Legal Services Board

Digital Register Options Assessment Report

06 April 2023

Bringing Ingenuity to Life.
paconsulting.com

Contents

01

Executive Summary

The Legal Services Board (LSB) commissioned a phase of **market research and regulatory body engagement to identify digital register options** to improve consumer access to information about legal services

Context

- Currently, **consumers do not have ready access to information that could help them make an informed legal services choice,** such as regulatory information, quality ratings and consumer reviews (Competition & Market Authority Legal Services Market Report 2020).
- **Existing products** to inform consumers on available legal service **options are not exhaustive**. The 'Can you trust your legal advisor?' tool, which is hosted on Legal Choices, does not currently include information from all regulatory bodies, and is limited to disciplinary information.
- Further, the level and extent of information published on individual regulatory body registers ranges significantly.
- Therefore, the LSB commissioned PA Consulting to conduct an initial piece of high-level market research to better understand the digital solutions available to address these issues. The intention is to then conduct a subsequent phase of 'user testing' work to determine which solution to adopt going forward.

Approach

PA produced a **report identifying and outlining options for a digital solution** containing (1) authorised persons and (2) regulatory information (including disciplinary record, and regulatory status).

1 Agree scope

- To outline 'types' of digital solution options available for the sector to explore further
- Understand the 'here and now', identifying options to improve access to regulatory information only. Note: future options may require capability to manage consumer centric information (e.g. service quality)
- Cross-sector insights gathered across 4 industries (including the legal services sector), outlining options to test technical feasibility and viability at the options assessment workshop

2 Conduct market & industry analysis

- Identified 3 industries that provide a different digital solution for the legal services sector to consider– financial services, health & social care, policing & financial crime
- Conducted desktop research to capture each industry's solution for hosting and displaying information to consumers
- Developed a high-level market insights report, capturing an overview of each industry's regulatory environment
- Conducted a 'deep dive' into the main digital solution used in each industry (including advantages and disadvantages)
- Developed design principles that any digital solution needs to adhere to
- Developed 3 overarching, industry agnostic, digital solutions for the legal services sector to consider and assess during the options assessment workshop

3 Workshop options with stakeholders

Ran an options assessment workshop with key regulatory body stakeholders*, to:

- Share market insight analysis – a high level overview of the 'digital register approach' in the legal, financial services, health & social care, and policing & financial crime industries
- Test design principles - capturing comments and additional principles to shape solution options
- Assess emerging options – a group activity to consider three digital register options for the legal services sector to adopt

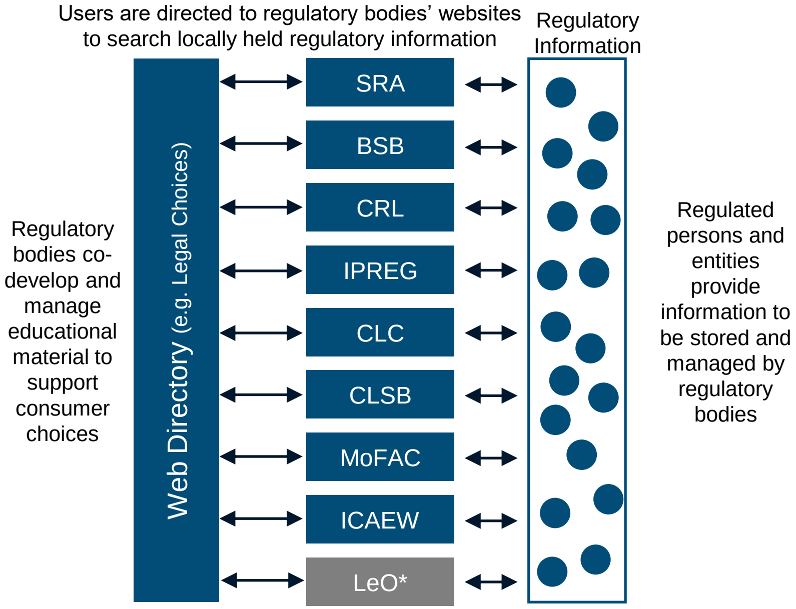
* See appendix for stakeholders engaged in this phase

Market research informed three options to explore further for the sector. To determine which were candidates to explore further, we asked **stakeholders to help assess consumer desirability, technical feasibility and viability** of each

Please note that the options are **not mutually exclusive**. While we are considering them separately, the ideal solution may include a combination of approaches. There is also an opportunity to consider other digital comparison tools when determining the most appropriate solution to implement.

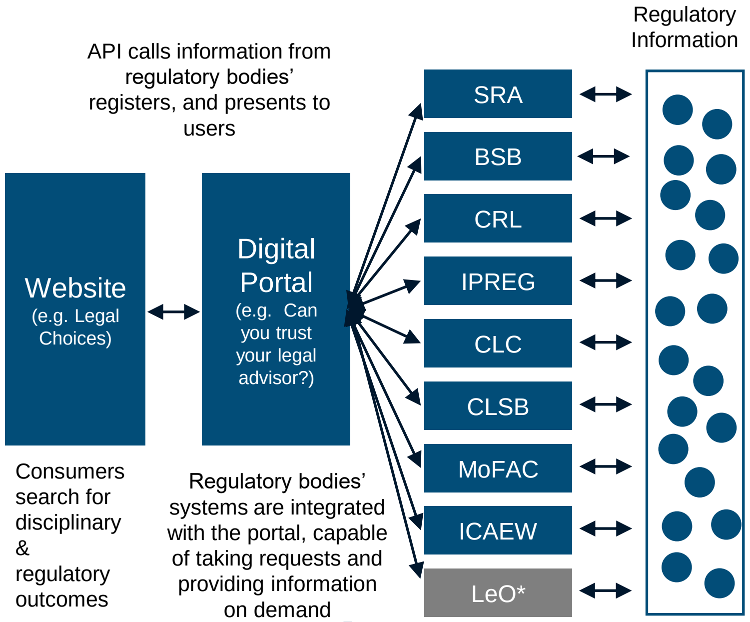
Option 1, Directory & Decentralised Registers: Utilising a central directory to access decentralised information sets

Providing directory services to regulatory bodies' hosted registers to act as a comprehensive directory of where to access regulatory information. This includes appropriate information from all regulatory bodies and in effect already exists.



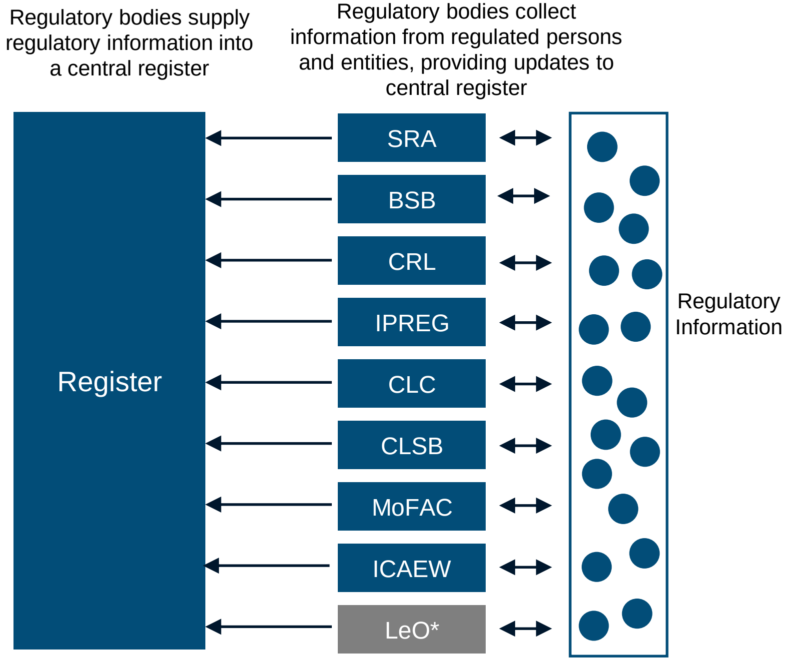
Option 2, Digital Portal: Iterate on the 'here and now': Single source access to multiple information sets

A digital platform to provide a single point of access to multiple decentralised registers. Regulatory information is hosted and managed by regulatory bodies and access is made available on demand, via the portal. 'Can you trust your legal advisor?' is an example of this and should be explored along with other portal solutions.



Option 3, Centralised Register: Consolidating information into a single interrogatable system

A register of registers, consolidating regulatory information collected by regulatory bodies, and stored in a centrally managed system. Consolidated regulatory information is searchable on demand.



*LeO is not a regulatory body, but it will contribute to the digital solution.

Best practice design principles for developing digital registers were tailored with the support of stakeholders. These provided guiderails to shape what good would look like in future options

The following design principles are based on best practice and PA Consulting's experience helping regulatory bodies on the journey to developing digital registers and portals. During the options assessment workshop, we discussed the trade-off between these principles, and agreed that we need to **prioritise consumer centricity, ensuring any solution adopted is demand led** (i.e. what consumers want).

1. Be consumer (end-user) centric

- Be user friendly and intuitive for all consumers, including your common lay-person, industry professionals, policemen, journalists etc.
- Provide a direct benefit to consumers and their ability to check and chose legal providers
- Allow consumers to understand what they should be using the platform for vs. when they should be going to regulatory body websites

2. Contain standardised & transparent information

- Deliver standardised information outputs that is easily accessible and easy to navigate to
- Focus on data quality and maintenance, providing user trust in accuracy
- Ensure consumers understand the context behind the information they are searching for

3. Support access to justice

- Improve access and ability to make informed legal service choices, enabling better and more equal access to justice

4. Be scalable & flexible

- Be adaptable and capable of flexing to future changes in the industry, e.g. through third party data hosts and leveraging Digital Comparison Tools
- Be adaptable to changes in end-user behaviour and how people consume information, e.g. with the introduction of AI
- Be able to integrate consumer centric information, e.g. quality information

5. Meet legislative & legal policy requirements

- Meet regulatory objectives under the *Legal Services Act 2007*
- Be legally viable, compliant with regulatory data collection powers and regulatory body duties and allowing the host to store and display the required information

6. Enable secure use and storage of data

- Maintain appropriate levels of data security
- Accommodate implications of GDPR and UK data protection policy
- Protect data privacy in line with public, political and legal expectation
- Ensure data is stored and accessed for appropriate purposes

7. Be a proportionate and effective use of regulatory body resources

- Represent fair value and cost effective use of levy funding and be cost-effective
- Deliver an efficient solution, simple to use, maintain and operate. This being proportionate to regulatory body resources, sizes and scales
- Provide benefits to regulatory bodies (e.g. promoting their service to end-users)

Translating design principles into focused **evaluation criteria,** stakeholder insights were used to assess the relative opportunities and challenges of each option

Design principle	Criteria	Guidelines
1. Be consumer (end-user) centric 2. Contain standardised and transparent information 3. Support access to justice	**End-consumer benefit**	**Enables the realisation of a range of benefits for end-consumers by:** ▪ Providing consumers with easy access to the information they require immediately
4. Be scalable & flexible	**Scalability**	**Is able to flex and integrate with future changes, including the ability to integrate other information, such as quality indicators, by:** ▪ Allowing inclusion of new data attributes, users, products and functionality
5. Meet all legislative & policy requirements	**Legal & policy compliance**	**Meets minimum requirements of policy and legislation**
6. Enable secure & appropriate use of data	**Security risk**	**Maintains appropriate levels of data security, by:** ▪ Protecting against threats and unauthorised information disclosure, modification and destruction ▪ Capable of meeting minimum baseline control set of the hosting organisation including identity management, authentication and access control, protective technology, API requirements.
7. Be fair & proportionate to regulatory bodies	**Change complexity**	**Reduces time to deliver a solution, by:** ▪ Minimising the scale of change required for a host / data holders ▪ Leveraging existing datasets, processes and requirements where possible ▪ Accounting for the change readiness of the various regulatory bodies and how long it will take to implement the change
	Relative cost	**Accounts for proper use of levy funding, by:** ▪ Providing a cost effective solution to build and run relative to other options ▪ Considering proportionate cost / timeframes to all regulatory bodies, so that smaller regulatory bodies don't face an undue burden in comparison to some of the bigger regulatory bodies
	Regulatory body benefits	**Enables realisation of a range of benefits for regulatory bodies by:** • Promoting their service to end-consumers • Providing ease of access to information for end-consumers, reducing traffic / questions for regulator • Provides up to date monitoring and evaluation, helping regulatory bodies make informed and strategic choices
	Other criteria	**Any other benefits or criteria which may be relevant***

*Stakeholders were asked to capture any other criteria they considered relevant

Based on the initial assessment, we **narrowed it down to two options to explore further** for the legal services sector; a Digital Portal and Centralised Register

Stakeholders largely agreed that a digital portal or centralised register would provide a more consumer centric solution, as data can be hosted and displayed centrally for consumers. While they are more complex solutions, they provide a range of benefits such as potential for a seamless user journey. However, before determining which to pursue, further research needs to be conducted to understand user needs, governance and regulatory body requirements.

Options assessment

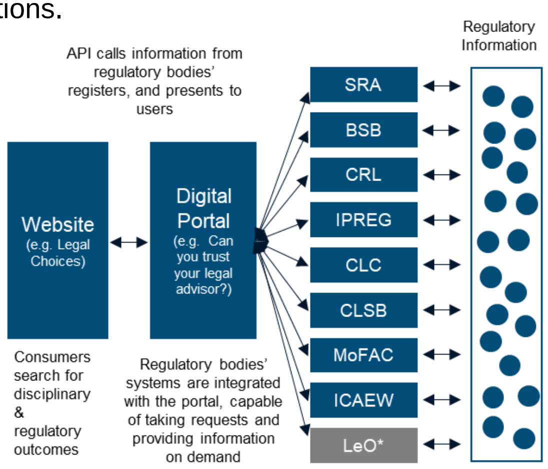
- **Assessment criteria:** We assessed each option based on the following criteria,** which mapped to our design principles:
    - End-consumer benefit
    - Scalability
    - Change complexity
    - Relative cost
    - Legal & policy compliance
    - Security risk
    - Regulatory body benefits
    - Other
- **Prioritisation:** Through our assessment, we determined that the most important priority was **consumer centricity**
- **Recommendation: Options 2 and 3** offer the greatest potential to support an integrated end-to-end consumer experience, and meet CMA expectations

Options to consider going forward

(Please note that the options are not mutually exclusive and there is an opportunity to consider digital comparison tools when determining the most appropriate solution to implement).

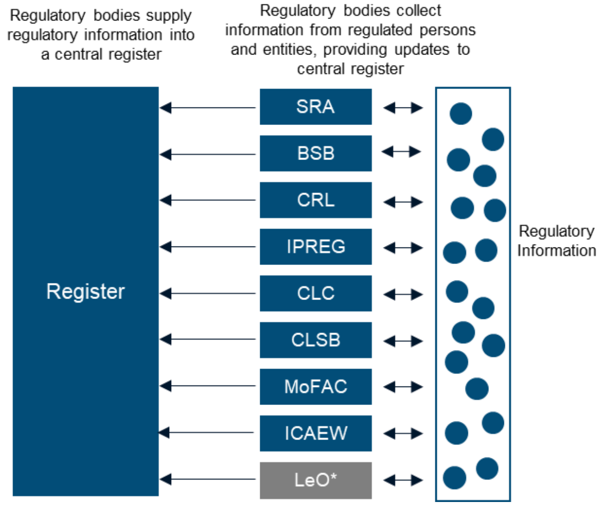
Option 2, Digital Portal: Iterate on the 'here and now': Single source access to multiple information sets

A digital platform to provide a single point of access to multiple decentralised registers. Regulatory information is hosted and managed by regulatory bodies and access is made available on demand, via the portal. 'Can you trust your legal advisor?' is an example of this and should be explored along with other portal solutions.



Option 3, Centralised Register: Consolidating information into a single interrogatable system

A register of registers, consolidating regulatory information collected by regulatory bodies, and stored in a centrally managed system. Consolidated regulatory information is searchable on demand.



*LeO is not a regulatory body, but it will contribute to the digital solution.
**Detailed criteria can be found in section 3, 'Options Assessment Report'

Following PA's service approach, we recommend further work focuses on **understanding consumer / stakeholders needs, and designing the future experience**. This will directly inform which digital solution is the most appropriate, when considering the end-to-end journeys

Key
- Achieved
- Partly achieved
- To be completed

What should the approach to develop a single digital register resolve?

WHY regulatory information services?	**Consumer & Stakeholder Needs**	Who are your consumers and what services do they need? What do other industries deliver? What requirements do stakeholder groups have?
	Ambition	What are the key outcomes that the LSB wishes to achieve through the service?
WHAT regulatory information service options exist?	**Value**	What is the value proposition we are aiming to deliver?
	Service	What services do we wish to offer to benefit key stakeholder groups? What are the priority services you might offer as a priority?
HOW Can it be delivered?	**Service Model Options**	What options do LSB have for delivering the service?
	Delivery	What is the best approach to test and launch the service?

	Core Activities	Phase 1: 'Here and now analysis'	Phase 2: 'User-led design'	Phase 3: 'Detailed solution design'
Benchmarking & needs	Conduct benchmarking, market analysis & gather findings	Achieved		
	Understand consumers' needs & priority groups		To be completed	
Service Ambition	Understand the purpose, goals and outcomes	Partly achieved	To be completed	
Value Proposition	Refine service vision		To be completed	
	Define value proposition		To be completed	
Service Outline	Define success criteria		To be completed	
	Outline design principles for the service	Achieved		
Design Options	Develop digital register options & agree preferred choice	Achieved	To be completed	
	Assess technical and delivery requirements	Partly achieved	To be completed	
	Technical regulatory body register review, and assessment of standardisation opportunities (inc. Open Data)		To be completed	
	Determine legal viability of solutions		To be completed	
Detailed Design & Prepare to Deliver	Develop sourcing options			To be completed
	Define sizing and costs			To be completed
	Define governance, delivery and engagement approach		To be completed	To be completed
	Develop service blueprint, operating model and roadmap			To be completed

In this phase **we achieved an understanding of available digital solutions and their high level benefits and challenges for regulatory bodies**. Following a user-centric approach, the next phase of activity should focus on understanding ‘why’ and ‘what’ users need in a future service

What we have learned so far

Next phase of work

Phase 1: Understanding the here and now & determining digital solutions to explore further

Achieved: Developed a high-level understanding of the regulatory information collected in the legal services sector, and identified the digital solutions available to consolidate regulatory information across regulatory bodies

Questions answered:

- What regulatory information do regulatory bodies collect in the legal services sector?
- How do Legal Choices and ‘Can you trust your legal advisor?’ operate?
- What do other industries deliver, focusing on financial services, health & social care, policing & financial crime?
- What digital solutions / options are available for the legal services sector to consider?
- What are the key design principles that should be considered for any digital solution?
- What are the recommended next steps?

Outcomes:

1) Developed an understanding of digital solutions across regulatory bodies

2) Identified 3 digital solutions for the legal services sector, and identified challenges / opportunities

3) Narrowed our focus down to 2 options to consider in the next phase of work; *Digital Portal* and *Centralised Register*

4) Outlined a service design roadmap and approach to development

Phase 2: Selecting a digital solution based on user requirements and feasibility

Objective: Selecting the digital solution that the legal services sector will develop to consolidate regulatory information, based on user-needs, regulatory body requirements and high-level commercial viability

Key questions:

1. What are the consumer / stakeholder segments and what are their needs?
2. What target experience should the technical solution enable?
3. What are the moments that matter to the consumer?
4. What are the key pain-points that need to be addressed for the consumer?
5. What are the requirements?
6. What are the future plans for the ‘Can you trust your legal advisor?’ tool?
7. What standardisation / access opportunities exist today?
8. What are the indicative costs?

Tackling these questions will help us choose the most appropriate digital register option to adopt in the legal services sector

Stakeholder engagement required

- LSB
- Bar Standards Board
- Faculty Office
- Solicitors Regulation Authority
- CILEx Regulation
- Institute of Chartered Accountants in England and Wales
- Costs Lawyers Standards Board
- Intellectual Property Regulation Board
- Legal Services Consumer Panel
- The Council for Licenced Conveyancers
- End-consumers (representatives from each consumer segment, e.g. common layperson, industry professionals etc.)

Recommended next steps for phase 2 include; detailed user research, regulatory landscape analysis and appropriate governance model before determining which solution to implement

Next steps

1. User testing

Conduct user testing to ascertain user needs across different journeys of those who use the platform, such as the common layperson and industry professionals (inc. reviewing current research already available - e.g. SRA's consumer research, LSB's consumer segmentation work and LSB's quality indicators research)

2. Data & technology deep-dive

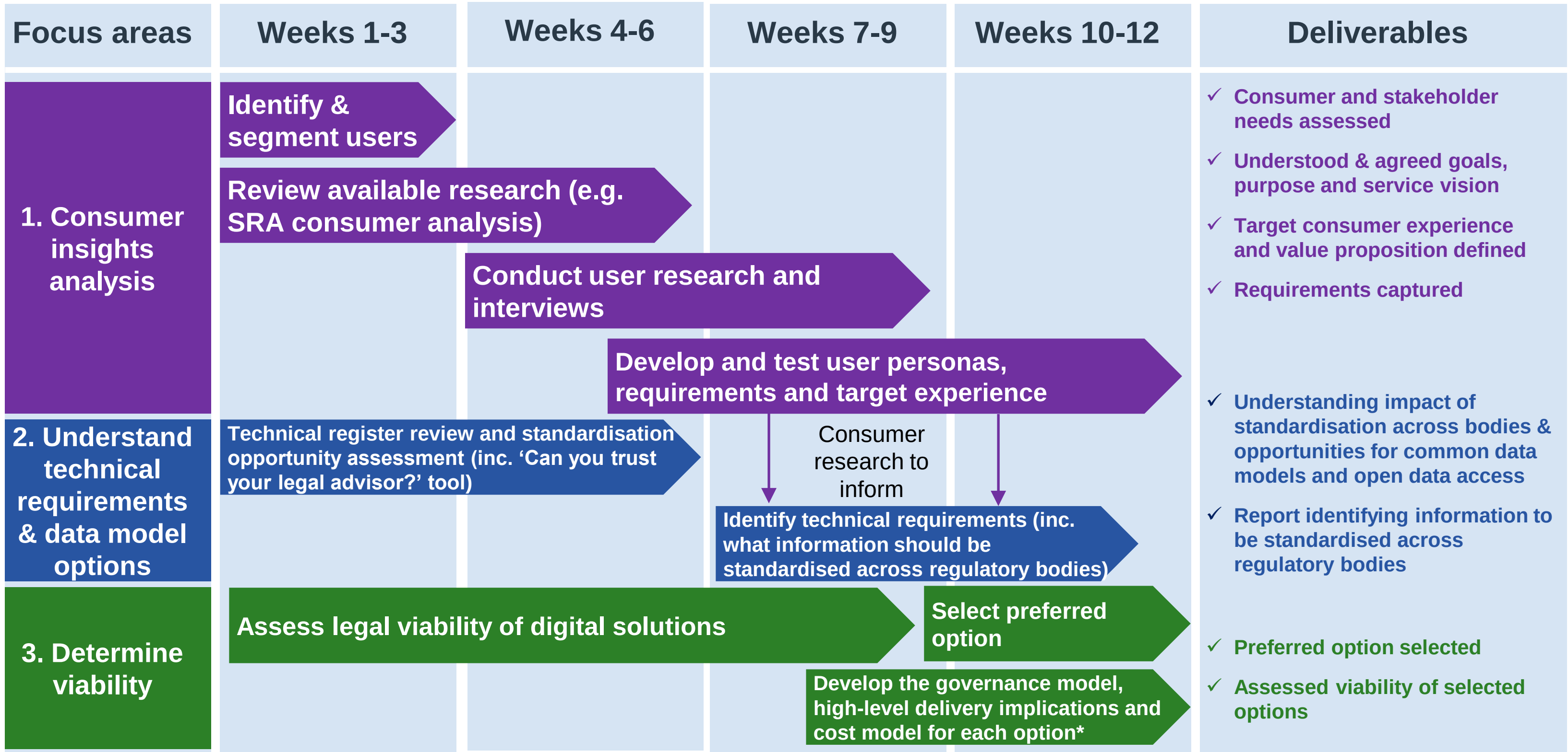
'Deep dive' into technology and data options underpinning regulatory body registers, identifying standardisation opportunities / challenges, and informing change impact assessments. Opportunity to capture technical requirements of future solutions, and explore how elements such as Open Data or Standardised Data Models may work in the system

3. Determine viability

Seek advice on legality of each option (e.g. GDPR), identify the required governance model (inc. who hosts the data) and develop a cost-model

Indicative activity roadmap

To determine which is the preferred option, further research is needed to analyse consumer needs, governance models and the legal regulatory landscape. The following high-level roadmap focuses on delivering service design phase 2 outcomes.



*Activity to continue into phase 3.

02

Regulatory Market Insights Report

Market insights report structure

2A. Insights Summary

Providing single-source access to regulatory information is a challenge across markets. Industry analysis has highlighted a range of approaches taken, with associated benefits and considerations

Background

The Competition & Market Authority's (CMA) 2020 report on the legal services sector highlighted consumers do not have ready access to information that could help them make an informed legal services choice. Regulatory information is spread across different registers and quality information is limited. As such, the CMA has recommended the LSB explore the development of a single digital register containing (1) authorised persons, (2), regulatory information (including disciplinary record and regulatory status), (3) consumer centric information (including quality).

Market analysis objectives

1. Evaluate the approach of 4 regulated industries (focusing on industries with comparable complexity, size, structure, data requirements).
2. Identify options for LSB and ecosystem legal services regulatory bodies to explore to improve access to regulatory information (note: initial focus on regulatory data only).

Key findings – common approaches

Legal Services:

Legal Choices
'Can you trust your legal advisor?'

Information Directory & Decentralised Registers Digital Portal

Healthcare:

Professional Standards Authority

Information Directory & Decentralised Registers

Financial Services:

Financial Conduct Authority

Centralised Digital Register

Policing & Financial Crime:

Federal Financial Supervisory Authority (BaFin - Germany), Ministry of Justice & Security (MoJS - The Netherlands)

Centralised Digital Register Digital Portal

Our research found variations on three approaches for providing access to regulatory information; Centralised Register, Digital Portal, Information Directory & Decentralised Registers

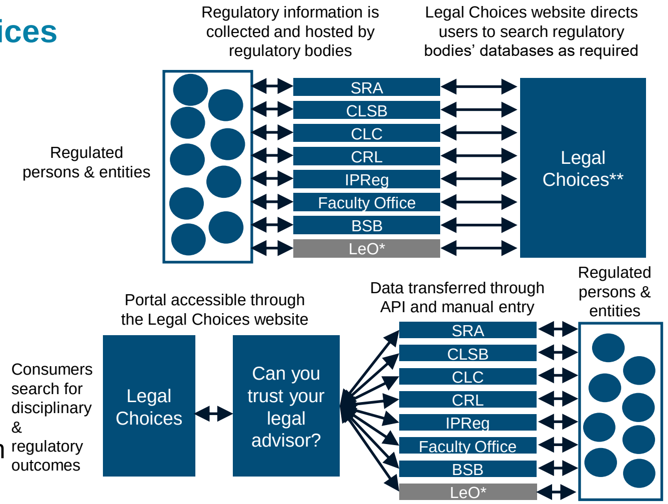
The 3 non-legal industries were chosen due to their digital solutions and how they capture information, not on their similarities with the legal services sector alone.

Legal Services | Legal Choices

Purpose: Supporting users of legal services to make better choices on legal issues and lawyers

Solution Description: (1) Legal Choices provides directory services to regulatory bodies' hosted registers (2) 'Can you trust your legal advisor?' (which is hosted on Legal Choices) is a portal solution, providing single access to decentralised information

Summary: Digital Portal, and Information Directory & Decentralised Registers

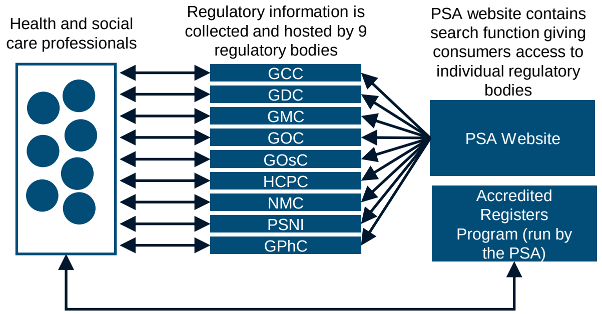


Health & Social Care | Professional Standards Authority

Purpose: Improving visibility of regulated health and social care professionals

Solution Description: Providing a centralised register of accredited, unregulated professions, and providing directory services to regulatory bodies' hosted registers as required

Summary: Information Directory & Decentralised Registers, and Centralised Register

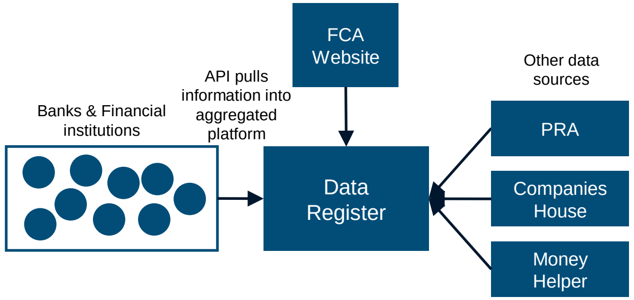


Financial Services | FCA

Purpose: Supporting users to understand the regulatory record of financial institutions

Solution Description: Entities submit regulatory information to a single digital register hosted by the FCA. Register information is searchable by users

Summary: Centralised Register

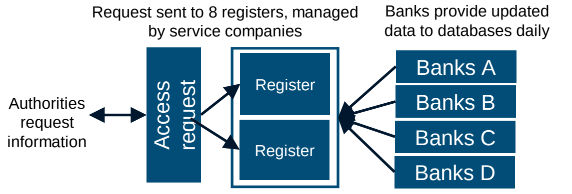


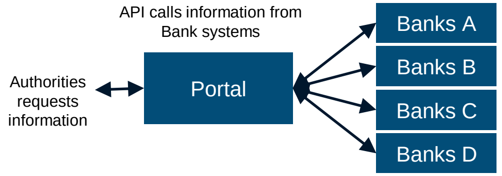
Policing & Financial Crime | BaFin (Germany), MoJS (Netherlands)

Purpose: Tackling financial crime by allowing investigators to access personal banking information held by regulated industries

Solution Description:
BaFin: Centralised registers of personal banking information, hosted by 3rd party suppliers
MoJS: Portal solution, providing single access to a range of decentralised information

Summary: Centralised Register, Digital Portal





*LeO is not a regulatory body, but it contributes to the platform.
** ICAEW supports governance but does not currently supply data

High level analysis has highlighted benefits and challenges of each approach, influencing options for the legal services sector to explore further

	Benefits	Challenges
Legal Choices & ‘Can you trust your legal advisor? **Information Directory & Decentralised Registers, and Digital Portal**	• **Cost-effective (Legal Choices):** Simple cost approach to provide access to regulatory information • **Low maintenance (Legal Choices):** No hosted regulatory information avoids data protection risks • **Transparency (Can you trust your legal advisor?):** To the legal services sector by making information easily accessible • **Data quality (Can you trust your legal advisor?):** Supports oversight of the legal services sector by providing access to up-to-date databases • **Context:** Enables consumers to go to regulatory bodies’ websites, giving them access to information presented in a contextual way	• **Scope:** Not all legal service regulatory bodies support the platform • **User-friendliness:** No one-stop-shop to search all content across disciplines • **Consumer choice:** No consumer centric information is presented (e.g. indicating quality of service providers)
Financial Services Register **Centralised Register**	• **User-friendliness:** A simple to search register • **User-friendliness:** Layers consumer friendly information on top of regulatory data (e.g. highlighting known bad actors) • **Data analytics:** Enables regulatory body to monitor and enforce regulatory requirements, and track firms and individuals through a lifetime	• **Phoenixing:** Difficult to identify all fraudulent entities who open up a new operation under a new name, and supply information for the register • **Data quality:** Data management policies have led to poor quality / out-of-date data being stored on the register • **Data quality:** Provides basic information on firms only, consumers may need to seek additional information from other sources to make informed decisions • **User-friendliness:** Some information presented is not consumer-oriented, requiring a level of financial knowledge to interpret the information correctly
Health & Professional Standards Authority **Information Directory & Decentralised Registers, and Centralised Register**	• **Cost effective:** Data remains hosted by regulatory bodies • **User-friendliness:** Clear branching makes it easy to navigate to the appropriate regulator’s website and register	• **Data quality / user experience:** Inconsistencies in how data is presented makes navigation of regulated ecosystem more difficult for users • **User-friendliness:** No one-stop-shop to search all content across disciplines • **Consumer choice:** No consumer centric information is presented (e.g. indicating quality of service providers)
BaFin **Centralised Register**	• **Efficiency:** Register handles a large volume of data and processing • **Transparency:** Easily accessible to the public and financial services providers • **Security:** Secure platform for storing and managing sensitive data	• **Data privacy:** System contains sensitive financial data about companies and individuals, which must be protected to ensure data privacy. There is a risk of data breaches and cyber-attacks that can compromise the security of the register • **Hosting costs:** Must ensure that the system is properly maintained and that contingency plans are in place in the event of system failure
MoJS **Digital Portal**	• **Transparency:** To the public and investors by making information easily accessible (inc. institution's regulatory status and ownership structure) • **Data quality:** Supports oversight of the financial sector by providing access to up-to-date databases	• **Accuracy:** Dependent on data holders’ quality management practices • **Data privacy:** Contains sensitive data about financial institutions and individuals, which must be protected to ensure data privacy

Introducing a set of **best practice design principles**, legal services sector stakeholders considered the relative opportunities and challenges of each option

The following design principles are based on best practice and PA Consulting's experience helping regulatory bodies on the journey to developing digital registers and portals. During the options assessment workshop, we discussed the trade-off between these principles, and agreed that we need to **prioritise consumer centricity, ensuring any solution adopted is demand led** (i.e. what consumers want).

1. Be consumer (end-user) centric

- Be user friendly and intuitive for all consumers, including your common lay-person, industry professionals, policemen, journalists etc.
- Provide a direct benefit to consumers and their ability to check and chose legal providers
- Allow consumers to understand what they should be using the platform for vs. when they should be going to regulatory body websites

2. Contain standardised & transparent information

- Deliver standardised information outputs that is easily accessible and easy to navigate to
- Focus on data quality and maintenance, providing user trust in accuracy
- Ensure consumers understand the context behind the information they are searching for

3. Support access to justice

- Improve access and ability to make informed legal service choices, enabling better and more equal access to justice

4. Be scalable & flexible

- Be adaptable and capable of flexing to future changes in the industry, e.g. through third party data hosts and leveraging Digital Comparison Tools
- Be adaptable to changes in end-user behaviour and how people consume information, e.g. with the introduction of AI
- Be able to integrate consumer centric information, e.g. quality information

5. Meet legislative & legal policy requirements

- Meet regulatory objectives under the *Legal Services Act 2007*
- Be legally viable, compliant with regulatory data collection powers and regulatory body duties and uallowing the host to store and display the required information

6. Enable secure use and storage of data

- Maintain appropriate levels of data security
- Accommodate implications of GDPR and UK data protection policy
- Protect data privacy in line with public, political and legal expectation
- Ensure data is stored and accessed for appropriate purposes

7. Be a proportionate and effective use of regulatory body resources

- Represent fair value and cost effective use of levy funding and be cost-effective
- Deliver an efficient solution, simple to use, maintain and operate. This being proportionate to regulatory body resources, sizes and scales
- Provide benefits to regulatory bodies (e.g. promoting their service to end-users)

2B. Approach

We assessed digital register options across four industries (including the legal services sector) to determine viable options for the legal services sector to consider

We conducted a high-level piece of market research over 2 weeks to identify and outline options for a digital solution containing (1) authorised persons and (2) regulatory information (including disciplinary record, and regulatory status). We used this information as the basis of an 'options assessment workshop' which was held with key stakeholders, including regulatory bodies.

Our approach

Our approach was primarily based on a mix of desktop research and a review of the information and outputs provided to us by the LSB.

1 Agree scope

- To outline 'types' of digital solution options available for the sector to explore further
- Immediate priority was to understand the 'here and now', identifying options to improve access to regulatory information only. Note: future options may require capability to manage consumer centric information (e.g. service quality)
- Cross-sector insights gathered across 4 industries (including the legal services sector), outlining options to test technical feasibility and viability at the options assessment workshop

2 Market and industry analysis

- Identified 3 industries that provide a different digital solution for the legal services sector to consider – financial services, health & social care, policing & financial crime
- Developed a high-level overview of each industry's regulatory environment
- Conducted desktop research to capture each industry's solution for hosting and displaying information to consumers, across 7 key dimensions mentioned on the following slide
- Conducted a 'deep dive' into the main digital solution used in each industry (including advantages and disadvantages)
- Developed design principles that any digital solution needs to adhere to
- Developed 3 overarching, industry agnostic, digital solutions for the legal services sector to consider and assess during the options assessment workshop

Output: Regulatory market insights report

Regulatory market insights report, capturing:

- Industry overviews of the legal, financial services, health & social care, and policing & financial crime industries, including the digital solution(s) used to host and display regulatory information
- A 'deep dive' into the main digital solution used in each industry
- Advantages and disadvantages of each solution
- Design principles to consider for any digital solution

Following a set of benchmarking criteria, each target industry was investigated to understand their approaches to delivering a ‘digital source’ of regulatory information to consumers

To the extent the information was readily available, we captured and analysed each industry’s key digital solution for capturing regulatory information across 7 key benchmark criteria.

Benchmark Criteria

1. Industry overview

- High level overview of the industry (inc. size) and its regulatory environment

2. Technical architecture

- The system(s) used to capture and display regulatory information
- How inputs and data are captured
- High level functionality of the system

3. Governance

- Who hosts the register
- Who can access the register
- Who is responsible for overseeing the register
- How the register is funded

4. Data

- The type of accounts that are captured on the register
- The data attributes that are captured
- How frequently data is updated
- How long data is retained

5. Usage

- The access permissions & thresholds that are in place
- The number of users of the register
- The number of requests they deal with each year

6. Implementation & run

- The stage of the implementation lifecycle the system is in
- How much it cost (£ & headcount) to implement the register

7. Benefits & limitations

- The benefits of the industry’s approach
- The limitations of the industry’s approach

2C. The Legal Services Sector

Legal services sector regulatory environment overview

Industry overview

The legal services sector in England & Wales is regulated primarily to ensure that law firms and legal professionals such as solicitors, barristers, legal executives, licensed conveyancers, and other legal practitioners adhere to high standards of professional conduct and ethics in the provision of legal services to clients. The legal regulatory framework is laid out in the *Legal Services Act 2007*, and includes the regulatory objectives that all regulatory bodies, including the LSB, work in support of.

There are multiple regulatory bodies operating in the legal services sector, which all sit under the purview of the Legal Services Board (LSB).

	Key Regulator	Purpose	Registers	Format of Register
1.	The Solicitors Regulation Authority (SRA)	The regulatory body for solicitors in England and Wales. It sets the standards for solicitors, oversees their training and education, and handles complaints about their conduct	1. Solicitors Register 2. Solicitor Check 3. Waiver Register 4. ABS Register	➢ Web Search / Return ➢ Web Search / Return ➢ Web Search / Return ➢ Web Search / Return
2.	The Bar Standards Board (BSB)	The regulatory body for barristers in England and Wales. It sets the standards for barristers, oversees their training and education, and handles complaints about their conduct	5. Barristers' Register	➢ Web Search / Return
3.	CILEx Regulation (CRL)	The regulatory body for legal executives in England and Wales. It sets the standards for legal executives, oversees their training and education, and handles complaints about their conduct	6. CILEX Authorised Practitioners Directory 7. CILEX-ACCA Probate Firm Directory 8. Disciplinary Records	➢ Web Search / Return ➢ PDF ➢ List
4.	Intellectual Property Regulation Board (IPReg)	The independent regulatory body of Patent Attorneys & Trade Mark Attorneys. IPReg is responsible for maintaining the register of patent attorneys and trade mark attorneys, setting standards for their qualification and professional conduct, and handling complaints and disciplinary proceedings against them	9. Register of Patent Attorneys 10. Register of Trade Mark Attorneys 11. Applicants for Voluntary Removal	➢ Web Search / Return ➢ Web Search / Return ➢ List

Legal services sector regulatory environment overview

	Key Regulator	Purpose	Registers	Format of Register
5.	**The Council for Licensed Conveyancers (CLC)**	The regulatory body for licensed conveyancers in England and Wales. It sets the standards for licensed conveyancers, oversees their training and education, and handles complaints about their conduct	12. CLC Register of Licensed Conveyancers	➢ Web Search / Return
6.	**Costs Lawyer Standards Board (CLSB)**	The CLSB is responsible for regulating and supervising Costs Lawyers. It sets the standards for their qualification and professional conduct, and handles complaints and disciplinary proceedings against them	13. CLSB Register of Costs Lawyers	➢ List
7.	**Master of the Faculties (MoFAC)**	The Master of the Faculties is the overall head of the Faculty Office and is the Approved Regulator of Notaries in England & Wales	14. Register of Notaries Public	➢ Web Search / Return
8.	**Institute of Chartered Accountants in England and Wales (ICAEW)**	ICAEW is a professional accounting body that represents chartered accountants in England and Wales. It provides education and training in accounting and finance, as well as professional accreditation and certification to accountants and finance professionals	15. ICAEW Directory of Chartered Accountants 16. ICAEW Probate Register	➢ Web Search / Return ➢ Web Search / Return

What this means?

1. Multiple regulatory bodies & registers

The LSB has oversight of 8 regulatory bodies. There are 16 registers, with each regulatory body operating it's own register(s). This makes it difficult for consumers to navigate and find regulatory information

2. Legal Choices & 'Can you trust your legal advisor?'

The regulatory bodies also contribute to two overarching platforms – Legal Choices (which acts mainly as a directory) and 'Can you trust your legal advisor?', which acts as a portal and is hosted on the Legal Choices website

We explore Legal Choices and 'Can you trust your legal advisor?' on the following slides, including how they operate and the information they display

Regulatory bodies currently publish a wide range of regulatory information, varying significantly across the size and scale of organisations. A future digital solution will need to consider which information is essential to inform choices

The regulatory bodies capture and publish data across the following fields. Please note that not all regulatory bodies capture all of this information. A breakdown of the specific information captured by the regulatory bodies can be found in the appendix.

Individuals (excluding SRA)

- Title
- Individual's name
- Entity or employer
- Trading name
- Postal address
- Head office address
- DX
- Fax
- Work phone
- Work email
- Work website
- Membership/ID no.
- Practice Right (PR)/Approved Manager/ Compliance
- Manager/Licence type
- Practising certificate validity period/Authorisation valid date/date joined
- register
- Conditions on
- practising certificate
- Date of Call
- Qualification (e.g. Higher Court Litigation)/specialist
- Practice
- Disciplinary findings- in accord disclosure
- policy
- Practice area
- authorised
- Role in entity
- Languages

Entities (excluding SRA)

- Title
- Contact name at
- entity
- Entity name
- Trading name
- Offices
- Postal address
- Head office address
- DX
- Fax
- Work phone
- Work email
- Work website
- Membership/ID no.
- Practice Right (PR)/Approved Manager/ Compliance Manager/Licence
- Type
- Practising certificate validity period/Authorisation
- Calid date
- Firm regulated/ by whom
- Specialist practice area/ Authorised to conduct following reserved legal activities
- Practice area authorised
- Practice area (not reserved activities)
- Role in entity
- Practising status
- If Registered Body
- If ABS/ Licensed Body
- Cancellation
- Disciplinary
- Company registration number (i.e. Companies House)
- Ownership structure (e.g. Ltd; LLP)

SRA

Various data fields across their four registers, in the following categories:

- Condition
- Decision
- Engagement
- Office
- Organisation
- Other name
- Permitted activity
- Person
- Role
- Website
- Work undertaken

Insights & key considerations

- What information needs to be in a central place?
- Is there certain information that should be in a central place to create a ‘minimum viable product’, recognising additional information can be stored centrally at later stages?
- What information should be standardised?
- Where and how do end-consumers want to access information?
- What is the proportionate impact of any change on regulatory bodies (noting differing resource constraints)?
- How is the data currently processed and held?
- How regularly is the data cleaned, aggregated or updated?

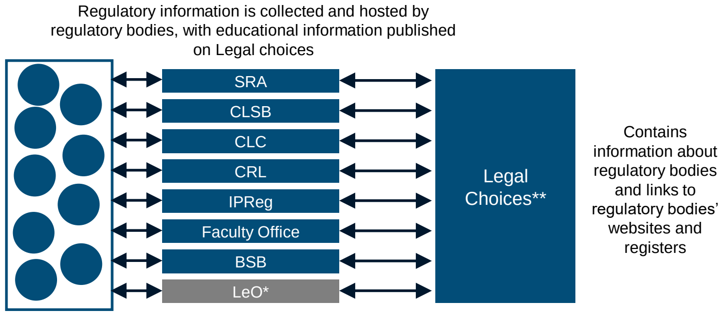
Market deep dive: Legal Choices

Description

Legal Choices is a website that gives independent, factual information about legal issues and legal advisers, and is run by legal services regulatory bodies in England and Wales. The website covers a wide range of legal topics, including consumer law, employment law, family law, and criminal law. It is operated by the SRA, BSB, CLC, CRL, IPReg. The website operates an 'information directory', containing factual information to inform choices and directing users to regulatory bodies hosted registers as required.

Technical Architecture

- Website acts as an 'information directory', providing information in a variety of formats. For example, it includes a directory of legal professionals and organisations, as well as a search function to help users find a lawyer or legal service provider in their area
- For the majority of regulatory information, the website directs you to the individual regulatory bodies who host and display their own data (through their own websites and digital registers)



*LeO is not a regulatory body, but it contributes to the platform.
** ICAEW supports governance but does not currently supply data

Key components of the register

1. Governance	*Who hosts the register?*	The SRA, IPReg, CLSB, CLC, CRL, Faculty Office, ICAEW
	Who can access the register?	Anyone
	Who is responsible for overseeing the register?	Legal Choices Governance Board
	How is the register funded?	Funded by the SRA, IPReg, CLSB, CLC, CRL, Faculty Office, ICAEW
2. Data	*What type of accounts are captured on the register?*	Legal Professionals, Firms and Accountants (through ICAEW)
	What data attributes are captured?	Directed to individual regulatory body websites, which may, for example, include: • The name and address of the firm or individual • The type of services that the firm or individual is authorised to provide • The status of the authorisation (e.g. active or inactive) • Any regulatory actions or sanctions taken against the firm or individuals
	How frequently is data updated?	Mix of hourly, daily and ad hoc updating. Some data is automated but other fields require the participation from the boards
3. Usage	*How many users will use the register?*	1.3m website visits in 2022
	What access permissions & thresholds are in place?	Information not readily available
	How long is data retained?	For as long as the individuals and firms are active and regulated
4. Implementation & Run	*What stage of the implementation lifecycle?*	Established in 2014 and updated following the 2016 CMA Report
	How much did it cost (£ & headcount) to implement the register?	£750,000 - over three years, refreshing the look of the website, scaling up marketing, developing four new products

Source: Legal Choices Reports

Benefits and limitations: Legal Choices

+

- Reliable and Accurate Information: Legal Choices provides reliable and accurate information on a wide range of legal topics.
- Information Presented Well: The Legal Choices website has a user-friendly design that makes it easy for people to find the information they need. The website provides information in a variety of formats, including articles, videos, and interactive tools, which can help users to understand complex legal concepts.
- Low Maintenance: The website does not host any regulatory information which prevents any possible data protection risks.

–

- Data Quality: By nature it has a reliance on timely administration from all involved which can cause lags.
- Limited Scope: While Legal Choices covers a wide range of legal topics, the information provided may not be comprehensive enough for some people's needs. It does not operate as a one-stop-shop for all legal disciplines.
- Not Interactive: Although the website includes interactive tools, users cannot receive personalised advice or feedback.
- Limited Consumer Centric Information: Does not give an indication of service quality which assists consumers in making an informed choice on individuals and entities to engage for legal assistance.
- Limited Reach: Depending on search terms used, Legal Choices may not be top of a Google search. It may therefore have to compete with our sources of information. Limited reach could be due to the funding model (i.e. funded by regulatory bodies, who also have to fund their other statutory activities)
- Difficult to Navigate: Legal choices is difficult to navigate with information not displayed in a consumer centric way (e.g. it is difficult to find the ‘How to trust your legal advisor?’ tool)

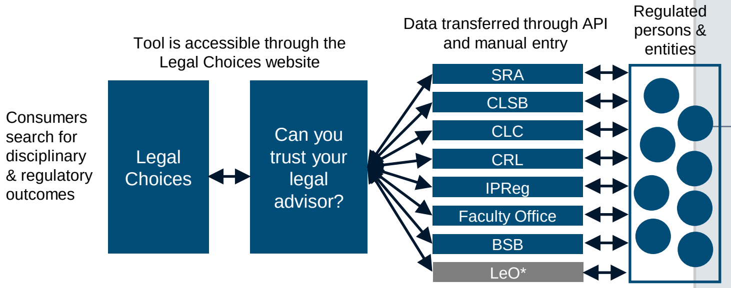
Market deep dive: ‘Can you trust your legal advisor?’ tool (hosted on Legal Choices)

Description

The Legal Choices website provides a ‘Can you trust your legal advisor?’ tool which consumers can use to find information on legal professionals and their firms. The tool pulls disciplinary and regulatory information to allow users to make an informed decisions on which legal professionals to engage based on their legal service requirements. The SRA provides this through a public website which offers users all the information in one place.

Technical Architecture

- A digital platform to provide a single point of access to multiple decentralised registers. Regulatory information is hosted and managed by regulatory bodies and access is made available on demand, via the ‘Can you trust your legal advisor?’ tool.
- To ensure that risks associated with the management of third-party personal data are appropriately shared, the participating organisations (the data controllers) sign up to a data-processing agreement with SRA technology partner, IE Digital (the data processer).
- Data is handled in different ways depending on characteristics of the source - which vary in scale, structure, format and frequency of change. A uniform (automated) approach, although preferable in the abstract, was found to be unworkable in practice for some organisations.



*LeO is not a regulatory body, but it contributes to the platform.

Key components of the register

1. Governance	*Who hosts the register?*	The register is hosted by a third party under contract to the SRA, acting with the approval of the Legal Choices Governance Board, which comprises the Chief Executives of legal services regulators, with the exception of the Bar Standards Board, which is in any case a party to the relevant data-sharing agreement.
	Who can access the register?	Anyone
	Who is responsible for overseeing the register?	The Legal Choices Governance Board (though the Legal Choices delivery team is made-up of SRA employees and is responsible for the day-to-day operation of Legal Choices, including the website, social media presence, reference group appointments, and more)
	How is the register funded?	The ‘can you trust your legal adviser’ toll is funded jointly by legal regulatory bodies (SRA, BSB, IPReg, CLSB, CLC, CRL, Faculty Office)
2. Data	*What type of accounts are captured on the register?*	Disciplinary information regarding Legal Professionals
	What data attributes are captured?	Disciplinary and regulatory records from the SRA, CLSB, CLC, CRL, IPReg and Faculty Office, BSB.
	How frequently is data updated?	Varies from hourly monitoring to ah doc and daily refreshes
3. Usage	*How many users will use the register?*	Legal Choices had 1.3m website visits in 2022
	What access permissions & thresholds are in place?	Information not publicly available
	How long is data retained?	Data is retained for as long as data remains published on source website. The lag between removal from source website and the Legal Choices website is a maximum of 24 hours for automated processes, and one working day for manual approaches.
4. Implementa tion & Run	*What stage of the implementation lifecycle?*	Legal Choices Established in 2014 and updated following the 2016 Competition and Markets Authority report
	How much did it cost (£ & headcount) to implement the register?	£750,000 is total budget for Legal Choices over three years, with the cost of implementing the ‘trust my legal adviser tool’ included within that budget (an estimated £50,000)

Source: Legal Choices Reports and Information provided by SRA

Benefits and limitations: ‘Can you trust your legal advisor?’ tool (hosted on Legal Choices)

+

- Reliable and Accurate Information: Legal Choices provides reliable and accurate information on a wide range of legal topics.
- Transparency: Makes information easily accessible (inc. firm’s regulatory status and disciplinary records).
- Reduces the risk of legal malpractice: By ensuring that users have a competent and trustworthy legal advisor, it reduces the risk of legal malpractice and ensures that consumer interests are protected.
- Data quality: Supports oversight of the legal services sector by providing access to up-to-date databases.
- Contextualisation: Enables consumers to go to regulatory bodies’ websites, giving them access to information presented in a contextual way

–

- Limited Consumer Centric Information: Does not give an indication of service quality, hampering consumers in making an informed choice on individuals and entities to engage for legal assistance
- Limited Regulatory Information: Does not currently include information from all regulatory bodies, and is limited to disciplinary information.
- Not Interactive: Although the tool gives a service, users cannot receive personalised advice or feedback. Some background legal understanding may be needed to properly interpret the information
- Accuracy: Dependent on data holders’ quality management practices, specifically when they were last updated

2D. The UK Financial Services Industry

Financial services regulatory environment overview

Industry overview

The UK financial services industry is diverse and complex, comprising banks, building societies, credit unions, insurance companies, financial advisers, investment institutions, pension fund managers, and accountants. Regulation is conducted by 5 key regulatory bodies, with the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA) being the two main regulatory bodies.*

Key regulatory bodies

1. The FCA

The FCA is an independent public body, funded from levies paid by the firms they regulate, that is responsible for the conduct of all regulated financial services firms operating in the UK. It also acts as the prudential regulator for those firms not supervised by the PRA. It's three main objectives are to (1) secure an appropriate degree of protection for consumers; (2) protect and enhance the integrity of the UK financial system; and (3) promote effective competition in the interests of consumers.

2. The PRA

The PRA is responsible for supervising the management and operations of over 1,500 banks, building societies and credit unions in the UK. It creates policies for firms to follow and supervises aspects of their business. Its aim is to ensure that the financial services and products that consumers rely on are provided in a safe and sound way.

3. The Bank of England (BoE)

As a 'resolution authority', the BoE is primarily responsible for regulatory intervention and the exercise of resolution powers in relation to banks that are failing or likely to fail. It is responsible for controlling UK monetary policy and oversees the PRA.

4. The Financial Reporting Council (FRC)

The FRC regulates auditors, accountants and actuaries, and sets the UK's Corporate Governance and Stewardship Codes. Its work is aimed at investors and others who rely on company reports, audit and high-quality risk management.

5. The Insolvency Service

The Insolvency Service supports those in financial distress, tackling financial wrongdoing and maximising returns to creditors. It administers bankruptcies and examines the conduct and affairs of companies in liquidation.

The Financial Services Register

- The Financial Services Register is a digital register that provides a public record of firms, individuals and other bodies that are, or have been, regulated by the PRA and/or FCA
- While there is other regulation conducted in financial services, we have focussed on the PRA and FCA's Financial Services Register given its overlap with the LSB's aspirations for a single digital register (i.e. it brings together data from multiple sources and offers information on individuals and entities)
- Please see the following slides for further information on the Financial Services Register

*There are also two government agencies established to offer protection to retail investors (The Financial Ombudsman Service and the Financial Services Compensation Scheme), which we have not considered as part of this report.

Market deep dive: Financial Services Register

Description

The Financial Services Register is a public record that shows details of firms, individuals, and other bodies that are regulated by the FCA and/or the Prudential Regulation Authority (PRA). The register can be accessed online via the FCA's website or through other third-party service providers. The FCA register is available online on the FCA's website, and it is free to access. Users can search the register by name, reference number, or location, and the results will display information about the firm or individual's regulatory status, activities, and any disciplinary actions that have been taken.

Technical Architecture

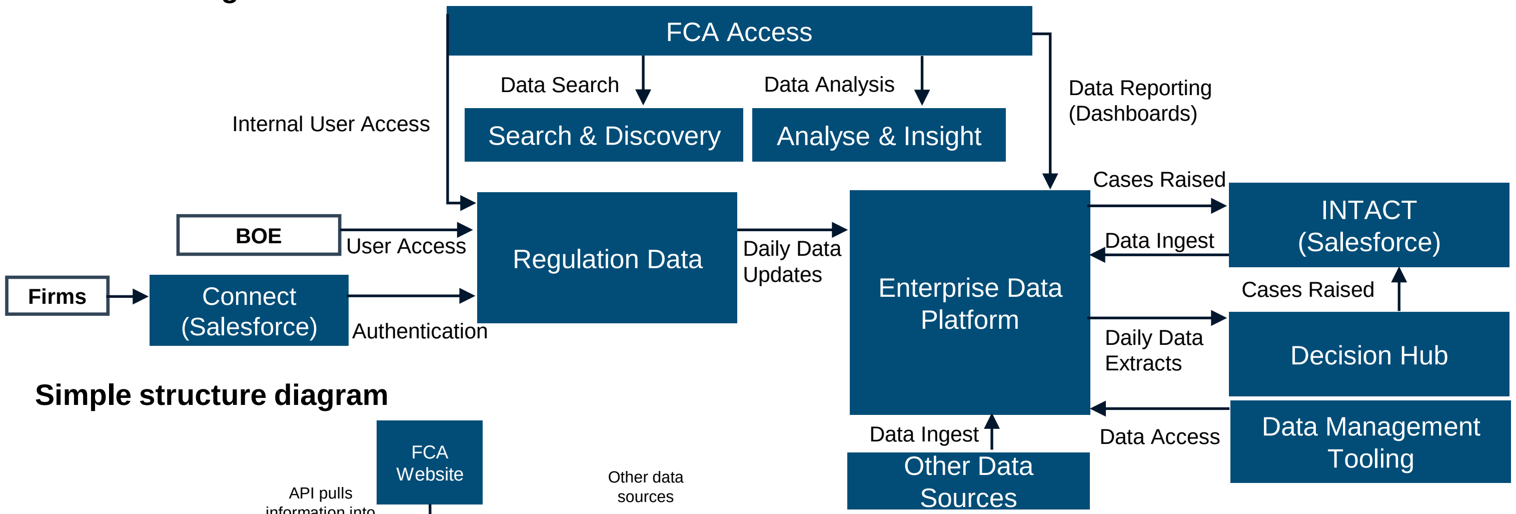
The technical architecture of the register is based on a modern web-based system that is built using several different technologies. The key components of the system are:

- **Database:** The database stores all of the information about authorised and regulated financial firms and individuals. The database is designed to be highly available, scalable, and secure.
- **API:** The API (Application Programming Interface) is the primary means of accessing information stored on the database. It allows external developers to access the information and integrate it into their own applications.
- **Web Application:** The web application provides a user interface for searching and browsing the information stored in the database. The web application is built using modern web technologies such as HTML, CSS, and JavaScript.
- **Authentication & Authorisation**: The system includes a robust authentication and authorisation mechanism to ensure that only authorised users can access the system.
- **Data Integration:** The system is integrated with various other data sources to ensure that the information it provides is accurate and up-to-date (e.g., the Companies House database).
- **Security:** The system is designed to be highly secure, with measures such as encryption, firewalls, and intrusion detection systems in place to protect against unauthorised access and data breaches.

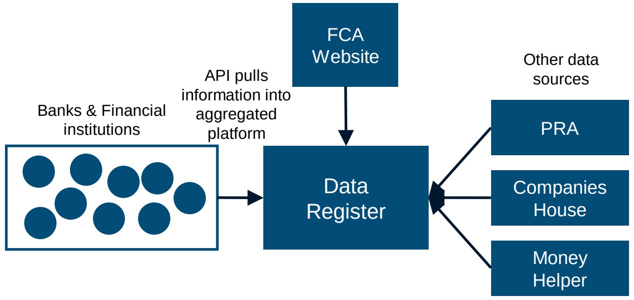
The BOE, among other Financial Institutions as well as individual professional themselves are relied upon to upload information which enters the FCA's data lake and becomes the 'Golden Source of Truth'.

Diagram

Technical diagram



Simple structure diagram



Market deep dive: Financial Services Register

Key components of the register		
1. Governance	*Who hosts the register?*	The FCA
	Who can access the register?	The register is accessible to anyone who wishes to search for information on authorised firms and individuals, including consumers, businesses, and other stakeholders
	Who is responsible for overseeing the register?	The FCA
	How is the register funded?	Through levies and fines paid by the firms they regulate
2. Data	*What type of accounts are captured on the register?*	Captures information about authorised firms and individuals in the financial services industry (rather than individual accounts)
	What data attributes are captured?	Register contains information on firms and individuals that are authorised by the FCA to provide financial services. The information captured includes: • The name and address of the firm or individual • The type of services that the firm or individual is authorised to provide • The date the authorisation was granted • The status of the authorisation (e.g. active or inactive) • Any regulatory actions or sanctions taken against the firm or individual
	How frequently is data updated?	The data on the register is updated on a continuous basis, as the FCA receives new information or makes changes to existing information. This is because the FCA requires authorised firms and individuals to notify it of any changes to their details, such as changes to their business address, contact details, or authorised activities. Additionally, the FCA conducts periodic reviews of authorised firms and individuals to ensure ongoing compliance with regulatory requirements. As part of these reviews, the FCA may request updated information or conduct site visits to verify the accuracy of the information on the register.
3. Usage	*How many API requests per month?*	Platform received 1.85m requests per month in 2022
	How many users will use the register?	c.184k external users
	What access permissions & thresholds are in place?	Information not readily available
	How long is data retained?	Regulatory permissions for as long as the firm is authorised to conduct regulated activities, other information is stored for as long as it is relevant and necessary
4. Implementation & Run	*What stage of the implementation lifecycle?*	The program was set up with 4 planned stages – (1) forming, (2) stabilising, (3) improving, (4) maintaining. Program is in stage 3 (which is a maturity stage)
	How much did it cost (£ & headcount) to implement?	Information not readily available

Source: FCA and internal assessments

Benefits and limitations: Financial Services Register

+

- User Friendly: The FCA Register is easily accessible online, which makes it convenient for consumers, financial firms, and other stakeholders to access the information they need.
- Transparency and Accountability: Makes information on firms and individuals regulated by the FCA and PRA readily available, which helps to build trust between consumers and financial services providers.
- Consumer Protection: The register can help to protect consumers from fraud and other forms of financial malpractice. By checking the register, consumers can ensure that the financial services provider they are dealing with is authorised to provide the services they offer.
- Regulatory Oversight: The register helps the regulatory authorities to monitor and enforce regulatory requirements in the financial services industry. The register enables the regulatory authorities to keep track of firms and individuals who are subject to regulation and to take action against those who breach regulatory rules.
- External access: The register's API allows external developers to access the information and integrate it into their own applications

–

- Phoenixing: There is a prevalence of fraudulent entities who scam people, or run a bad operation, opening up a new operation under a new name.
- Data quality: Relaxed data management policies have led to poor quality data being stored. It is not governed strictly, and this leads to information being out of date.
- Limited Information: The register provides basic information on financial services firms and individuals, but it does not provide detailed information on the products and services they offer. Consumers may need to seek additional information from other sources to make informed decisions.
- Complex Information & poor user experience: The register contains complex information that may be difficult for some consumers to understand without financial knowledge to interpret the information correctly.

2E. The UK Health & Social Care Industry

Health & social care industry regulatory environment overview

Industry overview

The health & social care industry in the UK is regulated primarily to protect the public by ensuring that health and social care professionals are properly regulated and held accountable for their conduct and practice. There are nine regulatory bodies operating in the industry, which all sit under the purview of the Professional Standards Authority for Health and Social Care.

Professional Standards Authority for Health and Social Care (PSA)

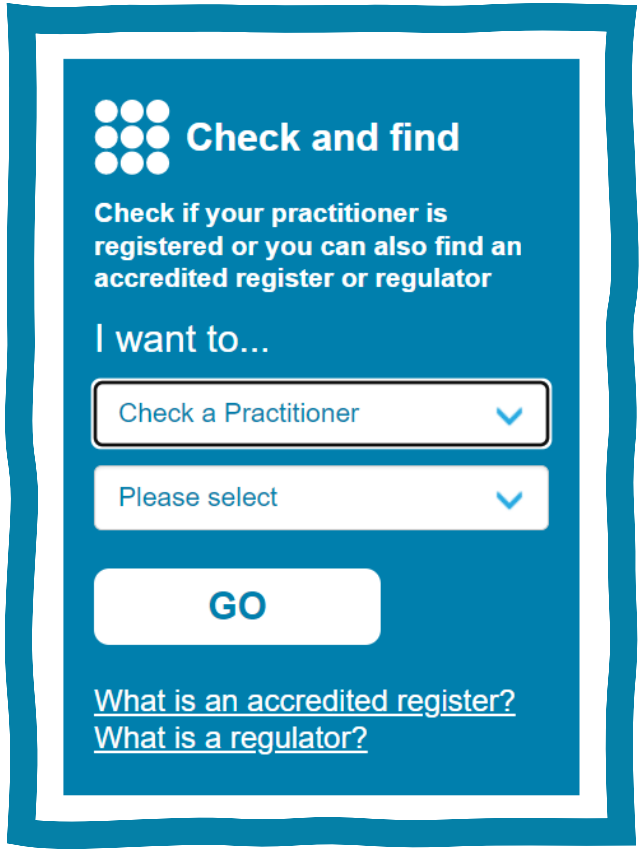
The PSA is an independent organisation that oversees and regulates the work of health and social care regulatory bodies, by:

1. Assuring the public that the health and social care regulatory bodies are meeting high standards in the way they carry out their functions and that the public is protected.
2. Promoting best practice among health and social care regulatory bodies and sharing good practice across them.
3. Providing advice and guidance to the health and social care regulatory bodies to support their work.
4. Conducting reviews of the regulatory bodies' performance, including their fitness to carry out their functions.

The Accredited Registers program: The PSA maintains a public register of health and social care professionals who meet certain standards of education, training, and conduct called the Accredited Registers program

- The program is a voluntary scheme that recognises professional registers that meet the Professional Standards Authority's high standards for governance, standard-setting, education and training, management of complaints and feedback, and public information.
- This register is separate and not directly linked to the registers that the nine health and social care regulatory bodies maintain. The registers maintained by the health and social care regulatory bodies are the official registers for their respective professions and are mandatory for practitioners to be able to practice. These registers are often a legal requirement for practitioners to use a protected title, such as "doctor," "nurse," or "midwife," and to be able to provide healthcare services to the public.

However, the PSA does provide a search tool on its website called ‘Check and find’ that allows people to ascertain if a practitioner is registered or find an accredited register or regulator.



Health & social care industry regulatory environment overview

The 9 key regulatory bodies are responsible for ensuring that health and social care professionals meet certain standards of education, training, and conduct, and that they are fit to practice in their respective fields. As an oversight regulator, PSA works with regulatory bodies to safeguard public interest, and deliver regulatory duties as required. Below is a summary of the regulatory bodies PSA oversees:

	Key Regulator	Purpose	Registers
1.	**General Chiropractic Council (GCC)**	Regulates chiropractors in the UK to ensure they meet high standards of education, training, and professional conduct.	1. GCC Register
2.	**General Dental Council (GDC)**	Regulates dentists, dental hygienists, dental therapists, dental nurses, and clinical dental technicians to ensure they meet high standards of education, training, and professional conduct.	2. GDC Register
3.	**General Medical Council (GMC)**	Regulates doctors in the UK to ensure they meet high standards of education, training, and professional conduct.	3. GMC Register
4.	**General Optical Council (GOC)**	Regulates optometrists and dispensing opticians in the UK to ensure they meet high standards of education, training, and professional conduct.	4. GOC Register
5.	**General Osteopathic Council (GOsC)**	Regulates osteopaths in the UK to ensure they meet high standards of education, training, and professional conduct.	5. GOsC Register
6.	**Health and Care Professions Council (HCPC)**	Regulates a range of health and social care professionals, including biomedical scientists, dietitians, occupational therapists, paramedics, physiotherapists, and social workers, to ensure they meet high standards of education, training, and professional conduct.	6. HCPC Register
7.	**Nursing and Midwifery Council (NMC)**	Regulates nurses, midwives, and nursing associates in the UK to ensure they meet high standards of education, training, and professional conduct.	7. NMC Register
8.	**Pharmaceutical Society of Northern Ireland (PSNI)**	Regulates pharmacists and pharmacy technicians in Northern Ireland to ensure they meet high standards of education, training, and professional conduct.	8. PSNI Register
9.	**General Pharmaceutical Council (GPhC)**	Regulates pharmacists and pharmacy technicians in England, Scotland, and Wales to ensure they meet high standards of education, training, and professional conduct.	9. GPhC Register

Market deep dive: PSA's website directory

Description

From our understanding, the PSA does not host or display the regulatory information and data captured by the regulatory bodies it oversees. Instead, it has opted for a lower-cost 'directory' option on their website, where consumers can 'check a practitioner', 'find a regulator', or 'find an accredited register' across the different professions it regulates. The results provide consumers:

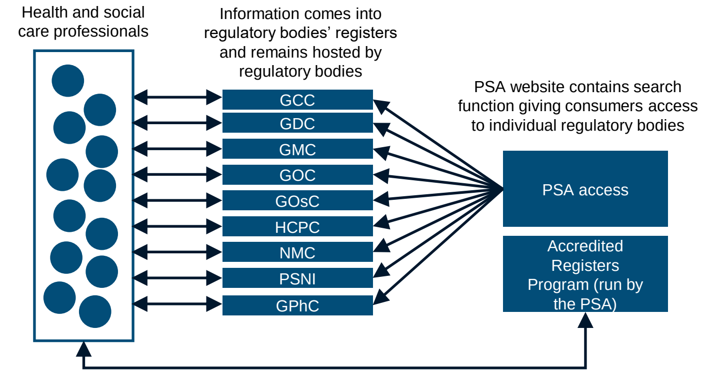
- Access to each individual regulator's website and register(s), association websites and accredited registers
- Information about the regulatory body (including independent PSA reports)

Technical Architecture

Each of the 9 regulatory bodies operates its own register. The PSA also has a register, which is separate and distinct to the registers held by the regulatory bodies it governs. However, the PSA does provide access to the 9 regulatory bodies' registers through a 'search function' on its website. It operates as follows:

- Information remains hosted on the individual regulatory bodies' register(s)
- PSA website contains a search function, which provides information about the regulatory bodies and access (through a link) to their websites
- Consumers access regulatory information through the register(s) hosted on each individual regulator's website

How it works in practice



Key components of the register

1. Governance	*Who hosts the website?*	PSA
	Who can access the website?	Anyone
	Who is responsible for overseeing the website?	The PSA is responsible for overseeing its website. Each regulatory body is responsible for overseeing its own register
	How is the register funded?	Fees on the 9 regulatory bodies, Fees on accredited registers, review fees from government departments
2. Data	*What type of accounts are captured on the Website?*	• Access to each individual regulator's website and register • Information about the regulatory body (inc. independent PSA reports)
	What data attributes are captured?	Website allows you to check a practitioner', 'find a regulator', or 'find an accredited register'
	How frequently is data updated?	Varies as it often relies upon healthcare professionals to provide updated information
3. Non-functionals	*How many requests are expected each year?*	Information not readily available
	How long is data retained?	As long as the professional is authorised to conduct medical activities, other information is stored for as long as it is relevant and necessary
4. Implementation & Run	*What stage of the implementation lifecycle?*	Mature - set up under the NHS Reform and Health Care Professions Act 2002, amended in line with the Health and Social Care Act (2012)
	How much did it cost (£ & headcount) to implement the register?	Information not readily available

Benefits and limitations: PSA's website directory

+

- Cost Effective: Cost effective solution, as data remains hosted by individual regulatory bodies
- Implementation Time: As there is no substantive change to the way regulatory information is displayed or hosted (it remains with the individual regulatory bodies), it is quick to implement.
- Easy Access: The search tool makes it easy for consumers to navigate to the appropriate regulator's website and register.

–

- Inconsistencies in Data Quality and Form: Information is hosted by individual regulatory bodies, which means it may not be presented in the same format to be easily understandable and accessible by consumers
- Sub-optimal User-experience: While the website contains links to all of the regulatory bodies' websites and registers, going through the process requires 'extra steps and clicks' which may deter consumers from going through the process as it is 'too difficult'.
- Limited consumer choice information: accessible information focuses on checking status of professionals (via regulatory body websites / registers). Additional information to inform choices (e.g. quality) is not available

2F. German Policing & Financial Crime

Market deep dive: Policing & Financial Crime - Germany's Federal Financial Supervisory Authority's (BaFin) register

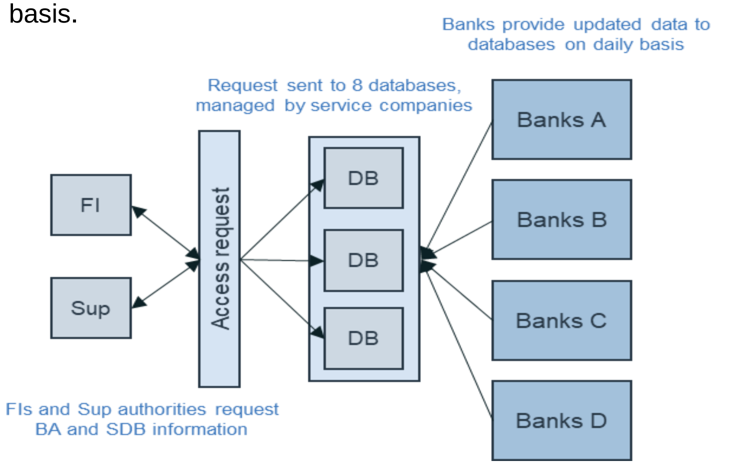
Description

EU member states are required to build Bank Account Portals / Registers. The German system allows Financial Investigators to request information from all banks who upload this to ring-fenced databases, hosted by an independent 3rd party, on a daily basis. The many different banks must keep their databases up to date and do this through 3rd party providers; the functionality to request data from all providers simultaneously is a valuable trait which helps to ensure data quality. The German register is a data retrieval system with the databases ring-fenced from the public authorities.

Technical Architecture

The consumer data sits in 7 databases run by a 3rd party service provider jointly owned/controlled by the banks. The member banks send the data on a daily basis to the service centres (e.g. new accounts, closed accounts, changes).

When a search is performed, the request is sent to each of the 8 service centres. The data is fed from the 8 databases to an IT service centre owned by the finance ministry, and the 8 responses passed on to the investigator. Data is only transferred to the public authorities on a request-by request basis.



Key components of the register

1. Governance	*Who hosts the register?*	3rd party provider jointly owned by Banks. Banks are required to host their respective database and have opted to source this out to IT service centres, however not all Service Centres are bank owned
	Who can access the register?	German prosecuting and supervisory authorities
	Who is responsible for overseeing the register?	Federal Financial Supervisory Authority (BaFin)
	How is the register funded?	From BaFin budget, raised through firms it supervises
2. Data	*What type of accounts are captured on the register?*	All custody accounts, savings accounts, deposit accounts and safe deposit boxes
	What data attributes are captured?	Account number, opening and closing dates, account holder's and authorised person's names and dates of birth, other beneficiary's name and if known address
	How frequently is data updated?	Daily - banks required to update information immediately
3. Non-functionals	*How many requests are expected each year?*	C.920,000 searches annually (150,000 of these by prosecuting authorities via BaFin)
	What access permissions & thresholds are in place?	Every access to data is logged (including requesting authority, time and reference number, name of the persons involved). This data is backed up for at least 18 months and no longer than 24 months
	How long is data retained?	Data which is no longer valid must be deleted after three to ten years.
4. Implementation & Run	*What stage of the implementation lifecycle?*	Deployed
	How much did it cost to implement?	Information not readily available
	How much will the register cost to run?	~50-60FTE are required to run the Portal across the German Public Sector

Benefits and limitations: BaFin’s register

+

- Efficiency: The system allows BaFin to manage the register efficiently and keep it up-to-date. The system can handle a large volume of data and allows for fast and accurate processing of information.
- Accessibility: Accessible online for financial services providers. This improves transparency and makes it easier for consumers and investors to obtain information.
- Security: The system provides a secure platform for storing and managing sensitive financial data. BaFin can control access to the register and ensure that data is protected from unauthorised access.
- 3rd Party Hosting - Resources: External expertise is utilised to deliver technical solutions, reducing burden on in-house BaFin teams.
- 3rd Party Hosting - Liability: Reduced liability for BaFin as external organisation host, manages and secures data
- 3rd Party Hosting – Affordability: Compared to other European Register Options, BaFin’s solution was more affordable due to lower technology, capability and run costs

–

- Data Privacy: The system contains sensitive financial data about companies and individuals, which must be protected to ensure data privacy. There is a risk of data breaches and cyber-attacks that can compromise the security of the register.
- 3rd Party Hosting – Dependency & controls: The system is essential to the operation of the register, and any issues with the 3rd party supplier will impact availability BaFin must ensure that the system is properly maintained and that contingency plans are in place in the event of system failure.

2G. Netherlands Policing & Financial Crime

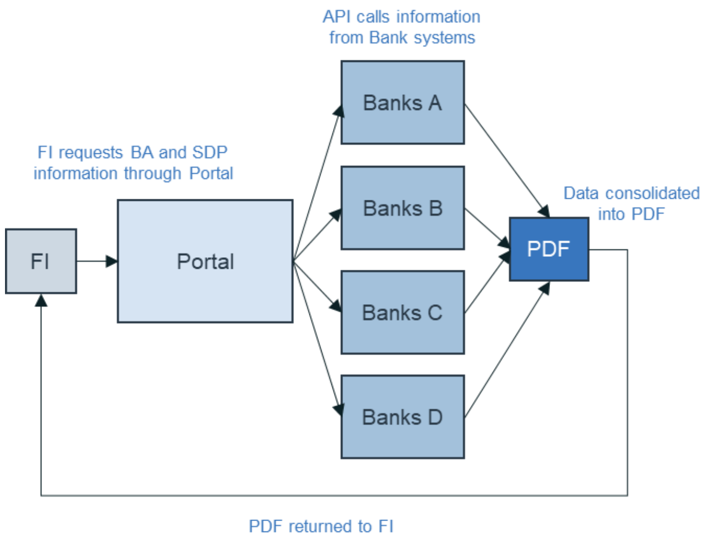
Market deep dive: Policing & Financial Crime – The Netherland's Ministry of Justice and Security's (MoJS) portal

Description

The Dutch system is a technologically sophisticated solution, using API technology to retrieve data directly from bank accounts. The Bank Data Retrieval Portal is a digital data retrieval system. It allows Dutch investigators, and other allowed institutions, to request bank account and SDB information from Banks in real-time.

Technical Architecture

Information is requested via a portal which access bank systems using real-time APIs and returns the requested information in a PDF document. The portal allows Dutch investigators to request information from multiple banks simultaneously.



Key components of the register

1. Governance	*Who hosts the register?*	Ministry of Justice and Security.
	Who can access the register?	Dutch National Police, Financial Intelligence Unit, Special Investigative Services, Public Prosecution Service, Dutch Tax and Customs Administration, Royal Netherlands Marechaussee, Dutch National Police Internal Investigation.
	Who is responsible for overseeing the register?	Special Investigative Services Information Centre (referred to as IBO).
	How is the register funded?	Various funding sources including: EU, MoJS and MoF
2. Data	*What type of accounts are captured on the register?*	Private or business account, savings accounts, securities account, life-course savings scheme account, annuity savings account, credit card, debit card, current account with overdraft facility, mortgage credit, consumer credit, commercial credit, deposit system, digital wallet, safe, insurance.
	What data attributes are captured?	Name, address, date of birth, Citizen Service Number; Organisation number, names and address; Chamber of Commerce (legal person).
	How frequently is data updated?	Data on the Portal cannot be older than 48 hours.
3. Non-functionals	*How many requests are expected each year?*	Approx. 5,000 requests per year.
	How many users will use the register?	Unknown.
	What access permissions & thresholds are in place?	Two-way TLS connection between JUBES, the central API security gateway for MOJS and the banks. Available 24/7 with an availability percentage of 99%.
	How long is data retained?	The search is wiped off the system 5 minutes after completion.
4. Implementation & Run	*What stage of the implementation lifecycle?*	Implementation.
	How much did it cost (£ & headcount) to implement?	~EUR 9.5m estimated implementation cost. 50-60 people to implement.
	How much will the register cost to run?	EUR 1.2-1.4m to run the portal (annual)

Benefits and limitations: MoJS' portal

+

- Transparency: The portal provides transparency to the public and investors by making information about financial institutions operating in the Netherlands easily accessible. It allows anyone to check whether a financial institution is licensed and regulated in the Netherlands and provides important details about the institution's regulatory status and ownership structure.
- Efficiency: The portal is an online platform that provides easy access to information about financial institutions. This improves efficiency by reducing the need for manual processes and paper-based records.
- Regulatory oversight: The portal supports oversight of the financial sector by providing an up-to-date database of licensed and regulated financial institutions. This allows the regulatory body to monitor the industry and take action against institutions that do not comply with regulatory requirements.

–

- Accuracy: While the regulatory body makes every effort to ensure the accuracy of the information in the portal, errors and omissions can occur.
- Limited scope: The portal only includes financial institutions that are subject to supervision by the MoJS. It does not include institutions that are not required to be licensed or registered with MoJS, such as those providing financial advice or consulting services.
- Data privacy: The portal contains sensitive financial data about financial institutions and individuals, which must be protected to ensure data privacy. There is a risk of data breaches and cyber-attacks that can compromise the security of the platform.

03

Options Assessment Report

The market research informed three options to explore further for the legal services sector. To identify which should be considered further, we used design principles and evaluation criteria to capture feedback from regulatory body stakeholders

3A. Design Principles & Evaluation Criteria

Best practice design principles for developing digital registers were tailored with the support of stakeholders. These provided guiderails to shape what good would look like in future options

The following design principles are based on best practice and PA Consulting's experience helping regulatory bodies on the journey to developing digital registers and portals. During the options assessment workshop, we discussed the trade-off between these principles, and agreed that we need to **prioritise consumer centricity, ensuring any solution adopted is demand led** (i.e. what consumers want).

1. Be consumer (end-user) centric

- Be user friendly and intuitive for all consumers, including your common lay-person, industry professionals, policemen, journalists etc.
- Provide a direct benefit to consumers and their ability to check and chose legal providers
- Allow consumers to understand what they should be using the platform for vs. when they should be going to regulatory body websites

2. Contain standardised & transparent information

- Deliver standardised information outputs that is easily accessible and easy to navigate to
- Focus on data quality and maintenance, providing user trust in accuracy
- Ensure consumers understand the context behind the information they are searching for

3. Support access to justice

- Improve access and ability to make informed legal service choices, enabling better and more equal access to justice

4. Be scalable & flexible

- Be adaptable and capable of flexing to future changes in the industry, e.g. through third party data hosts and leveraging Digital Comparison Tools
- Be adaptable to changes in end-user behaviour and how people consume information, e.g. with the introduction of AI
- Be able to integrate consumer centric information, e.g. quality information

5. Meet legislative & legal policy requirements

- Meet regulatory objectives under the *Legal Services Act 2007*
- Be legally viable, compliant with regulatory data collection powers and regulatory body duties and uallowing the host to store and display the required information

6. Enable secure use and storage of data

- Maintain appropriate levels of data security
- Accommodate implications of GDPR and UK data protection policy
- Protect data privacy in line with public, political and legal expectation
- Ensure data is stored and accessed for appropriate purposes

7. Be a proportionate and effective use of regulatory body resources

- Represent fair value and cost effective use of levy funding and be cost-effective
- Deliver an efficient solution, simple to use, maintain and operate. This being proportionate to regulatory body resources, sizes and scales
- Provide benefits to regulatory bodies (e.g. promoting their service to end-users)

Translating design principles into focused evaluation criteria, stakeholder insights were used to assess the relative opportunities and challenges of each option

Design principle	Criteria	Guidelines
1. Be consumer (end-user) centric **2. Contain standardised and transparent information** **3. Support access to justice**	**End-consumer benefit**	**Enables the realisation of a range of benefits for end-consumers by:** ▪ Providing consumers with easy access to the information they require immediately
4. Be scalable & flexible	**Scalability**	**Is able to flex and integrate with future changes, including the ability to integrate other information, such as quality indicators, by:** ▪ Allowing inclusion of new data attributes, users, products and functionality
5. Meet all legislative & policy requirements	**Legal & policy compliance**	**Meets minimum requirements of policy and legislation**
6. Enable secure & appropriate use of data	**Security risk**	**Maintains appropriate levels of data security, by:** ▪ Protecting against threats and unauthorised information disclosure, modification and destruction ▪ Capable of meeting minimum baseline control set of the hosting organisation including identity management, authentication and access control, protective technology, API requirements.
7. Be fair & proportionate to regulatory bodies	**Change complexity**	**Reduces time to deliver a solution, by:** ▪ Minimising the scale of change required for a host / data holders ▪ Leveraging existing datasets, processes and requirements where possible ▪ Accounting for the change readiness of the various regulatory bodies and how long it will take to implement the change
	Relative cost	**Accounts for proper use of levy funding, by:** ▪ Providing a cost effective solution to build and run relative to other options ▪ Considering proportionate cost / timeframes to all regulatory bodies, so that smaller regulatory bodies don't face an undue burden in comparison to some of the bigger regulatory bodies
	Regulatory body benefits	**Enables realisation of a range of benefits for regulatory bodies by:** • Promoting their service to end-consumers • Providing ease of access to information for end-consumers, reducing traffic / questions for regulator • Provides up to date monitoring and evaluation, helping regulatory bodies make informed and strategic choices
	Other criteria	**Any other benefits or criteria which may be relevant***

*Stakeholders were asked to capture any other criteria they considered relevant

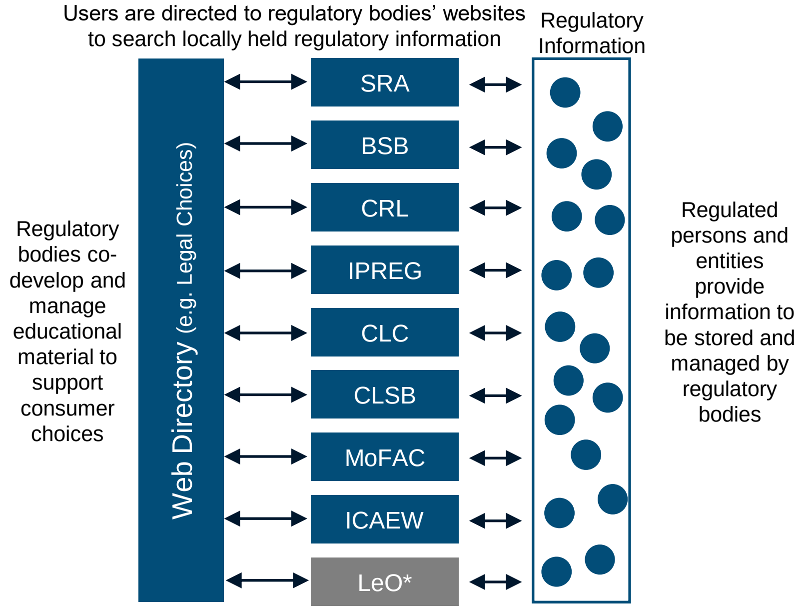
3B. Options Assessment

Using the evaluation criteria, regulatory body stakeholders evaluated three digital solutions to determine challenges and opportunities of each: (1) Directory & Decentralised Registers, (2) Digital Portal, (3) Centralised Register

Please note that the options are **not mutually exclusive**. While we are considering them separately, the ideal solution may include a combination of approaches. There is also an opportunity to consider other digital comparison tools when determining the most appropriate solution to implement.

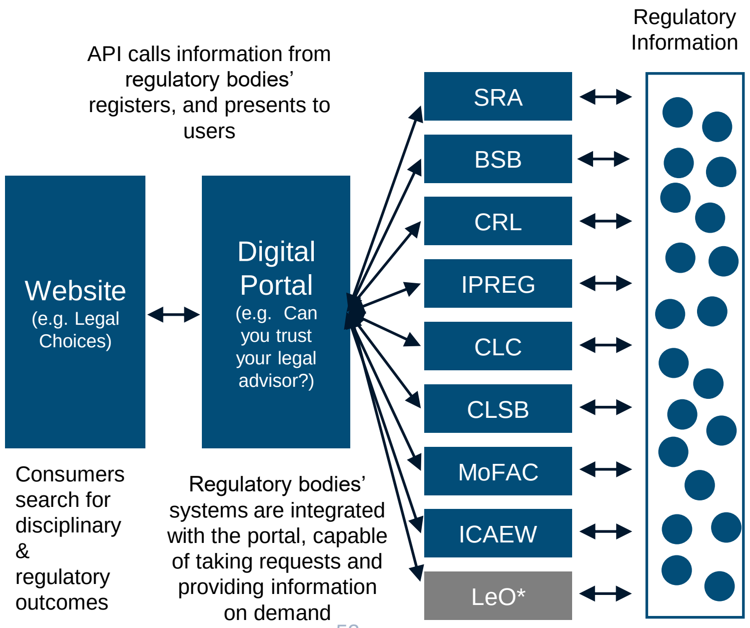
Option 1, Directory & Decentralised Registers: Utilising a central directory to access decentralised information sets

Providing directory services to regulatory bodies' hosted registers to act as a comprehensive directory of where to access regulatory information. This includes appropriate information from all regulatory bodies and in effect already exists.



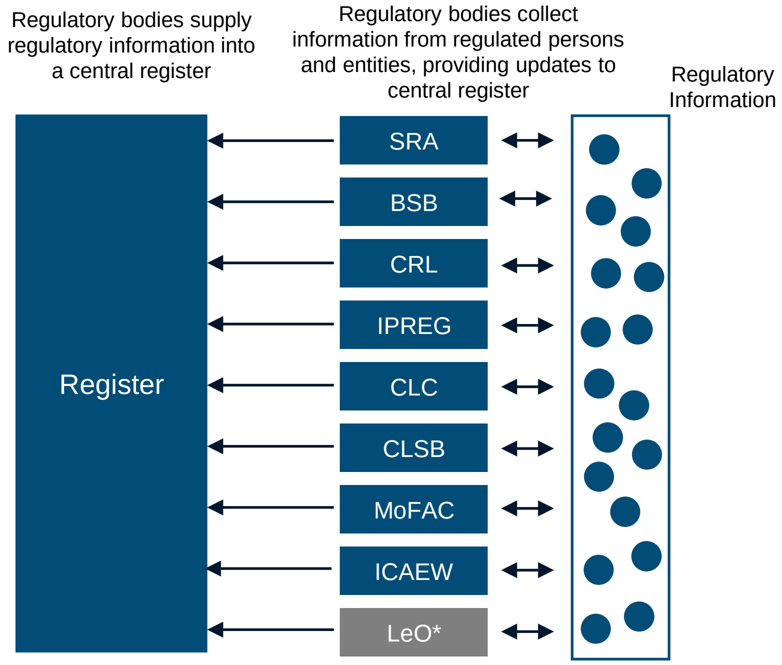
Option 2, Digital Portal: Iterate on the 'here and now': Single source access to multiple information sets

A digital platform to provide a single point of access to multiple decentralised registers. Regulatory information is hosted and managed by regulatory bodies and access is made available on demand, via the portal. 'Can you trust your legal advisor?' is an example of this and should be explored along with other portal solutions.



Option 3, Centralised Register: Consolidating information into a single interrogatable system

A register of registers, consolidating regulatory information collected by regulatory bodies, and stored in a centrally managed system. Consolidated regulatory information is searchable on demand.

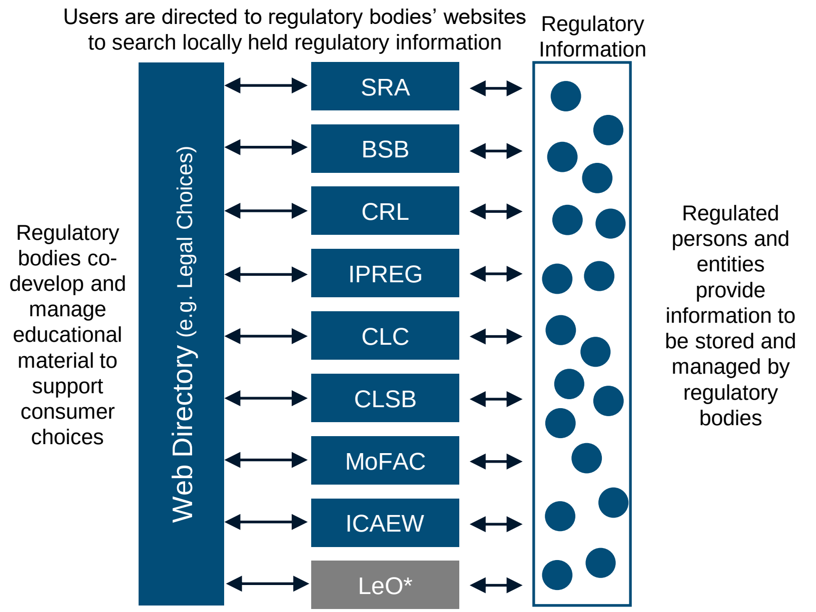


*LeO is not a regulatory body, but it will contribute to the digital solution.

Option 1: Directory & Decentralised Registers was considered the easiest solution to implement, but least consumer-centric, and not within the spirit of the CMA recommendations report

Option 1, Directory & Decentralised Registers: Utilising a central directory to access decentralised information sets

Providing directory services to regulatory bodies' hosted registers to act as a comprehensive directory of where to access regulatory information. This includes appropriate information from all regulatory bodies and in effect already exists.



*LeO is not a regulatory body, but it will contribute to the digital solution.

Headline findings

1. **Not consumer centric:** As information is not held and displayed centrally, consumers need to know exactly what to search for and then click a link through to individual regulatory bodies' websites
2. **Limited flexibility:** Easy to implement and cost effective, but limited flexibility to adopt future solutions (e.g. integrating AI)
3. **Lack of quality control:** Information is held and displayed in inconsistent formats and not updated uniformly across regulatory bodies

High-level capture from the workshop*

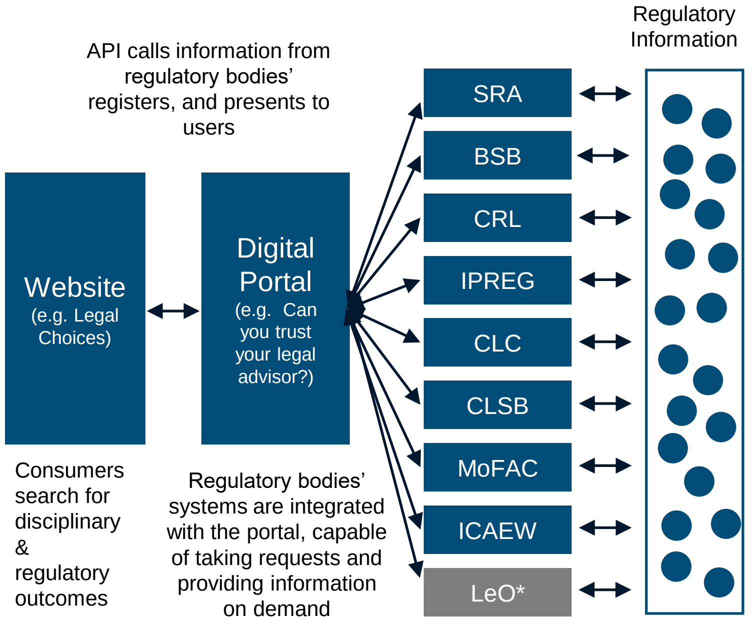
Category	Comments
Legal & policy	• This option is not within the spirit of the CMA recommendations
Security risk	• Low risk option as it would be up to each individual regulatory body to meet standards
Change complexity	• Easy to implement as it already exists, but assumes that all information across regulatory bodies is good quality • There would be work needed to standardise how each regulatory body displays its regulatory information (e.g. having the same level of contextual information across registers)
Scalability	• Limited flexibility to adopt intelligent future solutions (e.g. AI)
Relative cost	• Lowest cost option
End-consumer benefit	• Going to regulatory bodies' websites helps consumers see more valuable (consumer focused) information, not just the specific regulatory information they are searching for • Consumers need to know what they are searching for to navigate the directory • Solution does not help consumers compare legal services (i.e. it does not support choice)
Regulatory body benefits	• Regulatory bodies can give a personalised domain experience
Other comments	• There is a need to review what local, domain-led search tools are available • Consider a hybrid solution

*Further information captured can be found in the appendix

Option 2: Digital Portal was considered a more consumer centric approach, with greater scalability and future proofing potential. Added possibility to expand existing services (i.e. 'Can you trust your legal advisor?') meant this option was more readily implementable

Option 2, Digital Portal: Iterate on the 'here and now': Single source access to multiple information sets

A digital platform to provide a single point of access to multiple decentralised registers. Regulatory information is hosted and managed by regulatory bodies and access is made available on demand, via the portal. 'Can you trust your legal advisor?' is an example of this and should be explored along with other portal solutions.



*LeO is not a regulatory body, but it will contribute to the digital solution.

Headline findings

1. **Consumer centric:** users capable of accessing all relevant information from a single source, shortening users journeys and time-to-value
2. **Future centric:** Flexible solution, capable of adapting to changing user needs
3. **Regulatory body differences:** Enables different regulatory bodies to present their own information in a contextual way (e.g. different information about firms/individuals)
4. **Data standards:** Data standards required to enable this solution to come to fruition

High-level capture from the workshop*

Category	Comments
Legal & policy	• Regulatory bodies are different and have different requirements (inc. legal requirements)
Security risk	• Not discussed
Change complexity	• Difficulty in standardising information across regulatory bodies when by nature information is different (trade off between ease of use and quality of information) • Medium level of complexity - It builds on an existing solution and does not require the portal to be changed or adapted every time a regulatory body wants to input information
Scalability	• Always intended as a scalable starting point with a view to future development to include a much wider range of regulatory information
Relative cost	• More expensive than option 1, less than option 3
End-consumer benefit	• Better access to justice - being able to search information at a general level enables the common layperson to search for legal advisors when they otherwise would not know where to go • Not as user centric as a central register, as there is limited big data analytics opportunities • Interface can be presented in a standardised, easy to use format
Regulatory body benefits	• Need to be clear on what information can be pulled through to the portal
Other comments	• Could we integrate the platform with future solutions like AI? • Data quality is crucial and attempting uniformity for comparison could hinder its value in use

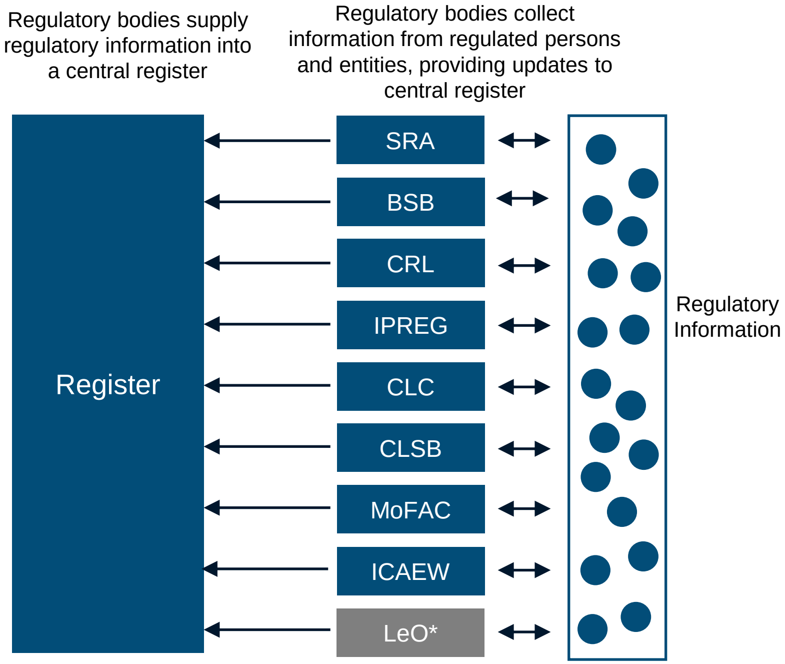
*Further information captured can be found in the appendix

Option 3: Centralised Register, was also considered a consumer centric approach to be explored further. The register approach may offer benefits of standardised data models across industry, and build the foundation for new ways consumers to access information (e.g. AI driven searches)

Option 3, Centralised Register:

Consolidating information into a single interrogatable system

A register of registers, consolidating regulatory information collected by regulatory bodies, and stored in a centrally managed system. Consolidated regulatory information is searchable on demand.



*LeO is not a regulatory body, but it will contribute to the digital solution.

Headline findings

1. **Consumer centric:** users capable of accessing all relevant information from a single source, shortening users journeys and time-to-value
2. **Future centric:** Flexible solution, capable of adapting to changing user needs
3. **Regulatory body differences:** Difficult to standardise information across regulatory bodies when info types are different (e.g. about firms/individuals), and could cause undue burden on smaller regulatory bodies
4. **Change complexity:** Ensuring data is standardised and high quality will require significant change
5. **Legal & governance concerns:** Who will own the information and what are the legal implications?

High-level capture from the workshop*

Category	Comments
Legal & policy	• Need advice on GDPR and how data is controlled
Security risk	• Not discussed
Change complexity	• Data quality concerns if the source is not the regulatory body. Can we ensure that information will be updated on a regular cadence (e.g. hourly or daily updates)? • Moving towards a shared data model will require significant mapping and standardisation. Need to understand scale of change and requirements on regulatory bodies to deliver (especially smaller regulatory bodies)
Scalability	• Standardised information is important to scale (e.g. templates). However, there are specific fields that relate only to some regulatory bodies, meaning there is a limit on what information can be standardised
Relative cost	• Most expensive option, but difficult to assess when we do not have a costs model
End-consumer benefit	• If consumers are not clicking onto individual websites and registers, they do not get the valuable content on those websites (cf. SRA research suggests consumers do not want value add content) – i.e. consumers lose ability to contextualise information for consumers, e.g., that different regulated persons are regulated differently • Most seamless user journey (less clicks) as data is hosted centrally • Question whether central register reduces consumer confidence in the information • Standardisation can lead to sacrifices in quality for ease of navigation and less contextualisation
Regulatory body benefits	• Loss of traffic to their websites which have value add content and contextualises information
Other comments	• Is it possible to make the solution future proofed (such as integrating it with AI)? • Need to consider governance model and who will own the data

*Further information captured can be found in the appendix

04

Next Steps

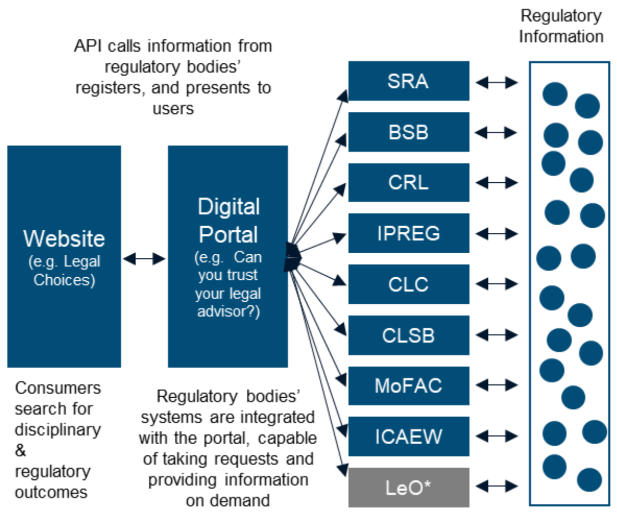
Based on the initial assessment, we **narrowed it down to two options to explore further** for the legal services sector: Option 2 - Digital Portal and Option 3 - Centralised Register

The stakeholders largely agreed that a digital portal or centralised register would provide a more consumer centric solution, as data can be hosted and displayed centrally for consumers. While they are more involved solutions, they provide a range of benefits, such as a more seamless user journey. However, before determining which to pursue, further research needs to be conducted to understand user needs, viability and regulatory body requirements.

Options for further consideration

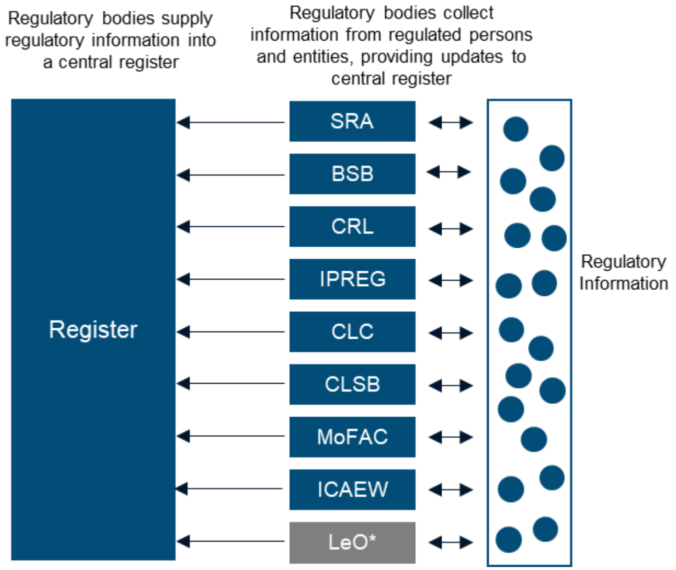
Option 2, Digital Portal: Iterate on the 'here and now': Single source access to multiple information sets

A digital platform to provide a single point of access to multiple decentralised registers. Regulatory information is hosted and managed by regulatory bodies and access is made available on demand, via the portal. 'Can you trust your legal advisor?' is an example of this and should be explored along with other portal solutions.



Option 3, Centralised Register: Consolidating information into a single interrogatable system

A register of registers, consolidating regulatory information collected by regulatory bodies, and stored in a centrally managed system. Consolidated regulatory information is searchable on demand.



Following PA's service approach, we recommend further work focuses on **understanding consumer / stakeholders needs, and designing the future experience**. This will directly inform which digital solution is the most appropriate, when considering the end-to-end journeys

Key
- Achieved
- Partly achieved
- To be completed

What should the approach to develop a single digital register resolve?

WHY regulatory information services?	**Consumer & Stakeholder Needs**	Who are your consumers and what services do they need? What do other industries deliver? What requirements do stakeholder groups have?
	Ambition	What are the key outcomes that the LSB wishes to achieve through the service?
WHAT regulatory information service options exist?	**Value**	What is the value proposition we are aiming to deliver?
	Service	What services do we wish to offer to benefit key stakeholder groups? What are the priority services you might offer as a priority?
HOW Can it be delivered?	**Service Model Options**	What options do LSB have for delivering the service?
	Delivery	What is the best approach to test and launch the service?

Core Activities

		Phase 1: 'Here and now analysis'	Phase 2: 'User-led design'	Phase 3: 'Detailed solution design'
Benchmarking & needs	Conduct benchmarking, market analysis & gather findings	Achieved		
	Understand consumers' needs & priority groups		To be completed	
Service Ambition	Understand the purpose, goals and outcomes	Partly achieved	To be completed	
Value Proposition	Refine service vision		To be completed	
	Define value proposition		To be completed	
Service Outline	Define success criteria		To be completed	
	Outline design principles for the service	Achieved		
Design Options	Develop digital register options & agree preferred choice	Partly achieved	To be completed	
	Assess technical and delivery requirements	Partly achieved	To be completed	
	Technical regulatory body register review, and assessment of standardisation opportunities (inc. Open Data)		To be completed	
	Determine legal viability of solutions		To be completed	
Detailed Design & Prepare to Deliver	Develop sourcing options			To be completed
	Define sizing and costs			To be completed
	Define governance, delivery and engagement approach		To be completed	To be completed
	Develop service blueprint, operating model and roadmap			To be completed

Recommended next steps for phase 2 include; detailed user research, regulatory landscape analysis and appropriate governance model before determining which solution to implement

Next steps

1. User research

Conduct user testing to ascertain user needs across different journeys of those who use the platform, such as the common layperson and industry professionals (inc. reviewing current research already available - e.g. SRA's consumer research, LSB's consumer segmentation work and LSB's quality indicators research)

2. Data & technology deep-dive

'Deep dive' into technology and data options underpinning regulatory body registers, identifying standardisation opportunities / challenges, and informing change impact assessments. Opportunity to capture technical requirements of future solutions, and explore how elements such as Open Data or Standardised Data Models may work in the system

3. Determine viability

Seek advice on legality of each option (e.g. GDPR), identify the required governance model (inc. who hosts the data) and develop a cost-model

Indicative activity roadmap

To determine which is the preferred option, further research is needed to analyse consumer needs, governance models and the legal regulatory landscape. The following high-level roadmap focuses on delivering service design phase 2 outcomes.

Focus areas	Weeks 1-3	Weeks 4-6	Weeks 7-9	Weeks 10-12	Deliverables
1. Consumer insights analysis	Identify & segment users Review available research (e.g. SRA consumer analysis)	Conduct user research and interviews	Develop and test user personas, requirements and target experience		✓ Consumer and stakeholder needs assessed ✓ Understood & agreed goals, purpose and service vision ✓ Target consumer experience and value proposition defined ✓ Requirements captured
2. Understand technical requirements & data model options	Technical register review and standardisation opportunity assessment (inc. 'Can you trust your legal advisor?' tool)		Consumer research to inform Identify technical requirements (inc. what information should be standardised across regulatory bodies)		✓ Understanding impact of standardisation across bodies & opportunities for common data models and open data access ✓ Report identifying information to be standardised across regulatory bodies
3. Determine viability	Assess legal viability of digital solutions		Develop the governance model, high-level delivery implications and cost model for each option*	Select preferred option	✓ Preferred option selected ✓ Assessed viability of selected options

*Activity to continue into phase 3.

05

Appendix

Structure of the appendix

5A. Glossary of Terms

Glossary of key terms

- **Register:** A register is a database or ledger that contains information about a particular set of entities, such as people, organisations, or assets.
- **Centralised Register:** A centralised register is a register that is controlled by a single authority, such as a single regulatory body or a third party corporation.
- **Decentralised Register:** A decentralised register is a register that is distributed across a network of computers, with no single entity controlling it. That is, each individual register is owned by each regulator.
- **Information Directory:** A web based tool (website) that provides users with a list of resources, such as websites or companies, that are relevant to the topic or subject. Users can browse the directory by category or subcategory and can usually search for specific resources using keywords.
- **Digital Portal:** A web based tool (website) that acts as a gateway to a range of resources and services on the internet. Portals are designed to be a one-stop-shop for users, providing easy access to a range of resources and services from a single location.

5B. Information Collected by Legal Regulatory Bodies

The SRA's registers

The SRA is the regulatory body for solicitors in England and Wales. It sets the standards for solicitors, oversees their training and education, and handles complaints about their conduct. The SRA operates 4 registers, as follows.

1. Solicitors Register

- **Purpose:** The definitive impartial source of information about the law firms and people regulated by the SRA. Consumers can ascertain whether somebody is a solicitor and find where they work; check whether the SRA regulates a law firm; check for firms the SRA has closed down and people they have prohibited from practising as a solicitor
- **System used:** "MySRA," which is a web-based and cloud-based platform that allows solicitors and law firms to manage their regulatory requirements and access information about their regulatory status

2. Solicitor Check

- **Purpose:** Used to check whether a solicitor has a condition imposed on their practicing certificate or has been otherwise subjected to a regulatory decision.
- **System used:** Using the "MySRA" platform, the search tool allows you to search by types of outcome, which include the individual regulatory decisions

3. Waiver Register

- **Purpose:** Contains a list of the SRA's waiver decisions, including those that have been approved and those that have been refused.
- **System used:** Uses the "MySRA" web-based and cloud-based platform

4. ABS Register

- **Purpose:** The ABS register is a register of Alternative Business Structures (ABS) maintained by the SRA. It is a public database that contains information about all ABSs that have been authorised to operate in the UK (e.g. the name and contact information of the ABS, date it was authorised, and any conditions on its authorisation)
- **System used:** The SRA maintains the ABS register using its own internal database systems and tools

We have provided a summary of the data captured under each register on the following slides.

The legal services sector: SRA’s Solicitor’s Register (slide 1 of 3)

Solicitors register					
Condition	Decision	Engagement	Office		
Reference to the organisation affected	Reference to the organisation affected	Reference to the office at which the person is engaged	Postal correspondence address, line 1 or building name and number	Email address	Postcode
Reference to the person affected	Reference to the person affected	Reference to the organisation at which the person is engaged	Postal address, line 2	Flag indicates that this address is the organisation's main practice address	SRA number
Date when the condition became (or will become) effective		Flag indicates whether this engagement represents the person's main practice	Postal address, line 3	Flag indicates that the address is in the UK	Telephone number
Reference to the type of condition imposed		Reference to the person engaged	Postal address, line 4	Organisation name associated with this office (not always the same as the head office name)	Postal town
Ful description of the condition imposed		Date when the engagement started	Country	Office type (head office, branch office or registered office)	Website URL
Relative display sequence			County (UK) or state, etc (overseas)	Reference to the organisation to which the office belongs	

The legal services sector: SRA's Solicitor's Register (slide 2 of 3)

Solicitors register

Organisation			Other name	Permitted activity
Date of the organisation's current authorisation	Constitution of the organisation	Reference to the regulatory body which authorises the organisation (for legal activities)	Date when the name ceased to be used. Null indicates that it is still open.	Reference to the reserved legal activity type authorised
Current status of authorisation	Flag indicates that the organisation has told us that it no longer trades (and the date has passed)	SRA number	Historic authorised name, current or historic trading name, or current traditional name of the recognised body	Reference to the organisation authorised to carry out reserved legal activity type
Date when authorisation status became effective	Authorised name		Reference to the type of name represented	
The basis on which the organisation has been authorised	Reference to the org's broad classification		Reference to the organisation employing the name	
Registration of charity at the Charities Commission	Orgs's type as defined for API		Date when the name became effective	
Registration of LLP or company at Companies House	For a freelance practice only, reference to its owner			

The legal services sector: SRA's Solicitor's Register (slide 3 of 3)

Solicitors register

Person			Role	Website	Work Undertaken
Date when admitted to the roll (AEW) or registered by SRA (REL, RFL)	Full name, without title or postnominals	Reference to type of prohibition (RD025)	Reference to the engagement through which a person carries out the role for an organisation	Reference to the organisation that owns the site	Reference to the organisation reporting the work
Current status of authorisation	Surname	Reference to the regulatory body which authorises the person	Reference to the type of role performed	Website URL	Reference to the area of work reported
Date when authorisation status became effective	Middle name(s) or initial(s)	SRA number			
Reference to the basis on which a person is authorised to practise	Date when the latest practising certificate (or equiv: REL, RFL) expired or was suspended				
Forename	Date when the current or latest practising certificate or equiv became effective				
Reference to the basis on which a freelancer can practise	Person's type as defined for API				

The legal services sector: SRA's Solicitor Check

Solicitor Check	
Condition	Decision
Brief description of the condition imposed	Date when the decision was recorded
	Reference to the type of decision
	Brief description of the decision made
	Full description of the decision made
	Reference to the type of outcome of the decision
	Date when the decision was, or is to be, published

The legal services sector: Waiver Register

Waiver Register	
Decision	Organisation
Summary of the exemption granted	Reference to the organisation granted the exemption
Details of the exemption granted	
Reference to conditions imposed on the exemption	

The legal services sector: ABS Register

ABS Register

Condition	Decision	Organisation	Permitted Activity
Reference to the terms and conditions of authorisation of the licensed body	Details of the exemption granted to the licensed body	Name of the licensed body	Reference to the reserved legal activity type authorised for the licensed body
	Date on which authorisation as a licensed body effective	Name of the licensed body's head of legal practice	
	Date on which authorisation as a licensed body granted	Name of the licensed body's head of finance and administration	
		Reference to whether licensed body is a quote company or a subsidiary of a quoted company	

The legal services sector: Summary of the information captured on individuals by all regulatory bodies excluding the SRA

The following table captures a summary of the data that the regulatory bodies (excluding the SRA) collect and make publicly available about individuals, such as individual solicitors, barristers and notaries.

	Title	Individual's name	Entity or employer	Trading name	Postal address	Head office address	DX	Fax	Work phone	Work email	Work website	Membershi p / ID no.
BSB												
CRL												
CLC												
CLSB												
Faculty Office												
ICAEW												
IPReg												

The legal services sector: Summary of the information captured on individuals by all regulatory bodies excluding the SRA

The following table captures a summary of the data that the regulatory bodies (excluding the SRA) collect and make publicly available about individuals, such as individual solicitors, barristers and notaries.

	Practice Right / Approved Manager / Compliance Manager / Licence type	Practicing certificate validity period / Authorisation valid date / date joined register	Conditions on practicing certificate	Date of call	Qualification (e.g. Higher Court Litigation) / specialist practice	Disciplinary finding-in accord disclosure policy	Practice area authorised	Role in entity	Languages
BSB									
CRL									
CLC									
CLSB									
Faculty Office									
ICAEW									
IPReg									

The legal services sector: Summary of the information captured on entities by all regulatory bodies excluding the SRA

The following table captures a summary of the data that the regulatory bodies (excluding the SRA) collect and make publicly available about authorised entities, such as law firms.

	Title	Contact name at entity	Entity name	Trading name	Offices	Postal address	Head office address	DX	Fax	Work phone	Work email	Work website	Membership / ID no.	Practice Right / Approved Manager / Compliance Manager / Licence type
BSB														
CRL														
CLC														
CLSB*														
Faculty Office*														
ICAEW														
IPReg														

*** These regulators do not regulate entities**

The legal services sector: Summary of the information captured on entities by all regulatory bodies excluding the SRA

The following table captures a summary of the data that the regulatory bodies (excluding the SRA) collect and make publicly available about authorised entities, such as law firms.

	Practicing certificate validity period / Authorisation valid date	Firm regulated / by whom	Specialist practice area / Authorised to conduct following reserved legal activities	Practice area authorised	Practice area (not reserved activities)	Role in entity	Practising status	If Registered Body	If ABS / Licensed Body	Cancellation	Disciplinary	Company registration number (i.e. Companies House)	Ownership structure (e.g. Ltd; LLP)
BSB													
CRL													
CLC													
CLSB*													
Faculty Office*													
ICAEW													
IPReg													

*** These regulators do not regulate entities**

5C. Stakeholder Engagement List

Stakeholder engagement: Workshop attendees & stakeholder interviews

The following is a list of stakeholders we engaged to provide comment and input into the options assessment workshop report.*

Name	Organisation	Engagement
Aisling O'Connell	Legal Services Board	Workshop
Margie McCrone	Legal Services Board	Workshop
Wilf White	Bar Standards Board	Workshop
Henry Fingerhut	Bar Standards Board	Workshop
Paul Martyn	Bar Standards Board & Bar Council	Workshop
Neil Turpin	Faculty Office	Workshop
Jane Malcolm	Solicitors Regulation Authority	Workshop
John Rieger	Solicitors Regulation Authority	Workshop
David Pope	CILEx Regulation	Workshop
Nicola Beard	Institute of Chartered Accountants in England and Wales	Workshop
Jacqui Connelly	Costs Lawyers Standards Board	Stakeholder interview
Fran Gillon	Intellectual Property Regulation Board	Stakeholder interview
Liz Owen	Legal Services Consumer Panel	Stakeholder interview
Lola Bello	Legal Services Consumer Panel	Stakeholder interview

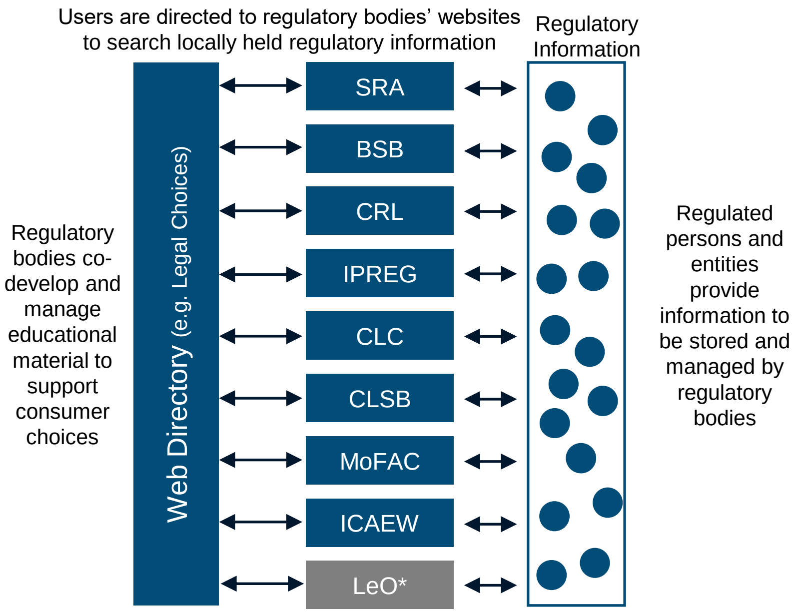
*Note: The Council for Licenced Conveyancers were unable to attend the workshop or a subsequent meeting during the timeframe of the work.

5D. Options Assessment Workshop Activity Outputs

Option 1: Directory & Decentralised Registers Workshop Notes

Option 1, Directory & Decentralised Registers: Utilising a central directory to access decentralised information sets

Providing directory services to regulatory bodies' hosted registers to act as a comprehensive directory of where to access regulatory information. This includes appropriate information from all regulatory bodies and in effect already exists.



*LeO is not a regulatory body, but it will contribute to the digital solution.

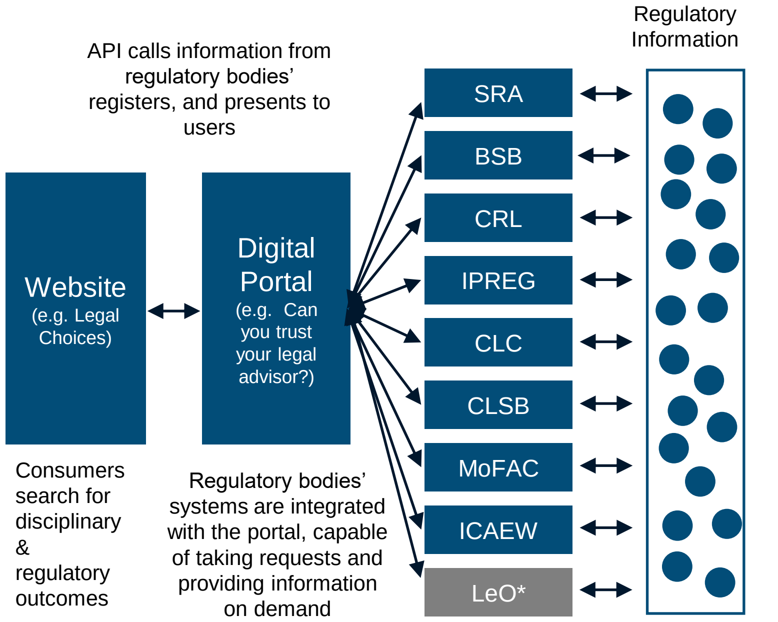
The following points are captured from our discussion

Category	Comments
Legal & policy compliance	• This option is not within the spirit of the CMA recommendations, which focuses on consumers preferring a single source of information
Security risk	• Low risk option as it would be up to each individual regulatory bodies to meet standards
Change complexity	• Easy to implement as it already exists, but it assumes that all information across all regulatory bodies is good quality • There would be work needed to standardise how each regulatory body displays its regulatory information (e.g. having the same level of contextual information across registers)
Scalability	• Limited flexibility to adopt intelligent future solutions (e.g. AI)
Relative cost	• Lowest cost option
End-consumer benefit	• Going to regulatory bodies' websites helps consumers see more valuable (consumer focused) information, not just the specific regulatory information they are searching for. More information and context is given in each individual domain • Consumers need to know what they are searching for. It is difficult if the consumer does not have baseline information / understanding • It works today (via Legal Choices) and is a 'good enough' starting point • This solution does not help consumers compare legal services (i.e. it does not support choice)
Regulatory bodies benefits	• Regulatory bodies can give a personalised domain experience, but only after the point a consumer knows their needs
Other comments	• There is a need to review what local, domain-led search tools are available • Digital comparison – we need to consider how we simplify data journeys (option agnostic) • Further analysis can be conducted on the EU-led solution, which forms a hybrid of Option 1 & Option 2

Option 2: Digital Portal Workshop Notes

Option 2, Digital Portal: Iterate on the ‘here and now’: Single source access to multiple information sets

A digital platform to provide a single point of access to multiple decentralised registers. Regulatory information is hosted and managed by regulatory bodies and access is made available on demand, via the portal. ‘Can you trust your legal advisor?’ is an example of this and should be explored along with other portal solutions.



*LeO is not a regulatory body, but it will contribute to the digital solution.

The following points are captured from our discussion

Category	Comments
Legal & policy compliance	• ‘Can you trust your legal advisor?’ is a good first step, and will be iterated in Legal Choices’ next 3 year plan. However, we need to understand that regulatory bodies are different and have different requirements (including legal requirements) • All regulatory bodies, except one, agree that this tool meets all legal and policy requirements. The one that does not agree says it does not have the right corporate structure • As a decentralised tool there is some consumer difficulty in use
Security risk	• No discussed
Change complexity	• Medium level of complexity. It builds on an existing solution and does not require the portal to be changed or adapted every time a regulatory body wants to input information • Needs to be clear what service each legal professional is able to offer (what is the legal professional regulated for and what are the regulated benefits) • Difficulty in standardising information across regulatory bodies when by nature information is different (trade off between ease of use and quality of information) • Assumption that all regulatory bodies have all the information that consumer may require already. We may need some work to understand what consumers require and adapt what is captured accordingly
Scalability	• The existing portal on Legal Choices has always been intended as a scalable starting point with a view to future development to include a much wider range of regulatory information
Relative cost	• More expensive than option 1, less than option 3 • Tool is already working at moderate cost

Option 2: Digital Portal Workshop Notes

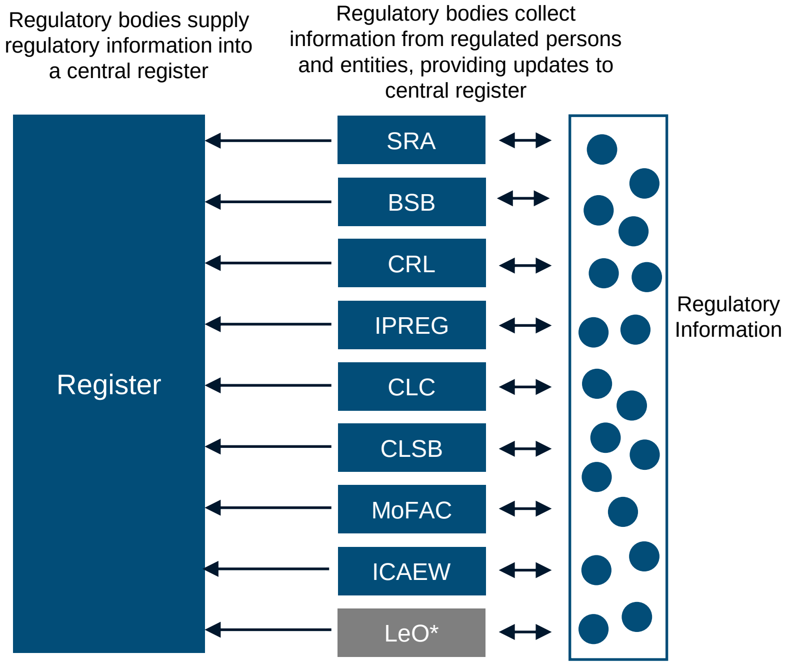
Category	Comments
End-consumer benefit	• Having all information in a central place provides better access to justice. • Solution provides ease of navigation and allows you to show that different regulatory bodies do things in different ways • We need to understand consumer behaviours and needs before developing the solution. A key next step is to understand what information and product features consumers (incl. legal professionals) want? • Interface can be presented in a standardised, easy to use format (making it easy to compare information) • Hard to define all qualitative benefits until user testing is conducted
Regulatory body benefits	• It could be considered a detriment to regulatory bodies as its money spent. But the ultimate priority is end-consumer benefit
Other comments	• Can a portal include information on what each individual lawyer wants to be instructed for (as they will not want consumers calling them for matters not in their purview)? • Could we integrate AI into the portal to help search functionality? • The platform needs to be searchable. Consumers may not know exactly what they want, so we need to make it easy for them to navigate and understand what they might be looking for

Option 3: Centralised Register Workshop Notes

Option 3, Centralised Register:

Consolidating information into a single interrogatable system

A register of registers, consolidating regulatory information collected by regulatory bodies, and stored in a centrally managed system. Consolidated regulatory information is searchable on demand.



*LeO is not a regulatory body, but it will contribute to the digital solution.

The following points are captured from our discussion

Category	Comments
Legal & policy compliance	• Need advice on GDPR and how data is controlled
Security risk	• Not discussed
Change complexity	• Data quality concerns if the source is not the regulatory body. Can we ensure that information will be updated on a regular cadence (e.g. hourly or daily updates) • We need to conduct user testing and then understand the scale of change. For example, how many people / resources from the Legal Services Board and regulatory bodies are needed to implement this? • Need to understand how a centralised register would run and the different degrees of change required across regulatory bodies • Moving towards a shared data model will require significant mapping and standardisation. This has both back-end and front-end implications
Scalability	• Possible to make the solution future proofed (such as integrating it with AI) • Standardised information is important and highly desirable to be able to scale, but how do you get there? Do we use data templates? • There are specific fields that relate only to some regulatory bodies, meaning there is a limit on what information can be standardised
Relative cost	• Likely to be the most expensive option
End-consumer benefit	• If consumers are not clicking onto individual websites and registers, they do not get the 'value add' content on those websites • Hypothesis that people miss out on value added content on individual regulatory body websites (people come for breakfast, then get a free lunch). However, the SRA tested this. They tried to drive consumers out of their register to value add content on the website and there was very little uptake. It showed that on the 'choice journey', people were on a mission find specific information

Option 3: Centralised Register Workshop Notes

Category	Comments
End-consumer benefit	• Consumer can be sceptical of the data source and its reliability. Does a central register reduce data reliability? • Legal Choices found in user testing with asylum seekers that they would seriously question / doubt information not provided either by the NGO they were served by or by GOV.UK. This / other evidence suggests a single register should be on the GOV.UK domain to have authority / credibility with consumers. • Data standardisation is not necessarily in the consumers' interests. Different legal service providers need to offer different types of information • Doubt as to whether the benefits of a single digital register outweigh the downsides for the 'uninformed' consumer. There are risks associated with instructing a lawyer to do something when the client / consumer themselves might not really know what they need their lawyer to do for them.
Regulatory body benefits	• Loss of traffic to their websites which have value add content and contextualises information • Data fields are not standard and regulatory bodies have different types of information. This will cause an undue burden on smaller regulatory bodies who will have to dedicate resource to consolidate, change and standardise data (and this could be a repeated burden if there is a need to change how data is captured and displayed on a regular basis)

Other comments	• Governance model: How regulatory bodies agree to be part of this is a consideration for any tool for the future
	• Need to consider who will own the data (the LSB or a third party)
	• Context vs ease of use (like for like comparison is difficult and being reductive is to the detriment to the quality of service) –
	• Are we prioritising ease of use and simplification over quality of service? Having a central register means that:
	    • Consumers are less likely to go to individual regulatory bodies' websites and get additional information that they need
	    • Information becomes oversimplified, which can mean users need a higher degree of legal knowledge in order to understand information and its context
	• The models are not mutually exclusive – we could opt for a combination.
	• Limit to how much we can standardise information without losing important pieces of information
	• If the register is intended simply to allow the consumer to check that the lawyer they are wishing to instruct is properly regulated, then a single register makes some sense. However, if it is intended to assist consumers to find a lawyer to instruct then that is a different function and one which a single register might not be best placed to do

Bringing Ingenuity to Life.

About PA.

We believe in the power of ingenuity to build a positive human future.

As strategies, technologies, and innovation collide, we create opportunity from complexity.

Our diverse teams of experts combine innovative thinking and breakthrough technologies to progress further, faster. Our clients adapt and transform, and together we achieve enduring results.

We are over 4,000 strategists, innovators, designers, consultants, digital experts, scientists, engineers, and technologists. And we have deep expertise in consumer and manufacturing, defence and security, energy and utilities, financial services, government and public services, health and life sciences, and transport.

Our teams operate globally from offices across the UK, Ireland, US, Nordics, and Netherlands.

PA. Bringing Ingenuity to Life.

Discover more at paconsulting.com and connect with PA on LinkedIn and Twitter

Corporate Headquarters

10 Bressenden Place
London
SW1E 5DN
+44 20 7730 9000

paconsulting.com