

Business Plan and budget 2022-23

Consultation responses

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October 2022

**These respondents asked us to publish their responses and their names**

Name	Respondent type
Michael Hudson	Individual
Liam Lane	Individual
Ciaran Fenton	Individual
Jack Normington	On behalf of a firm
Mark Menhennet	Individual

**These respondents asked us to publish their names but not their responses**

Name	Respondent type
Christopher Morgan	Individual
Dawn Bowdler	Individual

**This document also includes responses from respondents who asked us to publish their responses anonymously**

# Business Plan and budget 2022-23 consultation

Response ID:11 Data

## 2. About you

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10.

**How should we publish your response?**

**Please select an option below.**

Publish the response anonymously

## 3. Consultation questions

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11.

**1) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective one of our Corporate Strategy?**

No except that I think they are sensible and relevant

## 4. (untitled)

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12.

**2) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective two of our Corporate Strategy?**

No. You know best what is appropriate Corporate Strategy

## 5. (untitled)

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13.

**3) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective three of our Corporate Strategy?**

No

## 6. (untitled)

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14.

**4) What do you think about our budget for 2022-23 and the proportion we propose to allocate to our work under each of the three objectives?**

Seems sensible

## 7. (untitled)

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15.

**5) Do you agree that the SRA proportion of the practising certificate fee is reasonable and appropriate?**

Yes I agree

8. (untitled)

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16.

6) Do you agree with the proposed Compensation Fund contribution level for individuals?

Yes I agree

9. (untitled)

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17.

7) Do you have any comments on the equality impact assessment? Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?

No

# Business Plan and budget 2022-23 consultation

Response ID:20 Data

## 2. About you

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10.

**How should we publish your response?**

**Please select an option below.**

Publish the response anonymously

## 3. Consultation questions

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11.

**1) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective one of our Corporate Strategy?**

I think there is a good variety of objectives and current issues.

## 4. (untitled)

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12.

**2) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective two of our Corporate Strategy?**

I agree that the legal sector requires a great deal of advancement in the technology field to deliver more streamlined services.

## 5. (untitled)

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13.

**3) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective three of our Corporate Strategy?**

I think one of the priorities should definitely encompass the Professional Indemnity Insurance Market. The current state of the market is having a profound impact on firms, especially the smaller practices and sole traders.

## 6. (untitled)

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14.

**4) What do you think about our budget for 2022-23 and the proportion we propose to allocate to our work under each of the three objectives?**

## 7. (untitled)

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15.

**5) Do you agree that the SRA proportion of the practising certificate fee is reasonable and appropriate?**

Yes

8. (untitled)

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16.

6) Do you agree with the proposed Compensation Fund contribution level for individuals?

Yes

9. (untitled)

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17.

7) Do you have any comments on the equality impact assessment? Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?

# Business Plan and budget 2022-23 consultation

Response ID:27 Data

## 2. About you

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9.

How should we publish your response?

**Please select an option below.**

Publish the response anonymously

## 3. Consultation questions

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10.

1) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective one of our Corporate Strategy?

Seem reasonable

## 4. (untitled)

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11.

2) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective two of our Corporate Strategy?

Reasonable approach

## 5. (untitled)

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12.

3) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective three of our Corporate Strategy?

No

## 6. (untitled)

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13.

4) What do you think about our budget for 2022-23 and the proportion we propose to allocate to our work under each of the three objectives?

Appropriate

## 7. (untitled)

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14.

5) Do you agree that the SRA proportion of the practising certificate fee is reasonable and appropriate?

Yes

8. (untitled)

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15.

6) Do you agree with the proposed Compensation Fund contribution level for individuals?

Yes

9. (untitled)

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16.

7) Do you have any comments on the equality impact assessment? Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?

No



# Business Plan and budget 2022-23 consultation

Response ID:18 Data

## 2. About you

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1.  
**First name(s)**

Michael

2.  
**Last name**

Hudson

3.  
**Please enter your SRA ID (if applicable)**

103641

6.  
**I am responding..**

in a personal capacity

7.  
**In what personal capacity?**

Solicitor

8.  
**Please enter the name of your firm/employer**

Michael Hudson

9.  
**Please specify if you are**

10.  
**How should we publish your response?**

**Please select an option below.**

Publish the response with my/our name

## 3. Consultation questions

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11.  
**1) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective one of our Corporate Strategy?**

Too much of the budget is allocated to his area of work leaving too little for the others.

#### 4. (untitled)

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12.

2) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective two of our Corporate Strategy?

No

#### 5. (untitled)

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13.

3) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective three of our Corporate Strategy?

This is better left to the market, or the Law Society; it is not the function of a regulator.

#### 6. (untitled)

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14.

4) What do you think about our budget for 2022-23 and the proportion we propose to allocate to our work under each of the three objectives?

Too much is allocated to objective 1.

#### 7. (untitled)

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15.

5) Do you agree that the SRA proportion of the practising certificate fee is reasonable and appropriate?

No, the SRA should reduce the amount spent on objective 1 and reduce, not increase, the amount of the practising certificate fee accordingly.

#### 8. (untitled)

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16.

6) Do you agree with the proposed Compensation Fund contribution level for individuals?

Yes

#### 9. (untitled)

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17.

7) Do you have any comments on the equality impact assessment? Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?

No

# Business Plan and budget 2022-23 consultation

Response ID:22 Data

## 2. About you

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1.  
**First name(s)**

Liam

2.  
**Last name**

Lane

3.  
**Please enter your SRA ID (if applicable)**

6.  
**I am responding..**

in a personal capacity

7.  
**In what personal capacity?**

Other legal professional

8.  
**Please specify**

Trainee Solicitor

9.  
**How should we publish your response?**

**Please select an option below.**

Publish the response with my/our name

## 3. Consultation questions

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10.  
**1) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective one of our Corporate Strategy?**

SQE - The SRA should consider conversion routes for those who have completed the BVC/BPTC/BPC and exemptions as it did for those qualifying under that route as it did under the LPC. This increases the potential for legal professionals to qualify as solicitors, whilst reducing cost, and therefore increasing equality, diversity and inclusion.

Para 31 - the SRA should also monitor and intervene, where appropriate, with the cost of SQE Prep courses. The associated costs damage EDI to those who lack funds to complete the course.

Para 38 - the introduction of standards at the police station will be welcomed, but careful consultation will be needed to consult all agencies involved in police station work (police, appropriate adults and solicitors/accredited reps). The responses of legal advisors should be given greater weight.

Para 49 - Disappointed to not see any mention or focus on LGBTQ+ individuals, or what is being done about neurodiversity.

#### 4. (untitled)

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11.

**2) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective two of our Corporate Strategy?**

no comment to make

#### 5. (untitled)

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12.

**3) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective three of our Corporate Strategy?**

none

#### 6. (untitled)

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13.

**4) What do you think about our budget for 2022-23 and the proportion we propose to allocate to our work under each of the three objectives?**

no comment to make

#### 7. (untitled)

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14.

**5) Do you agree that the SRA proportion of the practising certificate fee is reasonable and appropriate?**

fair

#### 8. (untitled)

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15.

**6) Do you agree with the proposed Compensation Fund contribution level for individuals?**

yes

#### 9. (untitled)

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16.

**7) Do you have any comments on the equality impact assessment? Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?**

Again, no recognition of any statistics for LGBTQ+ individuals, or consideration of any impact. There appears to be a sole focus on race and sex.

# Business Plan and budget 2022-23 consultation

Response ID:36 Data

## 2. About you

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1.  
**First name(s)**

Jack

2.  
**Last name**

Normington

3.  
**Please enter your SRA ID (if applicable)**

825943

6.  
**I am responding..**

on behalf of an organisation

7.  
**On behalf of what type of organisation?**

Representative group

8.  
**Please enter the name of the group**

The Association of Consumer Support Organisations (ACSO)

9.  
**How should we publish your response?**

**Please select an option below.**

Publish the response with my/our name

## 3. Consultation questions

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10.  
**1) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective one of our Corporate Strategy?**

The importance of setting and maintaining high standards for the profession, and the SRA generally, cannot be overstated. Solicitors, law firms and those who regulate them need to ensure they act in a way which upholds public trust and confidence in the profession.

ACSO commends the SRA's commitment to the same and does not doubt that high professional standards result in an improved service to consumers.

As highlighted in the business plan, the Solicitors Qualifying Examination (SQE) has been a major recent development in the routes to qualifying as a solicitor.

On the face of it, the introduction of the SQE will not directly affect consumers themselves. Nevertheless, given the time and money expended by such a radical development, it is vital that the implications of the SQE route are monitored carefully, specifically in relation to the cost of the SQE route for aspiring solicitors, and also the proficiency of those qualifying via the SQE route as opposed to the various other paths to qualification which now exist.

It is important that consideration be given to the different qualification routes and ensuring there is not a material difference in the knowledge and skillset of solicitors qualifying via any of those different routes. A situation whereby solicitors who have completed the SQE as opposed to solicitors who have completed the Legal Practice Course (LPC) and a Period of Recognised Training (PORT – traditionally called a 'Training Contract') - or vice versa – enter the profession better equipped than their counterparts needs to be avoided.

It is therefore important that solicitors qualifying via any of the routes receive the same, high standard of training which equips them equally with the necessary skills to carry out their duties. This, in turn, will lead to consumers receiving the same high standard of service regardless of the chosen qualification route of their solicitor. The implications of not addressing this issue will lead to a disjointed system of training.

ACSO acknowledges that the aims of the SQE route to qualification are well-placed, but it is worth reiterating the importance of ensuring both the smooth running of the same and the SRA's openness to tweaking the SQE route should it be required. ACSO understands that the SRA will review the progress and function of the SQE route over the next business year. This should be a transparent process, assessed and monitored with an open mind to ensure the best-possible standard of training is provided to solicitors.

Further, ACSO welcomes the SRA's proposal to monitor the equality considerations within SQE results and to work with disabilities groups to deliver efficient and fair reasonable adjustment processes. ACSO would add that consideration should also be made for vulnerable parties who may not be registered disabled but may instead have mental health issues or other attributes/factors which mean they would also reasonably benefit from adjustments.

Promoting overall good health and wellbeing for the profession is vital. It has long been held that the legal profession can be demanding and take its toll on health and wellbeing, therefore more could be done over the coming business year in relation to industry-wide mental health (including that of SRA employees).

A major shift to hybrid/remote working in light of the Covid-19 pandemic has left many people struggling to cope. ACSO would like the SRA, as a key regulator, to respond. Poor health and wellbeing can result in low morale, higher sick leave and bad decision-making. Consumers will feel the knock-on effects of poor health and wellbeing in the profession by way of mistakes, errors of judgement and avoidable poor outcomes.

ACSO supports the SRA's stance on anti-money laundering. The need to have systems in place to detect, monitor and prevent money laundering is essential. In addition, fraud and cybercrime are rapidly on the increase too, which means increasing awareness throughout the profession about these issues would also be prudent.

Lastly, ACSO acknowledges the SRA's sentiment in the budget about reducing the time taken to investigate complaints through improved processes. However, it should be noted that acting to prevent complaints in the first place (within reason) should be the SRA's main focus.

#### 4. (untitled)

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11.

**2) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective two of our Corporate**

## Strategy?

ACSO agrees with the SRA that the proper use of IT within the legal services sector is a crucial component of the SRA's work to improve access to justice. There has become an expectation and necessity for many legal service providers to make an efficient use of IT and innovate in a way they may not have done so before the Covid-19 pandemic. In light of this, it does appear that the civil justice system is moving increasingly online with a push towards "digital justice" .

As noted in the budget, it is also important to have an understanding of the risks involved with a greater reliance on IT. With fraud and cybercrime on the increase , care needs to be taken over the next few years as law firms deal with large amounts of cash and are likely targets of financial crime. Investing in IT and associated innovation will also require investing time and money in understanding the risks posed to solicitors and law firms in doing so.

ACSO also considers that it would be useful to listen to the views of those who are opposed to (or have difficulties with, for whatever reason), IT, and try to work with them to properly understand their concerns so that solutions can be developed.

Research has shown that around 1 in 10 people in the UK are considered to have no digital skills, with a further 2 in 10 lacking very basic digital skills. A recent government white paper also acknowledged that 70 per cent of the UK population may be classed as either 'digital with assistance' or 'digitally excluded'.

It may be that smaller firms have fewer resources to implement and trial new methods of working, which could lead to only larger law firms being able to make the most of IT developments within the sector. For the sake of the rule of law, this should be avoided to ensure that, to an appropriate degree, the needs and abilities of different sizes of firms (and their respective clientele) can be upheld and involved in any such developments.

## 5. (untitled)

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12.

### **3) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective three of our Corporate Strategy?**

Given the events of the last couple of years, the importance of anticipating and responding to change has never been more striking. It is likely that the law firms which responded best to change during the Covid-19 pandemic will have been those which were more successful and better able to serve their customers.

Noting the comments in the budget regarding analysis of the Professional Indemnity Insurance (PII) market, ACSO would point out that the legal expenses insurance (LEI) market should also be of interest to the SRA. ACSO's LEI working group monitors this area to gain more of an understanding of the LEI market, current uptake and the possible trajectory of the market over coming years. The Legal Services Board (LSB) believes most households will be furnished with LEI cover in the next 10 years. This, along with other likely future developments, would transform the legal services industry and the civil justice system more generally. It would therefore be prudent of the SRA to consider developments in the LEI market and ACSO would be very happy to assist in this regard.

Lastly, ACSO welcomes the SRA's commitment to taking the view of the community, both in person and remotely at appropriate events, and encourages the SRA to take the lead where possible as a key regulator.

## 6. (untitled)

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13.

### **4) What do you think about our budget for 2022-23 and the proportion we propose to allocate to our work under each of the three objectives?**

In the absence of a detailed analysis as to costs, ACSO is unable to provide an informed opinion on the allocation of the SRA's



budget and specific proportioning of the same.

## 7. (untitled)

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14.

**5) Do you agree that the SRA proportion of the practising certificate fee is reasonable and appropriate?**

In the absence of a detailed analysis as to costs, ACSO is unable to provide an informed opinion on this.

## 8. (untitled)

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15.

**6) Do you agree with the proposed Compensation Fund contribution level for individuals?**

The Compensation Fund is not directly applicable to ACSO's work. As such, ACSO is not best placed to provide a well-informed response here.

## 9. (untitled)

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16.

**7) Do you have any comments on the equality impact assessment? Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?**

ACSO has no comments to make.

# Business Plan and budget 2022-23 consultation

Response ID:48 Data

## 2. About you

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1.  
**First name(s)**

Mark

2.  
**Last name**

Menhennet

3.  
**Please enter your SRA ID (if applicable)**

123969

6.  
**I am responding..**

in a personal capacity

7.  
**In what personal capacity?**

Solicitor

8.  
**Please enter the name of your firm/employer**

Edwin Coe LLP

9.  
**Please specify if you are**

10.  
**How should we publish your response?**

**Please select an option below.**

Publish the response with my/our name

## 3. Consultation questions

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11.  
**1) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective one of our Corporate Strategy?**

Disappointing that the thrust of this seems to relate to compliance - improving the overall quality of legal services overall is not mentioned

#### 4. (untitled)

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12.

**2) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective two of our Corporate Strategy?**

Hard to see how this falls under regulatory/compliance at all - the emphasises should be on what is (or is not) done, not how it is done.

#### 5. (untitled)

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13.

**3) Do you have any views on our proposed activities and areas of focus for 2022-23 under objective three of our Corporate Strategy?**

This is more akin to a political objective - again how to see how this will improve legal services provision for providers or end users.

#### 6. (untitled)

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14.

**4) What do you think about our budget for 2022-23 and the proportion we propose to allocate to our work under each of the three objectives?**

Objective One should receive most if not all of budgeted expenditure

#### 7. (untitled)

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15.

**5) Do you agree that the SRA proportion of the practising certificate fee is reasonable and appropriate?**

Cannot say

#### 8. (untitled)

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16.

**6) Do you agree with the proposed Compensation Fund contribution level for individuals?**

Cannot say - this should be sufficient to compensate victims of wrongdoing.

#### 9. (untitled)

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17.

**7) Do you have any comments on the equality impact assessment? Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?**

Unclear what this is intended to achieve - an assessment alone will not change attitudes or behaviour