2
15	Ensure effective contribution to combating economic crime	1, 4, 8	1a, 1b, 2	1, 2, 6, 7	Continue to develop support for AML, Sanctions work by the regulated community Sanctions information update – Q1 Staff development and training – Q2 AML training – Q2 and Q3 Ensure compliance with developing requirements – As needed
16	Set fee rates for the year beginning November 2023	1, 4, 5, 6,	2, 3	1, 2, 3, 4, 6	Review health of the regulated community and CLC's needs – Q2 Council workshop on fees and fee rates - Q2 Survey of regulated community on key points – Q2 Council decision on all fees and fee rates - Q3 Formal Consultation – Q3 Secure LSB approval for rates – Q3

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17	Continue to extend the transparency of CLC operations	1, 7, 8	1b, 2	1, 2, 6	Publish Annual Report on 2022 – Q1 Preparation for Annual Report 2023 – Q4 Deliver Council’s agreed steps from the review of the Publication Policy and Transparency – Q1 Maintain high open and click rates for e-newsletters - Monthly Continue to enhance engagement with CLC consultations - Ongoing Ensure CLC secures a good profile at third party events - Ongoing Deliver communications plans – year-round
18	Monitor operation of PII market and effectiveness of actual provision	1, 4, 5, 6	1a, 1b, 2, 3	1, 2, 6, 7	Monitor 2023 renewal process closely to ensure new requirements are implemented effectively - Q2 Maintain close contact with brokers and insurers during the year – Q1 and Q2
19	Deliver effective monitoring and inspection processes	1, 4, 8	1b, 2	1, 2, 6, 7	Evolve a risk-based approach to inspections and monitoring – Q1
20	Review sanctions to ensure they meet the regulatory objectives of the CLC	1, 4, 8	1b, 2	2, 6	Review financial sanctions – Q1 Council review of proposals – Q2 Implementation – Q3 Begin wider review - Q4
21	Ongoing Competence	1, 2, 4, 5, 6, 8	1a, 1b, 2	1, 2, 6, 7	Following completion of consultation, seek LSB approval for proposed changes – Q1 Dependent on application outcome, implement new approach – Q4
22	Extend probate-focused activity	1, 4, 5, 8	1a, 1b	1, 2, 6, 7	Scope targeted content on probate for specialist lawyers and for consumers of legal services – Q2 Develop and promote new content – Q3
23	Enhance employer brand to support recruitment and retention in a competitive market	All	1a, 3	4, 6, 8	Ensure reward and working practices remains competitive – Q1 Create content aimed at potential joiners to help them understand what it is like to work at the CLC – Q2 Review organisational design to mitigate risk further and inform fee-setting by Council - Q2
24	Face to face events with the regulated community	All	1a, 1b, 2, 3	1, 2, 6, 7	Series of six roadshows on practical compliance issues – Q2 and Q3 Potential for Conference depending on resource availability - Q3/4
25	Review accommodation provision	-	3	1, 3, 4, 5, 6, 8	Prepare options for more suitable workspace - Q2

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26	Website maintenance and review	1, 3, 4, 5, 7, 8	2, 3	2, 6, 8	Complete review of pandemic-specific material, retiring material or folding into existing content, as appropriate – Q1 Extend and improve visibility of Adjudication Panel content – Q1 Consider what website reshaping might be needed for 2024 – Q4
27	Data hygiene and security	All	2, 3	2, 5, 6,	Review data and data security measures, GDPR compliance – Q3 and Q4
28	Enhanced IT security	All	2, 3	2, 5, 6, 8	Implement multi-factor authentication and laptop encryption – Q1
29	Managing conflicts of interest	4, 8	1a, 1b, 2	2, 6, 7	Issue revised guidance on conflicts of interest developed with PRG in 2022
30	Consumer Reference Group (CRG)	1, 4, 7, 8	1b, 2	2, 6	Consult CRG on all relevant policy development issues in writing or at meetings – Ongoing Review the operation of the CRG in its first year – Q4

## Key

### Regulatory Objectives

1. Protect and promote the public interest
2. Support the constitutional principle of the rule of law
3. Improve access to justice
4. Protect and promote the interests of consumers
5. Promote competition in the provision of legal services
6. Encourage an independent, strong, diverse and effective legal profession
7. Increase public understanding of the citizen's legal rights and duties
8. Promote and maintain adherence to the professional principles

### Strategic Objectives

1. Promote quality in legal services

- a. The CLC should promote all aspects of improvement in the practice of conveyancing and probate, whether legislative, process change or it-driven to improve client outcomes.
  - b. Revised ethical standards should underpin work to drive quality and compliance and assist in the disciplinary process.
2. Exploit the CLC's unique approach, insight and relationship with the regulated community to further improve consumer protection
  3. Benefit clients by reducing the unit cost of regulation by the CLC and bringing the CLC's specialist regulation of conveyancing and probate to bear on a larger part of the market

#### **Principal Risks to the CLC**

1. Loss of significant practice fee income caused by depressed market conditions, practice churn or practice closure
2. Unplanned increase in the cost of regulation to the point where expenditure exceeds income
3. Loss of any or multiple SMT members
4. The CLC is unable to attract and retain capable and competent employees due to uncompetitive pay and, benefits.
5. A major incident, either physical or cyber threatens the continuity of the CLC through loss of staff or infrastructure.
6. Not delivering on the CLC Strategy.
7. Practices are not able to secure Professional Indemnity Insurance or terms are unaffordable or unacceptable to the CLC
8. Organisational performance and staff welfare risks in a small organisation