

## 2025 Business Plan

Purpose: For noting

Author: Director of Strategy and External Relations

Approver: Chief Executive

### Summary

This paper updates Council on progress against the Business Plan for 2025.

#### Recommendations

The Council is asked to note this update.

### Risk management

The business plan contributes to the management of strategic and operational risks.

### Financial impact

The budget for the year supports the delivery of this business plan.

## 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

None arising from this report.

### **Publication**

The CLC's Business Plan is published on the CLC's website here.

#### **Business Plan for 2025**

#### Introduction

This is the mid-year update to the Council on progress against the Business Plan agreed for the year 2025.

Progress is good, but there is a major cause for concern in relation to rule change applications to the LSB. Council Members will note this commentary at Item 8 in the table.

### Item 8 - Ongoing Competence

This item has been changed from green to amber status because, although we have submitted a rule change application to the LSB, we are experiencing significant resistance from the relevant team there as it seeks to impose its views on points of detail which we believe are properly the responsibility of the front line regulator. If the LSB persists in some of its objections to our application, we will need to withdraw it rather than compromise in a way that would not serve consumer protection or the development of the sector. The LSB's objection, to our decision not to pro rata ongoing competence for those absent for long periods (e.g. maternity leave or sickness) of a year, was so insistent on anti-discrimination grounds that we took further legal advice before reverting to the LSB without making the changes that they are seeking.

This is not an isolated issue. The LSB's approach as long been detailed without providing what we consider to be constructive challenge to improve outcomes.

Now the Rule Team, that reviews rule change applications by the front line regulators, is taking an approach which seems to remove all discretion from the regulators and be far too directive about the detailed contents of policy proposals. As noted above, this threatens the CLC's proposed improvements to its Ongoing Competence regime. The experience of submitting this application gives us cause for concern about later applications this year for changes to the Adjudication Panel Rules and the Compensation Fund Rules.

### **Government Initiatives**

We must also note that government initiatives in relation to growth, the Industrial Strategy and the evolution of AI are also beginning to consume considerable resource for participation in new ranges of meetings and reporting. I have kept Council informed of the meeting with the Minister of State at the Ministry of Justice on growth in the legal sector and the follow-up work with MoJ and DBT that is flowing from that. While we hope that we can keep the sector's attention on the very significant benefits to be gained from the work to transform home buying and selling, we must expect that reporting on contributions to growth may place increased demands on the CLC.

# Monitoring and reporting against the business plan

Each quarter, the update provides a colour-coded overall assessment for each item setting out whether it is

- On track green
- Completed green
- Delayed amber
- Replanned amber
- Paused red
- Cancelled red

This overall assessment will be supported by the narrative report for each item.

We hope that this enhanced approach will provide an easy and quick overview and capture information to explain the reason for the overall rating of each item. It will avoid the spurious accuracy of, for example, assessment of the percentage of progress towards a particular objective.

# Recommendation

The Council is asked to note this update.

#### **Business Plan 2025**

### **KEY**

CEO - Chief Executive

DANB - Director of Authorisations and New Business

DDA - Deputy Director of AML

DDRS - Deputy Director of Regulatory Standards

DFO – Director of Finance and Operations

DPO - Data Protection Officer

DSER – Director of Strategy and External Relations

## 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

# **LSB Regulatory Performance Standards**

- 1. Well-led
- 2. Effective approach to regulation
- 3. Operational Delivery

## **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



# Business Plan 2025

Ref	Lead	Business Plan Item	Regulatory Objectives	Strategic Objectives	RPA Standards	Principal Risks addresse	2025 development activity	Mid-year report on progress
1.	DFO/ DSER	Continue to deliver high quality monitoring, compliance and enforcement	All	All	2, 3	1, 2, 6, 7, 8	Continue to increase speed and efficiency of monitoring, compliance and enforcement  Enhance feedback to the profession to drive up standards, building on the Risk Agenda and running more compliance events online and in-person  Consider any potential follow-up actions on LSB's review of discipline and enforcement across the sector  Reduce first tier and second tier complaints in the sector – working with LeO where possible	The Annual Regulatory Return exercise has been completed. Findings are already informing action by the CLC and an information sheet will be published by the end of July.  The annual Risk Agenda will be ready for publication in July.  We await the LSB's findings on its review of discipline and enforcement. This has been delayed considerably due to what have been described to us as 'resource issues' at the LSB. Once we receive the draft report, we will provide an update to Council.  Following a 2024 survey of complaints handling by CLC practices, we published in
							FCO MILEIE HOSSING	practices, we published in

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								March an Advisory Note on Complaints Handling. This will feature at roadshows in Q3 and Q4. We will monitor the impact of this annually based on LeO statistics and will review whether further action is needed.  The Internal Audit on Compliance Monitoring was positive.
2.	DSER	Grow the activity under CLC regulation through practices and individuals choosing to move to CLC regulation	1, 3, 4, 5, 6, 8	All	2, 3	1, 2, 4,	Promote through      Direct     conversations     with practices     that should     consider moving     into CLC     regulation      Communications     aimed at reaching     individuals who     should consider	Web content aimed at individuals and practices has been reshaped and updated.  There are now three compelling case studies on our website of practices that have transferred into CLC regulation from the SRA.  We worked with insurance broker Miller to develop articles promoting transfer to CLC

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							moving into CLC regulation  Improving the ease of PII for firms moving into CLC regulation	regulation and they have produced a guide to obtaining PII for new practices and are looking to replicate that with other brokers/insurers. A short report on the very smooth PII renewal process is in preparation for publication.  None of the target practices that we wrote to in the spring offering a conversation about moving into CLC regulation has responded. We will write to a new group of practices in September once we have published at least one article in the trade press that promotes the route to transfer. This will be able to take account of new evidence about the success of CLC practices, the case studies etc.  An insurer that was formerly
								reluctant to take on switching or

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								having firms has recently done so. With the general easing of the PII market we expect to continue to see improvements. Close engagement with insurers, who are all very supportive of the CLC's aims, continues.
								We are seeing very significant growth in turnover at our practices which is also reflective of the appropriateness of the regulatory regime.
								In July the number of individual licence holders exceeded 2,000 for the first time ever.
								In the second quarter, four new practices have been approved for registration. Two are already operational, while the other two, including one SRA switch application, are expected to

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								become operational in August. A further switch application is in process and expected to conclude in early autumn. There are now three case studies of successful switchers on the website that we are using to promote CLC regulation.  We currently have three applications for new practices in progress. In addition, there is another application pending submission, which is linked to a new mortgage lender. This submission is contingent upon the firm obtaining FCA registration, which is anticipated within the next six months.
3.	DSER	Improve accessibility of CLC information for regulated community, stakeholders,	All	All	All	1, 2, 5, 6	Review contents of the website to ensure all information is correct and up to date	The web working group is delivering a steady flow of change and improvement to the presentation of and content on

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		consumers etc through the website					Review organisation of website to ensure easy and intuitive user journeys  Apply insights from the ongoing research with BSB and CILEx Regulation to address Digital Exclusion  Consider adding automatic translation tool to the website.	the website to deliver these aims. This will continue all year.  Content on the Licensing areas of the website has been refreshed as has content setting out the benefits of CLC regulation for practices.  A review of the Consumer Charter, beginning with the Consumer Reference Group will also improve the messaging for consumers of CLC-regulated services. This will be completed by the end of the year.
4.		Public Legal Education	1, 4,	2	2	6	Continue to enhance relevant content on Legal Choices  Continue First Time Buyer articles  Hold events for first time buyers in tandem with compliance and other	This work is on track. The articles in First Time Buyer are a very effective way to reach potential clients who are most likely to need support in choice and use of conveyancer.  Events will begin in Q3 in tandem with roadshows.

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							events around England and Wales	A recent CLC article in What Mortgage magazine was cited by the publication as useful for conveyancing clients in the wake of the Panorama episode looking at unethical practices in estate agencies that could impact on conveyancing services.
5.	DSER	Continue rolling review of Handbook, Frameworks, Guidance and sanctions	All	All	All	2, 6, 7	Implement new Code of Conduct and consequential changes  Review:  Notification Code Know Your Client expectations Completion and Registration expectations Equality Code Licensing Frameworks	The implementation of the new Code has been very smooth. It has been gratifying to see that the changes the CLC made to the Code of Conduct are closely aligned with proposals on ethical codes that the LSB is currently consulting on.  Council was updated on our preparations for the LSB's forthcoming Policy Statement on ethics and provided a useful steer. The statement has not yet been published.

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							Sanctions     (following LSB     report on         discipline and         enforcement,         expected in 2025)  Publish new guidance on dealing with vulnerable clients	Work to review the other codes listed here will pick up following the submission to the LSB in May of the Ongoing Competence Code changes.  Guidance on identifying consumer vulnerability that also sets out good practice, was published in March.
6.	DSER	Adjudication Panel Rules	1, 2, 3, 4, 7, 8,	All	All	2, 6, 8	Submit rule change application Implement revised Rules  Support the delivery of a more robust operation that delivers good outcomes faster for lawyers and clients	We have made good progress this quarter, preparing draft Adjudication Panel rules for consultation. They are currently going through a final check by regulatory lawyers.  However, we are concerned about the approach the LSB may take to reviewing an application for approval of the new rules. In recent rule change applications, the relevant LSB team has shown itself to be highly directive and seeking to

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								impose its own views about what is needed rather than allowing the front line regulator to meet its responsibilities in the way that is most effective for its sector. This is something that we are taking up directly at the highest level at the LSB and we will keep the Council updated.  CLC support for the Panel is effective, and we are looking to boost capacity with an additional post significantly dedicated to Panel support in Q2/3.
7.	DDRS	Compensation Fund	1, 4, 7,	2, 4	2, 3	2, 4, 6	Submit rule change application  Implement new rules once approved by LSB  Manage complex and novel claims	The rule change application is nearing completion and again we have concerns about the LSB's likely approach to considering our rule change application. The management of claims continues. We have added temporary additional resource

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								to assess a large group of claims relating to investment properties and that work is progressing well.
8.	DANB	Ongoing Competence	1, 4, 6, 8, 9	All	2, 3	2, 6, 7	Submit rule change application  Implement new approach for pilot year beginning November 2025	This item has been changed from green to amber status because, although we have submitted a rule change application to the LSB we are experiencing significant resistance from the relevant team there as it seeks to impose its views on points of detail which we believe are properly the responsibility of the front line regulator. If the LSB persists in some of its objections to our application, we will need to withdraw it rather than compromise in a way that would not serve consumer protection or the development of the sector. The LSB's objection, to our decision not to pro rata ongoing competence for those

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								absent for long periods (e.g. maternity leave or sickness) of a year, was so insistent on anti-discrimination grounds that we took further legal advice before reverting to the LSB without making the changes that they are seeking.
9.	DSER	Probate	1, 3, 4, 5, 6, 8, 9	All	2, 3	1, 2, 4,	Increase engagement with probate practitioners and respond to particular challenges of consumer protection and compliance	Our biennial State of Probate survey is currently in the field and the findings will be published in September. They will provide the basis to engage with the Society of Trust and Estate Practitioners and others in the sector to seek to address the challenges that we see.
							Secure engagement with Probate Registry	The Probate Registry continues to prove closed to approaches from us seeking information and collaboration. We will not devote any more resource to opening up that route.

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							Resolve the unintentional trading complexities faced by CLC probate practitioners following the 2023 revision of the JMLSG guidance. Encourage UK Finance and the Bereavement Working Group to adopt and a revised Banking. ProtocolEstate. Administration	UK Finance has taken ownership of the newly revised Banking.ProtocolEstate. Administration, developed in collaboration with the Legal Services Board (LSB), with nearfinal drafts in circulation. UK Finance has also agreed to recommend to the JMLSG and HM Treasury that the revised terminology be incorporated into future updates of the JMLSG guidance.
10.	DDRS	Improve performance at Completion and Registration (post- completion)	1, 4, 8, 9	All	2,3	2, 6, 7	Reduce HM Land Registry requisition rates through training of CLC practices, focusing on most challenging cases  Set out clear expectations for completion and registration and consider additions to the Handbook and guidance	We have run four dedicated training sessions with HM Land Registry for CLC practices so far this year. More than 200 CLC lawyers have taken part in those. We also promote heavily HMLR's general training resources and targeted application accuracy workshops.

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							Continue to promote alternatives to Client Account where they can improve completion	Now we will turn to a focus on those firms with worse than average rates of avoidable requisitions. This data is currently being made available by HM Land Registry to all practices with more than 10 transactions every six months.  Work has begun to develop guidance for CLC practices on alternatives to client account in collaboration with providers of those. We may be able to engage the SRA in this work but they have not yet agreed to that.
11.	CEO	Engage with the LSB in its oversight work	N/A	All	All	2,6	Continue to provide information and evidence to the LSB's review of discipline and enforcement  Review findings of LSB's review and apply to the CLC as appropriate	The process of the LSB's review of discipline and enforcement was lengthy and intensive. As Council Members will be aware, the time for the production of the final report has been extended by the LSB. Currently we have been told to expect to receive the draft report for

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							Review findings of the 2024 RPA and take follow-up action	comment shortly and to have four weeks to comment on it. We will update the Council once we have the draft report.
							Prepare 2025 RPA submission	We reviewed the RPA with Council at the May meeting and are taking forward the work that flowed from that.
								We made direct comment to the LSB in correspondence and in person about the structure and process of the RPA. We have been told that the next RPA will not begin before January 2026. The current interregnum at the LSB, which has both an interim Chair and interim CEO may well mean that the next RPA will begin considerably later than that. We hope that this period will be used by the LSB to reshape the exercise to make it
								more effective and useful for the sector. Its value in the past

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								must be very questionable given the major failings at the SRA that were not surfaced through the RPA process.
12.	DDRS	Equality, Diversity and Inclusion	1, 2, 4, 6	2	2	6, 8	Review how we capture and use data about the regulated community to improve quality and extent of data and reduce effort of collection to support analysis of EDI impacts of CLC policy and activity  Carry out EDI research on revised basis  Submit planned revisions to the Equality Code to the LSB for approval	The survey work is planned to take place in Q4.  The planned revisions to the Equality Code, which we had to prepare separately from the consequential amendments flowing from the revised Code of Conduct, will be submitted in Q3.  Our new Equality Impact Assessment template is now in use.
13.	CEO	MoUs with other organisations	All	All	All	1, 2	Review all MoUs with partner organisations to ensure they are supporting the CLC's	This is underway. A new willingness by HM Land Registry to share insight into individual

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							regulatory activity and consumer protection as well as they can	CLC practices has prompted early attention to that MoU.
14.	DSER	Transforming home buying and selling	All	1, 2	1, 2	1, 2, 6, 7	Shift CLC effort to use of our own levers as a regulator that can help drive positive change  Consider how consumer protection and acting in the best interests of clients can practically be achieved and enhanced in the transformation of the conveyancing process  Continue to promote choice of legal advisor and review enhancement of information available to assist consumer choice (informed by LSB assessment of the CLC's work on Consumer	The CLC is working through the Digital Property Market Steering Group and Home Buying and Selling Council to drive change. We are pleased that the Home Buying and Selling Council is developing and will issue its own guidance on Material Information to fill the vacuum left by Trading Standards. This will need to be agreed by the entire Council and so will have great authority. It should drive consistent approaches across the sector. If effective, it will be a very good model for the promulgation of new protocols and guidance for digital conveyancing.  We have published the write-up of our annual round table

Ref Lead Business Plan Item  Strategic Objectives Strategic Objectives Strategic Strategic Objectives addresse addresse	nt activity Mid-year report on progress
Empowerment the evidence su in September 20  Promote the CL Consumer Chal encourage prace display the bady link online	Our roundtable sessions have become a model for a new approach by HMLR. Sheila took part in the firs HMLR roundtable

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								The 14 <sup>th</sup> July Panorama programme on unethical practices in estate agencies has prompted us to issue a statement to the regulated community reminding them of their obligations in this regard and looking ahead to a thematic review of referral arrangements in 2026.  We do not now expect to receive an LSB assessment of the CLC's work on Consumer Empowerment following the extensive evidence submission we made in September 2024.
15.	DFO/ DSER	Evidence gathering	All	All	All	1, 2, 5, 6, 7	Continue to press OLC for better quality, more timely data.  HMLR data on requisition rates of CLC firms should be available for use in by March 2025. We will use	Work on OLC data continues slowly on their part and we remain very concerned about the accuracy and timeliness of data from OLC that should inform our monitoring and compliance work and that does determine billing for OLC costs.

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							this in risk assessment and to drive performance improvement  Other areas of evidence gathering include  • Annual Regulatory Return  • PII Claims data  • Tech and innovation insight from survey of tech providers and CLC practices  • Tech and Innovation Group, PRG and CRG sessions to inform policy and operations  • Stakeholder perceptions research	Requisition data is now being used as part of our risk assessment of practices and to target firms that would benefit from HM Land Registry or other training.  The ARR process is complete and is being reported to Council and will be published.  The Technology and Innovation Working Group carried out a survey of lawyers and tech providers that has been used to shape guidance for the sector that is now being finalised.

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16.	DFO	Database development and maintenance	1, 4, 8, 9	All	All	2, 5, 6, 8	Continue to develop the database to accommodate more CLC data requirements and support more processes, including the new Ongoing Competence data capture requirements	Evolution of the database continues. Currently work is underway to provide a feed of data to the Regulatory Information Service that the front line regulators are developing jointly.  There is also development to support the new approach to Ongoing Competence with new data capture.
17.	DPO	Annual Data Cleanse	N/A	3	1, 3	5, 8	Review data holdings and delete data that no longer needs to be held by the CLC or must be deleted in line with regulatory policy of legal requirements.	This has begun with a survey of the affected data that we need to take into account. A programme for the deletion process is currently being finalised
18.	DSER	Promote the CLC as an effective, proportionate, contemporary regulator of successful legal practices	1, 5, 6, 7, 8, 9	1,3	All	1, 2, 3, 4, 6, 7	Refresh narrative to be more confident of CLC strengths given comparison with other regulators	We have adopted a tone that is more reflective of the comparative strengths of the CLC compared to other regulators.

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							<ul> <li>media reporting/placed articles</li> <li>CLC and other events</li> <li>social media</li> <li>pastoral practice visits</li> <li>stakeholder engagement</li> <li>enhanced Whitehall and Westminster engagement for remainder of first year of Parliament to build base for future</li> <li>enhanced web content and functionality</li> </ul>	We are using social media to promote the CLC and its messages as usual.  2025 so far has seen even greater than usual engagement with stakeholders such as the representative bodies for conveyancers, lenders, panel managers and others as well as even closer collaboration with HM Land Registry.  It is notable that panel managers, lenders and HM Land Registry are becoming more willing to share insight about particular practices with the CLC – something we have been pressing for some time. This is proving very useful and at times reassuring for the positive picture it paints of the regulated community.

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								We have continued to develop engagement in Westminster and Whitehall and that has yielded success in the form of MHCLG commitment to the transformation of home buying and selling in February.
19.	CEO	Maintain best-in-class governance	All	All	1	2, 3, 4, 5, 6	Complete full programme of internal audit by independent auditor and maintain high internal audit rating  Reflect changes arising from Auditing, Reporting and Governance Authority (taking over from FRC)	This is on track.  We are in the process of the annual reviews of the ToR of the Council and Committees.  The launch of the ARGA is delayed but we have the relevant contacts and are keeping a watching brief
20.	DSER	Outreach to potential CLC practices/lawyers	1, 3, 4, 5, 6, 7	2, 3	2	1, 2, 3, 4, 6	Direct conversations Improve ease of PII cover for switchers and hivers	Direct conversations are underway and progress in the pipeline of new and switching practices is reported in the performance outturn report to this Council meeting.

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							Promote CLC qualifications to individuals and employers	Meetings with PI brokers and insurers in the early part of the year and ongoing engagement and the easing of the PI market shows signs of easing PI arrangements for new and switching/hiving practices. We expect that increased insurer familiarity with such arrangements will continue to improve the picture.  With more information emerging on apprenticeship routes and engagement with providers and employers identifying new messages to promote the CLC qualifications, we continue to grow our activity in this area.
21.	DSER	Review CLC strategy	All	All	All	All	Corporate Strategy period ends in 2025. Revised strategy will be developed	We began the strategy review at the Council Workshop session in June. A small Council working group will take the next steps, consulting the CRG and PRG

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							CLC will also review	and committee chairs and other Council Members ahead of the next workshop session of the full Council.
22.	DSER	Participate in cross-sector initiatives	All	2	All	2, 5, 6	Development of the Regulatory Information Service LSB's Professional Ethics and Rule of Law project LSB's Wales Forum Regulators EDI Forum Regulators Research Forum DPMSG HBSC LRAC HMLR Industry Forum HMLR Communicating with the Market Forum	There has been a great deal of activity with and through all of these groups in the first half of the year.  The RIS development is underway, and we have recently signed refreshed data sharing agreements between the regulators to support the final planned form of delivery.  We have contributed to the Professional Ethics and Rule of Law project and our recommendations to the LSB to make the forthcoming policy statement less directive than

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			Regulatory Objectives	Strategic Objectives	RPA Standards	Principal Risks addresse		
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					- **			the version issued for
								consultation seems to have
								been
								We should also single out work
								with HM Land Registry around
								the publication of requisition
								data to all practices – something that we have long
								pressed for and so a notable
								success for the CLC.
								The LRAC and other HMLR
								Forums have allowed us to
								monitor and suggest actions to
								HMLR as it continues its recovery. They have also
								provided useful forums for
								discussing the approach to
								publication of requisition data –
								which we have long pressed for, and which has now taken place
								for the first time.
								Our direct engagement with HMLR has become even
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								stronger and more productive, with Sheila recently attending an HMLR Board session as the only regulator. We have also arranged several dedicated training sessions by HLMR for CLC practices to help reduce requisition rates.
23.	DFO	Set new fee rates for the licence year beginning November 2025	1, 4, 5, 6,	All	All	1, 2, 3, 4, 6	Issue a consultation informed by turnover rates reported in the PII renewal process	Further to the discussions at the June Council Workshop, the consultation on proposals for 2025-26 is live and responses are beginning to come in.
24.	DANB	PII	1, 2, 3, 4, 5, 6,	1, 2, 3	All	1, 2, 6, 7	Monitor effective operation of the market through engagement with brokers and insurers	This was a very smooth PII renewal season with all practices that sought insurance receiving quotes. Many practices received early quotes from their existing insurers that enabled more shopping around. There is a more detailed update in the Chief Executive's report to Council.

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								Close working with the brokers and insurers to the scheme continues.
25.	DSER	Ensure wide input to CLC policy development	All	2, 3	All	1, 2, 6	Extend and enhance membership of both the Consumer Reference Group and Professional Reference Group	The next CRG meeting is taking place at the end of July and will be focusing on review of the Consumer Charter. The Chair of the group is working to grow membership.  Both groups will be consulted in the strategy review process.
26.	CEO	Staffing	All	All	All	All	Recruit staff in line with the budget agreement  Recruit to Council vacancies  Review remuneration, staff and Council policies, whistleblowing and probity policies	Work on Council recruitment is planned.  Staff recruitment is progressing but was delayed in one case while the new AP chair was appointed.  Work has begun on recruitment of a further policy specialist following the successful end of

Ref	Lead	Business Plan Item	Regulatory Objectives	Strategic Objectives	RPA Standards	Principal Risks addresse	2025 development activity	Mid-year report on progress
								probation of the Policy Manager taken on in late 2024.
27.	DSER	Continued intensive engagement with LSCP, LSB, OLC, OPBAS,	All	All	All	2,6	Ensure that work with those organisations is meeting the needs of the CLC	It is disappointing that the new CEO of the LSB has left the organisation after less than a year. We had developed a very constructive relationship with him, and he seemed to be taking the LSB in a new direction that was delivering improvements to the LSB's approaches, become less burdensome and more outcome focused.  As noted above, progress with the OLC is slow on the data front, but we are also engaged with them in other areas such as the trial of a new model complaints process.  We are in closer contact with the LSCP than before, and there
								are some signs that the Chair,

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								Tom Hayhoe, is taking a more constructive approach to his task than the previous incumbent. Certainly, the communication of the findings of this year's LSCP tracker Survey has been much more positive and constructive in tone than in the past.  Working relationships with OPBAS are where they should be. Interaction is lighter in those years when we do not have an inspection by that team.
28.	CEO	Business Continuity Planning	All	All	All	All	Annual Review of the Business Continuity Plan  Complete general review of policies and establishment of internal repository with review dates applied to all policies	The review of the BCP is complete and an internal audit of the BCP will begin shortly. This will report back initially to the next available meeting of ARC.  The review of policies and development of SOP is a major ongoing effort taking place

Ref	Lead	Business Plan Item	Regulatory Objectives	Strategic Objectives	RPA Standards	Principal Risks addresse	2025 development activity	Mid-year report on progress
							Ensure all CLC processes are documented in Standard Operating Procedures	alongside delivery of usual activity.