

SRA BOARD
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SOLICITORS REGULATION AUTHORITY
Minutes of the SRA Board meeting
held on 30 June 2025 at via Microsoft Teams

Subject to final approval by the SRA Board

Present: Anna Bradley (Chair)
Claire Bassett
Ann Harrison
Rob McWilliam
Simon Millhouse
Claudio Pollack
Lisa Mayhew
Vikas Shah
Liz Smart
Nicola Williams

In attendance: Paul Philip, Aileen Armstrong, Liz Rosser, Alex Magloire, Nimi Bruce, Kisha Punchihewa, Helen Hickling (for item 7), Dominic Tambling

1 WELCOME AND APOLOGIES

1.1 The Chair welcomed everyone to the meeting. There were no apologies.

2 MINUTES OF THE PREVIOUS MEETING ON 29 APRIL 2025

- 2.1 The minutes of the meeting on 29 April 2025 were approved as a true and accurate record subject to some minor amendments.
- 2.2 The Board asked the Executive to review the reasons for redacting some sections of the minutes and bring forward recommendations.

3 MATTERS ARISING AND DECLARATIONS OF INTEREST

- 3.1 There were no matters arising that would not be covered on the agenda. All actions due were completed or in hand. The Board received an update on risks associated with our work on EDI arising from work undertaken by the University of Exeter. A proposal was being developed which would be shared with Board members with a particular interest in this work and if appropriate the matter would be brought back to the Board for discussion.
- 3.2 Interests were as previously declared and available to view on the SRA website. Members would declare any additional particular interest in an individual item if necessary.
- 3.3 Since the previous Board meeting the Board had made one decision which was to agree the appointment of the new CEO, Sarah Rapson

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4 CHAIR'S UPDATE

- 4.1 The Board Chair noted that Board members had been involved in a lot of external meetings in recent weeks. These included Board to Board meetings with the Law Society (TLS) and Solicitors Disciplinary Tribunal (SDT) on 23 June 2025 and with the Legal Services Board (LSB) on 24 June 2025.
- 4.2 Board members had also been involved in discussions on the development of our risk and data programme and on the future of the organisation's pension arrangements as well as with Headland, which was advising us on communications.
- 4.3 Board members agreed that the meeting with the SDT had been particularly positive, with an agreement that we should engage more on matters unrelated to individual cases with the aim of delivering more efficiently and effectively.
- 4.4 The meeting with the LSB had included some positive discussion on legal services regulation and economic growth and how we might work together following a Ministerial roundtable on this subject held on 24 June 2025. The meeting had also covered bulk litigation and a further meeting would be organised to provide the LSB with a deeper understanding of our work in this area. The Board Chair had also attended a Ministerial roundtable on bulk litigation on 17 June 2025.
- 4.5 The meeting with TLS had focused on the assurances which TLS had sought from us around the Axiom Ince case. The Board noted that the Board Chair and the CEO would be attending the TLS Council meeting on 1 July 2025.
- 4.6 Board members who had gone to the SRA Innovate session in Leeds on 10 June 2025 reported that it had been well attended and received. A similar Innovate session would be held in Birmingham on 3 July 2025.
- 4.8 Board members had also attended some of the consultation events for our Business Plan and Budget for 2025/26. Feedback had generally been positive with an understanding of why we were increasing our resources to do more, but some public sector organisations had expressed concerns that they were finding it difficult to recruit suitably qualified lawyers. There had also been suggestions that the Solicitors Qualifying Examination (SQE) should explicitly cover the areas in which their organisations predominantly worked, such as housing, welfare and immigration.
- 4.9 Finally, the Board received an update on work on the plan for implementation of the Legal Services Board's directions to us following the investigation into the Axiom Ince case. It was hoped that the plan would be published within the next week. The Board had seen and commented on an earlier draft of the plan and it was agreed that the Board Chair should sign it off, subject to assurances around delivery within timelines.

5 COMMITTEE CHAIR UPDATE

- 5.1 The Board was asked to consider a report from the Chair of the Audit and Risk Committee (ARC) following the Committee's meeting on 5 June 2025.

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- 5.2 The Committee had signed off the final accounts for 2024/25 which had now been through the Law Society's Group Audit Committee and been filed with Companies House.
- 5.3 The Committee had received three internal audit reports and was content with management's responses to the actions. In addition, the Committee had specifically asked for the Executive to consider what the course of action would be if Kaplan, our service provider for SQE, was unable to operate, even though the risk of this occurring was low.
- 5.4 The Committee had also undertaken deep dives on fraud and cyber security and had been reassured that appropriate mitigation was in place, though noting that it was never possible to feel entirely comfortable where cyber security was involved.
- 5.5 On risk, the Committee the Committee had discussed the short term risks that the organisation faced and it was agreed that the Board should have the opportunity to discuss these further at its meeting on 7 July 2025.
- 5.6 The Board noted the report.

NB: the paper relating to this item will not be published as it relates to issues that are commercially sensitive and includes discussion of risk that might be exacerbated by publication.

6 BUSINESS PLAN AND BUDGET FOR 1 NOVEMBER 2025 TO 31 OCTOBER 2026

- 6.1 The Board was asked to consider a paper describing our next steps for finalising our funding requirement from practising fees and seeking approval of our fees from the Legal Services Board.
- 6.2 The Board considered the feedback from the consultation on our draft Business Plan and budget for 2025-26 and agreed that there was no reason to amend the proposed budget of £86.5m for 2025/26.
- 6.3 The Board
- (a) noted feedback received from our consultation on our draft Business Plan and budget 2025-26
 - (b) approved the SRA's budget for 1 November 2025 to 31 October 2026, of £86.5m to be provided by practising certificate fee income
 - (c) noted the expected practising certificate fee for 2025/26 of £326, which the Board would be asked to consider for approval following the Law Society Council's meeting on 1 July 2025.

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7 SRA CORPORATE COMPLAINTS NOVEMBER 2023 – OCTOBER 2024

- 7.1 The Board was asked to consider an update on the Board on corporate complaints for the year 2023/24 including the Independent Reviewer of Complaints (IR)'s annual report.
- 7.2 The Board was reminded of our three-stage procedure for handling complaints made about our service and noted that the key reasons for complaints being made continued to be decisions not to take regulatory action when a report was made and the time that it took us to deal with matters raised with us.
- 7.3 The Board also noted actions that were being taken to reduce the number of complaints received and our handling of them including an updated case management system and a new template which set out our reasons for decisions not to investigate.
- 7.4 Complaints about Client Protection work had increased significantly from 186 (Stage 1 and Stage 2) complaints in 2022/3 to 258 in 23/24 representing an increase of 38%. This was mostly due to increases in Complaints about Intervention Archives and to increasing volumes of Compensation Fund applications. Complaints related to the Contact Centre had decreased significantly, reflecting improvements to the handling of the Keeping of the Roll and Practising Certificate Renewal Exercise processes.
- 7.5 Board members asked what more might be done to improve the position relating to the retrieval of key documents following interventions. The Board was assured that this was kept under review, and that, for instance, a new online form would be launched which should help, but that the sheer number of documents involved and the fact that most of the firm closedowns were disorderly meant that this would always be challenging.
- 7.6 The Board discussed whether signposting for complainants was as clear as it could be and noted that the complaints policy had been significantly reworked, including making it shorter and more accessible. We had also produced outward facing guidance for complainants including adding avatar videos to our website explaining, for instance, what we could and could not investigate. Board members remarked that an increase in complaints could be down to increased dissatisfaction but might also be significant due to improved signposting.
- 7.7 The Board also reviewed the Independent Reviewer of Complaints (IR)'s annual report for 2023/24 the overall assessment of which was that we consistently maintained high standards and that our responses to complainants were thorough and considered. The number of Stage 3 complaints considered by the IR and complaint types were similar to the previous year. The IR had made a number of recommendations about further improvements we might make which would be carefully considered.
- 7.8 In discussion the Board suggested that setting out the context in which the IR was reporting would be helpful, for instance the number of complaints that were for the Legal Ombudsman to deal with rather than us or the effect which one or two high profile cases could have on the number of complaints received. It was noted that

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the IR report itself was not the appropriate place for such context setting and the Board therefore suggested that an overview report should be published alongside the IR report.

- 7.9 The Board also received a report on the handling of cases that had been raised with board members by correspondence that copied them in. The Board had asked for assurance that such cases were being dealt with appropriately.
- 7.10 The Board noted: the IR's annual report 2023/24; the report on complaints copied to the Board; the key trends in complaints in 2023/24; and the areas of focus to improve our service.

NB: annex 2 of this paper will not be published because it includes discussion of risk that might be exacerbated by publication.

8 FINANCE PERFORMANCE AND POSITION

- 8.1 The Board was asked to consider an overview of the financial performance and position of the SRA Limited, the Compensation Fund, and the Solicitors' Indemnity Fund (SIF) at the half year stage of the 2024/25 financial year.
- 8.2 The paper set out the financial position after the first six months of the financial year and the Board noted that a planned overspend of around £8m was still forecast. The main drivers for this were: emerging cost pressures arising from the impact of the employer national insurance increases; the Post Office investigation and increased work in the Investigations function; and increases in staff and legal costs.
- 8.3 The year end position would depend on how successful our plans for recruitment, which was challenging both because of the resource required and a degree of internal recruitment which required backfilling, were. The position on pay costs for the year should start to crystallize in coming weeks given the likely notice periods required for new recruits as we approached the end of the financial year. An updated forecast would be presented to the Board at its meeting on 9 September 2025. The Board otherwise noted the report.

NB: the paper for this item will not be published because it contains information which is commercially sensitive

9 REVIEW OF MEETING AND ANY OTHER BUSINESS

- 9.1 There was no other business. The next meeting would be held on 7 July 2025 in Liverpool.