

2024 Business Plan – End of Year Report

Purpose: For noting

Author: Director of Strategy and External Relations

Approver: Chief Executive

Summary

This paper sets out the end of year report of progress against the Business Plan for 2024.

Recommendations

Council is asked to note the progress on the Business Plan.

Risk management

The business plan contributes to the management of strategic and operational risks. The strategic risks addressed by each objective are captured in the paper.

Financial impact

Progress against the associated budget is monitored separately and reported to Council at this meeting.

Diversity and inclusion impact

The business plan includes measures to promote diversity and inclusion across the regulated community.

Regulatory objectives

The business plan is designed to ensure that CLC carries out its regulatory objectives set out in Legal Services Act 2007 and captures the relevant regulatory objectives addressed by each proposed item.

Communications requirements

The plan will be published online after its approval by Council. The outturn of the business plan is reported after the end of the year in the Annual Report.

Introduction

The Business Plan for 2025 was substantially delivered, as reported in the table below.

Some significant areas of work have had to be rescheduled to align with the LSB's timetables for research or policy development, both of which the CLC will need to take into account as it takes its own work forward. This is unavoidable and it would not be a sensible use of resources to undertake for example, further policy work on PII before the LSB sets out its own thoughts or expectations.

We are considering how to structure any research that is needed in 2025. This will need to be budget-neutral, which we believe can be achieved using in-house research. The ongoing research project on digital exclusion that we are funding with Bar Standards Board and CILEx Regulation will be completed in the first half of 2025 and is already fully funded.

Where activity originally planned for 2025 is carried forward, that appears in the Business Plan for 2025, which is also before Council for approval at this meeting.

The RPA process and the LSB's project to develop recommendations on discipline and enforcement in the sector have diverted considerable resource over the year. The 2025 business plan will take better account of the demands of oversight regulation on front line regulators, which continue to increase.

Recommendation

Council is asked to note the progress on the Business Plan.

The 2024 Business Plan

Key

CEO – Chief Executive

DFO – Director of Finance and Operations

DSER – Director of Strategy and External Relations

DDL – Deputy Director of Licensing

DDRS - Deputy Director of Regulatory Standards

DDA – Deputy Director of AML

DPO – Data Protection Officer

The Regulatory Objectives (Legal Services Act 2007)

1. Protecting and promoting the public interest
2. Supporting the constitutional principle of the rule of law
3. Improving access to justice
4. Protecting and promoting the interests of consumers
5. Promoting competition in the provision of services
6. Encouraging an independent, strong, diverse and effective legal profession
7. Increasing public understanding of the citizen's legal rights and duties
8. Promoting and maintaining adherence (by authorised persons) to the professional principles
9. Promoting the prevention and detection of economic crime

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

CLC Principal Risks

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

2024 business plan

Ref	Lead	Business Plan Item	Regulatory Objectives	Strategic Objectives	Principal Risks	2024 activity	Report on progress at the end of the year
1.	DSER	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 1st May</p> <p>Prepare consequential changes to wider Handbook.</p> <p>Launch consultation as soon as LSB approves Code of Conduct, likely to be early March. Q2</p>	<p>This was completed to an adjusted timetable because of the requirement of the LSB as they scrutinised the rule change application and extended the approval period. The new Code of Conduct came into effect on 1st January 2025. Consequential changes to subsidiary Codes also came into effect.</p> <p>Promulgation of the new Codes was supported through roadshows in November 2024 and online videos, and continues to be promoted through the CLC’s newsletter and on social media.</p>
2.		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. Q3</p> <p>Agree a regular review period for each Code. Q3</p> <p>Ensure master repository is complete Q3</p>	<p>The first priorities were identified in Q1 as the Complaints Code and to review issues in relation to post-completion work. Work on those has begun but was slowed by the intensive process of review of the CLC’s application to the LSB for changes to the Code of Conduct.</p>

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						Develop plan for review of other Handbook and Guidance elements by end Q3.	<p>In early July we ran an internal workshop of staff plus the chairs of the CRG and PRG. This generated some very useful ideas. (In particular, it was recognised that problems in post-completion work represent the greater risk to consumers and therefore will take priority over addressing the proportionally low rate of complaints against CLC practices to the Legal Ombudsman. Work to improve title applications began immediately and is ongoing.)</p> <p>The 2025 Business Plan sets out the timetable for review of the Handbook following the approval by the LSB of the revised Code of Conduct in September 2024.</p> <p>A new member of the Policy team is leading on the rolling review of the Handbook.</p>
3.	DDL	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 begin following approval of the Ongoing Competence proposals by the LSB. Their review of the rule change

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						Further work on the Licensing Framework will be picked up following the introduction of the revised Ongoing Competence Framework, in Q4 of 2024.	application has been extended into 2025 at the request of the LSB.
4.	DSER	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	<p>Conference and AGM on 1st February 2024</p> <p>Face to face and webinar events based on the Risk Agenda in 2024. Q3.</p> <p>Issue Discipline and Enforcement Report mid-year and as part of Annual Report. Q3</p> <p>Report on the progress of transformation of conveyancing and the CLC's contribution to that. Q4</p>	<p>Council reviewed and approved the updated messaging matrix at its May meeting.</p> <p>The CLC's 2024 Roadshows, covering key compliance issues took place from November 11-15 at venues around the country and received very positive feedback.</p> <p>The Discipline and Enforcement report was published in December 2024.</p> <p>Reporting on the work to transform conveyancing will be rolled into the 2024 Annual Report, for publication in March 2025.</p>
5.	DDL	Promote CLC qualifications to employers and individuals	4, 5, 6	2, 3	1, 2, 6, 7	<p>Prepare brochure for employers Q2.</p> <p>Use Conveyancing Week to promote CLC qualifications.</p> <p>Continue social media promotion of case studies.</p>	<p>There has been joint promotion of CLC qualifications with training throughout the year.</p> <p>A junior lawyers round table that was held on 4th June provided new material to engage with potential</p>

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							<p>new CLC lawyers and employers. The write up gathered a good response when published.</p> <p>We are preparing materials for CLC lawyers to use to promote CLC qualifications. These will be launched during Conveyancing Week in March 2025.</p>
6.	DSER	Take forward the findings of the Quality Indicators Pilot	1, 4, 5, 6, 7	1a, 2, 3	1, 6	<p>Below sets out how the CLC will take forward the seven actions in the Quality Indicators Pilot report, subject to Council consideration.</p> <ol style="list-style-type: none"> 1. Promote consumer access to, and use of, comparable information about the nature and quality of legal services and digital comparison tools (DCT). 2. Explore options to increase legal service provider engagement with DCTs or online reviews. 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. 4. Investigate and monitor the impact of information that may help consumers 	<p>We began work with HM Land Registry, SRA and CLC to look at how HM Land Registry Requisition Data can be made available in a useful way to consumers. This is moving towards making the data available to comparison websites to include in their data sets for consumers. This was held up by a pause at HM Land Registry and has begun again in February 2025.</p> <p>We held a webinar with ReallyMoving.com in the first week of June to demystify how practices can engage with DCT.</p> <p>In September we submitted to the LSB a comprehensive update on</p>

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						<p>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.</p> <p>5. Explore opportunities and regulatory levers to improve the accessibility and availability of Legal Ombudsman decisions for consumers.</p> <p>6. Continue engagement with HMLR on opportunities to improve consumer access to its data.</p> <p>7. Explore digital exclusion considerations and opportunities for regulators to influence the availability of comparable information through non-digital channels.</p>	<p>our work on Consumer Empowerment.</p> <p>We continue discussions with LeO about the accuracy and accessibility of the data that the Ombudsman holds about consumer complaints.</p> <p>The joint research into digital exclusion with the BSB and CILEx Regulation is progressing steadily.</p>
7.	DSER	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>	<p>The design phase of the project is now complete. There is concern that access to data (from other regulators, not the CLC) may delay the delivery timetable.</p>
8.	CEO	Implement revised Compensation Fund Rules	1, 3, 4,	2, 3	1, 2, 4, 6	<p>Consult CRG. Q2</p> <p>Public consultation on draft new Fund rules. Q3</p>	<p>Consultation began in December 2024 and will close in February. We know that the LSCP and SLC intend to submit responses and they have</p>

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						Submit final draft rules to LSB for approval. 2025 Implement new rules. 2025	been granted an extension to the deadline, to 24 February.
9.	DFO	Management of complex and novel Compensation Fund claims	1, 3, 4,	2, 3	1, 2, 4, 6	As required	This has taken considerable senior management time in 2024 and will continue to require significant resources in 2025.
10.	CEO	Finalise and implement revised Adjudication Panel Rules	1, 2, 3, 4, 7, 8	1b, 2	2, 6	Submission to LSB for approval. Q2 Support training for Adjudication Panel Members in the new rules. Q3 Bring new Rules into force. Q3	The timetable for finalisation of the new rules was extended to take account of learning from matters that were moving through the disciplinary pipeline during 2024. We intend to make a rule change application to the LSB by the end of June 2025.
11.	DDRS	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	We began work on the review of complaints handling in Q2 with a survey of the regulated community. We are in discussions with LeO about the accuracy and availability of data, but this does not seem to be a priority issue for LeO. It was not possible to work with LeO in 2024 to develop CLC-specific

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							training targeted at firms with high referral rates, as they did not have the necessary resource in place until late 2024. It does seem that should be possible in 2025 and there was in initial discussion of that at a meeting with LeO in January.
12.	DSER	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 and useful for clients. Q4	This work was deprioritised in 2024 and is rolled into the work on the Handbook.
13.	DDRS	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	Risk criteria have been reviewed and practices are now individually risk assessed against them.
14.	DDL	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. 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. New Apprenticeship Standards have been approved by IFATE and published Q4 2023.	This work was completed to timetable.

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15.	DSEER	Review and Promote Consumer Charter and Secure Badge	1, 4, 5, 6, 7, 8	1a, 1b, 2, 3	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>	<p>The CRG reviewed the Consumer Charter and provided useful suggestions for development.</p> <p>Council considered and agreed the limited scope of the Charter as a public legal education tool.</p> <p>Further work is captured in the 2025 Business Plan.</p>
16.	DSEER	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 Council (HBSC) and Digital Property Market Steering Group (DPMSG).</p> <p>Provide pilot arrangements for new tools and processes that will continue.</p> <p>Scope of pilot for Material Information tool finalised Q2.</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"> • Conference and AGM focuses significantly on transformation agenda. Q1 	<p>We are playing a leading role in the DPMSG in particular.</p> <p>DPMSG was paused during the election but will now resume.</p> <p>The potential for a pilot of the use of upfront information was explored with practices, tech providers and insurers in Q4 2024 with the result that the CLC will not be taking that forward immediately. The Technology and Innovation Group will help to provide advice and guidance to the sector through different means.</p> <p>The write-up of the annual round table has been published and the</p>

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						<ul style="list-style-type: none"> Film/record the annual round table update conversation on Conveyancing 2030. Q2 Hold smaller, more frequent discussion events to monitor and speed progress, using social channels to engage more conveyancers. Q3, Q4 <p>Demystifying tech opportunities for practices – producing more material like the joint guidance on ID tools – to promote uptake in the client interest.</p> <p>Issue any revised guidance. Q3.</p>	<p>CLC’s Conveyancing 2030 programme of work was again highlighted at the Conveyancing Association Conference in January 2025.</p> <p>We held an additional industry roundtable with ShieldPay looking at alternatives to client account and the write up was published.</p> <p>We have launched a pilot of the ShieldPay Third Party Managed Account tool to provide insight that we hope can support adoption of alternatives to client account by CLC practices. That has seen very limited interest and we are not looking to review the approach with ShieldPay in Q2 2025.</p>
17.	DSER	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. Q2</p> <p>Equality Code Submission to LSB. Q3</p> <p>Ensure there is sufficient guidance on the Equality Code. Q3</p>	<p>The 2023 Diversity Monitoring Survey findings were published at the beginning of 2024.</p> <p>Some changes have been made to the Equality Code consequent to the updates to the Code of Conduct. Further changes, which were identified prior to the Code of</p>

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						<p>Ensure that the new ongoing competence arrangements properly reflect EDI issues.</p> <p>Discuss findings with CRG, PRG and Council. Q2</p> <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>	<p>Conduct review will be made in 2025. It would have delayed the Code of Conduct review process to roll those changes into that process. That revised timetable for the rule changes pushed other work into 2025.</p> <p>We are considering how to structure research in 2025. This will need to be budget-neutral, which we believe can be achieved using in-house research.</p>
18.	DDA	Ensure effective contribution to combating economic crime	1, 4, 8	1a, 1b, 2, 3	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>Progress against that action plan will be monitored separately.</p>	<p>Already in 2024 there has been considerable work in this area with the development and publication of a revised Sector Risk Assessment by the CLC, the publication of a revised Practice Wide Risk Assessment and the AML Policy checklist.</p> <p>The findings of the thematic review of SARs were also published to deadline.</p> <p>We are delivering the Action Plan set out following the 2023 OPBAS inspection.</p>

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							We published the CLC's Annual AML Report on 29 th October and have submitted it to HM Treasury as required.
19.	DSER	Prepare CLC responses to developing policy across the sector and to formal consultations by third parties.	All	1a, 1b, 2, 3	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 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>	<p>We submitted written evidence to the Levelling-Up, Housing and Communities Select Committee's Inquiry into Home Buying and Selling and the Justice Select Committee's inquiry into probate. We also gave oral evidence to the Justice Select committee.</p> <p>We have developed new and constructive relationships with Parliamentarians and outreach continues.</p> <p>We submitted the following responses to third party consultations during 2024:</p> <ul style="list-style-type: none"> • December 2024 CLC Response to LeO Budget and Business Plan Consultation • July 2024 – CLC Response to CILEx Regulation Consultation

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							<p>on changes to Transparency Rules</p> <ul style="list-style-type: none"> • June 2024 – Response to HM Treasury Consultation on Improving the Money Laundering Regulations • April 2024 – Submission to DLUHC Select Committee Inquiry into Home Buying and Selling • April 2024 – Letter to the Chief Executive of the Legal Services Board on the operation of Internal Governance Rules • April 2024 – CLC Response to a Faculty Office Consultation March on Supervision <p>We had hoped that, following the interruption of the election period, the new Housing, Communities and Local Government Select</p>

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							<p>Committee would pick up its predecessor's inquiry into home buying and selling but we have heard from the committee clerk that it will not. We continue to engage with MPs, Ministers and officials on the issues.</p> <p>We contributed significantly to the work in relation to the six projects listed under '2024 Activity'.</p> <p>We have also undertaken urgent work with the Law Society and UK Finance to address barriers to CLC-regulated lawyers being able to operate effectively in probate. We received confirmation in late 2025 that UK Finance had made the changes we had requested to its sectoral AML guidance.</p>
20.	DFO	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 June.</p> <p>Consultation to be issued June.</p>	This was completed smoothly and to timetable.

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						This will include consideration of the split of the availability and usage elements of meeting the costs of the Legal Ombudsman.	
21.	DSER	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.</p> <p>Council's Annual Review of Publication Policy will take place at the 1 Feb 2024 Council.</p> <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>	<p>The CLC's conference was a success and gathered coverage.</p> <p>We await the LSB's Regulatory Performance Assessment for 2024 to understand their view of our current transparency arrangements.</p>
22.	DDL	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 (BSA) issues re PII. Q2</p> <p>Transferring Practices – mutual approach to be finalised. Q3</p>	<p>The PII renewal round was very smooth this year and saw the addition of new insurers. The system managed the departure from the market of one insurer very well. The requirements for early notice served the CLC and the sector well.</p>

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						<p>Review implications of potential changes in the PII market. We await the outcome of the LSB's research in this area</p> <p>Renewal will again be monitored closely, with messaging to firms beginning in early March.</p>	Planned LSB work on PII across the legal sector has not yet been reported on, though the CLC has provided date to the researchers.
23.	DDRS	Deliver effective monitoring and inspection processes	1, 4, 8	1b, 2	1, 2, 6, 7	The usual programme of inspections and desk-based monitoring.	<p>This was completed in line with the which had to be revised. Inspections planned for Q4 were postponed to</p> <ul style="list-style-type: none"> • Shift senior team members into training new joiners • Allow greater focus on interventions and disciplinary matters • Create capacity for work on complaints and Compensation Fund claims • Create capacity for senior team members to focus on documentation and preparation for the LSB review of discipline and enforcement

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24.	DDRS	Thematic Review of Informed Choice compliance	1, 3, 4, 5, 6, 7, 8	1A, 2	2, 6	Scope review Q1 Survey Q3 Targeted reviews Q3 Report Q4	This was rolled into the ARR. Returns are currently being analysed.
25.	DDRS	Refining approach to enforcement – setting thresholds for action	1, 4, 8	1b, 2	2, 6	Codify the current approach Q2	This work was completed in Q4.
26.	DDRS	Review all CLC sanctions to ensure they meet the regulatory objectives of the CLC	1, 4, 8	1b, 2	2, 6	The Legal Services Board intends to carry out work with the front line regulators on enforcement and discipline which may help inform this review. Identify statutory impediments to change. Q3 Review sanctions ladder. Q3 Review financial penalties. Q3 Prepare consultation on any changes Q4	Participating in the LSB work, which began later in the year than expected, took considerable resource in November and December 2024. The project is continuing into 2025. LSB will be interviewing CLC colleagues in February. The CLC's further review of its own arrangements will take place after the LSB reports on its proposed sector-wide approach.
27.	DDL	Ongoing Competence	1, 2, 4, 5, 6, 8	1a, 1b, 2, 3	1, 2, 6, 7	The new model was finalised after consultation in 2024.	The LSB has extended the period of its review of the CLC's proposed new Ongoing Competence arrangements. We hope that it will

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						Preparation for LSB submission and wider publication Q1. Planned implementation 1 Nov 2024.	be possible to introduce the new arrangements in pilot form in 2025.
28.	DSE	Extend probate-focused activity	1, 4, 5, 8	1a, 1b, 3	1, 2, 6, 7	Seek to engage with the Probate Registry to develop an agenda for cooperation. Q1 Develop clearer definition of the probate services that the CLC regulates. Q2 Hold Council workshop to develop plan of action. Q3 Access to financial service providers. Ongoing	Probate Registry have not responded to overtures in which we have offered help engaging with probate providers. We continue to try to engage and have sought the support of the Ministry of Justice. Other work must await the engagement of the Probate Registry.
29.	DSE	Events with the regulated community	All	1a, 1b, 2, 3	1, 2, 6, 7	Conference and AGM 1 st February At least four Roadshows based on Risk Agenda Webinars to promote revisions to the Handbook guidance as needed, beginning with Code of Conduct in April.	The AGM was successful and generated positive and wide coverage. We held four regional compliance roadshows in November 2024. We produced video content for the website to promote the revised new Code of Conduct.
30.	DFO	Review accommodation provision	-	3	1, 3, 4, 5, 6, 8	Review Q3 2024	This was completed according to plan.

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31.	DSER	Website maintenance and review	1, 3, 4, 5, 7, 8	2, 3	2, 6, 8	PRG to feedback on website usability and utility. Q1 Thorough review of content. Q2 Review navigation and simplify where possible. Q2 Add stand-alone Adjudication Panel area to underline independence. Q2	Some changes have already been implemented (simplification of navigation has begun, a new Adjudication Panel area has been created). There is now rolling work to deliver improvement to the website.
32.	DPO	Data hygiene and security	All	2, 3	2, 5, 6,	Data protection training for all staff. Q1 Incident reporting to SMT and onward to Council and in Annual Report as appropriate. Ongoing	This was completed in January.
33.	DFO	Enhanced IT security	All	2, 3	2, 5, 6, 8	Key staff have accounts of CJISM email system for sensitive email. Q1 Multi factor authentication to be introduced. Q2	CJISM email accounts were in operation by the end of Q1. MFA has been deployed to all users.
34.	DSER	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.	The CRG met formally three times in 2024. One planned meeting had to be rearranged to accommodate CRG members. The Chair of the CRG provided a report to the Council during 2024.

Ref	Lead	Business Plan Item	Regulatory Objectives	Strategic Objectives	Principal Risks	2024 activity	Report on progress at the end of the year
35.	DFO	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.	The core database which houses the register is in place as are the licencing and notification processes. Further data to support different functions across the CLC is being added.
36.	DSER	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	The process for 2024 began with a request for evidence in September for submission in November with a report being issued in March 2025. This round of the RPA was a very extensive exercise. Council reviewed a draft submission at its November meeting. A draft report is expected from the LSB in February.
37.	CEO	Council Lay Member Recruitment	All	1a, 1b, 2, 3	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.	The Appointments Committee has met and reported separately to the Council.

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38.	SMT	Staff recruitment	All	1a, 1b, 2, 3	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.	A new Policy Manager joined the CLC in September. More recruitment is planned for 2025.
39.	CEO	Annual Salary Benchmarking	All	1a, 1b, 2, 3	3, 4, 7	This will take place in Q4	This work will inform a meeting of the Remuneration Committee.
40.	DDRS	Panel Inspector Recruitment				Process to be completed in Q1	3 new panel inspectors were appointed.
41.	DDRS	Thematic Review of cost and price of conveyancing and probate and referral fees	1, 3, 4, 5, 6, 8, 9	1a, 1b, 2,	1, 6,	Scope potential Thematic Review for 2025 Business Plan	The LSB launched its own research into the costs of legal services, and we will await the findings of that survey, which we are supporting, to help scope the CLC's own work.
42.	DFO	Procurement policy	All	1a, 1b, 2, 3	2, 6, 8	Review Procurement policy. Q1	This has been completed.
43.	DFO	Annual Contract Review	-	3	2, 4, 5, 6, 7	Timetable and carry out reviews of all contracts	A timetable was established and was met.
44.	DFO	BCP Scenario testing	All	1a, 1b, 2,	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	The BCP review was considered by the Council at its July meeting.
45.	DSER	Breaches Of Undertaking	1, 2, 4, 8	1A, 1B	6	Draft and issue Advisory Note on Breaches of Undertaking. Q1	This was completed to timetable. The issue has also been highlighted

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							in the Risk Agenda and both publications gained good coverage to support the direct communications.
46.	DDA	Review of post completion work by practices	1, 2, 4, 5, 8, 9	1A, 1B, 2, 3	6	<p>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. Q3</p> <p>The Transaction Files Code will be a priority for review in 2024.</p> <p>Review of requisition data from HMLR. Q1</p> <p>Consider action with firms with disproportionately high requisition rates. Q3</p>	<p>We have begun work on post-completion issues and are looking at how requisition data could be used in addition to its contribution to the CLC's risk profiling of practices.</p> <p>The November roadshows included a focus on post-completion work and we have also produced a short video to raise awareness of the key challenges and steps that practices can take.</p> <p>HMLR Requisition Data forms part of our risk profiling of practices and so informs monitoring prioritisation. We are still discussing with HM Land Registry how else we might be able to use the data more publicly.</p>

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47.	CEO	Wales Forum	All	1a, 1b, 2, 3	6	<p>Participation in events and work organised by the LSB</p> <p>Development of CLC relationships with key players in the Wales Government and legal sector.</p>	<p>This is on track.</p> <p>We raised with colleagues in the Wales Government areas we would like to explore with them in more detail, especially in relation to education provision in the principality.</p>
48.	CEO	Continued intensive engagement with LSCP, LSB, OLC, OPBAS,	All	1a, 1b, 2, 3	2, 6	<p>Ongoing conversations:</p> <p>LSCP – Informed Choice and Quality Indicators in particular</p> <p>LSB- Wide range, including Managed Compliance and Governance Transparency in particular</p> <p>OLC – Complaints Handling improvement and OLC costs</p> <p>OPBAS – Inspection approaches, implementation of Action Plan</p>	<p>There has been considerable engagement on all of these fronts. We remain concerned about the performance of the OLC and especially in the data that is available to inform our regulatory work. We continue to engage with them.</p> <p>It was not possible to secure an individual introductory meeting with the new Chair of the Legal Services Consumer Panel.</p> <p>We made good and useful contact with the new Chief Executive of the Legal Services Board at private meetings and other events across the second half of the year.</p>

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49.	CEO	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.	As well as taking part in meetings, we have submitted evidence to the LSB team about ethical issues in our own sector.
50.	CEO	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.	The probity policies were by the Audit and Risk Committee at its meeting on 16 July 2024.
51.	DFO	Policy repository	All	1A, 1B, 2	6, 7	Creation of a new, single repository for all policies for ease of maintenance.	We have made progress on this and the extensive exercise will now complete in Q2 2025.
52.	DPO	Annual data destruction	-	3	2	A new, annualised approach to the destruction of data that the CLC no longer needs to hold.	Work on this will began in Q3.
53.	DSER	Post-Election engagement with new ministers and MPs	All	All	1, 2, 6	Engage with MoJ and DHC teams in particular and key back bench MPs to build constructive relationships, raise the profile of the CLC and Licensed Conveyancers and advance the CLC's own policy objectives for the protection of consumers and clients.	We appointed a public affairs agency for a fixed term of one year to deliver this work with the CLC. It began well in the immediate post-election period and we have developed good working relations with one MP and a Peer in particular, with more meetings in the pipeline.