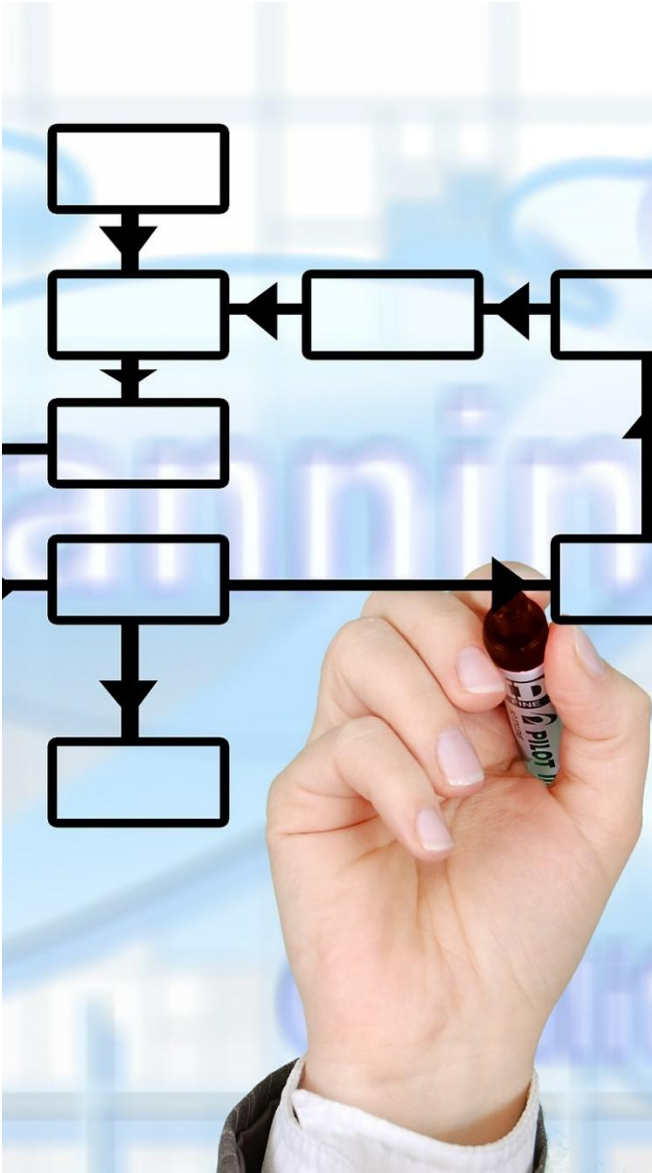


# Business Plan 2026

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**CONSULTATION**  
**2 July to 14 August 2025**

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**Costs Lawyer Standards Board**



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# Foreword

## Rt Hon David Heath CBE, Chair

The legal system in England and Wales continues to operate under intense public and political scrutiny. Persistent court backlogs, pressure on legal aid provision, and wider access-to-justice concerns have cast a long shadow over confidence in the justice system. This environment has elevated the importance of professional integrity and the regulatory frameworks that underpin the delivery of legal services.

In this context, questions about the future of legal services regulation have moved higher up the national agenda. The Justice Committee's recommendations in 2024 signalled the case for arguing that the Legal Services Act 2007 may no longer provide a coherent or sustainable framework for modern legal regulation grows stronger. The momentum for legislative reform is building, with implications for all legal regulators, including the CLSB.

Meanwhile, public trust in the legal profession has been tested further by the findings emerging from the Post Office Horizon IT Inquiry. The inquiry revealed troubling lapses in ethical standards among legal professionals, including failures to challenge injustice and act independently in the face of institutional pressure. These events reinforce the need for an ethical culture within legal services that is resilient, principled, and centred on public interest.

Against this backdrop, the CLSB has taken proactive steps to reaffirm the centrality of professional ethics to the Costs Lawyer profession. In 2024, we strengthened the Costs Lawyer Code of Conduct, placing greater emphasis on independence and the overriding duty to the court and the proper administration of justice. Through our necessarily evolving **Ethics Hub**, we are supporting Costs Lawyers with practical guidance and real-world scenarios to help them navigate ethical complexity with confidence.

These developments come at a time when the role of Costs Lawyers is expanding and diversifying. With the new Costs Lawyer Professional Qualification now in place, plans for the opening of the apprenticeship route, and a growing emphasis on pathways for costs advisors to become regulated, the profession is becoming more accessible, visible, and accountable. The CLSB's regulatory approach is evolving in parallel; agile, risk-based, and focused on enabling high standards through clarity and support.

Looking ahead, our commitment to the rule of law and to ethical practice will remain a cornerstone of our strategy. The CLSB will continue to play an active and principled role in shaping a regulatory environment that protects the public and supports a modern, independent Costs Lawyer profession.

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# Introduction

## Paul Mosson, Chief Executive

Building on the CLSB's ongoing work to uphold the standing and reputation of Costs Lawyers, we continue to support the profession in upholding robust standards and, where necessary, effective enforcement. These remain essential as demand grows for a diverse range of regulated costs services that meet the needs of increasingly informed clients. The CLSB Annual Risk Outlook for 2025 also highlights opportunities for Costs Lawyers to provide advice around the eight poles in the Government's growth strategy.

There remains significant untapped potential for the Costs Lawyer profession, including opportunities to attract more costs advisors into regulation. We are strengthening our focus on consumer protection by clearly communicating the benefits and safeguards that come with using a regulated Costs Lawyer over an unregulated provider.

In 2024, we launched a new regulatory framework for qualification, with ACL Training accredited to deliver the new Costs Lawyer Professional Qualification. We remain committed to supporting students through this transition, including expanding our FAQs on Qualifying Experience, revising our guidance based on recent student practice, and delivering targeted induction and information sessions.

A major step forward was our approval as the External Quality Assurance Provider for the Costs Lawyer apprenticeship in 2024, followed by recognition as the End Point Assessment Organisation in 2025. These milestones should now enable the apprenticeship route to open, with ACL Training registering as the first provider. We will continue to support the Apprenticeship Trailblazer Group in promoting this route.

Our commitment to equality, diversity and inclusion (EDI) continues to evolve. Through our Ethics Hub, collaborative partnerships, and practical leadership, we aim to enhance the profession's inclusivity so that it can respond to, and reflect, the diversity of the communities it serves. We will look at how we regulate through a neurodiverse lens to ensure we are a neuro-affirmative regulator.

We will continue to advocate for legislative change to enable Costs Lawyers to apply for judicial appointments, including both costs-specific and generalist roles. In addition, we will look to identify opportunities to support Costs Lawyers in Wales. Expanding recognition of Costs Lawyers across the legal landscape remains a priority. These interconnected initiatives reflect our ambition to expand career pathways and ensure the profession is equipped to meet the future needs of clients and the justice system in England and Wales.

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# Our objectives

## Pursuing our strategy

Below are the CLSB's strategic objectives for 2024 to 2027, as set out in our [mid-term strategy](#). Each strategic objective is assigned a letter, A through E. These letters are used in the remainder of this Business Plan to demonstrate how our annual priorities for 2026 are linked to achievement of our wider strategic goals.

- A. *We will nurture the positive working relationships created under our previous strategy and begin to look outside the legal services sector for inspiration and learnings, seeking collaboration where this furthers our mission.*
- B. *We will be perceived as an expert on the market that we regulate, proactively adding value for Costs Lawyers, their businesses, their clients and the wider justice system, and we will effectively communicate that value to those in the costs community who decide each year whether or not to opt-in to regulation.*
- C. *We will begin to raise standards in the part of the costs law market that is currently outside the scope of regulation, by finding non-legislative levers to encourage professionalism and by communicating the benefits of regulation to the people who make purchasing decisions about costs advisory services.*
- D. *We will continue to create, evaluate and improve a regulatory model that is uniquely suited to the unusual characteristics of the costs law market, finding inventive ways to tackle the challenges presented by the legislative environment in which we operate.*
- E. *We will build long-term organisational robustness and resilience to guard against external risks and shocks, and we will promote the same resilience within the Costs Lawyer profession.*

## The regulatory objectives

All of our activities must be compatible with, and promote, the regulatory objectives set out in section 1 of the [Legal Services Act 2007](#). The regulatory objectives are reproduced below, and each is assigned a number, 1 through 9. These numbers are used in the remainder of this Business Plan to demonstrate how our annual priorities for 2026 are linked to promotion of the regulatory objectives.

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The regulatory objectives are:

1. *protecting and promoting the public interest;*
2. *supporting the constitutional principle of the rule of law;*
3. *improving access to justice;*
4. *protecting and promoting the interests of consumers;*
5. *promoting competition in the provision of legal services;*
6. *encouraging an independent, strong, diverse and effective legal profession;*
7. *increasing public understanding of the citizen's legal rights and duties;*
8. *promoting and maintaining adherence to the professional principles; and*
9. *promoting the prevention and detection of economic crime.*

The professional principles referred to at 8 above are:

- that authorised persons should act with independence and integrity;
- that authorised persons should maintain proper standards of work;
- that authorised persons should act in the best interests of their clients;
- that persons who exercise before any court a right of audience, or conduct litigation in relation to proceedings in any court, by virtue of being authorised persons should comply with their duty to the court to act with independence in the interests of justice; and
- that the affairs of clients should be kept confidential.

## Promoting consumer outcomes

In line with [our commitment to consider consumer outcomes in all of our regulatory work](#), we have also indicated in this Business Plan how each initiative is linked to the promotion of one or more of the consumer outcomes that we are interest in, namely: price; quality; access; innovation; privacy; fairness; and/or diversity.

# Annual priorities

	Initiative	Link to objectives	Fit with consumer outcomes
1.	Progress the second phase of the communications strategy developed in 2024, aimed at supporting each of the five strategic goals in our mid-term organisational strategy in a cohesive and systematic way.	<b>Strategic</b> Supports all <b>Regulatory</b> Supports all	Quality Access Innovation Fairness
2.	Continue to collaborate with the Ministry of Justice, Judicial Appointments Commission and other key partners to expand current statutory eligibility requirements for judicial appointment to include Costs Lawyers.	<b>Strategic</b> A, B <b>Regulatory</b> 1, 3, 6	Diversity
3.	Expand the guidance and resources to support Costs Lawyers in upholding their professional ethical duties, in collaboration with strategically aligned expert partners and groups, where appropriate.	<b>Strategic</b> A, B <b>Regulatory</b> 1, 6, 7, 8	Fairness Diversity
4.	Work with ACL Training and the employer Trailblazer Group to progress the Costs Lawyer apprenticeship standard.	<b>Strategic</b> A, C, E <b>Regulatory</b> 3, 4, 5, 6	Quality Access Diversity
5.	Commission an external review of the CLSB's existing cyber security arrangements in light of the increasingly aggressive nature of cybercrime.	<b>Strategic</b> E <b>Regulatory</b> 1, 4, 9	Privacy
6.	Identify opportunities to support the current and future profession in Wales.	<b>Strategic</b> A, B, C <b>Regulatory</b> 5, 6	Access Diversity
7.	In collaboration with ACL Training, evaluate the third year of delivery of the new Costs Lawyer Qualification by carrying out the annual monitoring process under the	<b>Strategic</b> C, E <b>Regulatory</b> 1, 3, 4, 5, 6, 8	Quality Access Diversity

	<p>Accredited Study Provider Scheme Handbook.</p> <p>Provide new guidance to Qualified Persons built out from feedback and assessment in 2025.</p>		
8.	<p>Publish an Annual Report for 2025 to support our communications strategy.</p>	<p><b>Strategic</b> Supports all</p> <p><b>Regulatory</b> Supports all</p>	Supports all
9.	<p>Act upon the quantitative and qualitative career pathways research to:</p> <ul style="list-style-type: none"> <li>• Inform how the apprenticeship is promoted;</li> <li>• Guide the engagement strategy with prospective entrants to the profession; and</li> <li>• Review any unintended barriers to becoming a Costs Lawyer.</li> </ul>	<p><b>Strategic</b> Supports all</p> <p><b>Regulatory</b> 1, 3, 4, 5, 6, 8</p>	<p>Price</p> <p>Quality</p> <p>Access</p> <p>Diversity</p>
10.	<p>Monitor compliance with new guidance on:</p> <ul style="list-style-type: none"> <li>• Dealing with consumers; and</li> <li>• Client Care Letters.</li> </ul>	<p><b>Strategic</b> D, E</p> <p><b>Regulatory</b> 1, 4, 8</p>	Quality
11.	<p>Deliver the next phase of our digital workplan, by:</p> <ul style="list-style-type: none"> <li>• Implementing improved accessibility for the website; and</li> <li>• Delivering the secure area of the website for Costs Lawyer only content/ benefits.</li> </ul>	<p><b>Strategic</b> Supports all</p> <p><b>Regulatory</b> Supports all</p>	Supports all
12.	<p>Explore options to develop resources and opportunities to help Costs Lawyers:</p> <ul style="list-style-type: none"> <li>• develop those skills identified in the Ongoing Competency Framework, for which training is not easily available;</li> <li>• uphold professional ethics; and</li> <li>• progress diversity and inclusion in the profession.</li> </ul>	<p><b>Strategic</b> B, C, D</p> <p><b>Regulatory</b> Supports all</p>	<p>Quality</p> <p>Innovation</p>

13.	Use the levers at our disposal to address diversity gaps and barriers to inclusion within the profession, in collaboration with the ACL where appropriate. Developing a strategic approach to EDI that addresses short, medium and long term goals.	<b>Strategic</b> A, B, D <b>Regulatory</b> 6, 7, 8	Fairness Diversity
14.	Implement the next stage of our action plan to respond to the recommendations from the <i>Costs Lawyers, Technology and Regulation report 2024</i> , including guidance for Costs Lawyers on the professional and ethical considerations of using AI.	<b>Strategic</b> Supports all <b>Regulatory</b> 3, 4, 5	Access Quality Innovation
15.	Review the Competency Statement to ensure that it remains current and relevant, and the Assessment Outcomes and Guidance to ensure they remain fit for purpose.	<b>Strategic</b> B, D <b>Regulatory</b> 1, 4, 8	Quality Innovation Fairness

Our budget for 2026, which will facilitate delivery of this Business Plan, can be [found on our website](#).