

## 2024 business plan

Ref	Business Plan Item	Regulatory Objectives	Strategic Objectives	Principal Risks	2024 activity	Likely 2025 activity
1	Complete review of Code of Conduct and implement	1, 2, 4, 6, 8	1a, 1b, 2, 3	2, 6, 7	<p>Submit Code of Conduct rule change application to LSB following Council approval on 1 Feb</p> <p>Promote new Code of Conduct and run webinars</p> <p>New Code of Conduct to come into force 1<sup>st</sup> May</p> <p>Prepare consequential changes to wider Handbook. Launch consultation as soon as LSB approves Code of Conduct, likely to be early March. Q2</p>	Monitor compliance with Code
	Rolling review of CLC Handbook and Guidance 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	<p>Create prioritised list of Codes and Frameworks for review Q1</p> <p>Create new master repository for all handbook, guidance and other policy documents. Q2</p> <p>Agree a regular review period for each Code. Q2</p> <p>Ensure master repository is complete Q3</p> <p>Develop plan for review of other Handbook and Guidance elements by end Q3.</p>	Continue rolling review of Handbook and Guidance in line with plan agreed in 2024.

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2	Licensing Framework Review – to secure as much alignment and simplification as possible	1, 2, 4, 5, 8	2, 3	2, 6, 7	Further to work in 2023, there is some technical legal work under way in relation to appeal routes.  Further work on the Licensing Framework will be picked up following the introduction of the revised Ongoing Competence Framework, in Q4 of 2024.	Consult on and introduce changes to the Licensing Framework.
3	Explain and promote the impact and benefits of the CLC’s regulatory approach and activity	1, 4, 5, 6	2, 3	1, 2, 4, 6	Conference and AGM on 1 <sup>st</sup> February 2024  Face to face and webinar events based on the Risk Agenda in 2024. Q1.  Issue Discipline and Enforcement Report mid-year and as part of Annual Report. Q2  Report on the progress of transformation of conveyancing and the CLC’s contribution to that. Q4	Evolve this approach in the light of experience.
4	Promote CLC qualifications to employers and individuals	4, 5, 6	2, 3	1, 2, 6, 7	Prepare brochure for employers Q2.  Use Conveyancing Week to promote CLC qualifications.  Continue social media promotion of case studies.	Evolve the approach in the light of impact of work in 2024
5	Take forward the findings of the Quality Indicators Pilot	1, 4, 5, 6, 7	1a, 2	1, 6	Below sets out how the CLC will take forward the seven actions in the Quality Indicators Pilot report, subject to Council consideration.  1. Promote consumer access to, and use of, comparable information about the nature and quality of legal services and digital comparison tools (DCT).	Monitoring impact and compliance

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					<ul style="list-style-type: none"> <li>• Through the CLC’s media work targeting home movers. Year-round.</li> </ul> <ol style="list-style-type: none"> <li>2. Explore options to increase legal service provider engagement with DCTs or online reviews. <ul style="list-style-type: none"> <li>• Through promotion of participation with DCT</li> </ul> </li> <li>3. Establish ongoing regulator-led voluntary guidelines for DCTs that provide assurance to legal service providers and consumers about the standards DCTs have agreed to adhere. <ul style="list-style-type: none"> <li>• In collaboration with the other front line regulators. Date to be explored with the other regulators.</li> </ul> </li> <li>4. Investigate and monitor the impact of information that may help consumers compare providers in specific areas of legal services. This includes identifying other potential sources of independent, trusted data for legal services, and exploring opportunities for those data to be used as comparable information. <ul style="list-style-type: none"> <li>• Through a pilot of the Conveyancing Map data with CLC-regulated practices. Q2 and Q3</li> </ul> </li> <li>5. Explore opportunities and regulatory levers to improve the accessibility and availability of Legal Ombudsman decisions for consumers. <ul style="list-style-type: none"> <li>• Through work with LSB on making decisions more accessible and more easily understood. Q3</li> </ul> </li> </ol>	

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					<p>6. Continue engagement with HMLR on opportunities to improve consumer access to its data.</p> <ul style="list-style-type: none"> <li>The CLC works closely with HM Land Registry and will build this into that work. Ongoing.</li> </ul> <p>7. Explore digital exclusion considerations and opportunities for regulators to influence the availability of comparable information through non-digital channels.</p> <ul style="list-style-type: none"> <li>CLC is undertaking research with BSB and CRL into digital exclusion that will be completed in Q4.</li> </ul>	
6	Contribute to the development of a single digital register for the legal sector	1, 3, 4, 5,	1a	-	<p>CLC is making a financial and practical contribution to the development of a single digital register for the legal sector through the Legal Choices platform.</p> <p>We will ensure that CCL data appears accurately.</p>	Promotion of new register
7	Implement revised Compensation Fund Rules	1, 3, 4,	2, 3	1, 2, 4, 6	<p>Consult CRG. Q1</p> <p>Public consultation on draft new Fund rules. Q2</p> <p>Submit final draft rules to LSB for approval. Q3</p> <p>Implement new rules. Q4</p>	Monitor operation of new rules
	Management of complex and novel Compensation Fund claims					

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8	Finalise and implement revised Adjudication Panel Rules	1, 2, 3, 4, 7, 8	1b, 2	2, 6	Submission to LSB for approval. Q1  Support training for Adjudication Panel Members in the new rules. Q2  Bring new Rules into force. Q3	Chair of the AP will report to Council on the operation of the new rules.
9	Support improvement of first tier complaints handling and seek to reduce referrals to second tier	1, 4, 6	1a, 1b, 2	2, 6, 7	Scope Review based on complaints data Q1  Undertake Thematic Review of complaints handling. Q2  In light of Thematic Review findings work with firms with disproportionately high levels of referrals to LeO. Q3 onwards  If possible, work with LeO to develop training for the worst performing firms. Q3 onwards	Continue to focus on the worst performing firms.
10	Develop a review of the use of Letters of Instruction and terms and conditions.	1, 3, 4, 8	1A, 2	2, 6, 7	Scope an approach to exploring how letters of instruction and terms and conditions could be made more effective useful for clients. Q4	Begin project.
11	Enrich the risk profile assessment of all regulated entities	1, 4, 8	1a, 1b, 2	1, 2, 4, 6, 7	Scope integration with new database and contents of risk register. Q2  Risk criteria will be reviewed and the register will be maintained and updated. Q2	Continued maintenance of the risk register.
12	Ensure arrangements for the oversight and delivery of CLC qualifications are effective	1, 4, 5, 6, 8	1a, 2, 3	1, 2, 6, 7	The target date for the revised units and handbooks to be ready for the market is 1 September 2024.	Continued monitoring and management.

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					<p>Q1, CLC will focus on the SQA agreements necessary to bring to market the new Apprenticeship Standards. Q2, CLC will reengage negotiations with SQA to revise its Qualifications Partnership Agreement.</p> <p>New Apprenticeship Standards have been approved by IFATE and published Q4 2023.</p>	
13	Review and Promote Consumer Charter and Secure Badge	1, 4, 5, 6, 7, 8	1a, 1b, 2	1, 6	<p>CRG review of Consumer Charter Q2</p> <p>Consider whether Charter has any regulatory force behind display of the Charter badge. Q4</p> <p>Scope changes to the Charter and Secure Badge Q4</p>	Continue to promote the Charter to practices and consumers.
14	Contribute to the transformation of conveyancing processes	1, 3, 4, 5, 6, 7, 8	1a, 1b, 2, 3	1, 2, 6, 7,	<p>Continue to take an active role in the Home Buying and Selling Group and Digital Property Market Steering Group.</p> <p>Provide pilot arrangements for new tools and processes that will continue.</p> <p>Scope of pilot for Material Information tool finalised Q1.</p> <p>Material Information pilot begins, if approved. Q2</p> <p>Produce report and guidance for practices Q4.</p> <p>Promoting the benefits of automation and digitisation in the consumer and lawyer interest.</p> <ul style="list-style-type: none"> <li>Conference and AGM focuses significantly on transformation agenda. Q1</li> </ul>	This will be shaped in part by activity in 2024.

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					<ul style="list-style-type: none"> <li>• Film/record the annual round table update conversation on Conveyancing 2030. Q2</li> <li>• Hold smaller, more frequent discussion events to monitor and speed progress, using social channels to engage more conveyancers. Q3, Q4</li> </ul> <p>Demystifying tech opportunities for practices – producing more material like the <a href="#">joint guidance on ID tools</a> – to promote uptake in the client interest.</p> <p>Consider how strongly CLC guidance should recommend the use of classes of tolls/processes to improve conveyancing practice. Q1.</p> <p>Issue any revised guidance. Q3.</p>	
15	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	<p>Publish the most recent diversity monitoring survey with narrative. Q1</p> <p>Equality Code Submission to LSB. Q2</p> <p>Ensure there is sufficient guidance on the Equality Code. Q2</p> <p>Ensure that the new ongoing competence arrangements properly reflect EDI issues.</p> <p>Discuss findings with CRG, PRG and Council. Q2</p>	Respond to qualitative research findings with an action plan.

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					<p>Commission qualitative research. Q2</p> <p>Review qualitative research findings. Q4</p> <p>Maintain diversity tracking in licensing, ongoing competence, monitoring, enforcement and discipline and monitor for disproportionate impact. Year-round</p>	
16	Ensure effective contribution to combating economic crime	1, 4, 8	1a, 1b, 2	1, 2, 6, 7	<p>AML and sanctions compliance continues through the annual programme of inspections, monitoring and compliance work.</p> <p>Publication of TCSP Thematic Review Report. Q1</p> <p>Thematic review of SARs. Q4</p> <p>An Action Plan for further evolution has been developed following the 2023 OPBAS inspection of the CLC and will be agreed with OPBAS in early 2024.</p> <p>ADD Q1 PLAN</p> <p>Progress against that action plan will be monitored separately.</p>	This is rolling work that will continue in 2025.
17	Prepare CLC responses to developing policy across the sector and to formal consultations by third parties.	All	All	6, 7	<p>This is reactive work and will be recorded in the quarterly updates on progress against the Business Plan.</p> <p>There is an increasing number of initiatives, many stemming from the Legal Services Board, that absorb an increasing amount of SMT time. They include:</p> <p>The LSB's Professional Ethics and Rule of Law project</p>	This will continue in 2025.



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					<p>The LSB's Welsh Forum The Single Digital Register project The ID Framework Pilot DPMSG HBSG</p> <p>There is also the need to pay close attention to the evolution of the Office for Legal Complaints/LeO.</p> <p>There will undoubtedly be other initiatives or challenges that we will need to respond such as the Lasting Powers of Attorney issue and Select Committee Inquiry in 2024. It is not possible to plan for these so they have to be fitted in alongside planned work.</p>	
18	Set fee rates for the year beginning November 2024	1, 4, 5, 6,	2, 3	1, 2, 3, 4, 6	<p>Seek Annual Turnover Information March.</p> <p>Council Workshop May.</p> <p>Consultation to be issued June.</p> <p>This will include consideration of the split of the availability and usage elements of meeting the costs of the Legal Ombudsman.</p>	This is an annual exercise.
19	Continue to extend the transparency of CLC operations	1, 7, 8	1b, 2	1, 2, 6	<p>The LSB's final Regulatory Performance Assessment from 2023, expected in January 2024, will indicate whether further development is expected here following steps already take in 2022 and 2023.</p> <p>There was an internal audit of the Publication Policy in late 2023 which found Substantial Assurance. Council's Annual Review of Publication Policy will take place at the 1 Feb 2024 Council.</p>	Annual Review of Publication Policy.

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					<p>The Conference and AGM on 1 February will add to the CLC’s transparency.</p> <p>Ensure the Chair’s report on Council meetings explains clearly why decisions were reached. Following each Council meeting.</p>	
20	Monitor operation of PII market and effectiveness of actual provision	1, 4, 5, 6	1a, 1b, 2, 3	1, 2, 6, 7	<p>Meetings with brokers and insurers took place in late 2023 and continue in early 2024 in preparation for the 2024 renewal round.</p> <p>Bottom out Building Safety Act issues re PII. Q2</p> <p>Transferring Practices – mutual approach to be finalised.Q2</p> <p>Review implications of potential changes in the PII market. Q2</p> <p>Renewal will again be monitored closely, with messaging to firms beginning in early March.</p>	This work follows an annual pattern.
21	Deliver effective monitoring and inspection processes	1, 4, 8	1b, 2	1, 2, 6, 7	In addition to the usual programme of inspections and desk-based monitoring.	Annual programme
	Thematic Review of Informed Choice compliance				<p>Scope review Q1</p> <p>Survey early Q2</p> <p>Targeted reviews Q2</p> <p>Report Q3</p>	Action dependent on review findings

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22	Refining approach to enforcement – setting thresholds for action				Codify the current approach Q2	Monitor operation
23	Review all CLC sanctions to ensure they meet the regulatory objectives of the CLC	1, 4, 8	1b, 2	2, 6	<p>The Legal Services Board intends to carry out work with the front line regulators on enforcement and discipline which may help inform this review.</p> <p>Identify statutory impediments to change. Q2</p> <p>Review sanctions ladder. Q2</p> <p>Review financial penalties. Q3</p> <p>Prepare consultation on any changes Q4</p>	Consultation on changes Submission to LSB Implementation.
24	Ongoing Competence	1, 2, 4, 5, 6, 8	1a, 1b, 2	1, 2, 6, 7	<p>The new model was finalised after consultation in 2024.</p> <p>Preparation for LSB submission and wider publication Q1.</p> <p>Planned implementation 1 Nov 2024.</p>	Monitor compliance.
25	Extend probate-focused activity	1, 4, 5, 8	1a, 1b	1, 2, 6, 7	<p>Seek to engage with the Probate Registry to develop an agenda for cooperation. Q1</p> <p>Develop clearer definition of the probate services that the CLC regulates. Q2</p> <p>Hold Council workshop to develop plan of action. Q3</p> <p>Access to financial service providers. Ongoing</p>	Deliver plan agreed with Council in 2024.

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26	Events with the regulated community	All	1a, 1b, 2, 3	1, 2, 6, 7	<p>Conference and AGM 1<sup>st</sup> February</p> <p>At least four Roadshows based on Risk Agenda</p> <p>Webinars to promote revisions to the Handbook guidance as needed, beginning with Code of Conduct in April.</p> <p>Quarterly surgeries online.</p>	Seek to grow face to face events further.
27	Review accommodation provision	-	3	1, 3, 4, 5, 6, 8	Review Q3 2024	Dependent on 2024 review.
28	Website maintenance and review	1, 3, 4, 5, 7, 8	2, 3	2, 6, 8	<p>PRG to feedback on website usability and utility. Q1</p> <p>Thorough review of content. Q2</p> <p>Review navigation and simplify where possible. Q2</p> <p>Add stand-alone Adjudication Panel area to underline independence. Q2</p>	Continued maintenance.
29	Data hygiene and security	All	2, 3	2, 5, 6,	<p>Data protection training for all staff. Q1</p> <p>Incident reporting to SMT and onward to Council and in Annual Report as appropriate. Ongoing</p>	Will be defined in the light of experience in 2024.
30	Enhanced IT security	All	2, 3	2, 5, 6, 8	<p>Key staff have accounts of CJISM email system for sensitive email. Q1</p> <p>Multi factor authentication to be introduced. Q2</p>	Consider whether any further measures are required.

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31	Consumer Reference Group (CRG)	1, 4, 7, 8	1b, 2	2, 6	At least one meeting each quarter to inform the work of the CLC.	Quarterly meetings.
32	Complete database development	1, 4, 5, 7	1, 2, 3	2, 5, 6, 7	Implementation of business processes on the new database. Rolling programme across the year.	Continued development.
33	Regulatory Performance Assessment	All	All	N/A	There will be another Regulatory Performance Assessment. In 2024, this will be in line with the new approach developed by the LSB.  Licensing Processes Q1	Annual exercise.
34	Council Lay Member Recruitment	All	All	6, 8	Beginning Q2  The terms of two lay members expire in 2024 and the extended terms of the Chair expire in April 2025 and recruitment to all of those vacancies will begin in 2024.	Recruitment of Lay Chair.
35	Staff recruitment	All	All	4, 6, 8	One new member of staff began work with the CLC in January.  There is provision for two new roles to begin in Q4.	In line with need identified in late 2024.
	Annual Salary Benchmarking					
	Panel Inspector Recruitment				Process to be completed in Q1	Keep under review
36	Thematic Review of cost and price of conveyancing and probate and referral fees	1, 3, 4, 5,	All	1, 6,	Scope potential Thematic Review for 2025 Business Plan	Implement Review

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		6, 8, 9				
37	Procurement policy	All	3	2, 6, 8	Review Procurement policy. Q1	Dependent on outcome of 2024 review.
	Annual Contract Review	-	3	2, 4, 5, 6, 7	Timetable and carry out reviews of all contracts	Annual reviews.
38	BCP Scenario testing	All	All	3, 5, 8	Review scenarios and consider whether there is any practical testing to do. Q1  SMT/DD meeting in early 2024 to review scenarios. Q1	To be defined in updated BCP.
39	Breaches Of Undertaking	1, 2, 4, 8	1A, 1B	6	Draft and issue Advisory Note on Breaches of Undertaking. Q1	
40	Review of post completion work by practices	1, 2, 4, 5, 8, 9	1A, 1B, 2, 3	6	Revise Guidance on the Transaction Files Code to address problems that we have become aware of through interventions and HMLR data around timeliness and client communication. Q1  The Transaction Files Code will be a priority for review in 2024.  Review of requisition data from HMLR. Q1  Consider action with firms with disproportionately high requisition rates. Q2	Monitoring impact of changes.
	Wales Forum	All	All	6	Participation in events and work organised by the LSB  Development of CLC relationships with key players in the Wales Government and legal sector.	This will emerge from the work in 2024.

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	Continued intensive engagement with LSCP, LSB, OLC, OPBAS,	All	All	2, 6	Ongoing conversations: LSCP – Informed Choice and Quality Indicators in particular LSB- Wide range, including Managed Compliance and Governance Transparency in particular OLC – Complaints Handling improvement and OLC costs OPBAS – Inspection approaches, implementation of Action Plan	Conversations likely to continue
	Professional Ethics and Rule of Law Initiative	All	1A, 1B, 2	2, 6	Bringing the CLC (and especially the Chief Executive’s) unique insight and experience to bear on LSB work through attendance at workshops and participation in development.	This will emerge from the work in 2024.
	Policies for annual review Staff Handbook Whistleblowing Probity policies	1, 2, 3, 4, 9	1A, 1B, 2	2, 6, 7	Good housekeeping and ensuring that policies are kept up to date with evolving best practice and changing conditions.	Annual reviews.
	Policy repository	All	1A, 1B, 2	6, 7	Creation of a new, single repository for all policies for ease of maintenance.	Maintenance of the repository.
	Annual data destruction	-	3	2	A new, annualised approach to the destruction of data that the CLC no longer needs to hold.	Annual exercise.