Solicitors Regulation Authority

Business Plan and funding requirements 2026/2027

Summary of responses to our consultation

November 2026

Contents

Background 3
Who did we hear from? 4
In summary: our priorities 5
Comments and feedback for question one 6
Comments and feedback for question two 9
Comments and feedback for question three 11
Comments and feedback for questions four and five 14
Comments and feedback for question six 16
Comments and feedback for question seven 17
Comments and feedback for questions eight and nine 19

Background

Our consultation 'Business Plan and funding requirements 2026-27' launched on 8 May 2026 and ran until 22 June 2026. This set out our proposed programme of changes to improve how we regulate solicitors and law firms, with a sharper focus on protecting the public from the biggest risk.

The consultation invited views from our stakeholders on:

- our proposed Business Plan and work plans between 1 November 2026 and 31 October 2027
- our proposed funding requirements for 2026/27
- our proposed share of the practising certificate (PC) fee and compensation fund contribution for 2026/27
- a proposal to change the compensation fund apportionment between individuals and firms to 70 percent and 30 per cent respectively, compared to 50 per cent from each
- considerations of regulatory, equality, diversity, and inclusion impacts from our proposals.

Feedback received during the consultation has been used to finalise our Business Plan and funding requirements, our fees and approach to apportionment of the compensation fund for 2026/27.

Who did we hear from?

We received 72 formal responses to our consultation, from:

- six national representative bodies and membership organisations (including the Law Society (TLS) and Sole Practitioners Group (SPG))
- the Legal Services Consumer Panel (LSCP)
- the Legal Ombudsman (LeO)
- twelve regional and local law societies (including City of London Law Society (CLLS), members of the Joint V Law Societies, the County Societies Group, and Cardiff and District Law Society)
- eighteen commercial law firms, and seven sole practitioners
- a further twenty-four individual solicitors.

We also engaged directly with stakeholders and members of the public through focus groups, roundtable discussions, a webinar, social media activity and one-to-one meetings with key stakeholders.

We thank everyone who took part in our consultation process. We have published all responses received from stakeholders that confirmed we could do so, whether by name or anonymously. Following the consultation, we reviewed all feedback received and it has informed the final version of our Business Plan and funding requirements for 2026/27.

In the remainder of this report, we summarise some of the main areas of feedback we received through our consultation process.

In summary: our priorities

Feedback from our consultation and engagement, from both the public and the profession, was generally supportive of our overall priorities for 2026/27.

The public emphasised the importance of the SRA in protecting client money, maintaining standards and building trust in the profession. Most saw our proposals as core regulatory functions and were more willing to pay where this improved protection, particularly for higher-risk services such as conveyancing. However, some were concerned that higher fees would be passed on to consumers through increased legal fees.

We also heard general support from other stakeholders, including the profession and consumer groups, for a more proactive, risk-based and proportionate approach to regulation.

However, there was strong concern about the potential impact of increased fees across practising certificate, firm and compensation fund contributions. Respondents were particularly concerned about disproportionate impacts on sole practitioners, smaller firms and consumers, especially in relation to access to justice for vulnerable groups.

The profession also challenged whether we would deliver the changes set out in the plan, with many respondents asking for greater transparency about planned changes, progress and impacts, including for consumers.

Comments and feedback for question one

Our first question was:

‘Do you have any comments on our proposed work commitments for 2026/27 under our 'operational excellence' priority?

Under this question we described, and sought feedback on, our work proposals to deliver operational excellence through:

- clearer, faster and more proportionate outcomes by refocusing investigations and enforcement work on the areas that best protect the public
- expanding capability and capacity to deliver the new skillsets required
- upgrading IT systems to support new capabilities in risk, data and supervision
- building a high-performance culture and driving operational excellence across the organisation.

Feedback on this priority was generally supportive across stakeholder groups. Respondents recognised the importance of improving the effectiveness, consistency and timeliness of regulatory activity and agreed that operational excellence is fundamental to maintaining public confidence in legal services. Public participants told us they viewed much of this work as part of the SRA's core responsibilities, particularly where it contributes to maintaining standards, protecting client money, and ensuring appropriate action is taken when concerns arise.

Consumer representative groups supported proposals intended to improve performance and effectiveness but emphasised the importance of accountability and transparency. The LSCP said it wanted greater clarity about how proposed improvements would translate into better outcomes for consumers rather than simply generating internal efficiencies. It also called for clear delivery plans and evidence of progress against commitments.

The profession broadly supported the direction of travel, including improving operational effectiveness and focusing resources on the greatest risks of consumer harm. However, firms, representative bodies and local law societies asked for clearer implementation plans, measurable outcomes and regular reporting on progress. Several respondents questioned whether the scale of change could be delivered within the proposed timescales and said they expected tangible evidence of improvement.

A number of respondents provided more specific suggestions for improving investigations and enforcement processes. Birmingham and Manchester law societies highlighted the importance of investigator capability and called for investment in staff with a strong understanding of how legal practices operate in practice. Some respondents argued that

achieving better outcomes would depend not only on new processes but also on ensuring staff have the appropriate skills, expertise and professional judgement.

Many respondents supported proposals to strengthen triage and prioritisation so that lower-impact matters do not routinely progress into full investigation. However, stakeholders also sought greater transparency regarding how decisions would be made. The LSCP called for publication of Assessment Threshold Test criteria and information about reports closed at triage, while Access Legal suggested publishing examples of the categories of conduct that may no longer routinely attract investigation.

While respondents generally supported the objective of delivering faster outcomes, several organisations, including Birmingham and Newcastle law societies, cautioned that improvements in timeliness should not come at the expense of decision-making quality. We also heard requests from Bristol and Liverpool law societies for greater publication of performance information and evidence that lessons have been learned from previous regulatory challenges and major interventions.

Several respondents also requested publication of clearer investigation performance indicators and service standards so stakeholders can better assess whether improvements in timeliness, quality and proportionality are being achieved.

Representative bodies and local law societies sought greater transparency about how resources are being reallocated, including which activities would be paused, reduced or discontinued. Respondents said this would help stakeholders understand the trade-offs involved and assess whether resources were being directed towards the areas of greatest public interest and consumer harm.

Several respondents, including the LSCP, argued that improvements should be accompanied by clearer consumer-facing service standards and reporting. Stakeholders suggested that consumers and firms should have greater clarity regarding how concerns will be handled, the information they can expect to receive throughout the process, and the timescales within which key decisions will normally be made.

A further consistent theme was the desire for more structured and meaningful engagement with stakeholders. Representative bodies, law societies, firms, and consumer groups called for earlier involvement in policy development and greater transparency about how stakeholder feedback influences regulatory decisions.

While larger firms generally reported positive engagement and information flows with the SRA, smaller firms and local law societies were more likely to say they wanted earlier engagement, clearer communication, and more practical opportunities to influence policy development and implementation.

Public participants were generally supportive of the proposed priorities but sought greater clarity regarding how the proposed changes would be implemented in practice. Across the focus groups, participants raised questions about delivery plans, implementation timescales

and how progress would be monitored, with these issues receiving particular emphasis from Welsh-speaking participants.

Comments and feedback for question two

Our second question was:

‘Do you have any comments on our proposed work commitments for 2026/27 under our 'develop the ability to proactively identify and address risk' priority?’

Under this question we described, and sought feedback on, our work proposals to develop the ability to proactively identify and address risk by establishing a proactive supervision function, strengthening risk-based prioritisation, expanding intelligence-led regulation, enhancing data and analytics capability, improving consumer experiences, and strengthening partnerships with other regulators.

Feedback on this priority was among the most positive received during the consultation. Stakeholders generally supported proposals that would enable earlier identification of risks and more proactive intervention to prevent consumer harm. Many respondents felt that a stronger focus on intelligence, supervision and risk management represented a positive evolution of the SRA's regulatory approach.

While public participants were supportive of earlier identification and mitigation of risks, some expressed concern about how the SRA would implement these proposals in practice and wanted reassurance that the approach would be effective and proportionate.

Respondents from local law societies generally welcomed proposals to strengthen risk-based prioritisation, improve intelligence gathering and enhance the use of data analytics. Support was, however, conditional on these approaches being delivered proportionately, transparently, and consistently. A recurring message from the profession was that regulatory attention should be focused on areas of greatest risk rather than applied universally across the regulated community.

Respondents also provided more detailed views on how the proposed supervision model should operate in practice. A recurring theme was that supervision should be focused on areas of genuine regulatory risk, including rapid firm growth, mergers, acquisitions, accumulator firms, complex ownership structures, financial resilience concerns and client money risks. Respondents including TLS, the Association of Personal Injury Lawyers (APIL) and several local law societies argued that these characteristics may provide earlier warning signs of consumer harm than traditional reactive indicators alone. TLS specifically called for increased focus on complex and rapidly changing firms.

We also heard calls for greater clarity regarding how the supervision model would work in practice. Some respondents sought reassurance that supervision would not become investigation by another name. Liverpool Law Society called for explicit boundaries between supervision and formal investigation, while Newcastle Law Society suggested supervision should be targeted, proportionate and supported by clear entry and exit criteria.

Several respondents emphasised the importance of maintaining a clear distinction between supportive supervisory engagement and formal enforcement action, calling for transparent escalation criteria and appropriate safeguards where concerns arise.

Stakeholders also stressed the importance of ensuring that supervision does not create unnecessary burdens on firms. The Mental Health Lawyers Association (MHLA) supported earlier engagement provided it remained proportionate, while the SPG argued that supervision should focus on education and prevention rather than additional administrative requirements. The CLLS similarly emphasised that proactive supervision should remain proportionate and risk based.

While respondents generally supported greater use of intelligence and analytics, many requested more transparency about the data, methodologies, risk indicators and profiling tools used to inform regulatory activity. Stakeholders emphasised the importance of human oversight and proportionate, transparent decision-making that can be challenged where appropriate.

Consumer representative organisations also supported a more proactive approach to identifying risk but emphasised the importance of ensuring that regulatory improvements result in demonstrably better outcomes for consumers. The LSCP argued that greater explanation should be provided regarding how the proposed work would improve consumer experience and confidence in legal services.

While generally supporting a stronger focus on the most significant risks, some public participants also cautioned against overlooking smaller or recurring problems. They recognised the need for prioritisation but said that issues affecting smaller numbers of consumers can still have significant impacts on the individuals concerned.

Several respondents also encouraged the SRA to place greater emphasis on understanding the root causes of significant firm failures, interventions and emerging risks. The CLLS, Access Legal and a number of local law societies suggested that a stronger focus on identifying underlying causes and common risk factors would strengthen preventative supervision and enable earlier intervention in future.

Some stakeholders also questioned the factors contributing to the increase in misconduct reports, including whether this reflected changing consumer expectations, easier routes to reporting concerns, worsening conduct or other factors. Respondents suggested that a better understanding of these drivers could help inform future regulatory priorities and risk assessment activity.

Comments and feedback for question three

Our third question was:

‘Do you have any comments on our proposed work commitments for 2026/27 under our 'focus on the biggest issues' priority?’

Under this question we described our proposals to strengthen protections for client money, boost consumer protection in high-volume consumer claims, enhance confidence in the Solicitors Qualifying Examination (SQE) and support responsible innovation and growth within legal services.

Stakeholders generally agreed that the areas identified represent significant regulatory priorities. Public participants were particularly supportive of work focused on protecting client money and reducing the risks of significant consumer harm. Participants indicated that visible action in these areas would help strengthen trust and confidence in legal services.

Artificial Intelligence (AI) and innovation

A significant number of respondents felt that artificial intelligence (AI) should receive greater prominence within our plans. The LSCP argued that AI and innovation policy should be guided by consumer protection, consumer research, and access-to-justice objectives. A number of stakeholders felt that the pace of technological change meant AI deserved greater visibility as a strategic priority.

The most common request was for clear regulatory guidance and practical guardrails. Bristol Law Society called for a dedicated AI plan and guidance supporting innovation while addressing associated risks, while the Forum of Insurance Lawyers (FOIL) encouraged the SRA to take a stronger leadership role regarding generative AI. Several local law societies also raised concerns about capability gaps between firms and highlighted the importance of tailored support for smaller practices.

Respondents were generally supportive of the SRA using AI internally where it improves efficiency. However, firms sought greater transparency regarding how AI and advanced analytics may be used and wanted assurance that safeguards would exist against inappropriate reliance on automated decision-making. The CLLS highlighted the importance of clear governance arrangements and protections relating to automated assessments.

Respondents also requested greater transparency regarding wider technology and digital transformation programmes. FOIL, Birmingham Law Society, Manchester Law Society and others sought clearer information about planned investment, governance arrangements, expected benefits and how success would be measured, particularly where additional expenditure formed part of the funding proposals for 2026/27.

Access to justice, consumer outcomes, and consumer empowerment

Consumer groups supported the focus on systemic risks and issues with the greatest potential impact on consumers. However, some respondents argued that additional areas should be reflected within this priority. The LSCP highlighted access to justice, vulnerable consumers, public understanding of legal services and risks arising from unregulated providers as issues which it believed merited greater prominence.

Consumer groups called for greater focus on consumer outcomes and access to justice. While there was broad support for greater scrutiny of high-volume consumer claims, APIL and several firms cautioned against treating scale as inherently problematic, arguing that these models can support access to justice when operated appropriately. They suggested regulatory attention should remain focused on conduct, consumer outcomes and evidence of harm rather than firm size or business model alone.

Consumer-group representatives also highlighted growing concerns regarding unregulated and misleading sources of legal advice. Particular concerns were raised regarding online information, social media platforms and unregulated providers operating in areas such as housing and immigration. Attendees emphasised the importance of helping consumers identify trusted, regulated sources of legal advice and strengthening public awareness of the protections available when using regulated providers.

The LSCP argued that the SRA should publish consumer outcome measures alongside operational measures and do more to understand the downstream impact of regulatory decisions on consumers. The MHLA suggested that loss of access to legal representation should be recognised explicitly as a significant consumer risk, while other stakeholders highlighted the importance of monitoring geographical access to legal services.

The LSCP and other respondents also commented on the decision to pause further work on transparency rules, quality indicators and related consumer empowerment initiatives. While recognising current operational pressures, stakeholders sought greater clarity about future plans and timelines for resuming this work and emphasised its importance in helping consumers make informed choices about legal services.

The profession generally agreed that the plan focuses on the right issues and welcomed increased attention on serious risks and consumer harm. However, a number of respondents requested greater clarity about how success would be measured and how proposed activity would result in meaningful improvements in outcomes for consumers and firms. Some respondents also referenced recent high-profile firm failures and questioned how lessons learned from those events would influence future regulatory activity.

We also received feedback from LeO, which highlighted the importance of improving first-tier complaints handling and strengthening opportunities for earlier intervention before issues escalate. The Ombudsman also emphasised the value of greater data sharing and collaboration between oversight bodies to support improved standards and consumer outcomes.

The LSCP further suggested that consumers should play a more direct role in the development of major reforms, including work relating to client money protection and the Compensation Fund. It also highlighted the benefits of independent scrutiny and wider consumer participation in shaping regulatory policy.

Attendees at the consumer-groups roundtable welcomed the increased focus on consumers in vulnerable circumstances but argued that vulnerability should remain a prominent consideration across the organisation's wider regulatory activity. Participants also emphasised the importance of providing clear and accessible information to help consumers understand legal services, recognise when things have gone wrong and know where to seek support.

Solicitors Qualifying Examination (SQE)

The most detailed feedback regarding the SQE focused on transparency, evidence, and ongoing evaluation. Law societies including Devon and Somerset and Bristol called for publication of meaningful evidence demonstrating performance, accessibility, and differential outcomes, together with greater transparency about proposed changes and how success is being measured. Respondents also sought continued engagement with the profession as the SQE develops.

Respondents also called for continued evaluation of whether the SQE is producing solicitors who are ready to practise effectively at the point of qualification.

Other respondents, including Newcastle and Warwickshire Law Societies, argued that confidence in the assessment itself should be accompanied by greater focus on affordability, accessibility and widening access to the profession. Stakeholders also highlighted the importance of ethics, professional judgement, and support for non-traditional routes into legal practice.

Some respondents also highlighted the importance of professional culture in supporting alternative qualification routes and ensuring that candidates entering through non-traditional pathways are treated fairly and supported appropriately throughout their careers.

Comments and feedback for questions four and five

Our fourth question was:

‘Do you have any comments about our proposed funding requirement via the practising certificate fee for 2026/27?’

Our fifth question was:

‘Do you agree that the SRA's required proportion of the practising certificate fee is reasonable and appropriate?’

In these sections of the draft Business Plan, we asked stakeholders for their views about the share of the PC fee required to fund SRA regulation in 2026/27.

These questions generated a significant volume of feedback and concerns regarding the scale of proposed fee increases represented the most consistent theme raised during the consultation. While many respondents recognised the need to invest in regulatory capability and consumer protection, stakeholders sought greater assurance regarding the necessity of proposed increases and how additional funding would be used.

TLS stated that the scale and pace of the increases are significant and risk placing further financial pressure on the profession. It called on the SRA to provide greater evidence supporting expenditure proposals, demonstrate that reasonable cost-control measures have been explored and explain how costs will be managed over time.

A recurring concern from a number of respondents was that firms should not be expected to bear the costs of historic regulatory failings or major interventions through increased fees. Several stakeholders argued that any increase in funding requirements should be accompanied by clear evidence that lessons have been learned and that proposed investment will deliver demonstrable improvements in regulatory performance and consumer protection.

The SPG and many individual sole practitioners argued that fee increases would have a disproportionate impact on smaller firms. They noted that smaller practices lack the economies of scale available to larger organisations and often have limited ability to pass additional costs on to clients. Some respondents suggested that increases of the scale proposed could threaten the viability of certain practices.

A consistent theme from engagement with small firms, sole practitioners and consumer representatives was also concern about the resilience of legal aid providers and other organisations serving vulnerable communities. Participants argued that continued cost pressures could contribute to market consolidation, reduce the availability of legal services in some areas and create wider access-to-justice challenges.

Representatives of not-for-profit and free-advice providers noted that, unlike many commercial organisations, additional regulatory costs cannot easily be passed on to clients.

Participants said that any increase in regulatory costs is therefore likely to be absorbed directly by provider organisations, potentially affecting service capacity and sustainability.

A number of respondents, including larger commercial firms, understood the need for increased investment but sought greater transparency regarding how expenditure links to specific regulatory outcomes. They asked for clearer evidence supporting expenditure proposals, greater visibility of value for money and, in some cases, independent scrutiny or assurance of performance and delivery.

Respondents also called for clearer distinction between one-off transformation costs, reserve replenishment and ongoing regulatory expenditure. Stakeholders sought greater visibility of future funding requirements, anticipated efficiencies and the point at which temporary investment costs would reduce.

Consumer groups focused less on the affordability of fees for firms and more on potential downstream consequences for consumers. The LSCP highlighted possible impacts on law centres, not-for-profit providers and firms serving vulnerable communities, arguing that these effects should be considered as part of the overall assessment.

Consumer groups and some participants, particularly within the Welsh-language focus group, were concerned that rising legal costs could reduce affordability, increase reliance on unregulated providers and affect law centres, not-for-profit providers and firms serving vulnerable communities.

Comments and feedback for question six

Our sixth question was:

‘Do you agree with the compensation fund contribution for individuals for 2026/27?’

Under this question we explained our proposal to increase the required compensation fund contributions from individuals and law firms that hold client money for 2026/27.

There was broad support across stakeholders for maintaining a strong and sustainable Compensation Fund. Public participants strongly supported the principle that consumers should be protected when things go wrong and viewed the Fund as an important safeguard within the legal services sector.

Public participants generally expected that any increases in compensation fund contributions should be accompanied by visible improvements in consumer protection and service. Some also indicated greater willingness to accept higher costs in relation to higher-value legal services such as conveyancing.

Consumer representative organisations also emphasised the importance of the Fund. The LSCP stated that it remains a critical consumer protection mechanism, particularly in light of recent high-profile law firm failures. At the same time, it argued that repeated increases in contributions are unlikely to represent a sustainable long-term solution and suggested wider consideration of future funding arrangements.

While supporting the role of the Fund, the profession expressed concerns regarding the scale of proposed increases. Many respondents argued that costs arising from large interventions and firm failures were being distributed across the wider profession and questioned whether the burden falls fairly on lower-risk firms and practitioners.

Several respondents also highlighted wider access to justice considerations. Some warned that increased costs would ultimately be passed on to consumers, while others suggested that providers with limited financial resilience may reduce services or exit certain areas of practice.

We also heard from a Head of Legal Services working in local government who highlighted continuing budget pressures within the public sector and expressed concern that increased regulatory costs could ultimately reduce legal service capacity available to the public.

Comments and feedback for question seven

Our seventh question was:

‘Do you agree that, for 2026/27, we should maintain the apportionment of compensation fund contributions at 50% for individuals and 50% for firms, as is the current position, rather than moving to 70% for individuals and 30% for firms? If you do not agree, please provide any insights and suggestions you have on why we should change for 2026/27.’

This question generated substantial discussion about the longer-term sustainability of the compensation fund and how contributions should be apportioned across the profession. A common theme was that the current model should be reviewed and that future contributions should better reflect risk, turnover and ability to pay.

Some respondents also argued that future work should examine the underlying causes of pressure on the compensation fund itself, alongside consideration of alternative contribution models.

Views differed on the specific proposal considered through the consultation. The SPG supported moving to a 70:30 split between individuals and firms and argued that this would represent a fairer and more proportionate outcome for the smallest practices. Several individual sole practitioners expressed similar views.

In contrast, TLS, local law societies, and the LSCP supported retaining the existing 50:50 split for 2026/27. These respondents generally argued that there was insufficient evidence to support changing the balance at this stage. While supporting retention of the current split in the short term, they nevertheless called for a broader review of the compensation fund and alternative approaches to funding it.

The LSCP noted that it had not seen evidence demonstrating that compensation fund risks arise disproportionately from either individuals or firms and therefore supported retaining the existing split while wider review work is undertaken.

While views differed on the proposed apportionment for 2026/27, there was more alignment around calls for a broader review of how compensation fund contributions are calculated. The LSCP suggested future consideration of risk-differentiated models, while the SPG proposed tiered approaches linked to firm size, turnover or client money held. Similar views were expressed by TLS, the Criminal Law Solicitors’ Association (CLSA) and APIL, all of whom questioned whether flat-rate approaches appropriately reflect different levels of risk and scale within the market.

Public participants did not generally express views on how contributions should be split between individuals and firms, although they consistently supported approaches that would be seen as fair, proportionate, and effective in maintaining consumer protection.

Across stakeholder groups there was significant support for exploring future funding models based on risk profile, turnover or other factors that would better reflect differences between firms and business models.

Comments and feedback for questions eight and nine

Our eighth question was:

‘**Do you have any comments on the impact assessment of our proposed fees for 2026/27 and our equality, diversity and inclusion (EDI) related work commitments for 2026/27?’**

Our ninth question was:

‘Do you have information that will help us to further build our understanding in relation to impacts on different groups of solicitors?’

In the final section of our consultation, we requested views on the impacts and considerations relating to our workstream proposals, the proposed PC fee and compensation fund contributions for 2026/27. We had published a draft impact assessment as part of the consultation process.

Feedback on the draft impact assessment was more limited than feedback on our wider proposals. However, respondents across stakeholder groups consistently suggested that greater consideration should be given to the wider impacts of our proposals on consumers, providers, and access to justice.

The LSCP argued that the assessment focused primarily on impacts for solicitors and firms and did not sufficiently consider how those impacts could affect consumers. It highlighted concerns regarding affordability, access to legal services and potential impacts on vulnerable consumers and underserved communities.

Consumer groups also raised concerns that increased regulatory costs could contribute to market exit, reduced service availability, and increased prices, particularly in areas where legal service provision is already fragile.

Respondents from the profession highlighted that impacts are unlikely to be distributed evenly across the market. Smaller firms, sole practitioners, and not-for-profit providers argued that they have less ability to absorb additional costs and that differences in firm size, business model and risk profile should be more explicitly reflected within future assessments.

Not-for-profit and free-advice providers also noted that they are often unable to recover additional costs through higher fees and may therefore be disproportionately affected by increases in regulatory costs.

Several respondents argued that the assessment should go further in considering consumer affordability and the wider consequences of regulatory cost increases. TLS and others called for greater consideration of impacts on legal aid and publicly funded services, including how increased costs could affect vulnerable consumers who rely upon those providers.

Respondents also highlighted potential longer-term market effects, including withdrawal from lower-margin work, reduced geographical coverage, consolidation of firms, market exit, and the creation of legal advice deserts in some communities. Stakeholders argued that these impacts should be considered more explicitly because of their potential effects on consumers and access to justice.

Several organisations, including the MHLA, Cardiff and District Law Society and CLSA, requested more specific analysis of impacts on legal aid providers and firms serving vulnerable consumers. They highlighted that such providers may have less ability to absorb increased costs than other parts of the market.

We also heard calls for increased post-implementation monitoring. TLS, Liverpool Law Society, Newcastle and North of England Law Society and the County Societies Group suggested closer monitoring of issues such as firm numbers, service availability, consolidation, recruitment, and diversity trends to assess whether anticipated impacts emerge in practice.

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