

Section 32 LSB Directions

Progress Report

Reporting period: 30 May – 29 August 2025

Report submission date: 29 August 2025

RAG Ratings

	Step complete
	On track for completion by implementation date
	At risk of missing implementation date
	Step is overdue past the implementation date

Executive summary

There were four steps due for delivery in this reporting period (30 May – 29 August). These were –

- **1. Governance**
 - Requirement 1(a)(i) – Step 1
- **2. Risk**
 - Requirement 2(a)(iii) – Step 1
 - Requirement 2(a)(iv) – Step 1
- **6. Supervision: Pre-intervention procedures**
 - Requirement 6(a)(i) – Step 1

These steps have all been delivered and are shown as 'complete' in the report below.

We remain on track for delivery of all future steps, and do not need to raise any issues or requests for change at this point.

In the next reporting period (30 August – 29 November 2025) there are 17 steps due for delivery. These are –

- A review of our regulatory impact assessment (RIA) processes, templates and guidance (*1aii step 1*) and our evaluation arrangements (*1aii step 3*)
- A review of our significant governance and regulatory decision record keeping processes (*1aiii step 1*)
- Board approval of our Harms Framework (*2ai step 2*)
- Implementation of processes for documenting and scoring market risks in the RMF (*2av step 1*)
- A review of our internal reporting mechanisms for RIF (*2av step 2*)
- Authorisation: finalising policy position and proposed solution. Draft proposed rule changes. Board approval to consult on rule changes (*3ai steps 1 and 2*)
- Client money: finalising policy position and proposed solution. Draft proposed rule changes. Board approval to consult on rule changes (*4aii steps 1 and 2*)
- Sale, merger and acquisition: develop initial policy options, identify any rule changes required. Board approval to consult on rule changes (*5ai steps 1, 2 and 3*)
- Amended intervention plan to capture considerations of interim measures / regulatory tools at onset of investigation (*6ai step 3*)
- Creation of interim measures / regulatory tools to capture considerations following progression of investigation. (*6ai step 4*)
- Template wording amended to reflect previous considerations of interim measures / regulatory tools and guide decision makers on alternative options to intervention (*6ai step 5*)
- Work instructions drafted on creation, use, and monitoring of compliance plans (*6aii step 6*)

1. Governance

Put in place governance changes that deliver demonstrable improvement in regulatory effectiveness and efficiency. These changes must result in a regulatory approach that better protects and promotes the public interest and the interests of consumers and promotes and maintains adherence to the professional principles.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
1(a)(i) demonstrate improved Board-level oversight of regulatory risk and intelligence activity, including through a clear reporting cycle to the SRA Audit and Risk Committee and Board, which also allows for the appropriate escalation of risks,	- Within 12 months, focused on the regulatory objectives including consumer protection and the public interest, we will have: - Embedded relevant governance structures, involving appropriate Board oversight and an agreed cadence of regular reporting from the Risk and Intelligence Framework (RIF) through to Audit and Risk Committee (ARC) and Board. This will incorporate existing Risk Management Framework (RMF)	1. Board to agree clear regular reporting cycle to ensure overview of RIF activities.	1. By end of July 2025	At a workshop session in early July the Board discussed proposed amendments to our reporting arrangements. These were subsequently agreed by email with the Board on 29 July. This agreement will be minuted at the September Board meeting. The agreed reporting cycle comprises of - - Reporting on Strategic Risks to the Board three times per annum as part of the risk update. - The Mid-Tier Risks will be presented three times per annum to ARC. - Any new Mid-Tier or Strategic Risks will be shared with ARC between meetings for visibility. Any significant new risks will be notified to the Board immediately in line with escalation criteria being developed. - At each ARC meeting, there will be a summary of Risk and Intelligence Framework (RIF) topics discussed, with a focus on those taken for further development or action. - ARC reports to the Board following each meeting. These reports will always include any new and noteworthy entries/ shifts/developments in the risk environment. - The draft Market Risk Assessment will be presented to ARC and then to the Board for approval on an annual basis. Any significant updates thereafter will be presented to ARC with at least an annual review taking place. - An annual review paper will be prepared for ARC around lessons learned and the development of the RIF. This will include actions captured in the	

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	• Reviewed approaches and implemented updated, proportionate (i.e. not necessarily applying to every decision/action) procedures in respect of (a) regulatory impact assessments; (b) recording key decisions; and (c) evaluation of regulatory effectiveness.			RIF process being evaluated for effectiveness and learning lessons, creating a feedback loop, e.g. where we took a decision to undertake visits to firms, we could report on the issues identified and actions taken following those visits. This will then be shared with the Board with any significant issues discussed.	
		2. Improvements include oversight of RIF arrangements (i.e. reports on the processes adopted, including trials of embedded intelligence staff), updates to the RMF so that Mid-tier Risk Register (MRR) explicitly cover market risks, and regular ARC review of MRR.	2. By end of December 2025	• The RMF has been updated and submitted to the Audit & Risk Committee for approval on 2 September. • The MRR explicitly covers market risks, with their own scoring mechanism that has been developed. • One risk and intelligence analyst has been embedded into AERT to support operational teams to identify market risk and use the Harms Framework. Three additional embedded risk and intelligence analysts are being recruited.	
1(a)(ii) implement procedures to assess the impact of regulatory decisions on the public and consumers, and to enable evaluation of the SRA's regulatory effectiveness generally, and		1. Review and revise as necessary guidance, templates and desk notes on regulatory impact assessments (RIAs), including around incorporating lessons learnt from previous regulatory changes and our assessments of them.	1. By end of November 2025	We have started our review with a mapping exercise, and we are exploring using independent external expertise to complete the review and identify potential enhancements.	
		2. Implement updated regulatory impact assessment	2. By end of April 2026	This work will begin after the arrangement changes are identified through step 1.	

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Requirement	Headline actions	Steps	Implementation date	Progress	RAG
1(a)(iii) ensure consistent, accurate and timely records of all significant governance decisions and regulatory decisions are kept and maintained.		arrangements, including training. The arrangements will reflect lessons learnt from evaluations.			
		3. Review and revise evaluation arrangements within the SRA, including how lessons learnt can be fed back into the decision-making process (we will build on a tiered system to undertaking evaluations. Our arrangements will be proportionate – for example they may include a mix of set-piece evaluations for large-scale regulatory programmes and dip sampling of effectiveness of smaller regulatory actions).	3. By end of November 2025	We have begun reviewing our existing approach to evaluating the effectiveness of regulatory decisions.	
		4. Implement evaluation arrangements.	4. By end of April 2026	The implementation of enhancements to our evaluation arrangements will be dependent on the outputs of Step 3.	
		1. Review arrangements for ensuring consistent, accurate and timely records of all significant governance decisions and regulatory decisions are kept and maintained.	1. By end of November 2025	We have started our review of governance and regulatory decision recording processes, templates and guidance with a deep dive into our current arrangements.	

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Requirement	Headline actions	Steps	Implementation date	Progress	RAG
		2. Improve record keeping arrangements and training/guidance as required.	2. By end of April 2026	The improvements to our regulatory decision recording processes will be identified through Step 1 and delivered following the completion of that step.	

2. Risk

Strengthen risk functions and market intelligence to ensure a proactive and integrated approach to identifying and responding to risk across the legal sector.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
2(a)(i) establish and embed a framework for the ongoing, proactive identification and assessment of risks to consumer interests and the public interest, including those arising from firm structures,	- Within twelve months, focused on the regulatory objectives including consumer protection and the public interest, the SRA will have: - Tested, evolved and embedded a strategic approach to risk identification and management. No approach can identify every risk, but this approach will: - Gather insights from across the organisation, and externally, which will allow 'bottom-up' intelligence to be captured and marshalled	1. Deliver proactive and integrated approach to identify and respond to risks. Although it won't identify every risk, by linking to our evolving harms framework, we will be in a stronger position to identify and understand the potential impact of the most important risks. Our supporting work will be focused on spotting patterns, sharing information, and supporting evidence-based decision making. Our new RIF is already in place.	1. Already in place, but we will continue to evolve our approach – see further steps	We already have our current Risk and Intelligence Framework in place but see updates on further progress below.	
		2. Board to agree Harms Framework, covering all Regulatory Objectives including the impact on consumer interests and the public interest	2. By end of September 2025	We have updated draft materials on identifying and understanding harms to feed into our Risk and Intelligence Framework – these will go to ARC in September.	
		3. Review of Risk and Data Operating Model.	3. By end of March 2026	The design and implementation of the future state Risk and Data Operating Model has been set up as a project under the Risk and Data Programme. A Business Design specialist has been recruited and onboarded in August 2025 who will lead on the review of our Risk and Data Operating Model.	

2. Risk

Strengthen risk functions and market intelligence to ensure a proactive and integrated approach to identifying and responding to risk across the legal sector.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
	- Enable top-down, strategic assessment to identify the key risks related to legal services - Deliver more informed, risk-based decision making.	4. Potential new Risk and Data Operating Model agreed and implemented.	4. Through 2026 (part of continuous improvement which will continue beyond the 12-month implementation period for these directions)	Any new Risk and Data Operating Model will be designed through Step 1. Agreement and implementation will follow that step.	
2(a)(ii) develop risk-based systems and procedures to proactively collect, and analyse market intelligence, including identification and assessment of risks arising from the sale, merger and acquisition of firms,	Ensured that all strands of intelligence and risk work, including Horizon Scanning, feed into a single Framework for the identification and management of risk. There will be clear, documented, intelligence flows through the SRA's RIF.	1. Establish processes for market risk assessment.	1. By end of January 2026	We have recruited a Strategic Risk Analyst who joins the SRA in September 2025. They will be responsible for developing our market risk assessment process.	
		2. Conduct market risk assessment, including reviewing risks arising from firm structures and from the sale/merger/acquisition of firms.	2. By end of April 2026	This will follow step 1.	
2(a)(iii) develop effective sharing of market intelligence and regulatory data between internal teams to support timely and efficient authorisation, supervisory and enforcement decisions,	Developed an approach for a Market Risk Assessment	1. We will revise the Terms of Reference (ToR) for the Risk and Intelligence Governance Group (RIG) to ensure all operational areas are represented at leadership level. The ToR will also be updated to reflect the responsibility of leaders to incorporate market intelligence and data within their decision making, both in	1. By end of July 2025	Updated ToR were approved on 31 July. All operational areas are now represented at leadership level, and RIG members are aware of the responsibility to ensure regulatory decision making and policy development is informed by discussions on market intelligence and data.	

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	(sometimes called a Strategic Risk Assessment) which will be an analysis of the key risks to consumers, the profession and to regulation. Developed plans for the ongoing development of RIF, including by identifying what additional tools and organisational processes are needed to continue to more effectively gather data and intelligence, identify potential risks and insights, and to address potential harm	contributing to the RIF but also in taking actions away.			
		2. To evidence this, we're suggesting that actions captured in the RIF process could be periodically revisited and evaluated for effectiveness and learning lessons, creating a feedback loop.	2. We will trial this by the end of December 2025	We intend to undertake this as part of our first annual review of the RIF process.	
		3. Risk Analysts will support the operational areas in the identification and quantification of market risks.	3. In place by end December 2025	We are in the process of recruiting new Risk Analysts who will be embedded into select operational areas. The first started on 19 th August.	
2(a)(iv) use market intelligence to inform regulatory approach and policy development, to ensure that they are effective in identifying and acting on risks, and	and organisational processes are needed to continue to more effectively gather data and intelligence, identify potential risks and insights, and to address potential harm (some of these actions cover	1. We will revise the Terms of Reference for the RIG to ensure all operational areas are represented at leadership level. The ToR will also be updated to highlight explicitly the responsibility of leaders to ensure policy making is informed by market intelligence and data.	1. By end of July 2025	The updated ToR were approved on 31 July. All operational areas are now represented at leadership level, and RIG members are aware of the responsibility to ensure regulatory decision making and policy development is informed by discussions on market intelligence and data.	
		2. Providing risk analyst support to policy development projects, as part of working / steering groups to assist with that read	2. By end of December 2025	We are in the process of recruiting a Risk Analyst who will be focused on providing direct support to policy development projects and initiatives.	

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	more than one requirement, and some requirements are met by a combination of actions – e.g. 2(a)(i) and 2(a)(ii) overlap significantly):	across from RIF and to help with analytical products.			
2(a)(v) demonstrate delivery of all of the above requirements, through internal reporting mechanisms and regular reporting to senior leadership.		1. Implement processes for documenting and scoring identified market risks in RMF .	1. By end of September 2025	The updated draft RMF, including the process for documenting and scoring market risks, is going to ARC in September.	
		2. Review internal reporting mechanisms (including reporting to senior leadership) for RIF.	2. By end of November 2025 and end of April 2026	.We will conduct an initial review of the internal reporting mechanisms for RIF by the end of November. By this point we will have agreed our harms framework and a process for documenting and scoring market risks in the RMF. A second review will be conducted by the end of April 2026.	

3. Supervision – Authorisation

Strengthen the SRA's authorisation controls to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional principles, to address the concentration of ownership, compliance and management roles in one individual.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
3(a)(i) Revise its regulatory arrangements and guidance to put in place an effective risk-based approach to protect	Within twelve months, focused on the regulatory objectives	1. Finalise policy position and proposed solution. Draft any proposed rule changes. Prepare consultation.	1. By end of October 2025	We are progressing policy development and will discuss the proposed solution with Board in October.	

3. Supervision – Authorisation

Strengthen the SRA's authorisation controls to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
consumers and the public from potential harm arising from a single individual holding more than one role in a firm or other authorised body e.g. owner, manager, compliance officer for finance and administration, and money laundering compliance officer	Where reasonably possible and proportionate, made changes to our regulatory arrangements, and / or guidance, in respect of an individual being able to hold multiple ownership, management and compliance roles to mitigate risks associated with concentration of roles held by single individuals.	2. Board approval to consult on any proposed rule changes.	2. By end of October 2025	As above. Board will consider advice on any rule change and consultation materials in October.	
		3. Consultation on any proposed rule changes.	3. Between November – December 2025	The consultation will be dependent on the outcome of Steps 1 – 2.	
		4. Evaluate consultation response.	4. Between January – May 2026	Dependent on the successful completion of previous steps.	
		5. Board agrees positions and makes any necessary rule change(s)	5. By end of May 2026	Dependent on the successful completion of previous steps.	
		6. Set initial project plan for future implementation of rules, including plan for retrospective application to those previously authorised	6. By end of May 2026	Dependent on the successful completion of previous steps.	
		7. Submit LSB application.	7. By end of May 2026	Dependent on the successful completion of previous steps.	
		8. LSB evaluation of rules change (90-day estimate)	8. By end of August 2026 (Assumes 90 days)	Dependent on the successful completion of previous steps.	

3. Supervision – Authorisation

Strengthen the SRA's authorisation controls to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional principles, to address the concentration of ownership, compliance and management roles in one individual.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
	Developed a project plan for rolling-out changes	9. Set refined project plan for future implementation of rules, including plan for retrospective application to those previously authorised	9. By end of September 2026	Dependent on the successful completion of previous steps.	

4. Supervision - Client money

Strengthen the regulation of client money to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional principles.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
4(a)(i) use an effective risk-based approach to assess the potential for consumer or market harm arising from firms' financial stability, including where appropriate through obtaining and reviewing firms' financial and accounting information, and	- Within twelve months, focused on the regulatory objectives including consumer protection and the public interest, the SRA will have: - Reviewed the harms that can flow from firms'	1. Establish and conduct review of potential harms related to financial stability of firms.	1. By end of January 2026	We are mobilising a project team to conduct a review of potential consumer or market harm from financial stability of firms. We have defined the scope of the review and are considering the use of external expertise to support in conducting the review.	
		2. Identify any relevant changes to processes and/or regulatory arrangements.	2. By end of April 2026	Potential changes will be dependent on the outputs of step 1.	
		3. Implement any internal changes.	3. Delivery date to be confirmed once review complete and changes	Dependent on the successful completion of previous steps.	

4. Supervision - Client money

Strengthen the regulation of client money to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional principles.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
	financial stability, and made proportionate changes to our arrangements as appropriate, for example potentially by updating firms' obligations to supply us with relevant information.		identified – some changes may be beyond 12-month period		
	Made changes to our regulatory arrangements and developed an implementation plan and set a go-live date for an enhanced approach to the information that is received from law firms that hold client money	4. If the review identifies changes to regulatory arrangements, then set plan for finalising policy position/proposed solution/draft rules and consultation/Board approval thereof/consultation/evaluation of responses/Board making rules/submission to LSB etc once review complete.	4. By end of May 2026	Dependent on the successful completion of previous steps.	
4(a)(ii) ensure firms have effective safeguards to protect client money.		1. Finalise policy position, proposed solution. Draft any proposed rule changes. Prepare consultation.	1. By end of October 2025	We are progressing policy development and will discuss the proposed solution with Board in October.	
		2. Board approval to consult on any proposed rule changes.	2. By end of October 2025	As above. Board will consider advice on any rule change and consultation materials in October.	
		3. Consultation on proposed rule changes.	3. Between November – December 2025	The consultation will be dependent on the outcome of Steps 1 – 2.	

4. Supervision - Client money

Strengthen the regulation of client money to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional principles.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
	- through the annual reporting accountant process including: - Intelligence that will identify firms who are not getting an annual report as required, supported by a robust monitoring process - Greater clarity about the indicators of risk to client money that it requires reporting accountants to look for and report (articulated through updated guidance and templates) - Following the completion of our "Client money in	4. Evaluate consultation response.	4. Between January – May 2026	Dependent on the successful completion of previous steps.	
		5. Board agrees positions and makes any necessary rule change(s).	5. By end of May 2026	Dependent on the successful completion of previous steps.	
		6. Set initial project plan for future implementation of rules.	6. By end of May 2026	Dependent on the successful completion of previous steps.	
		7. Submit LSB application.	7. By end of May 2026	Dependent on the successful completion of previous steps.	
		8. LSB evaluation of rules change (90-day estimate).	8. By end of August 2026	Dependent on the successful completion of previous steps.	
		9. Set refined project plan for future implementation of rules	9. By end of August 2026	Dependent on the successful completion of previous steps.	

4. Supervision - Client money

Strengthen the regulation of client money to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional principles.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
	legal services - safeguarding consumers and providing redress" consultation process, defined implementation plans for changes to controls, checks and balances around client money within law firms as appropriate				

5. Supervision - Sales, mergers and acquisitions

Introduce oversight mechanisms for firm consolidation activity to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional principles

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
5(a)(i) put in place measures to enable more effective risk-based scrutiny of firms	Within twelve months, focused on the regulatory	1. Develop initial policy options around potential risk indicators and notification requirements.	1. By end of October 2025	We are progressing policy development and will discuss the proposed solution with Board in October.	

5. Supervision - Sales, mergers and acquisitions

Introduce oversight mechanisms for firm consolidation activity to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional principles

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
undergoing sale, merger or acquisition, including where relevant ensuring that the SRA receives advance notice of such activities,	objectives including consumer protection and the public interest, the SRA will have:	2. Identify any rule changes needed, draft rule changes. Prepare consultation.	2. By end of October 2025	We are progressing policy development and will discuss the proposed solution with Board in October.	
		3. Board approval to consult on proposed rule changes that sets the environment to call in different information.	3. By end of October 2025	As above. Board will consider advice on any rule change and consultation materials in October.	
		4. Consultation on proposed rule changes.	4. Between November – December 2025	The consultation will be dependent on the outcome of Steps 1 – 3.	
5(a)(ii) proactively use its powers, including for inspection and provision of information, where sale, merger or acquisition of firms presents or may present serious risk to consumers, including to enable an informed assessment of that risk to be made, and	- Identified arrangements specifying the circumstances in which firms must notify us when they are undertaking activity that will significantly change their profile including because of sale, merger and acquisitions, and when they must notify us. - Identified arrangements and processes providing for how	5. Evaluate consultation responses.	5. Between January – May 2026	Dependent on the successful completion of previous steps.	
		6. Implement any appropriate internal process improvements.	6. By end of April 2026	Dependent on the successful completion of previous steps.	
		7. Board to agree post-consultation positions and make rule change(s).	7. By end of May 2026	Dependent on the successful completion of previous steps.	
		8. Submit LSB application.	8. By end of May 2026	Dependent on the successful completion of previous steps.	
		9. Set initial project plan for future development of policy	9. By end of May 2026	Dependent on the successful completion of previous steps.	

5. Supervision - Sales, mergers and acquisitions

Introduce oversight mechanisms for firm consolidation activity to better protect and promote the public interest and the interests of consumers and promote and maintain adherence to the professional principles

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
5(a)(iii) make alterations to its regulatory arrangements where the SRA considers existing arrangements are insufficient to carry out the above functions effectively and efficiently.	we will scrutinise the changes firms are undertaking, where proportionate, based on reported and known risk indicators. Identified an appropriate approach to prioritise our actions based on risk and indicators of risk and have clear plans for implementing changes as soon as practicable.	positions to include developing resource and expertise needed			
		10. LSB evaluation of rules change (90-day estimate)	10. By end of August 2026	Dependent on the successful completion of previous steps.	
		11. Set project plan for finalisation of policy position, future implementation and prioritisation approach to deliver changes.	11. By end of August 2026	Dependent on the successful completion of previous steps.	

6. Supervision - Pre-intervention procedures

Improve its capacity to intervene early and proportionately to prevent serious regulatory failures.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
6(a)(i) ensure its guidance for making intervention decisions and decisions to investigate concerns require the consideration of the protection and promotion of the public interest and the interests of consumers,	- Within twelve months, focused on the regulatory objectives including consumer protection and the public interest, the SRA will have: - improved our suite of templates and work instructions to provide a clearer audit trail of the evidence that is considered when making recommendations balanced against the criteria set down in legislation, case law and our rules (the grounds and test for intervention). - improved our templates to	1. Reviewed processes and guidance for decision making on whether to intervene and investigate with supporting training for staff, ensuring it properly reflects the need to consider the protection and promotion of the public interest and the interests of consumers.	1. Review completed by end of July 2025	Reviews completed: Intervention: - We have reviewed the checklist which is used when making intervention decisions where there is a shortage, and the guidance on how/when to use the checklist. We have agreed parameters for the checklist and identified what additional guidance is needed. - We have collated the full suite of training/guidance in use and reviewed which ones consider the protection and promotion of public interest. Investigations: - Training delivered and guidance updated to improve initial assessment and triage of potential investigations. - Processes strengthened with additional review of cases to assess need for investigation. - Work initiated to implement further improvements identified by the reviews completed.	
		2. Implemented identified changes for decision making process and guidance on whether to intervene and investigate with supporting training delivered for staff, ensuring it properly reflects the need to consider the protection and promotion of the public	2. Changes implemented by end of December 2025	We will roll out the updated shortages checklist by the end of August 2025. We then intend to consolidate existing training into a centralised document which highlight the requirement to consider consumer and public interests. This will go through internal review processes before being rolled out before the end of 2025. The timeline for further improvements to decision making on whether to investigate will be monitored. This is in the light of continued increased reports received by the SRA.	

6. Supervision - Pre-intervention procedures

Improve its capacity to intervene early and proportionately to prevent serious regulatory failures.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
	provide assurance that decision makers within the SRA consider the full range of regulatory tools, including conditions considered the benefits of, and provided guidance to decision makers on, interim measures to protect the public that should be considered in advance of any interventions	interest and the interests of consumers			
		3. Amended intervention plan to capture considerations of interim measures / regulatory tools at onset of investigation	3. By end of October 2025	We will draft amendments and changes to work instructions by September with full roll out by the end of October 2025.	
		4. Create interim measures / regulatory tools to capture considerations following progression of investigation	4. By end of October 2025	We have organised a series of workshops through September to identify potential measures/tools/processes.	
		5. Draft amended template wording to reflect previous considerations of interim measures / regulatory tools and guide decision makers on alternative options to intervention	5. By end of October 2025	We have organised a series of workshops through September to identify potential measures/tools/processes.	
6(a)(ii) implement measures to ensure that proportionate interim protections for consumers and the public can be applied prior to formal intervention, and	reviewed whether any alternative regulatory arrangements are needed to provide for effective interim measures	6. Draft work instructions on creation, use, and monitoring of compliance plans	6. By end of October 2025	We have organised a series of workshops through September to identify potential measures/tools/processes.	
		7. In addition, for 6(a)(ii), we will review options for additional regulatory powers as alternatives for intervention. Implementation timelines will depend on the outcome of that review.	7. Review completed by end of April 2026	We are exploring using independent external expertise to undertake the review. This will include an assessment of alternative measures used outside of the UK legal sector.	

6. Supervision - Pre-intervention procedures

Improve its capacity to intervene early and proportionately to prevent serious regulatory failures.

Requirement	Headline actions	Steps	Implementation date	Progress	RAG
6(a)(iii) improve internal procedures, templates, and decision records to ensure evidence is gathered consistently, and decisions are auditable	reviewed, and updated if appropriate, our guidance on decisions to investigate	8. Process guidance for consideration of interim conditions in all investigations	8. Already completed (the effectiveness will be reviewed in January 2026)	Process guidance in place.	
				We will commence the effectiveness review at the end of 2025.	
		9. Implement use of compliance plans as potential alternative regulatory arrangements	9. Already completed (the effectiveness will be reviewed in January 2026)	Compliance plans in place.	
				We will commence the effectiveness review at the end of 2025.	