

| Investigation and Enforcement Continuous Improvement Action plan                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                               |                                                                                                                                                                      |                                           |                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                   |
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| What was the problem?                                                                                                                                                                                                                                                                             | Current position                                                                                                                                                                                                                              | Action                                                                                                                                                               | Date                                      | Delivery status | Expected position                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Evaluation of progress                                                                                                                                                                                                            |
| <p>The time taken to resolve investigations increased during the COVID pandemic and at times were not acceptable.</p> <p>There have been issues with the quality of decision making in our enforcement casework.</p> <p>Adequate and timely communications with parties needs to be improved.</p> | Over 10,000 complaints received pa, with around 1800 referred for investigation.                                                                                                                                                              | Increase resource across Directorate resulting in an increase from 195 FTE in July 2022 to 236 by October 2023.                                                      | All new starters in place by October 2023 | On track        | <p>By June 2024:</p> <ul style="list-style-type: none"> <li>Meet the following KPIs: <ul style="list-style-type: none"> <li>overarching investigation stage KPIs of 93% of investigations concluded within 12 months; 95% within 18 months; 98% within 24 months.</li> <li>80% of initial assessments completed within 2 months</li> <li>70% of investigations closed within 10 months from assessment</li> </ul> </li> </ul> <p>Investigations over 24 months old - 82 (c.50% reduction from July 2023)</p> <p>Case holdings by Investigation Officer reduced from a maximum of 40 to 25 by October 2023.</p> <p>Reduction in upheld complaints about delay and communication in annual report for year ending October 2024.</p> <p>Results of customer satisfaction survey in 2024 to monitor communication with parties.</p> | <p>KPI performance and aged case figures to be reported to board quarterly as part of standard performance pack.</p> <p>Interim progress report in January 2024 on implementation of new arrangements and training programme.</p> |
|                                                                                                                                                                                                                                                                                                   | KPI performance as of June 2023:                                                                                                                                                                                                              | Introduce simplified, documented processes and procedures to remove inefficiency and unnecessary delays and increase consistency.                                    | July 2023                                 | Complete        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>Overarching investigation stage KPIs: 94% against KPI of 93% of investigations concluded within 12 months; 96% against KPI of 95% within 18 months; 97% against KPI of 98% within 24 months</li> </ul> | Produce targeted guidance on addressing common causes of delay (non-cooperation from third parties, seeking expert evidence, and investigating multiple complaints). | July 2023                                 | Complete        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>87% against KPI of 80% of initial assessments completed within 2 months</li> <li>66% against</li> </ul>                                                                                                | Introduce new process, guidance, and templates to address urgent and immediate risk through interim conditions.                                                      | July 2023                                 | Complete        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                               | Introduce new case management system functionality to manage tasks, and improve management oversight. This will include triggers                                     | July 2023                                 | Complete        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                   |

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|  | <p>KPI of 70% of investigations closed within 10 months from assessment</p> <ul style="list-style-type: none"> <li>100% against KPI of 80% cases lodged within 20 weeks post referral to the SDT</li> </ul> <p>Aged cases:</p> <ul style="list-style-type: none"> <li>162 cases at 24 months or older as of July 2023</li> </ul> <p>Complaints for year ending October 2022 (annual report):</p> <ul style="list-style-type: none"> <li>56 (c. 50%) of complaints about delay relating to investigations reported as justified.</li> <li>54 complaints about communication in our</li> </ul> | for regular and deep dive case and to track compliance.                                                                                                                                                                                                       |                                                                 |          |  |  |
|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Set new service levels for milestones in an investigation, and introducing requirement for bespoke timelines to attach to activities in Investigation Plans - giving clear expectations on how long each stage of an investigation should take.               | July 2023                                                       | Complete |  |  |
|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Develop staff training programme for new and existing staff with more structured and ongoing programme of learning and development to continually improve skills and knowledge, and a focus on case analysis, effective case progression and avoiding delays. | Training developed and delivered for existing staff - June 2023 | Complete |  |  |
|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Model KPIs based on enhanced management information to enable more nuanced targets for aged cases                                                                                                                                                             | January 2024                                                    | On track |  |  |
|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Introduce formal buddying system                                                                                                                                                                                                                              | January 2024                                                    | On track |  |  |
|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Introduced templates for                                                                                                                                                                                                                                      | July 2023                                                       | Complete |  |  |

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|  | <p>investigation work reported as justified (69% of total upheld communication complaints).</p> <p>File reviews have shown: investigations could be improved by having clearer analysis, reasoning and focus; our case management system is not being used to its full potential, and there can be inadequate communication with parties.</p> | Investigation Plans and Notices supported by guidance on case analysis, with mandatory manager review and/ or lawyer sign off to improve                                 |               |          |  |  |
|  |                                                                                                                                                                                                                                                                                                                                               | Created new easily accessible “knowledge bank” repository, providing a single source of truth on technical and process issues.                                           | July 2023     | Complete |  |  |
|  |                                                                                                                                                                                                                                                                                                                                               | Improvements to assessment process including dedicated legal resource for complex complaints and updated threshold test.                                                 | November 2023 | On track |  |  |
|  |                                                                                                                                                                                                                                                                                                                                               | Introduce specific guidance on communicating with parties. This makes clear the standard of service parties should receive and when they should be contacted by the SRA. | July 2023     | Complete |  |  |
|  |                                                                                                                                                                                                                                                                                                                                               | Update template letters so they are clearer and easier to understand, automatically pre-populated with key information.                                                  | July 2023     | Complete |  |  |
|  |                                                                                                                                                                                                                                                                                                                                               | Introduce improved case management system                                                                                                                                | July 2023     | Complete |  |  |

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|  |  | functionality to trigger frequent contact (with an upper limit of 3 months from the previous contact) and monitor compliance.                          |               |          |  |  |
|  |  | Improve website content for complainants to provide support to those making complaints and give clarity on the information to assist an investigation. | December 2023 | On track |  |  |